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December 26, 2021

Asian Development Bank  
Pakistan.

Subject: *Concerns of lower riparians on enhancing capacity of water utilization by developing canal system of **Chaubara Branch and Jalalpur Irrigation System ADB Project No. 46528-002***

Dear Sir/Madam;

----- is a registered and recognized non-government organization, representing farmers. The vision of ADB is to invest to make Asia sustainable, resilient etc. Therefore, in our understanding the investments of ADB should be such that it compliments the vision. ----- will like to draw your attention on the current planned investment in the projects which may effect certain population, communities and may not help the economy of Pakistan. ----- being a body of farmers and growers are deeply concerned on construction of **Chaubara Branch and Jalalpur Irrigation system** which is being funded by ADB. We will therefore like to request to reconsider the funding of these projects on the following grounds.

1. Excessive and extensive water withdrawals upstream have already impacted the whole delta area. Once thriving communities like that of Keti Bunder are now living either in squalid conditions or have migrated. World Bank estimates annual loss of US \$s 2 billion to whole delta.
  - a. Increase of 440,000 hectares of paddy, mainly in Punjab from 2016 and increase of Sugar Cane cultivation in Punjab is a clear indication of excessive water use. In Sindh paddy is restricted to certain areas and in Punjab its not. Critical to emphasize that these are high delta crops consuming almost double the water of Cotton.
  - b. The harvesting of crops in Sindh is earlier than in Punjab due to climatic conditions, in paddy however the harvesting is almost at the same time, this reflects enhanced water use. In addition to this, early Kharif (March) in Sindh is already deprived of water due to preference to fill Mangla as the water in the catchment of Mangla becomes available earlier then the water from Indus. This is pointed out at many occasions including that of Government of Pakistan's report of Technical Committee on Water Resources Part-II, 2005.
2. Punjab's existing canal system capacity is already much beyond its allocation in water accord, to say that the water will be provided from the existing share is a fallacy and its non-palatable. The NOC therefore granted by IRSA contravenes with logic and is on an assumption that water will be deducted of one command area and be given to the other command area.

3. We are of strong view that the water in the system is reducing, to provide for water on the existing system in Pakistan is already a challenge. Therefore, the paradigm of investment in increasing the area under canal system by expanding the infrastructure needs to change.
4. In the science of economics, the resources are limited, therefore the investment in water sector needs to be on improving the current and existing system for efficiency and productivity. In Pakistan the investment should be in the system where per drop water efficiency can be improved. We cannot continue to sustain current water utilization of water in agriculture. Our water productivity is almost half to that in Murray Darling, in Australia.

This can only happen when institutions like ADB shifts its priorities of investment in Pakistan and provide traction and thrust to conservation, productivity, technology, sustainability and above all equity.

We have not provided the technical aspects of these systems, as ADB should already have them. Should there be any need of the numbers on capacity, discharges and allocations, ----- will be more than happy to assist in provision of those numbers.

Lastly, to reemphasize in almost every meeting of ----- the representatives of the most effected communities always raise a concern on areas being added to current irrigation system which is pushing them to poverty. We will therefore request ADB to help these communities to sustain their livelihoods and refrain from adding to infrastructure for which there is no water.

Sincerely