REPORT ON THE PUBLIC HEARING ON THE PROPOSED SODA ASH PLANT AT LAKE NATRON ORGANISED BY TANZANIA’S NATIONAL ENVIRONMENT MANAGEMENT COUNCIL AT KARIMJEE HALL DAR ES SALAAM ON 23RD JANUARY 2008.

By

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30th January 2008
1.0 INTRODUCTION

The National Environment Management Council (NEMC) of Tanzania conducted a public hearing on 23rd January 2008 to give an opportunity to stakeholders and the general public to air their views regarding the proposed Lake Natron Soda ash project. Tata Chemicals Ltd in collaboration with Tanzania’s National Development (NDC) propose to build a soda ash plant capable of producing 0.5 million tonnes of soda ash per year, at the lake that is a Ramsar site as well as an Important Bird Area. However, the lake is the only breeding site for Lesser Flamingos in Eastern Africa, accounting for 75% of the world’s population of the species that is listed by IUCN as near-threatened.

There are concerns that the implementation of the project could jeopardise the population of the Lesser Flamingos. There are also concerns that the health and the livelihoods of the local people – who are mainly indigenous Maasai – are at risk. The Lake Natron Consultative Group, a growing coalition of institutions (currently 28) in Eastern Africa, Southern Africa and North America has spearheaded a vigorous campaign to have the plans halted. On its part, BirdLife International launched a global campaign dubbed “Think Pink, Save Lesser Flamingos” to appeal to its partners and supporters world wide to oppose the development.

Since November 2006, the investor has been carrying out an Environmental and Social Impact (ESIA) study to determine the impacts that the project is likely to have on social, economic and ecological aspects. On 12th July 2007 Norconsult, the company contracted to undertake the ESIA, invited selected stakeholders in Dar es Salaam for a meeting to discuss the draft document. Those who attended pointed out that the document was inadequate saying that vital information and data were missing. They also faulted the consultation process saying it was not all-inclusive.

On 2nd November 2007, the NEMC held a Technical Advisory Committee (TAC) meeting during which experts gave their input to the document. Once again, the report was found inadequate and was heavily criticised for, among other things, lack of a clear cost-benefit analysis; lack of clear mitigation measures; weak consideration of cumulative impacts and project alternatives and weak stakeholder consultation. Groups that attended the meeting pointed out that the report lacked crucial data such as the impacts on hydrology and the breeding of Lesser flamingos.

Section 90 of Tanzania’s Environmental Management Act, 2004 and Regulation 27 (3) of the EIA and Audit Regulations, 2005 mandate the Council to conduct public hearings as part of the review process of Environmental
Impact Statements and submit recommendations to the Government to guide the decision-making process.

The public hearing took place at the Karimjee Hall, Sokoine Drive, Dar es Salaam from 10.00 Hrs to 16.00 Hrs.

Some of the interest groups present at the public hearing were:

- Lake Natron Consultative Group
- BirdLife International,
- A Delegation of 12 community members from Ngare Sero, Magadini, Pinyinyi, and other villagers around Lake Natron
- Wildlife Conservation Society of Tanzania (WCST),
- Lawyers Environmental Action Team, Tanzania (LEAT),
- Royal Society for the Protection of Birds, UK (RSPB),
- Youth for Conservation
- Journalists Environmental Association of Tanzania (JET),
- Development Partners in Tanzania,
- European Union,
- Tata Chemicals Ltd,
- National Development Corporation,
- Ramsar Convention Secretariat,
- Tanzania Wildlife Research Institute,
- National Environmental Management Authority (NEMA)-Kenya,
- African Wildlife Foundation-TZ,
- Save the Children Tanzania,
- Care International,
- Danish Embassy,
- Engineers, University Professors, conservationists and ordinary Tanzanian Citizens.

Ken Mwathe represented Lake Natron Consultative Group and BirdLife International. Also representing The Group was Phoebe Munyoro of Youth for Conservation Lota Melamari represented WCST while Dr Chris Magin represented RSPB.

2.0 BRIEFING AND SPELLING OUT OF THE RULES

The meeting started with NEMC officials led by Ms Anne Maembe, Ag. Director General (also Director for Environmental Information, Communication and Outreach), explaining the objective of the public hearing. NEMC wanted to gather views from the public and stakeholders in general in order to inform its recommendation to the Minister of Environment in the Vice President’s Office, regarding the project. The Minister is the one who will give a final word of approval or disapproval.

The facilitator, Dr. David Manyanza, took over and he went through the day’s programme (attached) and some rules. He said he would give participants a chance to give their views on the project and he expected participants to say their name,
where they came from and whether they supported or opposed the project. He also asked participants to give reasons to support their position.

3.0 PRESENTATION BY THE INVESTOR

The facilitator then invited the Investor, Lake Natron Resources Ltd (a company formed for the purpose of soda ash extraction by Tata Chemicals Ltd of Mumbai India and the National Development Corporation of Tanzania). An official from NDC gave the presentation on behalf of the investor.

In his presentation, the investor explained the proposed plant and its engineering design, the process of soda ash extraction and the choice method. He also displayed sketches showing the varying levels of brine, water and mud in the lake during the dry and wet seasons. He said that this information was obtained after laying transects across the lake from all possible directions. Overall, the lake is not continuous water body and the physical appearance may change in relation to water flow, season, and evaporation rate. The lake has an overall negative water balance.

He further explained the 3 possible routes that may be used to remove the final product from the Lake. The Eastern route through Arusha to Mto wa Mbu was considered to be the most preferable.

Concerning the project site, the investor said they had shifted from the earlier identified site: Wosi Wosi. The preferred new site was now Kitumbeine, more than 32 Kms away. Wosi Wosi site had been identified after comparing it with two other sites: Pinyinyi and Ngare Sero. The investor explained that they decided to move the project site to Kitumbeine when it became clear that there were likely to be many negative impacts on the Lesser Flamingos if the plant was built at Wosi Wosi.

The investor also mentioned other considerations that need to be taken into account, including the development of a Ramsar management plan and posting of a Manager to oversee the Ramsar site. Another consideration was that they would forward the proposal (of the new site) to National Environmental Management Council (NEMC) by the end of February 2008.

4.0 REACTIONS TO THE PRESENTATION BY THE INVESTOR

Immediately after the presentation, there was uproar from the participants who felt that the investor had short changed them by changing the site without informing NEMC and going through the necessary procedures. Speaker after speaker, the participants said if the site had been relocated there was then need for a fresh ESIA. Majority felt that the information contained in the document earlier submitted to NEMC was an old and therefore irrelevant for the discussions in that meeting. The change of goal posts by the investor also meant that participants were not in a
positions to give informed views regarding the new site. The participants suggested that the public hearing be called off and the investor be given a chance to carry out a fresh ESIA.

