

April 29, 2020

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Re: Supporting “High Quality” Construction on the Belt and Road – How Chinese Entities Can Protect People and the Environment in a COVID-19 World

Dear Minister Zhong Shan,

We represent over 260 organizations from across the world. Although we come from all corners of the globe, we share the same goal of protecting people and safeguarding the environment. In light of the global crisis posed by COVID-19, we believe that now is the time for all stakeholders – government, business, finance, civil society, and the public – to come together and find common ground more than ever. The COVID-19 pandemic lays bare the fact that international cooperation and transparency are crucial to ensure and maintain a healthy planet.

Supporting “High Quality” Construction on the Belt and Road. In February, China’s Ministry of Commerce and the China Development Bank (CDB) jointly issued a “Notice on the COVID-19 Pandemic Situation and Development of Financial Services in Supporting the High Quality Joint-Construction of the Belt and Road”.¹ The notice states that MOFCOM and CDB will facilitate financial relief to overseas projects in order to minimize the impact of the pandemic, as well as better serve the high-quality joint-construction of the Belt and Road and the overall situation of domestic economic and social development. The Ministry of Commerce is currently developing a list of projects negatively impacted by COVID-19 and in need of financial support, which it will pass on to the CDB. In turn, we understand that the CDB will provide additional support, through for example, low-cost loans, special working capital loans, foreign exchange and extended grace periods, for overseas projects deemed to be “high quality”. As Chinese companies seek to re-start overseas projects that have been impacted by the COVID-19 pandemic, we expect that other Chinese policy and commercial banks will begin to also step up support to offset losses and move these projects forward.

Healthier ecosystems lead to healthier societies. In light of this, we believe it is important to share with Chinese authorities our concern that certain projects, some of which directly impact local environments, communities, and livelihoods, should not be eligible for COVID-19 financial support due to pre-existing risks or controversies which were apparent long before the onset of the pandemic. If pursued, some of these projects would harm and or destroy forest, marine, desert, river, or other increasingly fragile and remaining intact ecosystems, and the people who depend upon them. COVID-19 has painfully highlighted how climate change and biodiversity loss hamper humanity’s ability to effectively combat pandemics, and it is clear that preemptively protecting the natural world plays a critical role in controlling future outbreaks.²

Defining and identifying “high quality” projects. We agree that projects eligible for COVID-19 financial relief should be “high quality”. It is encouraging to see the Ministry of Commerce take steps to promote financial support according to whether a project meets high standards and expectations. In qualifying

¹ 商合函【2020】61号 《关于应对新冠肺炎疫情 发挥开发性金融作用支持高质量共建“一带一路”的工作通知》

² John Scott, “How biodiversity loss is hurting our ability to combat pandemics”, World Economic Forum, March 9, 2020. <https://www.weforum.org/agenda/2020/03/biodiversity-loss-is-hurting-our-ability-to-prepare-for-pandemics/>; Under-Secretary-General of the United Nations and Executive Director of the UN Environment Programme Inger Andersen, “UNEP Statement on COVID-19”, United Nations Environment Programme (UNEP). <https://www.unenvironment.org/news-and-stories/statement/unep-statement-covid-19>;

projects as “high quality”, we believe that the following ten environmental and social issues should be considered:

1. Local community consultations are done according to free, prior, informed consent (FPIC) standards, per the 169 International Labor Organization Convention and the United Nations Declaration on the Rights of Indigenous Peoples.
2. Environmental impact assessments are robust, credible, comprehensive, transparent, assess full range of available alternatives, and account for cumulative impacts.
3. Project developers and financiers institute robust, accessible, and clear channels of communication with all relevant local stakeholders.
4. All relevant project information, such as pre-feasibility assessments, environmental impact assessments, project information, and other relevant information, should be disclosed (in the appropriate local language) to affected communities and stakeholders and allow for public feedback and participation starting from the earliest-planning phases to allow for better inclusive decision-making.
5. Projects should comply with international norms and best practices, including existing Chinese green finance policies such as the Green Credit Guidelines.
6. Projects should not negatively impact internationally (i.e. those protected by international conventions such as World Heritage, Ramsar, etc.) or national protected areas, key biodiversity areas, and old growth or primary forests.
7. Projects should not block free-flowing rivers, biological corridors, or migratory routes of animals listed by conventions on migratory species (i.e. Bonn Convention).
8. Projects should not contribute to the extinction of threatened species (i.e., per the IUCN Red List).
9. Projects should not trigger or exacerbate political, ethnic, labor, religious, intra-community, or resource-sharing domestic or transboundary conflicts.
10. Projects should not result in mass or involuntary displacement of local or indigenous communities, and should not encroach on cultural and religious sites.

Avoiding high-risk projects. For your reference, we include below a list of projects which we believe should either not be eligible for COVID-19 financial support, or should only be eligible if all concerns related to design and implementation are appropriately and effectively addressed to the satisfaction of local communities and stakeholders. At its core, this list of projects is based on criteria identified in the Ministry of Commerce and CDB announcement, that projects are “high quality”, comply with local laws, and have “controllable risks”.³ Furthermore, we believe this list can ultimately support the efforts of the Ministry of Commerce and Chinese financial institutions to identify and distinguish projects whose existing on the ground impacts may differ from those reported on paper.

We recognize that the world currently faces a troubled, uncertain future. We also recognize that there is a collective concern to revitalize the global economy. However, we believe the projects in the attached list will not contribute to a healthy recovery in the global economy, and may even intensify the environmental drivers – such as biodiversity loss, climate change, habitat destruction, loss of primary

³ 商合函【2020】61号《关于应对新冠肺炎疫情 发挥开发性金融作用支持高质量共建“一带一路”的工作通知》

forests, disruption of free flowing rivers – which increase the likelihood of recurring global pandemics in the future. **Given the following projects’ pre-existing environmental, social, or climate risks, we respectfully ask that the projects in their current form be excluded from COVID-19 financial relief, and that finance is targeted to projects that are truly “high quality”.**

A call to China’s financial institutions. Lastly, the joint notice of the Ministry of Commerce and the China Development Bank highlights the special role that the CDB may play in providing COVID-19 related financial support. However, a large range of Chinese financial institutions are actively supporting overseas projects and the development of the Belt and Road. We therefore believe that the above criteria for identifying “high quality” projects and the attached list of high-risk projects is relevant to Chinese financial sector actors more broadly, and can be useful for all banks interested in supporting high quality overseas projects that comply with local laws and relevant environmental and social standards. By conducting a thorough assessment of projects seeking financial support to offset the impacts of the COVID-19 pandemic, Chinese state actors and financial institutions can play an important role in realizing China’s commitment to build the “Green Belt and Road” while potentially supporting host countries in meeting United Nations Sustainable Development Goals.

