



Friends of the Earth

Middle East



August 8, 9, 12 2007
Amman, Jericho, Jerusalem

**Comments 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.**

Comments to April 19, 2005 Draft.

Purpose:

These comments are submitted by EcoPeace / Friends of the Earth Middle East (FoEME) to the World Bank and the three participating governments Jordan, Israel and the Palestinian Authority in support of their efforts that would 'Save the Dead Sea' by promoting sustainable development. These comments build on uninvited comments made to earlier drafts of the project Terms of Reference (ToR), our May 2007 report¹ and reflect the legitimate concerns of civil society that any investigation carried out is comprehensive and independent, with principles of sustainable development leading the process forward.

Introduction:

1. EcoPeace/Friends of the Earth Middle East is a unique, grassroots, not-for-profit 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.
2. In recent years we, along with local communities, have dedicated a great deal of our time and resources to promote a cooperative approach to water issues, particularly in the Dead Sea Basin and the Jordan River Valley.
3. Though we have led the campaign to protect the Dead Sea from further degradation, we are deeply concerned about the manner in which the World Bank and beneficiary governments are seeking to achieve this objective.
4. A study to investigate how to rehabilitate the Dead Sea, that would include a water conveyance stretching from the Red Sea to the Dead Sea (RDC) together with other alternatives, all in a comprehensive fashion, would have the support of FoEME.
5. However, the study of the RDC project alone, as a predetermined solution without any study of alternative solutions, is unacceptable to FoEME.

¹ **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**

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

Friends of the Earth-Middle East (FoEME)

P.O.Box 9341, Amman 11191 Jordan
Tel:+962-6-5866602/3, Fax:+962-6-5866604

85 Nahalat Benyamin St., Tel-Aviv 66102 Israel
Tel:+972-3-5605383, Fax:+972-3-5604693

P.O. Box 844 Bethlehem, PA
Tel:+972-2-2747948, Fax:+972-2-2745968

E-mail: info@foeme.org Website: www.foeme.org

6. To date the World Bank and beneficiary governments have been unwilling to give objective consideration to any alternatives to the RDC project.
7. We therefore believe that the draft ToR is fundamentally flawed and requires considerable changes before the study process should move forward.

These comments represent our key concerns to the present ToR:

1. Applicability of World Bank Operational Guidelines and Safeguard Policies.

World Bank staff have repeatedly stated to FoEME verbally that World Bank operational guidelines and safeguard policies will not apply to this project since they have described the role of the World Bank as only coordinating donor support and managing the study, rather than it being an actual World Bank project using World Bank funds.

The legal opinion obtained by FoEME concludes that World Bank safeguard policies do apply. That the Bank has committed to a "full Environmental and Social Assessment" (ToR section 1.4) that can only be guided by implementation of World Bank procedures. For this reason the Bank is undertaking a public hearing on the ToR, prior to the issuance of an RfP to external consultants. For this reason also the ToR creates an Independent Panel of Experts (ToR section 17.1) to serve as independent reviewers of the Feasibility Study and Environmental and Social Assessment, in recognition that the project is a Category A project, highly complex and will present major irreversible decisions.

World Bank staff have also stated in writing that the beneficiary governments have agreed to the governance of World Bank operational guidelines. The World Bank project website homepage further states that "The World Bank agreed to manage the Study in accordance with its established policies and guidelines."

FoEME requests a written clarification from the World Bank as to whether all World Bank established policies and guidelines, including safeguard policies will be followed and that the Bank will not follow only select guidelines.

2. Independent Analysis of Alternatives to Proposed Project

Common sense dictates that a large scale project such as the RDC, both highly complex and with irreversible implications, requires that all reasonable alternatives to the given project be investigated and costs and benefits compared. Common sense further dictates that for such a project, the study be carried out by an independent consultant and not an interested party.