Other issues that emerged during this debate were:

- The investor had concentrated on the engineering aspects of the project.
- He did not touch on the social, economic and ecological impacts.
- The investor did not say a word on mitigation measures for possible negative impacts of the project especially on people and Lesser Flamingos.
- Many at the meeting felt that the investor was not decided on what he wanted to do. The tabled document should therefore be regarded as a feasibility study and not an ESIA.
- It was observed that the investor did not even have drawings of the works; instead he displayed photographs of a soda ash plant in India.
- There was need for more information on the new proposed site that was outside the locale of the Lake.

In response, the NDC official responded by saying he had been asked to present a paper on the ‘technical’ aspects of the project. However, this did not seem to help his position with participants and the facilitator telling him that he had squandered his opportunity.

At this point, the Ag. Director General intervened and made a ruling. She said that the new site was not part of the earlier document submitted to NEMC. She confessed she had heard of the new project site from the floor of the house. She therefore asked the participants to give their views based on the original document given to the public. She also asked participants to hand in their written statements to the NEMC secretariat at the end of the hearing.

**5.0 SUMMARY OF ARGUMENTS BY THOSE WHO SUPPORTED THE PROJECT**

On the whole, there were about 5 people strategically placed in the hall who supported the project. One was an Indian investor in Tanzania who sat close to the Tata officials. He said there was growing demand for soda ash but the supply seems to be diminishing. He said political unrest in Kenya after the December 2007 elections was causing a shortage of supply since the product could not be delivered. A representative of Care International hailed the importance of soda ash to the local Tanzanian economy and the benefits attributed to it. He further stated that soda ash drives the economy of the US and Kenya got US $ 8 Million from exporting soda ash last year. He further emphasised that Tanzania is sitting on a gold mine that needed to be exploited to benefit people and bring about development in the country. A Tanzanian citizen, Baldwin Kachenje, saw a Kenyan agenda in the opposition to the project. He asked “why so many emails were coming from Kenya opposing the project”. Clearly, he was referring to the vigorous email campaign and regular
updates on the project by the Lake Natron Consultative Group. He insisted people should reveal their nationality before stating their position on the project.

6.0 SUMMARY OF ARGUMENTS BY THOSE WHO SAID “NO”

The participants were near unanimous in opposing and condemning the project. Over 90% said “NO” to the soda ash project. It is not possible to capture here the sentiments of all who spoke but selected position statements are annexed to this report (See Annexes).

The most significant position was that of the local community represented by 12 men from Pinyinyi, Ngare Sero, Magadini and other villagers from around the Lake. Through an interpreter, the traditional Maasai chief (Leigunani) spoke in Maa and said that they relied on pastoralism, some irrigation agriculture and eco-tourism for their livelihoods. There was no way they could support the project since it would deplete water resources. He said building the plant was like “taking a fish out of the water and throwing it into the bush”. He reiterated, “We cannot accept a gift that will later destroy us”. He complained that there was water over-abstraction in the Loita Hills and only a trickle reached the Lake through Pinyinyi river. The elder occasionally travelled to Loita in Kenya to plead with his fellow Maasai to allow some of the water to pass through.

The community delegation emphasised that the Lake is facing many threats without the project and so building the plant would make the situation worse. They wondered why the tourism industry that was already benefiting them should be uprooted to build a soda ash factory. They expressed fears that the plant would bring about discrimination in the community by employing the educated; saying proceeds from ecotourism benefited all. They cited were the case of women who made a livelihood out of selling beads.

The community delegation submitted a written statement citing the following reasons for rejecting the project:

- Loss of pasture and livestock economy
- They were not properly consulted
- Increased diseases
- Displacement and increased quarrels over land
- The flamingos will go away
- Environmental degradation
- Damage to ecotourism which is already thriving in the area

Nshalla Rugemeleza (LEAT) made a strong case to show that the Tanzanian land laws had been violated by the project as central government could not take village land for development without their consent. Mr Kiyame, (fine artist from Arusha who makes...
flamingo paintings) said he was willing to sell his artwork to compensate the government for not constructing soda ash plant.

Most of those who contributed criticised the investor for not stating how the project will benefit the local communities. For example, Ms Jema Mkwale from the Danish Embassy wanted to know how the jobs will be distributed, if any. Mr. Razi Latif from the European Union and Co-chair of the Donor Group on the Environment in Tanzania said the existing ESIA was inadequate, and that a new ESIA and Technical Advisory Committee review process would be necessary for the revised plan.

In our submission, the Lake Natron Consultative Group stated that the tabled report was a feasibility study and not an ESIA since so much information was missing. In rejecting the project, we recommended that government of Tanzania should publicise the unique character and ecological importance of the Lake. In particular, its importance as the “maternity” for Lesser flamingos and the unique Maasai culture should be emphasised. On its part, BirdLife International questioned the possibility of the lake continuing to function as a breeding site for Lesser Flamingos if the plant is built and called for the precautionary principle to be applied in rejecting the project.

Mr. Deodatus Mfugale, the chairman of the Journalists Environmental Association of Tanzania said the project would pollute the environment and destroy the ecosystem within the Lake. JET wants the lake protected and conserved for eco-tourism purposes.

The National Environmental Management Authority (NEMA) - Kenya, sent two representatives, Director, Dr. Muusya Mwinzi and the Deputy Director of Enforcement and Compliance, Mr Langwen who said they could not support or oppose the project since a lot of information was still not available. They advised the government to do its home work and call a meeting of stakeholders at a later date.

7.0 Way Forward

After much discussion Ken Mwathe requested the presiding officer guide the participants on the way forward since most views had already been put forward. At this point the facilitator invited NEMC to conclude.

Before moving he emphasised the following points:

- He acknowledged the wide representation from Tanzania and other countries
- There was need to trend carefully and consider all possible impacts before a go ahead is given to the project
- The construction of the Soda Ash Plant is not only a national issue but an international one as well. As the Lake Natron is not only recognised internationally as a RAMSAR site, and as an Important Bird Area.
NEMC official Mr. F Rugiga, stood to close, he said that his organisation’s work was to collect views and they would make recommendations to the Minister based on these views. He thanked the participants for a very lively and informed debate

8.0 Conclusion

From the public hearing we can make the following conclusions:

- There is very strong opposition to the project, inside and outside Tanzania and among development partners
- The lake is already under threat even without the soda ash project. This is as a result of water over-abstraction in the upper catchment
- The investor has not demonstrated how the project will be beneficial. There is still no cost-benefit analysis.
- The report lacks critical information and data such as hydrology of the area
- The investor has not provided acceptable mitigation measures to address the likely loss of biodiversity (especially lesser flamingos) and community livelihoods.
- There were questions as to the legality of central government to take community land for the development of the project without their consent.
- A new ESIA needs to be conducted for the new site
- There is an urgent need for a management plan for the Ramsar site

From our perspective, the meeting was a great boost to the campaign that Lake Natron Consultative Group and BirdLife International have been conducting to have the project construction halted. The fact that so many people opposed the project means that our messages have been going through to the ground. It also means that we need to come up with new strategies to prepare for the next round of engagement.