Finally, we welcome the efforts of the Ministry of Commerce to establish a mechanism to ensure financing is directed to high quality overseas projects. The issue of transparency is fundamental to ensuring high quality development with shared benefits, and as such we urge the Ministry of Commerce and the China Development Bank to publish the list of projects that will receive financial support through this mechanism, including project details, locations and assessments to date.

As the world continues to reel from the ongoing impacts of climate change, and now COVID-19, it is more important than ever for us to find common ground in achieving a mutually beneficial, sustainable future together. We have reached out to you in good faith, and so look forward to any feedback. We hope to encourage an open and reciprocal communication with Chinese stakeholders.

We remain at your disposal should you need any additional information on projects listed here, or if you would like to discuss any other details contained in this letter.

Sincerely,

1. 350.org, International
2. A Rocha, Ghana
3. Acción Ecológica (Ecological Action), Ecuador
4. ACOVEF, Democratic Republic of Congo
5. Action Coalition on Climate Change, Uganda
6. Action Solidarité Tiers Monde, Luxembourg
7. Adana Çevre ve Tüketiciyi Koruma Derneği, Turkey
8. Adana Tabip Odası (Adana Medical Chamber), Turkey
9. AFM, Democratic Republic of Congo
10. Africa Institute for Energy Governance, Uganda
11. African Climate Reality Project, South Africa
12. African Initiative on Food security and Environment, Uganda
13. Agriculture Rural Development and Environmental Action, Bosnia and Herzegovina
14. Aid/Watch, Australia

15. Aksi Ekologi & Emansipasi Rakyat (AEER), Indonesia
16. ALERT, International
17. Alerte Congolaise pour l'Environnement et les Droits de l'Homme, Democratic Republic of Congo
18. Alianza Hondureña ante el Cambio Climático, Honduras
19. Alliance of Religions and Conservations, India
20. Alliance on Civic Initiatives Promotion, Kyrgyzstan
21. Amazon Watch, Ecuador
22. Amigas de la Tierra/Friends of the Earth Spain
23. Amis de l'Afrique Francophone-Bénin (AMAF-BENIN), Benin
24. Arab Watch Regional Coalition, Middle East & North Africa
25. Asia Pacific Forum on Women Law and Development, Thailand
26. Asian Peoples Movement on Debt and Development, Asia
27. Asociación Ambiente y Sociedad (Environment and Society Association - AAS), Colombia
28. Asociación Marianista de Acción Social (Marianist Association of Social Action - AMA), Peru
29. Associação Agroecológica Tijupá (Tijupá Agroecological Association), Brazil
30. Associação Alternativa Terrazul, Brazil
31. Associação dos Produtores Rurais Quilombolas de Santa Rosa dos Pretos, Brazil
32. Association de gestion des ressources naturelles et de la faune de la Comoé-Léraba, Burkina Faso
33. Association des Mamans pour la Lutte Contre le Traumatisme, Democratic Republic of Congo
34. Association of Environmental Journalists of Saint Petersburg, Russia
35. Association of Oil-affected Youth, Uganda
36. Association of Parks in Bulgaria, Bulgaria
37. B4future, Ecuador
38. Baikal Biosphere Reserve, Russia
39. Balkani Wildlife Society, Bulgaria
40. Balkanka Association, Bulgaria
41. Bangladesh Environmental Lawyers Association/Friends of the Earth Bangladesh
42. Bank Information Center, United States
43. BankTrack, Netherlands
44. Bee House, Myanmar
45. Biodiversity Conservation Center, Russia
46. Buliisa Initiative for Rural Development Organisation (BIRUDO), Uganda
47. Bunyoro Kitara Students Association, Uganda
48. Bureau for Regional Outreach Campaigns (BROC), Russia
49. Buryat Regional Organization for Baikal Lake, Russia
50. Cáritas Brasileira Regional Maranhão (Caritas Brazilian Regional Maranhão), Brazil
51. CENSAT Friends of the Earth Colombia, Colombia
52. Centar za zivotnu sredinu / Friends of the Earth Bosnia and Herzegovina
53. Center Civil and Media Initiatives, Ukraine
54. Center for Citizens Conserving, Uganda
55. Center for International Environmental Law, United States
56. Centre de National de la Recherche Scientifique, France
57. Centre de Recherche sur l'Environnement la Démocratie et les Droits de l'Homme, Democratic Republic of Congo
58. Centre for Constitutional Governance, Uganda

59. Centre for Energy Governance, Uganda
60. Centre for Environmental Justice / Friends of the Earth Sri Lanka
61. Centre for Human Rights and Civic Education (CHRCE), Kenya
62. Centre Mwabana, Democratic Republic of Congo
63. Centro Amazónico de Antropología y Aplicación Práctica, Peru
64. Centro Andino de Promoción y Difusión José María Arguedas, Peru
65. Centro de Documentación e Información de Bolivia, Bolivia
66. Centro de Documentación en Derechos Humanos "Segundo Montes Mozo SJ", Ecuador
67. Center for Public Policy and Human Rights, Peru
68. Centro Labor (Labor Center - COSME), Peru
69. Change Partnership, Belgium
70. Charity Distressed Children, Democratic Republic of Congo
71. Church Youth Department, Democratic Republic of Congo
72. Citizens Concern Africa, Uganda
73. Climate Action Network – Global
74. Climate Trace, Puerto Rico
75. Climaxi vzw, Belgium
76. Club Amis de l'Environnement (CAE), Democratic Republic of Congo
77. Coalition des Organisations de la Société Civile pour le Suivi des Réformes et de l'Action Publique, Democratic Republic of Congo
78. Colectivo Salvaginas (Salvaginas Collective), Bolivia
79. Comerg, Myanmar
80. Comisión Episcopal de Acción Social (Episcopal Commission on Social Action - CEAS), Peru
81. Comunidades Unidas, Colombia
82. Human Rights Commission of the Brazilian Bar Association - Maranhao Section, Brazil
83. Pastoral Land Commission – Maranhao, Brazil
84. Commons and Safeguards, Philippines
85. Community Empowerment and Social Justice Network (CEMSOJ), Nepal
86. Community Resource Centre Foundation, Thailand
87. Amazonian Community of Social Action Cordillera del Condor Mirador – CASCOMI, Ecuador
88. Confederation of Indigenous Nationalities of the Ecuadorian Amazon – CONFENIAE, Ecuador
89. Conseil Régional des Organisations Non Gouvernementales de Développement, Democratic Republic of Congo
90. CooperAccion, Peru
91. National Coordination of Indigenous Farming Territories and Protected Areas – CONTIOCAP, Bolivia
92. Coordinadora por el Medio Ambiente, Bolivia
93. deCOALonise, Kenya
94. Derechos Humanos y Medio Ambiente (Human Rights and Environment - DHUMA), Peru
95. Development centre 'Taraqqiet', Tajikistan
96. Doğu Akdeniz Çevre Dernekleri (East Mediterranean Environmental Associations), Turkey
97. Dront Ecological Center, Russia
98. EarthRights International, United States
99. EAST, Democratic Republic of Congo
100. Ecoa - Ecologia e Ação (Ecology and Action - Ecoa), Brazil
101. Endorois Welfare Council, Kenya