Not surprisingly World Bank guidelines require that alternatives to the given project be compared and that studies of these alternatives be carried out by independent experts (*OP 4.01 Environmental Assessment*). Jordanian, Israeli and Palestinian environmental laws also require that as part of conducting an environmental assessment of a major project, alternatives to the project be studied. The regulation that governs the analysis of alternatives in environmental assessment under U.S. law declares that the alternatives section "is the heart" of the environmental assessment. 40 C.F.R. sec. 1502.14.

It is therefore unclear to FoEME why in Part E – Environmental and Social Assessment of the ToR, (section 13.1.9) there is no task that requires the independent consultant to study alternatives to the project at the regional level. Contrary to all other tasks defined in the ToR where the independent consultant plays an active role, here in sub-task 2, dealing with

alternatives at the regional level, the role of the consultant becomes passive, accepting a report provided by no other than the three governments, who are the proponents of the RDC project.

Furthermore throughout the ToR document where there is discussion of alternatives, the tasks involved only refer to comparison with alternative possible alignments of the conveyance system and/or a comparison with the "no-action" alternative. For example this occurs in sections 5.4.1; 6.4.3; 8.2.1; 8.2.2; 8.2.3; 8.2.3.

For the tasks in section 8.4.1, dealing with the "Economic and Financial Analysis of Restoring the Dead Sea", common sense would dictate that comparisons need to be made with other reasonable alternatives to the project and not only the "without project situation." The same alternative comparisons are missing in section 8.4.2 as regards "Water Supply and Energy Options" for the project and for section 8.4.3 as regards a "Financing Plan".

Without the study of reasonable alternatives and their comparison with the project, section 10.2.1 of the ToR, "Integrating Findings into a Coherent Decision Support Framework" is in the opinion of FoEME, incapable of being carried out by the consultant in any meaningful manner.

Furthermore, without an independent study of current water resource use in the region, there will be a disincentive to cease current unsustainable water use practices and water pricing in the region. A comprehensive study to promote sustainable water management is required so that the project does not further institutionalize inefficient water allocation to the agricultural sector. This likely outcome would be contrary to the World Bank's own recommendations concerning water resources in the region, particularly pricing of fresh water to the agricultural sector in Israel and Jordan.

As to the Jordan River alternative, that in the belief of FoEME needs to be the key focus of a study of alternatives, please see Annex I attached.

FoEME seeks written clarification from the World Bank as to why an independent assessment of all reasonable alternatives is not being carried out as part of the Feasibility Study and Environmental and Social Assessment, contrary to established World Bank policies and guidelines.

3. Credibility and Independence of the Process

Given the ToR statement that the project purpose is primarily environmental, it defeats the purpose that the head of the Steering Committee for each beneficiary party (ToR section 15) is not a representative of the Environment Ministry / Authority. In fact it is not clear what role the Environment Ministries are playing at all. In the Palestinian Authority, the Environment Minister has made public statements that he is against the project and refuses to be involved. In Israel, the Technical Steering Committee team is led by the head of the Water and Sanitation Authority. The Israeli Environment Ministry representative has only observer status and is not even one of the four Israeli Steering Committee representatives. In Jordan too the whole process is being led by the Jordan Valley Authority under the auspices of the Ministry of Water and Irrigation.

FoEME calls on the World Bank to encourage beneficiary governments to appoint their respective Environment Ministries to be the lead agency for the project Technical Steering Committee.

In order to strengthen the credibility of the process, both for the general public and for the international community and donor states who have been asked to financially support the study, **FoEME sees the need to appoint an additional two representatives to the Technical Steering Committee (ToR section 15) – one from UNEP and the other from UNESCO.** Both UN agencies have representatives in the region either in Amman or Ramallah and are the leading UN agencies dealing with environmental issues.