Tata Chemicals Ltd and the government will not take this lying down; they will be going out to influence the opinion of the local community to be in favour of the project. This will be the next battleground. Increased awareness at local, national and international levels will be required so that support for our cause may continue to grow.
Annex 1: Public Notice by National Environment Management Council

The National Environment Management Council (NEMC)

PUBLIC NOTICE- Electronic media

The National Environment Management Council (NEMC) is hereby informing the General public that, there will be a public hearing as part of the review of the Environmental Impact Assessment (EIA) report for the proposed Lake Natron Soda Ash Project in Arusha Region.

The hearing will be held on 23rd January, 2008 in Dar es Salaam, at Karimjee Hall, starting at 10:00 a.m.

Interested parties are invited to attend. All submissions and comments received by the Council will be incorporated in the preparation of recommendations to the Government to guide approval and decision making on the project.

For further information on this matter, please contact:

The Director General,
National Environment Management Council,
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Additional information

The Council is currently reviewing the Environmental Impact Statement (EIS) for the proposed Lake Natron Soda Ash Project submitted by Lake Natron Resources Ltd (a company owned jointly by National Development Corporation and TATA Chemicals of India). The EIS document is available at the Council's Library and can be accessed on working days beginning 10:00 a.m to 4:00 p.m.

The National Environment Management Council is a body corporate established by Environmental Management Act (EMA) No.20 of 2004 to undertake enforcement, compliance, and review and monitoring of environmental impact assessments, environmental research, raising awareness and collecting and disseminating environmental information.

Section 90 of EMA, 2004 and Regulation 27 of the EIA and Audit Regulations, 2005 mandate the Council to conduct public hearings as part of review process of Environmental Impact Statements and submit recommendations to the Government to guide the decision-making process.
Annex 2: Lake Natron consultative Group position statement

LAKE NATRON CONSULTATIVE GROUP
C/O Birdlife Africa Partnership Secretariat, P.O. Box 3502, 00100, Nairobi, Kenya; Tel: 254-20-8562246/8562490
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Proposed development at Lake Natron, Tanzania:
Position by the Lake Natron Consultative Group

Lake Natron Consultative Group (The Group) is a coalition of 28 environmental and conservation institutions in Eastern Africa, Southern Africa and North America. Our objective is to ensure that the integrity of the Lake Natron ecosystem, especially as a breeding site of the Lesser Flamingos, is maintained following the threat posed by the proposed development of a soda ash extraction plant at Lake Natron. We also wish to see the livelihoods of the local people around the lake safeguarded. The full list of our membership is provided as Attachment 1.

We have been in operation since June 2007 and maintain a regular update on this development that is sent to over 500 individuals and institutions across the globe. In collaboration with others, we are asking the Government of Tanzania and Tata Chemicals Ltd to rescind their proposal to build the plant since it has not demonstrated that the benefits from the same do not exceed the losses, which, in our view, are enormous. Critically, the ESIA commissioned by the developers, clearly states that there are no direct mitigation options for possible negative impacts on the Lesser Flamingo.

Our interest in Lake Natron is because we believe it is a global resource as much as it is a national resource. The lake is the breeding site for more than 75% of the world’s Lesser Flamingos. It is also an Important Bird Areas as well as a Ramsar site. The local community who are mainly indigenous Maasai, depend on the lake basin and the cross border ecosystem to derive their livelihood, which is, nomadic pastoralism. The surrounding area is also rich in other forms of biodiversity, especially large mammals, including some very rare species.

The Group would like to acknowledge and appreciate the fact that the National Environment Management Council (NEMC) has made efforts to widen stakeholder participation by calling for a public hearing on 23rd January 2008, as it did during the Technical Advisory Committee on 2nd November 2007. This indeed shows that NEMC is keen to provide recommendations to the Minister of Environment in the Vice President’s Office, in whose office lies the final decision. As a group, we take note of and appreciate this deliberate effort by NEMC.

Brief Comments on the Environmental and Social Impact Assessment and project in general

1. **ESIA or feasibility study?** It is our considered view that the document presented by the Consultants is a feasibility study and not an ESIA. This is because critical data are lacking. For example, the source of water that will be used to run the plant and for domestic use is not clear. The plant is expected to use 129,000 litres of water per hour, yet, there are no indications of where this water will come from in an extremely dry environment. The group has been informed that plans are underway for the investor to undertake hydrological studies, giving credence to our assertion that the current report is indeed a feasibility study. As a group, we will be glad to have an actual ESIA of the project conducted and are willing to be involved in the process.

2. **Cross border consultation and assessment of impacts** It is clear from the ESIA report that the consultants did not consider impacts of the project (negative or positive) outside the Tanzanian borders. For example, there is Shompole, a local community on the Kenyan side that depends heavily on the Lake Natron flamingos in its ecotourism project. This community is wary of the project and want it halted. In a letter dated 17th December 2007 addressed to the Tanzanian Minister of Environment (and copied to the Director NEMC), Shompole Group ranch indicate their shock that no one talked to them about the...
proposal. At the same time they are worried that their land risks being sandwiched between two soda ash factories (Magadi Soda factory is in the vicinity) and will lose their livestock, as well as benefits from ecotourism.

In addition, the impacts of the proposed development on other ecosystems in the region, notably, Lake Nakuru, Lake Bogoria, Abijata-Shalla Lakes National Park (Ethiopia), Nechisar National Park (Ethiopia) and Queen Elizabeth National Park (Uganda) – that are all linked to Lake Natron - where ignored.

- Appendix C: Records from Kenya, Page C23 to C52. The Group was shocked to see these records appended as part of the ESIA as unspecified “records from Kenya”. To readers who are not aware, it may appear that extensive consultations were carried out in Kenya as part of Consultation and Public Participation; nothing can be further from the truth. The discussions recorded here were undertaken by Norken Ltd on behalf of Norconsult (TZ) Ltd. Norken’s brief was to identify issues that were to be considered during the full ESIA. In other words, this was the scoping phase of the ESIA during which Norken did not spend much time at the institutions visited. Norken said they would come back for a second round of intensive consultation during the actual ESIA. Most of these institutions later joined the Lake Natron Consultative Group, in protest, when it became clear that a full ESIA was not forthcoming. We also note that what is recorded differs significantly from what was discussed in the actual meetings. We recommend that page C23 to C52 be expunged from this document.