102. Environmental Paper Network, International
103. Environment Governance Institute, Uganda
104. Equitable Cambodia, Cambodia
105. Erzin Çevre Ve Tarihi Varlıları Koruma Derneği, Turkey
106. Erzin Yeşilkent Sulama Kooperatifi (Erzin Yeşilkent Irrigation Cooperative), Turkey
107. Federation des comites des pecheurs Individuels du lac Edourad, Democratic Republic of Congo
108. FGCA, Democratic Republic of Congo
109. Fórum Carajás, Brazil
110. Forum Des Engages Pour Le Développement Durable (FORED), Democratic Republic of Congo
111. Fórum Mudanças Climáticas E Justiça Socioambiental (FMCJS), Brazil
112. Foundation for the Conservation of the Earth, Nigeria
113. Foyer de Développement pour l'Autopromotion des Pygmées et Indigènes Défavorisés, Democratic Republic of Congo
114. FPJAD, Democratic Republic of Congo
115. Friends of Nature, Uganda
116. Friends of the Earth Finland
117. Friends of the Earth Japan
118. Friends of the Earth US
119. Friends of the Siberian Forests, Russia
120. Friends with Environment in Development, Uganda
121. Fundación Ambiente y Recursos Naturales, Argentina
122. Fundación de Investigaciones Chamanistas (Shamanic Research Foundation), Colombia
123. Fundación EcuMénica para el Desarrollo y la Paz, Peru
124. Fundación para el Desarrollo de Políticas Sustentables, Argentina
125. Fundación Tantí (Tanti Foundation), Chile
126. Fundacja "Rozwój TAK - Odkrywki NIE", Poland
127. Gastivists Collective, International
128. GegenStromung – Counter Current / Institut für Ökologie und Aktions-Ethnologie, Germany
129. Gender Action, United States
130. German-Russian Exchange, Russia
131. Graffen Organisation – Butimba, Uganda
132. Grande Action pour le Développement (GAD), Democratic Republic of Congo
133. Green Innovation and Development Centre, Vietnam
134. Greenpeace – Russia
135. Groundwork / Friends of the Earth South Africa
136. GRUFIDES, Peru
137. Grupo de Estudos: Desenvolvimento Modernidade e Meio Ambiente, da Universidade Federal do Maranhão, Brazil
138. Grupo de Trabajo sobre “Fronteras, regionalización y globalización en América” del Consejo Latinoamericano de Ciencias Sociales, Brazil
139. Guild Presidents’ Forum on Energy Governance, Uganda
140. Humanitarian Action for Sustainable Development, Democratic Republic of Congo
141. Igapo Project, France
142. Inclusive Development International, United States
143. Individuell Människohjälp, Sweden

144. Infostelle, Peru
145. China Latin America Sustainable Investments Initiative (IISCAL), Latin America
146. Innovation pour le Développement et la Protection de l'Environnement, Democratic Republic of Congo
147. Integrated Social Development Effort (ISDE), Bangladesh
148. Interamerican Association for Environmental Defense, International
149. International Accountability Project, International
150. International Association of River Keepers Eco-TIRAS, Moldova
151. International Rivers, United States
152. İskenderun Çevre Derneği (İskenderun Environment Association), Turkey
153. Jamaa Resource Initiatives, Kenya
154. Jordens Vänner/ Friends of the Earth, Sweden
155. Jump Flow, Russia
156. Justiça nos Trilhos (Justice on the Rails), Brazil
157. Justice-Plus, Democratic Republic of Congo
158. Justicia Ambiental! / Friends of the Earth Mozambique
159. Karambi Action for Life Improvement, Uganda
160. Karen Environmental and Social Action Network, Myanmar
161. Karen Peace Support Network, Myanmar
162. Kasese Citizens Coalition to Safeguard Biodiversity, Uganda
163. Kasese District Development Network, Uganda
164. Kasese Women for Development, Uganda
165. Katwe Sanitation and Clean Energy Women's Club, Uganda
166. Kwataniza Women's Group, Uganda
167. La Commission Justice et Paix (Justice and Peace Commission), Belgium
168. Laboratory for a Wellbeing Economy, Costa Rica
169. LEAT, Tanzania
170. Leave it in the Ground Initiative (LINGO), Germany
171. Legal Rights and Natural Resources Center-Kasama sa Kalikasan / Friends of the Earth Philippines
172. Maiden, Democratic Republic of Congo
173. Manushya Foundation, Thailand
174. Mekong Community Institute, Thailand
175. Mekong Watch, Japan
176. Mersin Çevre Derneği (Mersin Environmental Association), Turkey
177. Mighty Earth, United States
178. Milieudefensie/ Friends of the Earth Netherlands
179. Moldova is my Motherland, Moldova
180. Mouvement Ecologique Friends of the Earth Luxembourg
181. Movimento de Defesa da Ilha (Island Defense Movement), Brazil
182. Myanmar Alliance for Transparency and Accountability, Myanmar
183. NGI "TRIZ - Moldova", Moldova
184. NGO "Bahna", Belarus
185. NGO "Ecological club "Kraj", Ukraine
186. NGO Forum on Asian Development Bank, Asia
187. NGO Forum on Cambodia, Cambodia