The present situation where the government members of the Technical Steering Committee appoint the Panel of Experts is open to conflict of interest. In order to ensure independence of decision making the proposed two UN agency representatives to the Steering Committee should first make a recommendation for the Panel of Experts, to then be approved by the Steering Committee as a whole. (ToR section 17.1)

The tasks of the Panel of Experts need to be further defined in the ToR. A required role of the Expert Panel should be to decide on whether new studies and/or extension of study time are required. Presently (ToR section 3.4.2 sub-studies) the prescribed process is decided by the Technical Steering Committee which is made up of project proponents. Since some government representatives have already stated that the study process of 24 months is too long, there is a clear conflict of interest in having them also determine if and what new studies may be required and any associated extension of time. **This task should therefore be transferred to the Panel of Experts which is not only an independent body, but is also better placed to make such determinations in the first place.**

4. Cultural Benefits and Peace Dividend

In Part D – Overall Feasibility of the Project (ToR section 8.2.2) great emphasis is placed on identifying intangible benefits, identified as cultural heritage benefits and Peace Dividend benefits.

The World Heritage – cultural, natural and tourism values of the Dead Sea would appear to be very much related to the existing mineral composition of Dead Sea waters. According to the latest research undertaken by the Geological Survey of Israel, the unique Dead Sea mineral composition will certainly be altered by the release of waters whose sources are other than the Jordan River basin. In this regard, in sub Task 2, Tourism Industry Task **8.4.1**, missing is the need to evaluate the impact of the change of composition of Dead Sea waters on cultural heritage, tourism and especially health tourism to the Dead Sea. While a cost benefit analysis is subscribed in relation to impacts of mixing the two sea waters on the chemical industry, no such analysis is tasked under tourism.

A key issue not even raised in the ToR is whether the mixing of Red Sea waters in the Dead Sea would constitute such a change in characteristics of the Dead Sea that it would impede the ability of the countries at a later date to register the Dead Sea as a World Heritage site as has been indicated by some of the parties by listing the Dead Sea on their World Heritage Tentative List.

A task of the consultants should be to gain the opinion of experts from the UNESCO World Heritage Center.

Furthermore cultural heritage protection and raising the water level of the Dead Sea are not as clearly related as the present version of the ToR suggests. The prescription of institutional arrangements to sustainably manage the Dead Sea Basin and the prevention of tourism development along all edges of the Dead Sea shoreline are what is required to protect cultural heritage values and the ToR must address these matters.

FoEME would like to see World Heritage registration of the Dead Sea basin be listed in the ToR as a prerequisite outcome of a project that claims to have saving the Dead Sea as its prime objective.

ToR section 8.4, task 8.4.1, seeks to identify economic benefits from a so called "Peace Dividend" that the project proponents believe to be associated with the project. To FoEME the "Peace Dividend" of the RDC is less than clear as the project solely passes through Jordan and Israel two countries who have already signed a peace treaty. The language of the ToR section asking consultants to be "innovative" and "exercise creativity" highlights the concern that the consultants will use this loop hole in the ToR to inflate the financial benefits of the project. **An objective study of alternatives to the project, a feature deficient in many areas of the present version of the ToR, would likely reveal that a "peace dividend" from alternatives to the RDC, such as the Jordan River alternative described in Annex 1, will be of much greater economic benefit to the region.**

5. Comprehensive Development Framework that Ensures an Environmentally Sound and Sustainable Project

World Bank Environment Assessment (EA) guideline OP 4.01 requires an environmental assessment to help ensure that proposed projects are "environmentally sound and sustainable." However, the ToR only states that the outcome of the EA will help decide whether the water conveyance project is "feasible." (ToR section 1.4.) The EA should be used to decide not only whether the project is feasible, but also whether it is environmentally sound and sustainable when analyzing the project and other alternatives. This is even more the case as the ToR itself states that "it is designed to be carried out within a comprehensive development framework (ToR section 1.4 last paragraph) and that it is being promoted as an environmental project with potential water supply benefits. (ToR section 1.3)

The current draft ToR only deals in a comprehensive fashion with the needs of building the proposed conduit. Institutional issues mentioned in the ToR focus on ownership, operations and legal aspects of running the proposed conveyance and any desalination or energy plant to be built.