3. **Cost benefit analysis of the project:** The proposed project is of high public interest locally, nationally and internationally because it touches on the survival of a near-threatened species and the livelihoods of a local community. The study suggests economic benefit of several million dollars but it does not compare this against the anticipated loss (section 7.5.1, page 7-9). In Tanzania, wildlife tourism is the major source of revenue in Tanzania earning US $ 746 million in 2004, supporting 200,000 direct jobs. The number of tourists visiting Tanzania is expected to grow from 580,000 in 2004 to one million by 2010. Ecotourism at the southern end of Lake Natron generates US$500,000 per year in Tanzania and is a rapidly growing industry that relies on the pristine environment of Lake Natron to give eco-tourists a "wilderness experience". In other East African countries, Flamingos contribute a considerable proportion of the US $ 886 million that Kenya earned from tourism in 2006 while they are a great tourism attraction in Queen Elizabeth National Park and Abijata-Shalla Lakes National Park in Uganda and Ethiopia, respectively. Shompole Group Ranch (in Kenya), which borders Lake Natron, earns US $ 80,000 per year from ecotourism activities and is the winner of the 2006 UNDP Equator Award for its contribution to biodiversity conservation and poverty alleviation. Our Group considers the absence of an analysis comparing the benefits from the proposed project against the anticipated loss of tourism revenue and community livelihoods a major gap in this study.

4. **Benefits to the local community.** Section 6.6.5 is categorical that the project is unlikely to bring about an increase in local employment, yet the local people are likely to lose their livestock economy due to encroachment to pasturelands. Section 6.6.4 identifies HIV/AIDS as one of the consequences of building the plant on the local community. If people will lose their livestock and ultimately their lives, of what good is the project? From the mitigation measures given in the document, it is clear that these issues were not given the weight they deserve.

5. **Ranking of impacts**

The basis for the rankings of impacts used in the ESIA document is not clear. Indeed there seems to be internal inconsistencies in the ranking of impacts. For example, the assessment indicates that livestock grazing is at its limit (especially during the dry season), and there is already conflict over resource use (grazing, water, soda ash), it admits that the project will exacerbate this, and then lists the impacts as ‘moderate-minimal’. In fact, the situation is already severe. Reduced livestock production will occur, but the ranking is ‘moderate –minimal’. This ranking is peculiar, considering that the social profile doesn’t seem to list any other means of production for the Maasai, except for livestock production. So it is going to deprive the people of their basic form of livelihood. On the other hand, it actually says that the
positive impact of wage earning opportunities from the soda ash project will be MINIMAL, meaning the local people are not going to gain jobs, but WILL lose their means of production.

6. **Importance of Lake Natron for Lesser flamingos:**

Lake Natron is critically important for the Lesser flamingos being the only breeding site in Eastern Africa. The report seems to downplay the importance of the Lake to flamingos by stating that their numbers ‘often exceed 200,000 individuals (c. 8% of global population)’. While this is true, what is more significant is the fact that the lake accounts for the breeding of the 1.5-2.5 million flamingos in East African Rift Valley lakes. This population accounts for 75% of the global population of lesser flamingos! As stated above, the report acknowledges the fact that there is possibly no way of mitigating the long term threat to the survival of the species posed by the soda ash project. But on the same breath the Environmental Impact Statement (Section 11-8) asserts: “no single or likely cumulative impacts have been identified that would with certainty preclude project development.” We find this contradictory and unacceptable.

- The proposed method of soda ash extraction, including a large network of pipes across the lake, incredible noise and 24-hour flood lights, would disorient Lesser Flamingos, which move mainly at night, and other night flying birds. The noise and light would create a high level of disturbance that may disrupt the Lesser Flamingo breeding process. This may be the reason there has been no Lesser Flamingo breeding at Lake Magadi in Kenya for 45 years where a similar soda extraction operation plant has been in operation for almost 100 years. The proposed mitigation in the ESIA is to site the soda ash plant as far away as possible from the nesting sites. However, nesting is only one of the aspects of breeding and close to 80% of the lake does appear to be important for flamingos at various stages of the breeding process. This is a very significant impact; significant enough that in our view the project should not be allowed to go ahead.

7. **Analysis of Project Alternatives**

The analysis of project alternatives is not adequate. An attempt has been made to consider the possible sites where the soda ash could be mined and a recommendation given for the suitability of Wosi Wosi area. However, there is no consideration and comparison of the available mining and processing technologies and this particular technology has been chosen. On the same note, the study does not clearly argue why the “No Project” option is not an option. In fact the arguments on Page 7-9 imply that the local communities are better off without the project.

**Our recommendations**

**Observations**

We would like to make the following observations:

- There are huge gaps in vital information (such as hydrological data) in the “ESIA” report. In addition, significant negative impacts with serious ecological, social and economic ramifications at local, regional and international levels have been identified but no serious mitigation measures have been provided
- The investors have not done a cost-benefit analysis that can support their argument that the project will be beneficial.
The study acknowledges the fact most of the impacts lie between negative-high, negative-moderate and negative-low within the normal curve. It therefore means that positive impacts are on the tail end of the normal curve.

**Recommendations**

In view of the above and in addition to our letter written to the Minister of Environment in the Vice President’s Office dated 3rd December 2007 (copied to Director National Environment Management Council), we make the following recommendations:

1. Due to the fact that so much information is lacking, we propose that the precautionary principle be applied with regard to this project. **We therefore recommend that the plans for the construction of the soda ash plant be halted now and in the future. Systems should also be put in place to make it difficult for other trans-boundary projects with significant environmental impacts to be initiated.**

2. The Lake Natron basin and the cross border ecosystem should be developed for flamingo tourism and other forms of tourism including cultural tourism. In line with Kobb report (2001) the government of Tanzania should publicise the unique character and ecological importance of the Lake. It importance as “maternity” for Lesser Flamingos and the unique Maasai culture should be emphasised. The government should make deliberate efforts to promote and utilise the lake’s tourism potential. Several national and international bodies (e.g. BirdLife International) have expressed their willingness to work with the Government of Tanzania in this regard. It is notable that the South Rift Association of Landowners (SORALO), is in the process of opening the Southern Tourism Circuit which will connect Amboseli National Park with Maasai Mara National Reserve. This provides a great opportunity to link tourism in Northern Tanzania with Southern Rift area of Kenya.