188. NGO Green Home, Montenegro
189. O.ZERO, Ukraine
190. Oil Refinery Residents Association, Uganda
191. Oil Workers' Rights Protection Organization Public Union, Azerbaijan
192. ONFEC, Democratic Republic of Congo
193. ONG Arte-Mojó (NGO Arte-Mojó), Brazil
194. Organic Agriculture Association, Albania
195. Organisation of Health and Development, Democratic Republic of Congo
196. Organización del Pueblo Shuar Arumtan, Ecuador
197. Organizing Committee of the Animal Protection Party, Russia
198. Oxfam - Vietnam
199. Oyu Tolgoi Watch NGO, Mongolia
200. Pastoral Social Caritas Tajira (Caritas Social Pastoral Tarija), Bolivia
201. Pastoral Social del Vicariato de Jaen (Social Pastoral of the Vicariate of Jaen), Peru
202. Paung Ku, Myanmar
203. Paxdei / Ituri, Democratic Republic of Congo
204. Pengebangan Ekonomi Dan Teknologui Rakyat Selaras Alam (PETRASA), Indonesia
205. People of Asia for Climate Solutions, Philippines
206. Perhimpunan Bantuan Hukum & Advokasi Rakyat Sumatera Utara (Bakumsu), Indonesia
207. Plataforma de la Sociedad Civil sobre Empresas y Derechos Humanos, Peru
208. Pro-Trebujeni, Moldova
209. Program of Action for Development Community, Democratic Republic of Congo
210. Programme Intégré pour le Développement du peuple Pygmée (PIDP), Democratic Republic of Congo
211. Public Interest Law Center, Chad
212. Puget Soundkeeper Alliance, United States
213. Red Eclesial Panamazónica (Pan-Amazonian Ecclesial Network - REPAM), Ecuador
214. Red Latinoamericana Iglesias y Minería (Latin American Churches and Mining Network), Peru
215. Red Muqui (Muqui Network), Peru
216. Red Peruana por una Globalización con Equidad, Peru
217. Red Regional Agua, Desarrollo y Democracia, Peru
218. Red Uniendo Manos (Bringing Hands Together Network), Peru
219. Research and Support Center for Development Alternatives - Indian Ocean, Madagascar
220. Responsible Business Lab, Australia
221. Rivers without Boundaries, International
222. Rural Integrated Center for Community Empowerment, Liberia
223. Russian Social-Ecological Union / Friends of the Earth Russia
224. Sahabat Alam Malaysia / Friends of the Earth Malaysia
225. Save Lamu, Kenya
226. Save the Natural Resources, Myanmar
227. SEA, Democratic Republic of Congo
228. Section on Great Apes of the International Union for Conservation of Nature (IUCN) SSC Primate Specialist Group, International
229. Union Section of the National Union of Teachers of Higher Education Institutions at the Federal University of Maranhao (APRUMA), Brazil

230. Sindicato dos Trabalhadores na Pesca e na Aquicultura do Município de São Luís, Brazil
231. Socio-ecological Union International, Russia
232. SORADEC, Democratic Republic of Congo
233. South East Europe Network on Natural Resources, Energy, and Transport, Southeast Europe
234. South Western Institute for Policy and Advocacy, Uganda
235. Sumatran Orangutan Society, United Kingdom
236. Sustentarse, Chile
237. Synergie des Ecologistes pour la Paix et le Développement (SEPD), Democratic Republic of Congo
238. Synergie des Jeunes pour le Développement et les Droits Humains, Democratic Republic of Congo
239. Synergie des Vanniers Amies de la Nature (SVAN), Democratic Republic of Congo
240. Synérgie Ukingo Wetu (SUWE), Democratic Republic of Congo
241. Tajik Social and Ecological Union (TSEU), Tajikistan
242. Tarsus Çevre Derneği (Tarsus Environmental Association), Turkey
243. TEMA Foundation, Turkey
244. Terra-1530, Moldova
245. Twimukye Womens Organisation, Uganda
246. Umbrella for journalists in Kasese, Uganda
247. União Beneficente dos Moradores de Rio dos Cachorros, Brazil
248. Union of Quilombola Rural Black Communities of Itapecuru-Mirim – Maranhão, Brazil
249. União de Moradores do Taim (Taim Residents Union), Brazil
250. Union des Familles pour la Recherche de la Paix (UFAREP), Democratic Republic of Congo
251. Union for Defense of the Aral Sea and Amudarya, Uzbekistan
252. urgewald e.V., Germany
253. Wahana Lingkungan Hidup Indonesia (WALHI) / Friends of the Earth Indonesia
254. Wahana Lingkungan Hidup Indonesia (WALHI) - West Java, Indonesia
255. Water and Electricity Consumers' Association, Uganda
256. Witness Radio – Uganda, Uganda
257. WomanHealth, Philippines
258. WoMin, South Africa
259. World Heritage Watch, Germany
260. World Peace Protection, Democratic Republic of Congo
261. World Voices, Uganda
262. World Wildlife Fund - Turkey
263. Yayasan Diakonia Pelangi Kasih (YDPK), Indonesia
264. Yayasan HAKA (Yayasan Hutan Alam dan Lingkungan Aceh), Indonesia
265. Zeleno dvizhenie, Bulgaria

High Risk Projects

The following projects were identified by civil society groups as containing major environmental, social, biodiversity, or climate risks prior to the onset of COVID-19. Due to local discontent with the project location, concept, or development, many projects listed below have already become extremely controversial. As such, these projects should not be considered “high quality”, particularly as many of them are not in full compliance with local law and/or may have uncontrollable risks. As such, they should not be deemed eligible for financial relief, or should only be eligible if local and affected communities are fully satisfied and involved in any project re-design and implementation.

For further information, we attach an appendix with additional details regarding each of the listed projects, and our rationale for their inclusion.

1. Amazarsky Saw and Paper Mill and Loguhe-Pokrovka Border Crossing, Russia
2. Amazon Waterway Project, Peru
3. Bandung High Speed Rail, Indonesia
4. Batang Toru Hydropower Project, Indonesia
5. Cambodian Coal Power Plants, Cambodia
6. Canal "Eurasia" Project, Russia and Kazakhstan
7. Cauchari-Olaroz Lithium Project, Argentina
8. Coal Projects under the Midterm Energy Program, Mongolia
9. Condor Cliff- Barrancosa Hydroelectric Complex, Argentina
10. Dairi Prima Minerals Zinc Mine, Indonesia
11. East African Crude Oil Pipeline, Uganda and Tanzania
12. El Nogal Oil Block, Colombia
13. Eldorado Vanguarda 2 Mill, Brazil
14. Emba Hunutlu Coal Plant, Turkey
15. Expansion of the SQM Lithium Carbonate Plant, Chile
16. Ghana Integrated Aluminum Development Agenda, Ghana
17. Global Energy Interconnection (GEI) Scheme, Global
18. Golden Veroleum Liberia Palm Oil Plantations, Liberia
19. Henda-Siberia Industrial Logging Project, Russia
20. HUBCO Thar Coal Power Project, Pakistan
21. Imported Coal-based Power Plant at Gwadar, Pakistan
22. Inga 3 Hydropower Dam, Democratic Republic of Congo
23. Julius Nyerere Hydropower Plant, Tanzania
24. Kaliwa Dam New Centennial Water Source Project (NCWSP), Philippines
25. Karsa Waste-to-Energy Power Plant, Ukraine
26. Kingfisher Oil Project, Uganda
27. Koukoutamba Dam, Guinea
28. Kyauk Phyu Special Economic Zone, Myanmar
29. Lamu Coal Plant, Kenya
30. Las Bambas Copper Mine, Peru
31. Mekong Mainstream Hydropower Dams, Laos
32. Masindi Park Junction and Tangi Junction Para-Buliisa Road Expansion, Uganda