ToR Task 9.3.1 allocates limited tasks to the consultants to study the need to support the sustainable management of the Dead Sea as a whole. This is despite the fact that the project is identified by the Bank and the beneficiaries as primarily an environmental project which is designed primarily to prevent further degradation of the Dead Sea. The need for an integrated development plan for the Dead Sea Basin or the creation of institutional support through the creation of a Dead Sea Commission are regarded by the TOR as instruments that will need to be developed at a later stage.

The lack of political commitment currently foreseen by the Bank is particularly problematic considering the induced impacts that the Bank states can be expected from a stabilized Dead Sea water level. ToR section 12.3.10 states that "total hotel rooms are projected to rise to as many as 40,000 over the next 20 years a 10-fold increase over the current situation." Without an effective management plan and an authority in place to oversee the plan, rapid tourism development alone could turn the project into an environmental disaster for the natural and cultural heritage values of the Dead Sea Basin.

The additional energy requirements of the project, to initially pump water out of the Gulf of Aqaba and in to the conduit, and after the desalination process, from the Dead Sea pump desalinated drinking water up transmission corridors to major cities, might require the building of an additional fossil fuel power station. (ToR Section 4.3.1) The need for an additional power station or the expansion of existing stations would be a major environmental impact, particularly as regards air pollution, that requires detailed investigation as an additional task of the consultants not presently mentioned.

Furthermore, there exists an Israeli government decision in support of the "Peace Corridor," which includes the building of artificial lakes along the length of the Israeli Jordanian border, to be supplied water from the water conveyance. The artificial lakes, hotels and other "Las Vegas" type facilities proposed by a member government would be a direct result of the project yet presently receive no mention in the ToR document (see drawing of lakes proposed attached as Annex II). A specific chapter must be added to the ToR, for the consultant to carry out an environmental and social assessment in respect of these proposed lakes.

6. The Precautionary Principle and Special Risks

The precautionary principle must be accepted and incorporated into the ToR. Due to the potential reliance on computer modeling – on the mixing of the waters of the Red Sea in the Dead Sea and on the impact of water extraction at the head of the Gulf of Aqaba - a level of uncertainty must be taken into consideration that the computer models might fail.

Since the impact of building the proposed project could lead to irreversible negative consequences for the Dead Sea, Arava and Gulf of Aqaba the precautionary principle requires that the real possibility that models fail be given extra weight in any final analysis.

7. Public Participation

The attempts of August 2007 to hold public hearings in Amman, Ramallah, Jericho and outside Jerusalem have been less than satisfactory. Minimal efforts, if any, were made in all beneficiary countries to alert the general public and to specifically notify interested stakeholders. Specific requests for notification, agenda and relocation to a more central location in the case of Israel were either ignored or denied. The lack of notice and timing of the hearing in the midst of August holidays has meant that many interested parties and leading academics that had wanted to be present at the hearings were absent. Failure to translate the ToR documents to Arabic and Hebrew has meant that local communities remain ill-informed.

In the opinion of FoEME, a public hearing process on the draft ToR has not occurred and needs to be attempted again in a professional manner.

Annex I

The Jordan River Alternative

Background

Until the 1950's the Jordan River carried an average of 1.3 billion cubic meters of fresh water annually in to the Dead Sea making the Jordan River the primary source of fresh water for the lake. Today this figure has been reduced to just 70 – 100 million cubic meters per year. Israel, Jordan and Syria divert 95% of the water that once flowed through the Jordan River upstream.

By diverting fresh water from Jordan River tributaries and replacing it with sewage, not only has the Dead Sea been devastated but also the culturally and historically important Jordan River has been turned into little more than an open sewage channel. This is contrary to natural and cultural heritage values subscribed to by Israel and Jordan under international conventions. In recent years grass roots activities in Israel, Jordan and Palestine have been taking place to try to raise awareness as to the state of both the Jordan River and the Dead Sea in an effort to improve the inflow of water for both.