3. In collaboration with regional and international institutions, the government of Tanzania should initiate and complete the Management Plan for the Natron Basin Ramsar site. In the spirit of the East African Protocol on Natural Resource Management, the plan should extend beyond the Tanzania border in order to encompass the whole ecosystem. The Lake Natron Consultative Group is willing to provide expertise within its membership to facilitate the realisation of this goal.

As a Group, we shall petition the authorities in Kenya in order to have the portion of Lake Natron that is located in Kenya, and the adjoining ecosystem, listed as a Ramsar site as well. This will complete the picture across the border and will foster collaborative planning and management of this critical ecosystem.
Annex 3: BirdLife International Position Statement

Proposed development at Lake Natron, Tanzania: The position of BirdLife International

East Africa’s Lesser Flamingos are one of the world’s greatest bird spectacles. These extraordinary birds feed at, and move between, a chain of alkaline lakes along the East African Rift Valley. However, they depend on just one lake – Lake Natron, in northern Tanzania – as their only regular and successful breeding site.

Lake Natron Resources Limited, a company jointly owned by the Government of Tanzania and TATA Chemicals Limited of Mumbai, India, proposes to develop a facility at Lake Natron to extract and process soda ash. As this proposal stands, it has the potential to damage or destroy the East African Lesser Flamingo population through disrupting the birds’ breeding at Lake Natron. To nest successfully, Lesser Flamingos require very specific conditions. Lake Natron, but no other site, provides these. The proposed plant poses major risks to the Lesser Flamingos from disturbance (including increased populations of nest predators) and changes in the water balance and chemistry of the lake. These risks are so serious that BirdLife International’s view is that the plant must not be built.

BirdLife International understands that Lake Natron Resources is carrying out further chemical and hydrological research at Lake Natron, and considering alternative sites and plant designs than those originally proposed. It is the view of BirdLife International that the precautionary principle must apply to any revised proposal. In other words, unless the proponent demonstrates clearly, through sound and convincing science, that the development will not impact negatively on the Lesser Flamingos it should not proceed. A new and thorough Environmental and Social Impact Assessment, dealing with the full range of potential impacts on the environment and people, must also be carried out. At present our understanding of Lesser Flamingo ecology and the hydrology, chemistry and biology of Lake Natron remains very inadequate. Without considerable improvement in our knowledge, that would allow a reliable assessment of potential impacts, it is BirdLife International’s view that any industrial-scale extraction of soda ash from Lake Natron poses unacceptable risks. There is a very high likelihood that this will still be the case even with improved understanding.

Lesser Flamingos make an important contribution to tourism in East Africa, economically key for all countries in the sub-region. Lake Natron itself supports a thriving, and growing, tourist industry, with its wild, beautiful and unspoiled landscape being a major attraction. BirdLife International believes there is great potential to develop responsible ecotourism further, as an alternative to mining the lake’s mineral resources. We stand ready to assist and advise at any time.

BACKGROUND INFORMATION

Introduction

- Lake Natron Resources Limited, a company jointly owned by the Government of Tanzania and TATA Chemicals Limited of Mumbai, India is proposing to develop a soda ash facility at Lake Natron in the Arusha Region of Tanzania.
- The company plans to construct a soda ash extraction and processing plant and associated infrastructure – coal fired power station, road and rail links, housing, pipelines etc. - at Lake Natron.
- The plans have attracted concern and condemnation from around the world as Lake Natron is designated as a wetland of international importance (Ramsar site) and is a crucially important site for the Lesser Flamingo Phoeniconaias minor.
At a recent meeting in Nairobi, all 23 organisations in the BirdLife Africa Partnership signed a petition to stop the development. At a meeting of the Mediterranean and West African Flamingo Network in November 2007 in Spain, all 21 flamingo experts attending—including eminent authorities such as the ex-chair of the IUCN Flamingo Specialist Group and present chairman of the IUCN Western Hemisphere Flamingo Group—signed a petition against the project.

Flamingos at Lake Natron
- Lake Natron is the world's most important breeding site for Lesser Flamingos and is the only site in East Africa where they regularly and successfully nest.
- Nearly all of East Africa's estimated 1.5 - 2.5 million Lesser Flamingos (75% of the world population) will have been hatched at Lake Natron.
- Lesser Flamingos are extremely sensitive to environmental disturbance, particularly when breeding. They readily abandon colonies.
- The Lesser Flamingo is classified as Near Threatened on the IUCN Red List 2007, as it is vulnerable to disturbance or ecological change at a small set of key sites.

Negative impacts of a soda ash plant at Lake Natron on Lesser Flamingos
- Lake Natron's isolation and wilderness character, untouched by human development, are major reasons why Lesser Flamingos chose to breed there.
- Increased human disturbance as a result of the soda ash plant (e.g. aircraft flights, noise, vehicle movements, lights at the plant, human presence, pollution, and especially the attraction of scavenging predators such as Marabou Storks, eagles and crows) could easily cause Lesser Flamingos to abandon breeding at Lake Natron.
- A soda ash plant is likely to alter the lake's hydrology and salinity, affecting feeding and breeding conditions for Lesser Flamingos, and restricting their access to freshwater which is essential for bathing and drinking.

Economic considerations
- Wildlife tourism (or ecotourism) is the major source of tourist revenue in Tanzania. The country earned US$746 million from tourist receipts in 2004, supporting 200,000 direct jobs. The number of tourists visiting Tanzania is expected to grow from 580,000 in 2004 to one million by 2010.
- Ecotourism at many protected areas in Tanzania, Kenya, Uganda and Ethiopia depends in part on the East African population of Lesser Flamingos.
- Ecotourism at the southern end of Lake Natron generates US$500,000 per year in Tanzania and is a rapidly growing industry that relies on the pristine environment of Lake Natron to give ecotourists a "wilderness experience".
- At the local level there is concern that there will be loss of livelihoods, land and natural resources to the project, and also indirectly to incomers seeking work.

Political considerations
- The Government of Tanzania signed the Convention on Wetlands of International Importance especially as Waterfowl Habitat (the Ramsar Convention), and listed Lake Natron as a Ramsar Site. Contracting Parties are required to take all necessary measures to safeguard the integrity of such sites.
- Lake Natron has been designated as an Important Bird Area – a site of global significance for bird conservation – by BirdLife International.
- Tanzania is a signatory to the Convention on Biological Diversity (CBD), the Bonn Convention on Migratory Species (CMS), and the CMS Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA). These agreements require signatories to seek consensus from neighbouring states in the management and development of shared ecosystems. Other Eastern African states have not been consulted and involved in the proposal process.

