

**June 14, 2006**

**Comments about  
Bhilangana Hydro Power Project in Uttaranchal, India**

**[This comment was sent to the Designated Operating Agency for the CDM validation for Bhilangana SHP on June 14 2006 and the DOA acknowledged the receipt of the comment.]**

While (relatively) small hydro projects like the 22.5 MW BHPP are desirable if taken up in proper manner, the project taken up as present should not be validated for the following reasons.

1. The project developer (Swasti Power Engineering Ltd) has not done any satisfactory consultation with the people in the affected villages. The local people have not been given any of the project documents like the detailed project report, have not been given the full environment impact assessment or environment management plan in the language that they can understand. Nor have the people been told in full about the adverse impacts of the project. This is clear violation of the rights of the people and also violation of the CDM norms for consultation of the stakeholders and the local people. The claim made by the proponents in the CDM PDD in this regard (section G 1) is misleading. Till this is corrected, the project should not be validated.

As a matter of fact, an intense agitation by the local people against the project has been going on for over two years, during which the local community people have also faced human right violations. We would be happy to provide material to substantiate this if required.

2. Section G.1 should have given details of the amount of total land to be taken for the project, which has not been given.

3. The PDD repeatedly makes the most shockingly misleading statement (section F.1, page 27 of PDD) "there is no negative impact on the environment due to the project activity". A project of this nature always causes significant negative impacts on the environment, including due to diversion of agricultural land, due to diversion of forest land, due to diversion of the Bhilangana (thus almost drying up of the stream even if we take into consideration the claim that project would release 0.25 cumecs discharge all the time, till the water return to the stream after tail end channel), blasting for the tunnels and diversion structure, addition of large number of outsiders to the area and the impacts thereof, the disposal of the muck created in the project activity, the laying of transmission lines & roads, noise and dust pollution during construction, increase of possibilities of soil erosion and land slides and so on. The project document should be honest on such impacts and should include management plan for such impacts.

4. The PDD contradicts itself as on the one hand it says that the power will be connected to the grid and exported to the Northern region (section A.2). In the last para in section B.1.1 (page 7) the PDD says the power will be exported to Punjab as per Power Purchase Agreement with Power Trading Corporation. (The PDD also justifies the need of the project in the name of power demand in the northern region.) On the other hand it claims (section F.1, page 27) that "With the availability of assured cost effective electricity, there is vast potential for the development of agro, horticultural and forest

based industries". Experience from other areas where such projects have been taken up so that such claims are unfounded as the grid connected power (that too mostly exported outside the state) does not benefit the local people.

5. The PDD makes wrong statement in section A.4.3 that "only fossil fuel fired power stations would contribute to major part of the future capacity additions" in the Northern region in future, when in reality, a very large number of big hydro projects are planned and under construction in the Northern Indian region. Moreover, the figure of energy shortage of 10.06% in 2004-5 is wrong, as per the report of the Northern Region Load Dispatch Centre ([www.nrlcdc.org](http://www.nrlcdc.org)), the shortage was 9.01%. The figure of growth rate in peak power of 11.39% given is also wrong. The correct way would be to look at the compound annual growth rate over the last decade, which figure is 4.7%.

6. Power generation data from small hydro projects in Uttaranchal shows (e.g. in the PDD of the Kaliganga small hydro in Uttaranchal, which was put up for validation during May 5 to June 4, 2006) that the Plant load factor of such projects is 20.7% generally. If that is the case how are the proponents claiming that for the proposed BHPP, the PLF would be 66.26% when it claims in section A.2 that "The project will produce around 130.59 GWh of electricity"?

7. The analysis and the conclusion there from on page 8-13 in section B.3 that project is additional is misleading and incorrect for the following reasons.

⇒ It would not be right to claim that step 0 does not apply to BHPP activity.

⇒ The alternatives listed in step 1a does not include some of the most important viable alternatives: Increase the output from existing plants, reduce transmission and distribution losses, increase end use efficiencies, reduce theft of power, other generation options including smaller hydro, biomass, solar, etc. Due to non-inclusion of these important and viable alternatives, the exercise of proving the project as additional remains suspect.

⇒ Rejection of Alternative on the grounds that the project cannot be taken up without the CDM credits is not correct as the project activities started before the CDM registration process started. As mentioned in point (f) on page 11, the project was allotted to the developer (on developer having expressed interest in the project) by the Uttar Pradesh govt before 2001.

⇒ The claim made (page 11) "The people who were affected by the Tehri dam have been given heavy monetary compensation" leading to "increased expectations and greed" is utterly wrong and misleading. As a matter of fact the struggle of the people affected by the Tehri dam to get just & proper rehabilitation as per the promised policies and provisions have been long and well known, which is not yet over. To say that they have been given "heavy monetary compensation" is totally wrong. To insinuate that people affected by such projects are driven by greed, that too when it comes from the developer of the project, is total travesty of justice and truth. The situation is exactly opposite, most developers in their greed to cut corners and reduce expenses, do injustice to the affected people.

⇒ Moreover, there is a separate ministry for non conventional sources of energy, at whose website ([www.mnes.nic.in](http://www.mnes.nic.in)) one can see the slew of incentives provided for small hydro projects. By not mentioning these, the proponents are trying to mislead the CDM process.

⇒ The figure of existing hydropower capacity in India at 27 000 MW given in step 4 is quite outdated. The existing capacity as on March 31, 2006 is over 32200 MW as per

Ministry of Power, Govt of India, see the website: [www.powermin.nic.in](http://www.powermin.nic.in). Similarly the current figure for small hydro installed capacity as on Dec 31, 2005 is 1747.98 MW and those under implementation is at 585.13 MW (annual report of MNES for 2005-6). Thus the claim on page 13 that “similar options as that of BHPP is not existent as of now” is totally wrong. A number of projects in comparable range are coming up in Northern India.

8. The baseline emission rate of 916 T / million units generated (section E.4) is much higher than what should be the figure. For example, the rate for the emission from the recently commissioned 20% of the existing capacity in the Northern Region comes to 720 T / MU, way below the assumption of 916 T / MU. Similarly, for Kaldigad, Kaliganga and madhyamaheshwar small hydro in Uttaranchal that came up for validation recently, the emission factor assumed is 839.87 T/ MU, way below the figure assumed for BHPP. If the project were to consider the project mix in Uttaranchal or Punjab (where the power from the project is expected to go), than the emission rate would be even lower.

9. The statement in section F.1 that “the irrigation facilities currently dry up in the lean discharge months...” gives a wrong picture. In reality the project is going to significantly alter the releases in the Bhilangana stream and impact both the irrigation water availability in the downstream areas and also the fisheries and other biodiversity in the stream. There is no mention of the full assessment of these impacts in the PDDs, and on the contrary an attempt has been made to give a contrary picture.

10. The claim in section G.2 that there is no requirement for NOC (No objection certificate) from the state pollution control board is completely wrong as NOC is required not just from the SPCB, but also from each of the panchayat in the project area.

11. The objectives of “open forum” stated in Section G.1 that the project is for it is to ensure project sustainability and help stakeholders contribute to the project is also incorrect. The objective of the public hearing process is supposed to be to get people’s views about the project’s acceptability, among other aspects and the public hearing process is supposed to be part of the decision making process.

12. The statement on page 30 of the PDD that “land inundation would not occur due to the BHPP” is not correct. Some inundation of the land at the diversion dam and also in the path of the tunnel/ channel / tail race canal.

Under the circumstances, the project in current form should not be validated.

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