33. Mirador Copper Mine, Ecuador
34. Muse-Mandalay Railway, Myanmar
35. Myitkyina Industrial Zone (also known as Namjin Industrial Zone), Myanmar
36. Nam Ou Hydropower Dam Cascade, Laos
37. Northern Sea Route Oil and Gas Projects, Russian Arctic
38. Obi Island Battery-grade Nickel Smelter Project, Indonesia
39. PLTA Hydropower 1-5 Sungai Kayan, Indonesia
40. Port Qasim Datang Coal Power Plant, Pakistan
41. Port Qasim Lucky Coal Power Plant, Pakistan
42. Power of Siberia-II Gas Pipeline, Russia, Mongolia, and China
43. PT Weda Bay Nickel Smelter, Indonesia
44. Rio Blanco Copper Mine, Ecuador
45. Rio Blanco Copper Mine, Peru
46. Rogun Hydrodam Project, Tajikistan
47. Rovuma LNG Project, Mozambique
48. Salween River Mainstream Hydropower Dams, Myanmar
49. San Carlos Panantza Copper Mine, Ecuador
50. San Luis Port, Brazil
51. Sao Manuel Hydroelectric Dam, Brazil
52. Société Camerounaise de Palmeraies (Socapalm) Palm Oil Plantations, Cameroon
53. Sombwe Dam, Democratic Republic of Congo
54. South Pulangi Hydroelectric Power Plant Project, Philippines
55. SSRL Thar Coal-I 6.8Mtpa & Power Plant, Pakistan
56. Sumsel 1 Coal Plant, Indonesia
57. Tampur Dam Project, Indonesia
58. Toromocho Copper Mining, Peru
59. Water Infrastructure Mega-projects in the “Blue Horse” Program, Mongolia
60. Zashulansky Coal Mine, Russia

Appendix – Profiles of Selected Projects

This appendix contains additional information regarding the relevant environmental, social, climate, legal, and/or financial risks of listed projects. As referenced in our statement, these projects should not be eligible for COVID-19 relief as we do not believe they meet that standard of “high quality” projects, violate local laws, or contain “uncontrollable risks”. Please find supporting information below.

Amazarsky Saw and Paper Mill and Loguhe-Pokrovka Border Crossing

Zabaikalsky Province, Russia

Agribusiness – Pulp and Paper

Financier: China Development Bank

Key Project Developers/Contractors: Heilongjiang Xingbang Guoji, Heilongjiang Longxin Co.

Project Status: Suspended

Heilongjiang Xingbang Guoji Co. began developing Amazarsky Saw and Pulp Mill Project in 2005 using a loan from China Development Bank. The project is situated along the Sino-Russian border in the last remaining areas of primary biodiversity rich forests. The project planned on logging three million hectares of forest, developing a reservoir for industrial water supply, and building a road to expedite exports.

In this case, road development is extremely problematic as it will accelerate habitat and biodiversity loss, while increased access to the wilderness will enable poaching and additional industrial activities in previously untouched ecosystems. The Amazar River contains the endangered Siberian Taimen, the largest salmonid in the world. In addition, logging operations and new roads will threaten the traditional land use of local communities and Evenki indigenous people.

The environmental impact assessment was incomplete and results of public consultations were contested. Due to the controversial project risks, both Shenzhen and Hong Kong Stock Exchanges banned the project’s developer from trading stocks. In 2019, the Russian Ministry of Commerce and Industry stripped the project of the “priority investment” status due to unfulfilled obligations, and 750,000 ha of forest leases have been revoked.

Since 2013, local scientists, activists and communities have fought to stop the project. Local communities are pleased with the project’s suspension, and are now calling for no further investment in the Amazar Mill. They are also calling for the area to be legally protected due to its rich biodiversity, and for a legally non-compliant dam built on the Amazar River to be removed.

- “Dodgy Deal Profile: Amazar Pulp and Saw Mill”, Banktrack.

https://www.banktrack.org/project/amazarsky_pulp_and_paper_mill

- “Amazar”, Rivers without Boundaries coalition (RwB), 2013-2020. <https://www.transrivers.org/?s=Amazar>

- “The end of the misguided Amazar pulp mill project?” Merel Van der Mark, Environmental Paper Network, January 10, 2020. <https://environmentalpaper.org/2020/01/the-end-of-the-misguided-amazar-pulp-mill-project/>

Amazon Waterway Project

Loreto and Ucayali, Amazon region, Peru

Infrastructure - Transportation

Financier: Sinohydro

Key Project Developers: Sinohydro and CASA

Project Status: Stalled

The Amazon Waterway project involves dredging 2,687 km in the four most important Amazon rivers in Peru: Marañon, Ucayali, Huallaga and Amazonas. These rivers are the most important food sources for riverside populations. Significantly, the environmental impact assessment (EIA) and the Engineering Study does not provide conclusive or complete information about the environmental and social impacts. Neither does it confirm viability of the project, as designed in the concession contract.

The Amazon Waterway will affect fourteen indigenous populations that inhabit the areas of concern, causing transboundary impacts to the Amazon's hydro corridors and ecosystems. The project would also dispossess Peruvian and Brazilian fishing and farming communities of their livelihoods. Currently, the project is stalled because the project developers were not able to correct more than 400 issues in the EIA. In addition, the ecotoxicity studies requested by the National Environmental Certification Service for Sustainable Investments have not been presented by the company or the Ministry of Transportation.

The Cocama Development and Conservation Association of San Pablo of Tipishca, representing 64 communities living alongside the Marañon, Chambira, Ucayali and Amazonas rivers, are asking for the cancellation of the project. A larger number of national and local social organizations in Peru support this request and also demand that rivers never be developed.