The Environmental and Social Impact Assessment
- At a meeting of the National Environment Management Council's Technical Advisory Committee in October 2007 to review the development, most participants agreed that the ESIA was inadequate,
• The ESIA concludes that "the project will entail a significant degree of environmental risk for this species [Lesser Flamingo] in the longer term that is not capable of direct mitigation”.

• In a critical wildlife habitat and sensitive environment like Lake Natron, the Precautionary Principle should apply. It is up to the proponent to prove that there will be no adverse effects of the project. So far, it has clearly not done so.

• TATA Chemicals, on behalf of Lake Natron Resources Ltd., have suggested they can mitigate the impacts of the project through consultation with flamingo experts such as IUCN and its Flamingo Specialist Group, for example by locating the plant further away from the lake and outside the Ramsar site boundary. Such a substantially changed proposal requires a new and thorough study to assess the full range of environmental and social impacts.

• In the view of BirdLife International, our scientific understanding of Lake Natron and of the Lesser Flamingo’s ecology is currently so scanty that any proposal for large-scale soda ash extraction poses unacceptable risks, and should not be allowed to go ahead.

**BirdLife International**

• BirdLife International is a global Partnership of national grass root conservation organisations that strives to conserve birds, their habitats and biodiversity, working with people towards sustainability in their use of natural resources. BirdLife International Partners operate in over one hundred countries and territories worldwide.
Annex 4: Position statement by Wildlife Conservation Society of Tanzania

THE WILDLIFE CONSERVATION SOCIETY OF TANZANIA (WCST)

WCST POSITION

And Presentation made during the Hearing of Public Opinion on Lake Natron ESIA.

THE DEVELOPMENT OF THE PROPOSED SODA ASH FACILITY WILL IMPACT ON THE LAKE NATRON ECOSYSTEM
INTRODUCTION

To the Director General
National Environment Management Council

On behalf of the Society’s membership and on my own behalf, I would like to echo our support to the steps taken by NEMC in organizing this public hearing aimed at collecting the views of stakeholders on the this major development with great potential of threatening the integrity of Lake Natron ecosystem and especially the Lesser Flamingo. We thank you very sincerely for giving us the opportunity to air our concerns and opinion on issues related to sustainable development and environmental conservation in the Lake Natron area.

WCST congratulates the efforts being taken by our Government in strengthening public participation in environmental conservation. As we all know, Tanzania has built itself a remarkable reputation as one of the world top leaders in nature conservation. This has earned the country great respect and recent efforts in promoting the participatory management of natural resources has further strengthened the country’s position in the sustainable management of its natural resources and environment. In this regard, the legal instruments and democratic rule permit for the participation of citizens in the decision making processes that promote sustainable development and good welfare for all. The National Environment Management Act of 2004, is one such important legal instruments which is guides Government machinery in the decision making process on all issues related to the environment. This progressive Law has distributed powers to all segments of the society demanding them to take active participation and action in ensuring that the country attains a sustainable conservation programme the environment. We look at this law as the one that promotes peace and harmony between people and the environment.

WCST is a membership, charitable, not-for-profit civil society that participates and promotes conservation goals by:

- Working with the Government and people of Tanzania in realization that:
- The conservation and sustainable use of natural resources is a national and global priority
- Planning parameters for conservation must take into account economies of scale in time and space
- And as a Society, WCST has to engage in:
- Assisting in safeguarding the environment through the policy of “precautionary principle”; thus avoiding development projects with potential of adversely impacting on the environment. Our efforts go to conservation priority areas for developing and implementing biodiversity conservation

WCST and its BirdLife International (BLI) Partners after studying the Environmental and Social Impact Assessment Report on the Proposed Development of Soda Ash Facility in Lake Natron, strongly believe that the cumulative impacts from the proposed facility have a high risk of causing extreme detriment to the Lesser Flamingo population should the project be allowed to be developed in Lake Natron area.

We would like to quote the document itself in its conclusions on page 25 which reads:
However it must be recognised that the limited knowledge available on the functioning of the Lake Natron ecosystem as it relates to the Lesser Flamingo strongly suggests that the project will entail a significant degree of environmental risk for this species in the longer term that is not capable of direct mitigation.

These concerns have been raised with Norconsult (the Consultants who prepared the ESIA), with TATA Chemicals Limited and with the Government of Tanzania during the early stages of scoping and debriefing of stakeholders on the ESIA in June and November 2007. We had understood some willingness from Tata to try to refine the proposal in the light of the concerns expressed. However, the Final ESIA Report does not seem to have sufficiently addressed the concerns on the development proposal in the draft ESIA and the final ESIA are unaltered.

Our conclusions are that the ESIA does not place enough emphasis on potential cumulative impacts on biodiversity especially on Lesser Flamingo and the Lake Natron Ramsar site hence the project should not be approved.
Annex 5: Statement by Ilkisongo Pastoralist Initiatives

ILKISONGO PASTORALIST INITIATIVES (IPI)
P.O. Box 47-Monduli-Arusha
Email: ilkisongomonduli@yahoo.com

Wednesday, 05 December 2007

Rt. Hon. Mark Mwandosya
Minister for Environment
Vice President's Office
P. O. Box 5380, Dar es Salaam
TANZANIA.
Fax No. +255 22 2128749

Dear Sir,

Re: Ilkisongo Pastoralist Initiative’s (IPASTORIIN) Concerns on Proposed Lake Natron Soda Ash on our People’s livelihoods

The Ilkisongo Pastoralist Initiative is a member-based Non-Governmental Organisation (NGO) working with indigenous Maasai communities of Longido and Monduli Districts to improve the quality of life through education and support environmental conservation programmes. Our main goal is to alleviate poverty through sustainable natural resource management. We have 262 members and our project area covers 267 hectares with a population of 16,000 people scattered in nine villages.

The plans to build a soda ash plant at Lake Natron have come to our attention. We have seen the Environmental and Social Impact Assessment document and take note of the following regarding the plant:

- The proposed plant will abstract huge amounts of fresh water to the tune of 106,000 litres per hour. At this rate, the plant will consume about 1,600,000 litres (in 15 hours) which is sufficient to meet the needs of 40,000 cattle in one day.
- The construction of the plant will lead to loss of our people’s source of livelihood – livestock – as pasture land gets encroached by the factory’s footprint.
- The local people are unlikely to benefit from employment at the plant. The report states that “no casual labour recruitment of any sort except from major towns outside the Rassau site” – including during construction phase.
- Our people will be exposed to HIV/AIDS due to an influx of people. The report does not provide any workable mitigation measures to address this serious issue. The President of Tanzania recently launched a campaign to fight against the disease and this would be regressive to negate these gains.
- The plant will attract many people to the area, precipitating serious environmental degradation due to over-use of resources like fuel wood.
- Our other source of livelihood, tourism, is likely to be lost due to noise and loss of wilderness value. In particular, we are aware that the Lake is special for Lesser Flamingos since it is the only breeding site for the species in this part of Africa. Our communities get tourism benefits from the tourism activities happening around the Lake due to the presence of the flamingos and we would not like to see them harmed in any way.
- Our people’s culture is likely to be affected negatively due to an influx of people.

