



## Oromo Studies Association

January 29, 2014

Mr. Reg Hankey  
Pittards PLC  
Sherborne Road, Yeovil  
Somerset, England BA21 5BA

### **Re: Pollution of Lake Koka**

Dear Mr. Hankey:

I am writing in response to your June 1, 2009 letter to my predecessor as President of the Oromo Studies Association (“OSA”), Dr. Abebe Adugna.

On behalf of OSA, I appreciate your stated commitment to sustainable development in Ethiopia and your willingness to engage in a dialogue on this important environmental issue, which impacts so many Ethiopians. I also appreciate your invitation to meet on this issue.

I respectfully disagree with your suggestion that my predecessor’s May 3, 2009 letter was not “fully research[ed].” As you know, a scientific study published in August 2002 observed that effluents from Ethiopia Tannery Share Company (“ETSC”) facility

might very likely contain highly toxic forms. In cases where such forms are available, bioaccumulation of the metals by aquatic biota is inevitable. Such metal accumulations are also very likely to occur in the biota of the terrestrial areas around these lakes.

A preliminary determination of heavy metal concentrations in the extract of watermelon grown around Lake Koka contained **alarmingly high concentrations** of [chromium, iron, nickel and lead].<sup>1</sup>

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<sup>1</sup> G.M. Zinabu & Nicholas J.G. Pearce, “Concentrations of heavy metals and related trace elements in some Ethiopian rift-valley lakes and their in-flows,” *Hydrobiologia* 429, 171-178 (2003) (emphasis added, internal citations omitted).

As reported by “People and Power,” many local residents identify the Pittards-run facility as an ongoing source of pollutants contaminating Lake Koka.<sup>2</sup> A local farmer whose livestock grazes by the tannery’s effluent stream recounted: “What comes from this factory has killed the cattle. It burns the plants. It’s no good for harvesting. It’s no good for people either.”<sup>3</sup>

Indeed, when interviewed on the subject, you apparently were unwilling to definitively rule out the Pittards facility as a source of pollutants: “Saying it’s all associated with the tannery in the northwest that we’re associated with is probably incorrect. That’s not to say that we’re saying there aren’t some issues. I don’t know if there are or aren’t. . . .”<sup>4</sup>

Unlike your earlier statement, your June 1, 2009 letter now denies without reservation that the tannery “is responsible in any way for any pollution found in Lake Koka.” None of the evidence you cite in your letter, however, appears to exonerate the tannery.

- While you mention that the tannery does not discharge effluent directly into the lake and that the effluent liquors are used to irrigate land within the boundaries of the ETSC compound, you do not state that those effluents are free of pollutants or that any pollutants do not find their way to the lake water. To the extent Pittards has conducted or is aware of any recent scientific studies showing that the heavy metals and other pollutants found around Lake Koka in the August 2002 study are not being discharged from the tannery, I ask that you please make those available.
- While you mention the tannery’s ISO 14001 accreditation, it is our understanding that obtaining ISO 14001 status does not require a firm to reduce pollution below specified levels or to use particular pollution control technologies. It is further our understanding that a firm does not even need to be in compliance with applicable regulations, but rather must declare a commitment to the goal of compliance. Moreover, critics have noted the conflicting interests of the consulting firms that perform ISO 14001 audits, which may call into question their reliability. I ask that Pittards make available all materials relating to ISO 14001 audits of the ETSC facility.
- While you include a statement from the Ministry of Trade and Industry (“MTI”), the MTI does not reference any recent water quality studies or other scientific evidence in connection with its claims. The statement merely recites – oftentimes word for word – the assertions made in your letter. I ask that Pittards make available any studies or other reports conducted by or on

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<sup>2</sup> “Green Lake,” *People and Power* (aired February 21, 2009).

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

behalf of the MTI or any other agency of the Ethiopian government relating to the tannery.

As my predecessor mentioned in his May 3, 2009 letter, Pittards can still do much good to help address this situation. As an initial matter, I ask that Pittards work with OSA and other appropriate organizations to conduct environmental assessments of the Lake Koka area in order to establish conclusively the sources of pollutants and to assist the relevant authorities in Ethiopia in devising and implementing a viable remediation plan. If Pittards believes that it is not causing harm to the Lake Koka environment, participation in such an endeavor would go a long ways towards dispelling the belief among local residents and others about the tannery's impact. Participation would also provide very tangible evidence of Pittards' stated commitment to sustainable development in Ethiopia. I would be happy to arrange a meeting with Pittards by representatives from my group to devise a plan agreeable to all interested parties.

I look forward to hearing from you.

Sincerely,

Haile Hirpa, Ph. D  
OSA President