



Comments on  
“Preparatory Survey on Thilawa SEZ Development Project (2,000 ha)  
Strategic Environmental Assessment (SEA), Aug 2015.”

By Mekong Watch  
30 September 2015

We have reviewed the content of the Aug 2015 version of the SEA for the Thilawa SEZ Development Project (2,000 ha). Our comments are as follows:

- 1) The SEA states that it will a) provide baseline data; b) identify and analyze anticipated problems; and c) set environmental objectives and standards. We understand that SEAs are also supposed to identify and analyze cumulative impacts of a project. This SEA does not contain this analysis. In addition, we find that the objectives identified by this very SEA have not been met.
  - a. The baseline data is very cursory.
  - b. Anticipated problems are neither identified nor analyzed. While the SEA provides an overview of current conditions, it does not indicate how we can expect those conditions to change with the implementation of Phase 2. It would be appropriate at this stage to identify several predictable scenarios and examine the environmental and social impacts such scenarios would have.
  - c. While there is information regarding the various laws, regulations, and guidelines, we did not see any environmental objectives set. In addition, there was mention of standards being applied on a “rolling basis.” This opens up the potential for arbitrary changing of applied standards, which could have detrimental environmental and/or social impacts.
- 2) There were many issues raised and addressed with varying degrees of success in the Phase 1 area of the Thilawa SEZ, and some are still on-going. There are many lessons from Phase 1 that can be applied to Phase 2, in particular in regard to social impacts, but none of these are mentioned in the SEA.

We find the current quality of the SEA to be insufficient. It fails to address the topics that it itself identifies as the objectives of the study. Further analysis will is needed to identify the types of environmental and social impacts that can be expected. Local people who are supposed to be relocated and who have been carefully monitoring the Phase 1 resettlement process probably have many things to input regarding potential impacts to their livelihoods. More consultations with them could also improve the quality of this SEA.