

September 7, 2015

Mr. Hiroshi Watanabe
Governor, CEO
Japan Bank for International Cooperation (JBIC)

Re: Darlipali and Tanda Coal-fired Power Plants in India

Dear, Mr. Watanabe

We, the undersigned 19 organizations, are writing to express our concerns over the consideration of Japan Bank for International Cooperation (JBIC) to finance the Darlipali and Tanda Coal-Fired Power Plants in India. We have found that the projects fail to comply with the JBIC Guidelines for Confirmation of Environmental and Social Considerations (the Guidelines) in the following points:

1. Alternative options have not been considered in the EIA of Tanda Coal-fired Power Plant, and it is unclear whether information on alternative options was provided at the public consultations. The project does not comply with the Guidelines, which require the examination of alternative proposals and sufficient consultations with stakeholders via disclosure of information from an early stage.
2. In Darlipali, affected people filed a complaint to the High Court of Odisha, since blasting works have been carried out illegally. The blasting works have been carried out within the prohibited residential area by a company who does not have an adequate license. These projects do not comply with the Guidelines, which require the compliance with environmental laws and standards of the host nation and local governments concerned.
3. Although both EIAs states that expected SPM levels are 100 mg/Nm³, Indian Ministry of Environment and Forest (MoEF) does not accept more than 50 mg/Nm³ in their Environment Clearances for these projects. These projects violate the Guidelines, which require the compliance with environmental laws and standards of the host nation and local governments concerned.
4. Predicted ambient air qualities of SO₂ and PM₁₀ in both projects exceed the standards set in the IFC's Environmental, Health, and Safety Guidelines (EHS Guidelines), JBIC would violate the Guidelines, which require that JBIC ascertain whether the projects meet EHS Guidelines of the World Bank Group.
5. Since both Supercritical Plants of 800MW x 2 in Darlipali and 660MW x 2 in Tanda are "business as usual" plants in India, thus, any avoidance/minimization of GHGs has not been considered. These projects do not comply with the Guidelines, which stipulates GHG as one of the impacts to be examined.
6. It is unclear whether Resettlement and Rehabilitation Plans for both projects have been disclosed, and whether information on Resettlement and Rehabilitation Plans has been provided at the public consultations. These projects may not comply with the Guidelines, which require that the

resettlement action plans are made available to the public, and consultations are made with the affected people based on sufficient information made available to them in advance.

7. In Darlipali, compensations for 72 affected families (200 tribal people) have not been paid. An affected person filed a complaint on the non-compensation for his lost land to the High Court of Odisha, and the Court ordered the Government of Odisha to provide an appropriate compensation. The project does not comply with the Guidelines, which require the prior compensation at full replacement cost.

As mentioned in the above, it is obvious that the projects violate the several provisions of JBIC Guidelines, and we believe that your support for such projects could damage JBIC's reputation. Therefore, we urge JBIC to review these projects carefully, and to reject these projects based on the JBIC's Guidelines.

We look forward to your response.

Sincerely,

Signatories:

Organizations:

11.11.11, Belgium

BankTrack, International

CHANGE, Vietnam

Earthlife Africa Jhb, South Africa

Friend of the Earth France, France

Friend of the Earth Japan, Japan

Global Human Rights Communications, India

Greenpeace India, India

Human Rights Forum, India

Japan Center for a Sustainable Environment and Society (JACSES), Japan

Kiko Network, Japan

Korea Federation for Environmental Movements, South Korea

Oil Change International, USA

Rainforest Action Network, USA

Shimin Gaikou Centre, Japan

Sierra Club, USA

Ulu Foundation, USA

Umeedenao Community Citizen Board, Pakistan

Urgewald, Germany

Individual:

Shankar Sharma, Power Policy Analyst, India