



United Nations Environment Programme

برنامج الأمم المتحدة للبيئة • 联合国环境规划署
 PROGRAMME DES NATIONS UNIES POUR L'ENVIRONNEMENT • PROGRAMA DE LAS NACIONES UNIDAS PARA EL MEDIO AMBIENTE
 ПРОГРАММА ОРГАНИЗАЦИИ ОБЪЕДИНЕННЫХ НАЦИЙ ПО ОКРУЖАЮЩЕЙ СРЕДЕ

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TELEFAX TRANSMISSION

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SUBJECT: Asian development Bank PDF-B proposal on the Songhua Wetlands

Ref: GEF/IW/Shrimps

Dear Al and Andrea,

Takehiro Nakamura & I have read the above proposal which we find interesting but perhaps not well enough elaborated to be accepted at this stage. We offer the following technical comments on the draft as submitted.

1. Although section 7 (project linkage to National priorities, action plans and programmes) focuses on issues of water resources, the main text of the proposal does not elaborate on water resource issues and envisaged actions. It is correctly pointed out in the proposal that management of the associated watersheds should lead to conservation of wetland ecosystems but the proposal is unclear as to how this objective is to be achieved.
2. From the water resource management perspective, quality and quantity should be dealt with together. However, there are no proposed actions designed to maintain or improve the quality of rivers feeding the Sanjiang plain. Industrial and urban development in the basin to date have resulted in degradation of water quality. Although we do not have data to hand, we understand that degradation of water quality has measurable impacts on the habitat conditions in the Sanjiang Plain.
3. Although this project is directed at both flood mitigation and wetland management, there is little information on the impacts of the floods on the wetland ecosystems. Without an overview of the impacts and some information regarding how these impacts are to be addressed, it is difficult to envisage what flood management components are included in this 'biodiversity' project.

4. Although we do not have detailed data, unlike the Yangtze floods in 1998 and 1999 (which were considered to be 20-30 year-floods), the Songhua floods (especially in the Nen) in 1998 were considered to be floods of less frequent occurrence. Not many countries have flood management schemes for large floods that exceed 30 year probabilities of occurrence. From the flood management perspective in China, it is perhaps more important to address the damage caused by more frequent floods of lesser magnitude in other basins. Further, physical modification of the river will need careful evaluation of the natural flood water retention capacity and mechanisms of flood plain functioning. It would appear that the proposal involves destruction of river margin ecosystems and habitats, in order to protect downstream ecosystems. Such counter-intuitive actions require a careful 'environmental cost-benefit analysis'.

4. The proposal is very weak in terms of a justification for distinguishing this proposed set of actions from those of the UNDP/GEF project. According to the project document, the UNDP/GEF project also includes stakeholder participation which seems a major justification used for this intervention.

5. We are very surprised to see that Ministry of Water Resources is not involved in this project since our understanding is that physical modification of the river and flood mitigation measures cannot be implemented in the People's Republic of China.

Yours sincerely,



John O. Pernetta