

## FP054 - Implementation project of the integral management plan of the Lujan River Basin (Argentina/CAF)

---

*CSO comments on the project given as intervention during the 18<sup>th</sup> GCF Board Meeting, October 2017*

1. The project fails to address root causes of the problems in the Lujan River Basin, such as unplanned urban expansion and deforestation. The project should include non-infrastructure actions that aim at reconstructing natural ecosystem services that manage floods, such as reforestation, change of soil uses, and spatial planning for the whole area of influence, including pasture areas, wetlands, and natural flooding areas.
2. The project does not yet have an approved Environmental License nor an EIA or a Strategic Impact Analysis (SIA). These are serious deficiencies, given that the project includes the development of new infrastructure works such as dredging and canalization.
3. The project does not come with a legitimate social mandate since the Plan in which it is based was not subject to an adequate participatory process. The meetings for the presentation of the project had several weaknesses, and were poorly communicated. This is especially sensitive when we consider that the project may call for expropriations and resettlements.
4. The proposal does not mention that protected areas could be affected, even though one of the actions of the project is the widening of the Santa Maria Canal, which passes through the Otamendi Reserve. As a condition to this project, there should be a complete analysis of possible impacts to protected areas.