FoEME recognizes that there are constraints involved in conducting a Feasibility Study and Environmental Assessment. However a study which seeks to address the declining levels of the Dead Sea without addressing what constitutes the root cause of the decline is in our opinion grossly flawed.

Key professionals knowledgeable of the issues in both Israel and Jordan have made statements in favor of a study of the Jordan River option. An Israeli government decision taken in 2003 required the preparation of a policy document on the future of the Dead Sea to be compiled by the Ministry of the Environment and the Ministry of National Infrastructure.² The Israeli Government decision requested a review of three possible scenarios and their impact on the Dead Sea; business as usual; seawater conduit and freshwater supply. The freshwater supply refers to a study of restoring a considerable portion of the natural sources of water that flowed into the Dead Sea.³

By 2006 however only the business as usual scenario was completed leading Israeli professionals who took part in the policy document to issue the following declaration: "All who took part in preparing the current policy paper on the future of the Dead Sea call on the government to implement the above recommendations... in line with previous government decisions, are the studies... of restoring most of the natural flow (particularly of the Jordan and the Yarmuk) to the Dead Sea. This should be done parallel to the feasibility study of the Red Sea — Dead Sea conduit (the "peace conduit"), due to be undertaken by international consultants under the auspices of the World Bank."⁴

² Israeli Government decision no. 2863, 5 January 2003

³ Setting the Policy Agenda for the Future of the Dead Sea: Interim Report Examining the "business as usual" scenario, Jerusalem March 2004, State of Israel, Ministry of the Environment, Ministry of National Infrastructure Policy Division, The Geological Survey, The Jerusalem Institute for Israel Studies, Center for Environmental Policy, page 2, (English language summary).

⁴ The Dead Sea Basin - *Assessment of Current Situation and Prospects for the Future* Under Continued Dead Sea Water-Level Decline, Jerusalem 2006
The Jerusalem Institute for Israel Studies, Ministry of the Environment, Ministry of National Infrastructures, the Geological Survey, State of Israel, page Xiii, (English language summary).

The Royal Scientific Society in their opening statement of the Socio-Economic Study not only support the Jordan River study but unequivocally state that if the parties could only cooperate it would be the solution of choice.

"Since the main reason of the Dead Sea decline is diversion of the Jordan River and other springs that naturally flow into the Dead Sea for agricultural, industrial and municipal services in Israel and Jordan. Then a simple and direct idea to save the Dead Sea would be to implement an integrated, cooperative plan between the three parties (Jordan, Israel and Palestine) to efficiently manage the Dead Sea basin and distribute the surrounding water resources equally assuring that considerable amount of fresh water flows back to the Dead Sea. This plan represents a cure of crises from its original cause. If this plan is well studied analyzed and skillfully managed then it will be much easier, more feasible and with very low impact on the environment compared with other solutions."⁵

The hard questions that should be studied

It would be unreasonable to consider alternatives that are plainly unfeasible as part of the Feasibility Study and Social and Environmental Assessment; this is precisely the grounds upon which the current ToR seeks to dismiss the Jordan River alternative.

In order to partially restore the flow of the Jordan River, riparian countries would have to reduce the amount of water being diverted upstream for domestic and agricultural use. This can be achieved through the promotion of public and private water conservation measures, more realistic water pricing, agricultural sector reforms and capitalization of unexploited water resources.