- "Hidrovia Amazónica: cuestionado proyecto entrampado por problemas con el estudio de impacto ambiental," Mongabay, January 29, 2020. <https://es.mongabay.com/2020/01/hidrovia-amazonica-estudio-de-impacto-ambiental/>

- "Hidrovia: ¿qué espera el gobierno para anular un proyecto inviable?," SERVINDI, January 20, 2020. <https://www.servindi.org/actualidad-noticias/19/01/2020/hidrovia-amazonica-que-espera-el-estado-para-terminar-con-este>

- "Investigados por corrupción ligados a licitación de la Hidrovia Amazónica," Diálogo Chino, December 20, 2019. <https://dialogochino.net/es/infraestructura-es/32203-investigados-por-corrupcion-ligados-a-licitacion-de-la-hidrovia-amazonica/>

Bandung High Speed Rail

West Java Province and Jakarta, Java Island, Indonesia

Infrastructure – Rail

Financier: China Development Bank

Key Project Developers/Contractors: PT Kereta Cepat Indonesia China (KCIC), China Railway International Co. Ltd (CRIC), and PT Pilar Sinergi BUMN Indonesia (PT PSBI)

Project Status: Construction

The US\$6.07 billion Jakarta-Bandung High Speed Rail project is a 142 km rail line which has attracted international attention for its numerous legal, environmental, social, and financial risks. The approvals and reviews process was extremely rushed, leading to the violation of at least six Indonesian laws. For instance, Country Law No. 32/2009 regarding Environment Management and Control requires that the environmental impact assessment be developed over at least one year (and include analysis for both dry and rainy seasons) for a project of this scale. However, the EIA was completed in less than 6 months, meaning the EIA contains inaccurate and flawed data analysis regarding the project's actual environmental impacts.

The project also violated Government Regulation No. 27/2012 regarding environmental permits, which requires public participation in the making of the EIA document. However, public participation and concerns were not included in the EIA document. As a result, the project has led to the loss of livelihood and homes of many local communities, disrupted the region's water catchment areas, and promoted a shift from community farms to monoculture plantations, which will likely over-exploit existing water resources in the region. Due to the project's design defects, planned route through numerous geological faults, and strong local opposition, the rail project has encountered increasing delays and financial costs.

From the outset, local communities and environmental organizations have called for the project to be cancelled for its high cost and minimal benefit to the Indonesian public. Currently, affected communities have reported that project developers have ignored or created additional barriers which prevent access to redress or compensation.

- "CSOs raise concerns on environmental & social impact of Jakarta-Bandung High Speed Rail invested by China Development Bank", Business and Human Rights Resource Center. <https://www.business-humanrights.org/en/indonesia-csos-raise-concerns-on-environmental-social-impact-of-jakarta-bandung-high-speed-rail-invested-by-china-development-bank>
- "Minister urges KCIC to apply recommendation on project suspension", Antara News, 4 March 2020. <https://en.antaranews.com/news/142802/minister-urges-kcic-to-apply-recommendation-on-project-suspension>
- "SOE Ministry demands assessment of halted high-speed railway project", Jakarta Post, 2 March 2020. <https://www.thejakartapost.com/news/2020/03/02/soe-ministry-demands-assessment-of-halted-high-speed-railway-project.html>
- "Jakarta-Bandung high-speed railway project delayed", Jakarta Post, 17 April 2020. <https://www.thejakartapost.com/news/2020/04/17/jakarta-bandung-high-speed-railway-project-delayed.html>

Batang Toru Hydropower Project

North Sumatra, Indonesia

Energy - Hydropower

Financier: Bank of China (tentative financing)

Key Project Developer/Contractors: PT NSHE, Zhefu Holding Group, Sinohydro

Project Status: Construction (suspended)

The Batang Toru Hydropower project is located in one of the most biodiverse, primary forests left in North Sumatra. The project's environmental impact assessment contained serious omissions and inaccurate information, including failing to recognize key critically endangered species such as the Tapanuli orangutan, in addition to a forged signature. Local communities have long opposed the dam development, and scientists have warned that the dam's development will lead to the extinction of the rarest great ape, the Tapanuli orangutan.

Since 2017, WALHI, the largest and oldest environmental network in Indonesia, has called for the project to be cancelled due to its negative environmental, biodiversity, and social impacts.

- "Open Letter to Bank of China", WALHI North Sumatra. <https://www.walhi.or.id/index.php/open-letter-to-bank-of-china>
- "Bank of China to evaluate Batang Toru hydropower plant project", The Jakarta Post, 14 March 2019. <https://www.thejakartapost.com/news/2019/03/14/bank-of-china-to-evaluate-batang-toru-hydropower-plant-project.html>
- "IUCN calls for a moratorium on projects impacting the Critically Endangered Tapanuli orangutan", International Union for Conservation of Nature, 16 April 2019. <https://www.iucn.org/news/secretariat/201904/iucn-calls-a-moratorium-projects-impacting-critically-endangered-tapanuli-orangutan>

Cambodian Coal Power Plants

Location: Koh Kong province and Oddar Meanchey province, Cambodia

Energy - Coal

Financiers: Unconfirmed

Key Project Developers/Contractors: Royal Group and Sinosteel Equipment & Engineering (Koh Kong plant) Han Seng Coal Mines & Guodian Kangneng Technology (Oddar Meanchey plant)

Project Status: Planned

In February 2020, Cambodia's Council of Ministers approved two new coal plants, both to be developed by Cambodian-Chinese joint ventures. A 265 MW plant and coal mine was approved in northwest Oddar Meanchey province, and a 700 MW coastal plant in southwest Koh Kong province. The projects are projected to be completed in 2024. After sign-off from the Council of Ministers, the projects moved quickly through the National Assembly and Senate and a power purchase agreement was approved in late March.

Local groups were concerned at the speed with which the projects moved forward. It is unknown if either has been subject to an environmental impact assessment, as required under Cambodian law. If an assessment was conducted, it has not been published and did not involve public consultation, which is not in compliance with Cambodian legal requirements. The two projects would double Cambodia's current coal power generating capacity, pushing the country towards a heavily fossil fuel dominated energy mix. At present, Cambodia generates less than 1 percent of its energy from solar power and has no wind farms. Cambodian environmental groups have appealed to the state and investors to prioritize development of the renewable sector, and Chinese companies can potentially play a crucial role here, rather than locking the country into a fossil fuel dominated future.

Canal "Eurasia" Project

Russia

Infrastructure - Transportation

Financiers: Unconfirmed

Key Project Developers/Contractors: Port Lagan LLC, Azov Shipping Co., Sinohydro, China Energy Engineering Corporation (CEEC) and China Poly Group.

Project Status: Planning

In 2007, Kazakhstan President Nazarbayev proposed to Russia the development of a shipping canal between the Caspian and Black Sea, which would connect landlocked Kazakhstan to the Black Sea through Russia. Sinohydro is involved in the feasibility study for this navigation waterway. Estimated costs have so far exceeded US\$10 billion.

