



a million
voices for
nature

Dr Ayub Macharia
The Acting Director General
National Environment Management Authority (NEMA)
P O Box 67839, 00200
Nairobi, Kenya

6 June 2011

Dear Dr Macharia

NEMA's decision on the Bedford Biofuels (Tana Delta) Limited Jatropha plantation project, Garsen District, Tana River Delta

As you will be aware, the RSPB (BirdLife in the UK) has been following this proposal closely. We previously submitted objections, because of its potential impacts on biodiversity and natural resources of recognised international importance.

The RSPB has provided assistance to conservation in East Africa for the past 15 years, primarily through our BirdLife International partner organisations. This has included collaboration with NEMA and other Government institutions through, for example, training for officers involved in site and species monitoring programmes.

Nature Kenya (BirdLife partner) has passed the RSPB a copy of your decision letter dated 6 May 2011 granting Bedford Biofuels a licence to proceed with cultivation of 10,000 hectares of jatropha. **We feel compelled to write to register our strong objection to this decision, which we believe will be environmentally damaging.** We do not understand how a project with a footprint as large as 10,000 hectares can be considered as 'a pilot' and it appears to us that this decision has been made without proper consideration of the viability of jatropha in this location or the need for wider land use planning in the area. We fully support the more detailed comments submitted by Nature Kenya on 23 May.

We strongly urge NEMA to reconsider this decision. Like Nature Kenya, the RSPB recognises the need for appropriate development in the Tana River Delta to benefit local people. However, as the Tana River Delta is such a critical site for biodiversity conservation we urge that before this project, or any other major development, is allowed to proceed:

- the listing of the Delta as a Ramsar site is completed; and
- a multi sector land use plan for the Delta is prepared to provide the strategic context for assessing individual developments. As you will be aware Nature Kenya is working to facilitate a meeting to bring a range of Government institutions together as a first step towards this planning process and it is hoped that this meeting will take place this summer. With your support, this process could commence now to provide the much needed planning framework for the Delta.

We will continue to strongly support our partner NatureKenya in their work towards future sustainable development of Tana River Delta, which integrates development, environmental and livelihood objectives, rather than sacrificing the latter for the benefit of short-term gain.

We do hope you will reconsider this decision on the Bedford Biofuels project.

Yours sincerely



Dr Tim Stowe
Director of International Operations, RSPB

cc

Mr Paul Matiku, Executive Director Nature Kenya
Dr Julius Arinaitwe, Head of the BirdLife International Africa Secretariat, Nairobi, Kenya
Mr. Mourad Amari, Chair of the BirdLife Council for the Africa Partnership
Dr Marco Lambertini, CEO, BirdLife International
Mr Ian Davidson, Executive Director, Nature Canada
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