



Netherlands Commission for
Environmental Assessment

To: Mrs Handhayani
Assistant to the Governor for
Development
Special Province of Jakarta

To: Mr Murjanto
Head Bureau of Planning and
International Co-operation
Ministry of Public Works

Cc: Mr Hahn
Lead Infrastructure Specialist
WorldBank Office Jakarta

your reference

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your letter of
3 March 2008

our reference
081-036/Sf/Jz

subject

Advice on the Terms of Reference for the
EIA for the Jakarta Urgent Flood
Mitigation Project

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Utrecht, The Netherlands
4 June 2008

Dear Mrs Handhayani and Mr Murjanto,

In March 2008 Mr Murjanto and Mrs Handhayani's predecessor Mr Wirawan requested the Netherlands Commission for Environmental Assessment to give advice on the Terms of Reference (ToR) for the EIA (Amdal) for the Jakarta Urgent Flood Mitigation Project, since then renamed the Jakarta Emergency Dredging Initiative (JEDI). The request letters, dated March 3rd, were hand-delivered during a meeting at our offices with a delegation consisting of yourselves and your Indonesian colleagues.

I would like to express our appreciation for your assistance and hospitality during the working groups' visit to Jakarta in April. This has allowed the Commission to receive the necessary information in a short period of time.

It is now my pleasure to submit to you our advice on the ToR for the EIA for the JEDI. I would like to draw your attention to the following:

- Due to the urgency of the flooding problem, the project is under considerable time pressure. Nonetheless, the EIA should be given a realistic timeframe. If too little time is allowed, the EIA may not adequately identify the undesirable environmental and social impacts of the project nor adequately develop solutions to avoid or mitigate them. Not only should the timelines of the Amdal procedure be respected, but sufficient time should be allocated to undertake the necessary EIA studies as well. In particular, the EIA would benefit from an extended fact-finding phase in which additional information is collected on the quality and composition of the material to be dredged. The currently available information on composition and quality of the material to be dredged is at present not sufficient to be able to select and compare the options for dredging,

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processing and disposal of the dredged material. The content of waste in the sedimentation, for example, will determine which dredging techniques are best suited. The composition and quality of the material also govern the possibilities for beneficial re-use, for example to fill land reclamations. Finally, a higher level of contamination will dictate more stringent requirements for disposal site construction and monitoring.

- The Commission also recommends that the objectives for the project be more clearly identified. The environmental and social ambitions for the project are at present not clearly stated, nor have the project's concrete contribution to the flooding problem been demarcated. Setting such objectives is not so much a task for the EIA team, as it is the responsibility of the project's proponents.
- The Commission applauds the intention to include a capacity building component in the JEDI project. This will help to ensure that the drainage system's discharge capacity, once restored, is maintained. Before capacity strengthening can begin, it will need to become clear how the mandates for the different aspects of the project are divided over the different authorities, and how the different authorities will co-operate in project implementation, as well as in monitoring and (long term) maintenance of the drainage system and disposal sites.
- The JEDI has been widely welcomed as a first step in a longer process towards a resolving Jakarta's flooding problem sustainably. Although outside of the scope of this project, the Commission recommends that an integrated and strategic approach is developed to address the root causes of flooding, at catchment level. A suitable planning scale and framework will need to be identified for this planning process, as well as a appropriate co-operative arrangement between the authorities involved. The Commission would recommend undertaking a Strategic Environmental Assessment (SEA) for this plan to support decision-making on how to move forward. An SEA could help to structure the dialogue between stakeholders, and to compare the various proposed solutions on their environmental and social impacts as their contribution to flood elimination. KLH is interested to support such an SEA, as part of the ongoing efforts to introduce SEA to Indonesian planning practice.

Finally, we would like to offer to independently review the quality of the EIA report for the JEDI project, once it is finalised.

Yours sincerely,



Klaas Jan Beek
Chairman of the Working Group of the Commission for Environmental Assessment