Since 2019, Port Lagan LLC has reported that the China Energy Engineering Corporation (CEEC) and Poly Group have been preparing a feasibility study and construction of Port Lagan at the canal mouth in Kalmykia republic of Russia on the Caspian Sea.

Canal construction would negatively impact the Ramsar wetlands of the Kuma-Manych Depression between Casian and Black Seas. It would also degrade the "Black Soils" and "Rostovsky" UNESCO biosphere reserves, disrupt the migration of critically endangered saiga antelope, facilitate the invasion of alien species, increase oil pollution risk, and intensify soil salinization. The Canal's negative impacts are similar to other mega-projects such as the planned E40 waterway from Black Sea to the Baltics, which would cross Ukraine, Belarus and Poland. The E40 waterway project will destroy wetlands and Polesie Forest, the largest remaining European wilderness.

Civil society groups are calling on stopping the canal and similar mega-waterways. Instead, sustainable, alternative transportation schemes should be considered.

- "Canal "Eurasia: Environmental and socio-economic consequences and threats", Dr. Vladimir Krivoshey, Russian Geographic Society, 2010. <http://npncvp.ru/doklad-proekt-kanala-evraziya.html>
- "Kalmykia refuses to build navigation canal proposed by Kazakhstan and China", Kursiv Media, August 2, 2018. <https://www.kursiv.kz/news/vlast/vlasti-kalmykii-ne-gotovy-k-predlozennoj-kazahstanom-i-kitaem-postrojke-sudohodnogo-kanala-evrazia/>
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- "Moscow Now Seeking to Make the Caspian Both a North-South and an East-West Hub", Paul Goble, Eurasia Monitor, March 24, 2020. <https://jamestown.org/program/moscow-now-seeking-to-make-the-caspian-both-a-north-south-and-an-east-west-hub/>
- "Dodgy Deal: E40 Inland Waterway", Banktrack. https://www.banktrack.org/project/e40_waterway
- "The race to save Polesia, Europe's secret Amazon", The Guardian. March 6, 2020. <https://www.theguardian.com/world/2020/mar/06/the-race-to-save-polesia-europes-secret-amazon-aoe>

Cauchari-Olaroz Lithium Project

Susques department, Jujuy Province, Argentina

Mining

Financiers: Unconfirmed

Key Project Developer: Jiangxi Ganfeng Lithium Co. Ltd.

Project Status: Construction

The Cauchari-Olaroz Lithium Project will impact ten indigenous territories and is located in fragile desert ecosystems that suffer from chronic water shortages. As such, local communities are concerned that mining will over-exploit or deplete already limited water resources, thus leading to water shortages for local communities. Lithium extraction will alter surface water systems which will also affect ancestral “salt harvesting” practices. The Apacheta Network, a group of communities and small producers in Susques, complained in court that the communities' right to free, prior and informed consent was not fulfilled.

Local communities reject all types of large-scale extraction of raw materials and require governments (municipal, provincial and national) not to take or carry out any decision or negotiation with the company that involves their territories.

- “Estudio de los Recursos Hídricos y el Impacto por Explotación Minera de Litio,” FARN, December 2018. <https://farn.org.ar/wpcontent/plugins/downloadattachments/includes/download.php?id=26988>
- “Extracción de litio en Argentina: un estudio de caso sobre los impactos sociales y ambientales,” FARN, May, 2019. https://farn.org.ar/wp-content/uploads/2019/05/DOC_LITIO_ESPAÑOL.pdf
- “Comunidad atacameña de Jujuy anuncia acción judicial para detener proyecto de litio. No a la mina,” December 7, 2017. <https://noalamina.org/argentina/jujuy/item/38192-comunidad-atacamena-de-jujuy-anuncia-accion-judicial-para-detener-proyecto-de-litio>
- “Litio y espejos de colores,” Observatorio Petróleo Sur,” November 29, 2018. <http://www.opsur.org.ar/blog/2018/11/29/litio-y-espejos-de-colores/>

Coal Projects under the Midterm Energy Program of Mongolia

Energy - Coal

Financier: World Bank and unconfirmed Chinese financiers

Key Project Developers/Contractors: Datang & China Nuclear Co. (Baganur Coal Plant), China Merchants Construction and Development Group (Buuruljuut Coal Plant), Erdenes Mongol LLC & China State Grid (Shivee Ovoo Coal Plant) Bodi International LLC.

Project Status: Construction (Baganuur), Planning (Buuruljuut and Shivee-ovoo).

Mongolia's Midterm Energy Program (2018-2023) necessitates borrowing at least US\$4 billion, a large proportion of which Mongolia is seeking from Chinese sources. This plan includes a number of coal power plants, including: the Shivee ovoo Coal Plant (5GW), Baganuur Coal Plant (700MW), and Buuruljuut Coal Plant (300MW).

Project risks include increased dependence on coal, increased pollution and emissions, and over-exploitation of water sources. For instance, the Baganuur power plant is adjacent to the Kherlen river and will cause water and air pollution. The Shivee Ovoo Coal Plant will exhaust local groundwater supplies. All projects suffer from substandard environmental impact assessments, insufficient public participation/community consultations, and lack of consent from local communities.

The World Bank is involved in the Baganuur project. OTWatch and other local groups filed a complaint to the World Bank Inspection Panel regarding potential impacts of the associated Baganuur coal mine expansion. As a result of civil society and activist efforts, construction of the 700 MW power plant was stalled in 2018. They continue to call for a stop to these projects, and call on Chinese banks to not finance thermal coal plants and coal mines in Mongolia.

- "Pitfalls of the Mid-term Energy Program of Mongolia", Rivers without Boundaries, December 6, 2018. <http://www.transrivers.org/2018/2477/>
- "World Bank Panel Registers Two Requests for Inspection of MINIS Project", World Bank Inspection Panel, May 16, 2018. <https://www.inspectionpanel.org/news/panel-registers-two-requests-inspection-minis-project-mongolia-issues-notice-non-registration>
- "The Mongolian electricity sector in the context of international climate mitigation efforts", Frederic Hans, Leonardo Nascimento, Tessa Schiefer, Sofia Gonzales-Zuñiga, Himalaya Bir Shrestha and Frauke Röser, New Climate Institute. March 16, 2020. <https://newclimate.org/2020/03/16/the-mongolian-electricity-sector-in-the-context-of-international-climate-mitigation-effort/>

Condor Cliff- Barrancosa Hydroelectric Complex

Santa Cruz Province, Argentina

Energy - Hydropower

Financiers: Bank of China, China Development Bank, Industrial and Commercial Bank of China

Key Project Contractors: China Gezhouba Group Corporation in association with Hidrocuyo SA and Electroingeniería SA

Project Status: Construction

The Condor Cliff- Barrancosa Hydroelectric Complex project will negatively impact the indigenous Mapuche Tehuelche de Lof Fem Mapu people, and is potentially driving endangered birds to extinction. It will negatively impact large free-flowing river ecosystems and glaciers, such as the iconic Perito Moreno Glacier located in Los Glaciares National Park, a World Heritage Site.