The above are serious issues from the community perspective. What is clear is that the community will incur huge economic, social and environmental losses but they will be get little, if any, in return. What is worrying is that the local people were hardly consulted during the ESIA process. The ESIA document states that only one forum held at District level was conducted, with only 14 participants and 2 facilitators.
There are 8 villages in the Lake Natron basin but there is no evidence that any meetings were held at the community level and there are no reports to show that such meetings took place. This raises questions on the involvement and participation of the local community, which is paramount for ownership and sustainability including mitigation of impacts.

IPASTORIN is aware that ESIA is awaiting approval by your office. In view of the issues raised in this letter we request that:

1. You reject the project in totality: From a community perspective, the costs seem to immensely outweigh any perceived benefits
2. As the ultimate custodian of the Environment in Tanzania, ensure that any future proposals to mine soda ash at Lake Natron undergo a rigorous process, including a comprehensive community consultation as enshrined in the laws of Tanzania

Yours truly,

Mike Ole Mokoro
PROGRAMME OFFICER - ILKISONGO PASTORALIST INITIATIVES

Copy to:

1. The Permanent Secretary,
   Ministry of Natural Resources and Tourism,
   P. O Box 9172,
   Dar es Salaam,
   Tanzania,
   Fax No. +255 22 2123158

2. The Director General (Ag),
   National Environment Management Council (NEMC),
   Tancool House (3rd floor), Sokoni Drive,
   P. O Box 63154,
   Dar es Salaam,
   Tanzania;
   Fax +255 22 211159
Submission by RSPB to the Public Hearing organised by the National Environment Management Council (NEMC) on 23rd January 2008 at Karimjee Hall, Dar es Salaam, Tanzania

Proposed soda ash development at Lake Natron, Tanzania threatens the survival of Lesser Flamingo

After careful consideration of all the available facts, the Royal Society for the Protection of Birds (RSPB) would like to express its strong opposition to the proposal by Lake Natron Resources Ltd to develop a soda ash facility at Lake Natron in Tanzania.

Lake Natron is an internationally important wetland and the only site in East Africa where Lesser Flamingos regularly breed. Therefore, nearly every Lesser Flamingo seen in East Africa and three-quarters of the world population of this species has probably been hatched at Lake Natron. Large flocks of flamingos are one of the main tourist attractions in East Africa.

With over one million members, the RSPB is Europe’s largest conservation organisation and the world’s largest bird conservation charity. We have a proven track record of high-quality research and conservation action both in the UK and internationally, including several projects in Tanzania where we work closely with the Wildlife Conservation Society of Tanzania (WCST). We believe that conserving biodiversity is a moral imperative, an economic necessity, and fundamental to the well being of people. We work closely with governments and the corporate sector to promote truly sustainable development, where economy, ecology and social wellbeing are of equal importance.
We have studied in detail the information available to us, including the Environmental and Social Impact Assessment recently presented by Norconsult to the Tanzania Government’s NEMC and the Tata Chemicals Ltd Position Statement on the Lake Natron Project from 31st October 2007. The sheer remoteness and undisturbed environment of Lake Natron makes it particularly attractive to ecotourism and important for nesting flamingos. Lesser Flamingos are widely known to be highly sensitive to disturbances and changes to their environment. The ecologies of Lake Natron and of the Lesser Flamingo are extremely complex and little understood. It is therefore impossible to predict the precise effects of a major development, but there is ample reason to conclude that any proposal to commercialise soda extraction carries high risk of irreversible harm to the ecosystem and to the Lesser Flamingo population. We do not believe mitigation is possible, even if the plant is placed outside the boundaries of the Ramsar site. The proposed development would also lead to serious disruption of the lives of the Massai pastoralists living in the area, many of whom we understand are opposed to the project. The local economy at Lake Natron and the economies of Kenya and Tanzania depend on ecotourism. Tanzania’s Wildlife Division announced a new policy and fee structure at the end of 2007 to enable local communities such as those around Lake Natron to increase the benefits they derive from ecotourism. The loss of the Lesser Flamingo would be a serious blow to this industry, which has great potential to grow. For these reasons, in our opinion, the proposed development at Lake Natron is neither ecologically nor socially sound. Nor is it in the longer term interests of the East African economy. In these circumstances, we hope it would be the policy of the Tanzanian government to apply the precautionary principle, and abort the project.

Those of us who have had the privilege of visiting Lake Natron have been inspired by its austere beauty and remoteness. The prospect of damage to such a treasure is truly appalling, and this feeling will be shared by our membership, and if the issue attracts more concerted media interest, by a wider public in the UK and around the world.

Submitted by Dr Chris Magin, International Officer - Africa, on behalf of RSPB.
Annex 7: Position statement by Journalists Environmental Association of Tanzania

CHAMA CHA WAANDISHI WA HABARI ZA MAZINGIRA TANZANIA (JET).

TAMKO KUHUSU MRADI WA UCHIMBAJI MAGADI KATIKA ZIWA NATRON.

CHAMA cha Waandishi wa Habari za Mazingira kinatoa msimamo kuwa kinapinga mradi wa uchimbaji magadi katika ziwa Natron kwasababu utekelezaji wa mradi huo unaharibu mazingira na kuathiri mtandao wa mazingira (ecosystem).

Ziwa Natron na bonde lake kwa ujumla ni eneo tengefu la Ramsar ambalo linatakiwa kuhifadhiwa. Kadhalika ni eneo la hifadhi ya ndege (BirdLife) ambapo ndege wote wana nje mazingira wa mazingira (ecosystem). Ziwa hili ni mahali pekee katika Afrika Mashariki (Tanzania, Kenya, Uganda, Ethiopia, Djibouti) ambapo ndege hao huzaliana na asilimia 75 ya aina hiyo ya ndege duniani wamezaliwa hapo.