At present agriculture consumes over 57% of Israel's total water utilization⁶ while employing approximately 2% of the workforce and accounting for only 1.8% of GNP⁷ while in Jordan agriculture is estimated to use 73.9% of the total water consumption,⁸ employing 5% of the workforce for a return of 2.8% of GDP.⁹ These extremely poor economic returns for water are the result of significant government subsidies for water being used in agriculture and the lack of education and incentives to better conserve water resources. These practices enable massive water diversion at unreasonably low prices, which leads to the widespread misuse of our most scarce resources in the region - water. Government subsidies facilitate the cultivation of inappropriate crops, such as tropical fruits, which need excessively large amounts of water for this region. Without independently studying the opportunities of better water management in the region, an outcome of the RDC project will be to further encourage unsustainable water practices. Introducing more efficient agricultural practices will dramatically reduce the strain on existing water resources and increase the feasibility of regenerating the flow of the Jordan River.

Demand management reforms can be accompanied by exploitation of under utilized sources of water; reuse of treated sewage water, desalination and yet untapped groundwater. Former Israeli Water Commissioner Professor Dan Zaslavski has estimated that regenerating the flow of the Jordan River to bring water to the Dead Sea will cost no more than \$800 million,¹⁰ substantially less than the \$5 billion it is estimated that will be required to

⁵ 'Socio-Economic Condition.' Royal Scientific Society/Environmental Research Centre, Page 6

⁶ Israel Central Bureau of Statistics, "Agriculture in Israel, Table 12: Water Production and Consumption by Source and Purpose," latest figures are from 2004.

⁷ "Economic report on agriculture and rural areas, 2005", Israeli Ministry of Agriculture and Rural Development, 2006

⁸ United Nations Food and Agriculture Organization, AQUASTAT – Information System on Water and Agriculture (1993 figures).

⁹ World Bank national accounts data, and OECD National Accounts data files, 2005.

¹⁰ Professor Dan Zaslavski, "The water Level in the Dead Sea and the Two Seas Canal," October 2006, p.4 -5.

complete the RDC project. In addition to the comparatively low cost, the regeneration of the Jordan River will in itself deliver hundreds of millions of dollars worth of benefits each year as the Jordan River has immense historical, cultural and natural values and its unexploited value for tourism is significant.

These factors indicate in the opinion of FoEME, that it is advantageous to include in the RDC project an independent study of the feasibility of restoring the flow of the Jordan River as a means of halting the decline of the Dead Sea. Consideration of this course of action should be given in the ToR so that decision makers and the general public are fully informed of their options in dealing with the difficult situation that the region finds itself in with respect to water.

Ancillary Advantages of the Jordan River Alternative

Other benefits in rehabilitating the Jordan River include:

- Rehabilitating the Jordan River is a commitment of the Peace Treaty signed in 1994 between Jordan and Israel.
- The 'Peace Dividend' described in the ToR in relation to the RDC project would be substantially greater in any initiative to revitalize the Jordan River. The banks of the Lower Jordan River, which constitute the border between Jordan, Israel and the Palestinian West Bank, have become a closed military zone. By working together to revitalize the River the area could be opened up for controlled sustainable development given its immense historical, cultural and religious significance as well as its natural beauty.
- Opportunities would be created for joint tourism development among Israelis, Jordanians and Palestinians, which will further reinforce any 'Peace Dividend'.
- A Jordan River option would safeguard the cultural, religious and historical value of the Jordan River Valley and the Dead Sea while the RDC project ignores the Jordan River.
- The financial cost of rehabilitating the Jordan River could be significantly less than the cost of the RDC project.¹¹
- There would be a sizeable net environmental gain from rehabilitating the Jordan River and the Dead Sea with no negative environmental implications. This must be compared to the significant risks associated with the RDC project.
- There might also be a sizeable financial gain from rehabilitating the Jordan River in terms of tourism revenue in both the Jordan Valley and the Dead Sea.

What does the World Bank ToR say in relation to the Jordan River?

