

CITIZENS CONCERN FOR DAMS AND DEVELOPMENT

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SUBMISSION OF THE CITIZENS CONCERN FOR DAMS AND DEVELOPMENT IN RESPONSE TO CALL FOR COMMENTS TO THE PDD OF 66 MW Khuitam HEP, PROPOSED IN ARUNACHAL PRADESH

After perusal of the Project Design Document (PDD), Version 01 dated 21/06/2011(available on the UNFCCC website) of Khuitam Run-of-the-River Hydro Electric Project, Executive Summary of the Project and also the proceedings of the Public Hearing conducted on the proposed project at West Kameng District, Arunachal Pradesh, India and considering the views of affected villagers and the insistence for mega dam construction in almost all rivers and tributaries in India's North East, the organization have concluded that it will not be appropriate to accept the Khuitam HEP for CDM credits.

Some of the main reasons for this conclusion are outlined below.

1. The process and reasons of seeking additionality for Khuitam HEP to seek CDM is highly problematic and based on misrepresentation of facts and realities in India's North East (NE) and in particular, Arunachal Pradesh. As for instance, the reference in Page 2 under A.2 of the PDD for Khuitam HEP that in the absence of the project activity, same amount of electricity would have been supplied by the existing power plants connected to a new Integrated NEWNE grid, dominated by thermal power plants upto 73% and that the supply of electricity from this grid in absence of this project activity would have led to the emission of Greenhouse Gases, represents a highly misleading statement as the same energy could also have been supplied with due exploration of other viable alternative sources of energy. Moreover, the clubbing of the four regional grids Northern, Eastern, Western & North-Eastern into a new Integrated NEWNE grid, as outlined in page 19 of the PDD for Khuitam HEP, is only to use thermal projects domination for power source in some grids as pretext to clandestinely qualify the 'additionality' criteria to reap CDM benefits from Hydro projects.
2. As there is not even a single thermal power plant in India's North East and most of the power needs in the region and also power source in North East Grid comes from hydro projects, the project proponent tries to take cover under the integrated NEWNE Grid where some grids have substantial energy source from thermal plants in order to qualify for additionality clause. Because of such misrepresentation, this project is not fit to qualify for additionality clause for CDM benefits. The Central Electricity Authority (CEA) in its website and publications repeatedly outlined several projects already under implementation in NE and the energy source of NE Grid as mostly from hydro. The planning commission of India has clearly spelt out in various policy documents that the targeted capacity addition under 11th plan (upto 2012) is 100,000 MW. In Arunachal Pradesh, the entire electricity generation is hydro; there is not even a single thermal plant in this state. Indeed, Arunachal Pradesh has the highest number of mega dams planned across India. So, project proponent's stories about the project's additionality are baseless.
3. The Executive Summary of the EIA and EMP for Khuitam HEP, prepared by the Energy Infratech Pvt. Ltd, Gurgaon and also the deliberations by project authorities and the officials of the Arunachal Pradesh State Pollution Control Board at the Public hearing on 11 October 2010

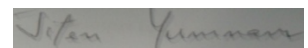
on the project at West Kameng did not outline and mention the needs and ongoing efforts for seeking CDM benefits to pursue the project. These constitute a serious denial of information and dubious moves of the project proponents to satisfy additionality criteria of the project.