Kadhalika utekelezaji wa mradi huo utaathiri mazingira siyo ya ziwa hilo tu, bali maziwa yote yapo katika mkondo wa bonde la Ufa (Nyasa, Manyara, Natron, Nakuru, Bogoria nk) ambako ndiko Flamingo wanaishi. Maeneo yote hayo yapo katika mfumo mmoja wa mazingira (ecosystem) hivyo ni vema kuliangalia suala hili kwa upana wa mazingira na siyo kama nchi. Kwa mantiki hilo, ingawa Ziwa hilo na maliasili zilizomo ni mali ya Tanzania lakini wadaw wake ni ulimwengu wote kwa ujumla, hivyo ni vema kufikiria mapendekezo yao na ushauri wao.

Serikali imetoa sababu kuu tatu zinazoifanya iendelee na mradi huo: Kuongeza mapato ya serikali, Kuongeza ajira na Kuondoa umaskini.
Sisi tunasema kuwa serikali inayo njia mbadala ya kuoneza mapato yake kutoka eneo la ziwa Natron bila kuchimba magadi hayo. Mpaka mwaka 2006, eneo la kusini kwa mwa Ziwa Natron lilikuwa linaiingizia serikali dola 500,000 kila mwaka kutokana na utalii, hasa utalii wa asili. Kinachotakiwa sasa ni kwa serikali na wadu wengine kukuza na kuutangaza utalii huo ili kuongeza mapato. Ipo njia mbadala ya kuongeza mapato ya serikali badala ya kung’ang’ania kuchimba magadi, kitu ambacho kinapingwa na jumuia ya kimataifa.

Kuhusu ajira, hakuna uhakika kuwa watakoajiriwa katika mradi huo wengi watakuwa watanzania na hasa wale wanaotoka katika eneo la mradi. Jambo la kuongeza ajira limekuwa likitumika kupata ridhaa ya wananchi katika kuchimba magadi ambayo si endelevu.

Kuhusu kuinua hali ya maisha ya wanchi wa kawaida, bado jamii ingeweza kusaidiwa kuendeleza utalii wa asili na miradi midogomidogo ya uzalishaji ambayo isinge athiri mazingira wala makazi na mazalio ya flamingo.

Kuhusu kuinua hali ya maisha ya wanchi wa kawaida, bado jamii ingeweza kusaidiwa kuendeleza utalii wa asili na miradi midogomidogo ya uzalishaji ambayo isinge athiri mazingira wala makazi na mazalio ya flamingo.


Ni vema tukajiuliza kuwa utekelezaji wa mradi huu utamnufaisha nani zaidi: serikali, muwekezaji au jamii zinazozunguka ziwa Natron?

Hatimaye ni vema tukajikumbusha historia. Kati ya mwaka 1997 serikali iliruhusu muwekezaji kuchimba mradi wa kuongeza mapato ya serikali, kuongeza ajira na kuonjaa umaskini. Wanamazingira walipiga utekelazi wa mradi ule kwasababu ya uharibifu wa mazingira amba augetokea na kuwakoshe kipato wananchi.

Pamoja na ushauri uliotolewa na wataalamu na wanamazingira wa nje na wa ndani, serikali ilishikilia msimamo wake lakini baadaye ilibidi ifute mradi huo kimyakimya.

Hivi karibuni, kati ya mwaka 2005 na 2007, serikali ilikusudia kuuza msitu wa Longuza ambacho una miti ilikomaa na tayari kwa kuvunwa. Wanamazingira
walipinga jambo hili kwa misingi kuwa kwanza uuzaji wake ulikuwa umegubikwa na utata. Pili haikuwingia akilini mwa wanamazingira na wananchi wa kawaida kwanini serikali yenye we isingeuza miti ile badala ya kumpa muwekezaji auze wakati wananchi ndiyo waliyoikuza miti hiyo na serikali yenye we inahitaji mapato.

Miradi hiyo miwili ilitetewa kwa kila namna na serikali, ikipingana na wanamazingira kwa sauti ya nguvu nyingi. Tunajua serikali ina nguvu ya kuwekeleza kile inachoamua lakini ni vema tukaelewa kuwa mazingira na maliasili zilizomo ndani yake ni mali ya Watanzania wote na wana haki ya kutoa mawazo yao wanapoona mambo yanakwenda kombo.

Baadhi ya makundi yanayopinga mradi wa kuchimba magadi ziwa Natron ni kama yafuatayo:

2:BirdLilfe International
3:Wetlands International Flamingo Specialist Group
4:IUCN
5:The British Citizens Group (initiated by Ms Lydia Blake)
6: The Natural History of South East Asia

Deodatus Mfugale
MWENYEKITI
Annex 8: Tanzania Association of Tour Operators (TATO) – Position Statement at the Public Hearing

M.07/6/156. 22nd January, 2008

The Director General,
National Environmental Management Council,
P.O. Box 63154
ARUSHA

Dear Sir,

RE: LAKE NATRON SODA ASH PLANT

The Tanzania Association of Tour Operators (TATO) is the Government recognized voice of tour operators. The Association provides common and comprehensive position of the tourism industry in its relation with the Government and its institutions in matters pertaining to the formulation of tourism policy, plans and programmes.

It is a known fact that most of the Tanzania Tourism is Wildlife based, Flora and Fauna being the paramount products. In this case Environment Protection is one of the priorities of the members of the Association.

Members of the Tanzania Association of Tour Operators at the Public Hearing to review the Environmental Impact Assessment (EIA) report for the proposed lake Natron Soda Ash Plant would like to present the following position objecting the proposed construction Lake Natron Soda Ash Project planned to be constructed by Lake Natron Resources Ltd (owned by National Corporation) and TATA Chemicals of India. We submit the following arguments:-

1. That implementing the project will interfere with the world renown Flamingo habitat and breeding area.

2. Because of the Flamingo presence, Lake Natron has become one of the famous tourist bird watching area in the world because greater percentage of flamingo world population breed at this lake. The only areas where flamingo breed minute number is Itosha in Namibia and Sua Pan in Botswana.

3. The Association would like to strongly warn that implementation of the project will threaten flamingos into flight, making the country and the entire region lose the world-renowned tourist attraction. Consequently, the country will lose in
terms of taxes, employment and the economic trickle down effect; this is over and above the loss that the tour operators will suffer.

4. The local communities also will lose income that is currently generated through tourism activities carried out in the area.

5. That constructing a factory intended to produce 500,000 tones of soda ash per annum will definitely destroy the environment by turning it into an industrial area instead of conserved area – which is a current status.

6. That for the above given reasons the tour operators submit that the planned construction of the Soda Ash factory at the shores of Lake Natron be stopped.

We submit

Mustapha Akunaay
EXECUTIVE SECRETARY