The introduction to the ToR states that "the natural flow of the Jordan River is fully appropriated for what is considered essential use by the various water sectors." The World Bank position could not be stated in the ToR more unequivocally. "No degree of reform and change in management of freshwater resources in the region is likely to keep pace with the

¹¹ Professor Dan Zaslavski, "The Water Level in the Dead Sea and the Two Seas Canal," October 2006, p.4.

demand, attain even the minimum standard of water availability or significantly contribute to the restoration of the Dead Sea.”¹²

The Terms of Reference do however include a requirement that “The Technical Steering Committee shall provide the Consultant with a report on alternatives/options that have been proposed, studied and/or are being undertaken under a variety of initiatives to arrest the Decline of the Dead Sea. The report will include water management measures and/or water conservation measures and options such as expanded use of treated wastewater and brackish waters and desalination in order to meet the current and future demands for water. The report will discuss whether the option of increasing Jordan River flows to the Dead Sea is or will be attainable taking into account all considerations...”¹³

Considering the categorical statement against the Jordan River option in the introduction to the ToR it might seem surprising to see a willingness to study the option later in the text. A full and careful reading of the ToR explains what would otherwise appear quite confusing.

On all other issues throughout the ToR it is an independent consultant hired by the World Bank that is involved in either carrying out or scrutinizing all aspects of the report. This last paragraph mentioned above relating to alternatives at the regional level is the only 'task' given to the consultant that does not mention any independent research, study or review and ability to scrutinize. Since twelve out of fourteen members of the Technical Steering Committee are Jordanian, Israeli and Palestinian government representatives, it is in fact the beneficiary parties themselves who will be wholly responsible for preparing information on the Jordan River alternative. It is therefore no wonder that the World Bank is comfortable to appear accommodating to the Jordan River option since it stripped any notion of independence and transparency from the relevant section of the ToR, tying the hands of the independent consultant to accept government findings and integrate them into the report without any questions asked. No independent consideration is given to project alternatives other than different RDC alignments and the no project option in the Feasibility Study.

A study that claims to have saving the Dead Sea as its primary objective without any independent examination of the root causes of the problem and an investigation into whether those causes can be mitigated as a means of addressing the problem, in the opinion of FoEME puts the credibility of the World Bank into question.

¹² Terms of Reference, paragraph 1.2.

¹³ Terms of Reference, paragraph 13.1.19.

Annex III

FoEME meetings, correspondence and discussions held with World Bank and government officials concerning the project.

FoEME has made strenuous and repeated attempts to make both the Bank and the beneficiary governments aware of our concerns. We have made contact with Bank and government officials on many occasions as follows:

- Three separate telephone discussion and several email exchanges with World Bank project officials, Alex McPhail, Stephen Lintner and Vahid Alavian in July 2007.
- Discussion with World Bank officials at FoEME Red Sea / Dead Sea Conference, Jerusalem on May 2007
- Meetings with Jordanian Minister of Water and Irrigation and Israeli Water Commissioner followed by letter of correspondence copying Bank officials in June 2007.
- Discussion with World Bank officials at FoEME Dead Sea Conference, Jordan on 10 December 2006
- Email correspondence with Vahid Alavian, dated 17 July 2006
- Letter to Christiaan Poortman Vice President MENA Region World Bank, dated 7 June 2006
- Email correspondence with Vahid Alavian, dated 2 June 2006
- Letter to Mr. Christiaan Poortman, Vice President MENA Region World Bank, dated 18 May 2006
- Meeting with Christiaan Poortman and Inger Anderson 9 May 2006, attended by Jordanian, Israeli and Palestinian mayors from the Jordan Valley Region
- Meeting with Shimon Peres' office May 2006
- Meeting with Christiaan Poortman Vice President MENA Region World Bank in 2005
- Letter to Yehudit Naot, Israeli Environment Minister, dated 8 July 2004
- Meeting with Vijay Jagannathan, Vahid Alavian and Stephen Lintner on 17 March 2004 in Amman
- Meeting with World Bank officials Stephen Litner, Vahid Alavian in Washington DC, 4 June 2004
- Meeting with Christiaan Poortman Vice President MENA Region World Bank in 2003