4. The PDD failed to explore and address other alternatives for energy needs. The need for an option assessment, solar, wind, biomass, micro hydro as outlined by the World Commission on Dams has not been respected. Options include making the transmission and distribution of electricity more efficient and ensuring generation of electricity at optimum level for existing HEPs in NE. The insistence on Run of the River project and other mega dams in India's NE and hence seeking additionality for CDM credits is simply unacceptable and just constitute injustice.
5. Referring to A.4.4 of PDD, where the project activity stated to reduce 249,728 tones of CO₂e per year over the crediting period set at ten years and to generate electricity without any emission of local pollutants and suspended particulate matter etc, this is misrepresentation of realities as the emission of GHG from fossil fuels to be used during dam construction, due to massive destruction of forests for construction of the dam, during boring of tunnels and for construction of roads, the release of GHG gases from forest to be submerged by the 19 meters high Barrage is either not taken into consideration or omitted in the count of GHG emissions.
6. Referring to Page 42 of E3 of PDD under the Forest land compensation, the clarification by the President, Adishankar Power private Limited (APPL), during the public hearing on 11 October 2010 concerning the forest land submergence by the project activity that "the land shown under forest is actually river bed and is under water" is meaningless as affected villagers raised objections to forest area being identified as only 1.28 hectares. The Executive Summary of the EIA prepared for Khuitam had underestimated the forest area coverage of areas to be affected by the dam. The final report of the public hearing available widely while mentioning the need for rectification of the forest area presentation, did not mentioned the meaningless clarification of the President of the project proponent, APPL, as outlined in the PDD. Neither has the PDD mentioned that the total land requirement for the project is 49.14 Hectares as stated in the EIA nor has there been indication of the extent of forest land to be acquired for the project. This is clear evidence that the project proponent only insist on misrepresentation impact on forest.
7. Referring to Page 3 of A.2 of the PDD, the Khuitam HEP cannot be defined as sustainable, since it will adversely affect the local environment and the communities. Neither has the detailed project report, the EIA and the PDD prepared has not been formulated with the local communities nor has holistic impact assessment been conducted with their due participation. There will be both loss of faunal and floral species, especially fish species because of the barrage and the tunnel and will also drastically change and destroy the downstream river hydrology and biodiversity in all seasons. The EIA for the project tried to undermine the survival dependence of affected villagers from River Gang.
8. The PDD also wrongly informed that no one will be affected by the dam but at least 94 families will be affected by the Khuitam project as testified and raised by villagers during the public hearing on 11 October 2010 at Government Middle School, Salari, West Kameng District, Arunachal Pradesh. For Khuitam HEP, under social well being contribution, it is mentioned that the project activity will help in meeting the demand supply gap of electricity of the entire region. However, there is no specific assessment of the power needs of the people in Arunachal Pradesh or North East for that matter.

9. Under economic well being, the PDD outlined again that the project will benefit local people both in construction and operational phase which is misleading. In reality the construction of mega dams in India's North East involves bringing in non locals both for construction and for management, which has already led to social tensions, demographic impacts on indigenous populations and other health impacts. While the PDD identify the issue of bringing in non locals, there are no efforts to address these concerns. Arunachal Pradesh is facing serious issues and challenge, including conflicts due to influx of non-locals in indigenous peoples' territories. In North East, the construction of dams often involves bringing in of militaries, which further complicates ongoing conflicts and human rights violations.
10. The power need calculations, projections and benefits sought from CDM is neither based on the actual power needs of the NE region, or neither comes from the people of the NE region. The region is envisaged to supply the increasing needs of "growing economy" of metros of India and this efforts to target the rivers of NE will only lead to an unsustainable and destruction of our land, rivers and survival of the indigenous peoples of the region and there is no reason as to how such destructive processes can be considered for CDM benefits. And considering the series of dams built in NE region which is very much in excess of the power needs of the people in the region, it is clear that the regions resources are only been targeted to meet the energy needs of others at the cost of the people and resource of the region.
11. The mandatory need to ensure that people affected by mega dams are secured with their Right to Free Prior and Informed Consent as outlined by the UN Declaration on the Rights of Indigenous Peoples, 2007 and by various recommendations of UN human rights bodies concerning decision making and implementation of mega dams in India's North East continues to be ignored. The consideration for receiving support from CDM has never been discussed with the people of Arunachal Pradesh, nor there understanding of such complex and dubious carbon markets. The project proponents failed to introduce the participants that the Khuitam HEP is in the process of seeking CDM credits even during the public hearing process of 11 October 2010.
12. The Adhishankar Khuitam Power Private Limited, project proponent of Khuitam HEP, has very weak credentials concerning experiences in dam construction. There is no proper information about the project proponents, except providing its address in New Delhi. There is no information available on its experience of dam building, on success or failures. The company does not have any policy to ensure accountability and responsibility for any violations both during the construction and operation period of the project. The company has no policy to adhere to the guidelines and recommendations of the World Commission on Dams concerning construction of mega dams and for promotion of the human rights of indigenous peoples.

Under these explained circumstances, the validation of the Khuitam HEP in current form for CDM credits will be a very bad precedent, inappropriate and highly improper if the project gets validated, registered as CDM activity or gets CERs.

Signed by/-



(Jiten Yumnam)
Joint Secretary