The project's environmental impact assessment was rushed and as a result lacked key information and analysis on environmental impacts. For instance, the environmental assessment does not adequately evaluate impacts on the Southern Patagonian Ice Field, the world's third-largest freshwater reserve. The project has attracted controversy for corruption allegations related to contracting and land acquisition. Local organizations are asking for the full suspension of the project.

- "Impacts and Violated Rights," FARN, 2016. <http://farn.org.ar/wp-content/uploads/2016/05/Dams-On-Santa-Cruz.pdf>
- "Represas en río Santa Cruz: avance de las inversiones chinas sobre el ecosistema y las comunidades," FARN, April 30, 2019. <https://farn.org.ar/archives/26667>
- "Con nuevo gobierno, Argentina reactiva las represas en la Patagonia," Diálogo chino, February 25, 2020. <https://dialogochino.net/es/clima-y-energia-es/33727-con-nuevo-gobierno-argentina-reactiva-las-represas-en-la-patagonia/>
- "Represas de Santa Cruz: escándalo por un grave error en la construcción," EconoJournal, November 5, 2019. <https://econojournal.com.ar/2019/11/represas-de-santa-cruz-escandalo-por-un-grave-error-en-la-construccion/>
- "ONG presentó escrito ante la ONU por el reclamo de comunidades indígenas de Santa Cruz," Tiempo Sur, July 28, 2019. <https://www.tiemposur.com.ar/nota/178000-ong-presento-escrito-ante-la-onu-por-el-reclamo-de-comunidades-indigenas-de-santa-cruz->

Dairi Prima Minerals Zinc Mine

North Sumatra, Indonesia

Mining

Financier: Unconfirmed

Key Project Developers/Contractors: China Nonferrous Metal Industry's Foreign Engineering and Construction Co., Ltd. (NFC), Bumi Resources Minerals, JCHX Mining Management

Project Status: Construction

The Dairi Prima Mineral Zinc Mine is under construction by a Chinese-Indonesian joint venture. Local civil society groups have conducted legal analysis of the project and find it lacking in a number of areas, including the environmental impact assessment and compliance with disaster management laws. The location of the mine is a serious concern, as it is within one of the most active earthquake areas in the world. Tailings dams are located upstream of villages, and dam failure due to earthquakes or other reasons would be catastrophic.

Expert advice indicates that the mine will threaten the local population and environment for generations. Due to high average rainfall and seismic activity in the location of the project, severe damage to or failure of the tailings dam is an extremely high risk. Funding this project will expose Chinese financiers to indefinite risk of exposure to catastrophic failure of mine facilities that could result in loss of life and environmental contamination in a delicate ecosystem.

Local civil society groups are calling on the company to suspend work on the project until a thorough environmental and social impact assessment has been done, and to disclose all relevant documents related to the project. Local groups also call on Chinese state institutions and banks to closely scrutinize the project and the potentially serious environmental and social impacts before providing approvals or finance before it moves forward.

East African Crude Oil Pipeline (EACOP)

Uganda and Tanzania

Energy - Oil Pipeline

Financier: Unconfirmed

Key Project Developers/Contractors: China National Offshore Oil Corporation Ltd (CNOOC Ltd), Total, Tullow Oil, governments of Uganda and Tanzania.

Project Status: Construction

The East African Crude Oil Pipeline (EACOP) is a proposed 1,443-kilometer pipeline from Hoima, Uganda to the port of Tanga in Tanzania. Construction of the pipeline threatens to open critical ecosystems, including Murchison Falls National Park, to oil extraction. It is expected to cause large-scale displacement of communities and pose grave risks to protected environments, forests, water sources and wetlands in Uganda and Tanzania.

This project presents risks to local people through physical displacement and threats to incomes and livelihoods of millions of people who depend on tourism, agriculture and fisheries for their incomes. The pipeline creates risks to water, biodiversity (including threatened and endangered animal and plant species, such as lions and chimpanzees, among others), and to natural habitats. It also represents a massive new source of carbon emissions – estimated to be over 34 million metric tons per year. As such, banks should avoid financing this project and instead seek opportunities to finance genuine renewable infrastructure to help meet the region’s energy needs in a clean and rights-compatible manner in the decades to come.

- “East African Crude Oil Pipeline”, BankTrack.

https://www.banktrack.org/project/east_african_crude_oil_pipeline#financiers

- “East African oil pipeline would cause more emissions than Denmark”, China Dialogue, 16 January 2020.

<https://www.chinadialogue.net/article/show/single/en/11783-East-African-oil-pipeline-would-cause-more-emissions-than-Denmark>

- “Standard Bank and Sumitomo Mitsui Banking Corporation: Don’t finance the East Africa Crude Oil Pipeline”, 39 civil society organizations. <https://act.350.org/sign/stop-east-africa-crude-oil-pipeline/>

El Nogal Oil Block

Department of Caqueta, Amazon region, Colombia

Energy - Oil

Financiers: Unconfirmed

Key Project Developer: Emerald Energy (subsidiary of Sinochem Group)

Project Status: Development

El Nogal Oil Block is the largest oil block in the Colombian Amazon. Project developer Emerald Energy is a subsidiary of Sinochem Group. Due to the environmental impacts associated with oil exploration, the project would negatively impact two indigenous Coreguaje reservations and local farming communities. For instance, communities have challenged the environmental impact assessment (EIA) due to the lack of information on soil pollution, possible filtration of contaminated waters, omission wetlands and hydrological cycles impacts, lack of detailed studies on endemic fauna and flora, and lack of seismological studies. Furthermore, the EIA did not consider cartographic studies carried out by the communities themselves, where their existing properties and the natural resources are clearly identified. These environmental concerns have led to conflicts. In 2014, one person died during a protest against the project.

Local communities have filed a lawsuit against the granting of the environmental license and actively oppose the project.

- "Los dudosos estudios ambientales de la explotación petrolera en Caquetá," El Espectador, March 20, 2018. <https://www.elespectador.com/noticias/medio-ambiente/los-dudosos-estudios-ambientales-de-la-explotacion-petrolera-en-caqueta-articulo-745473>
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Eldorado Vanguarda 2 Mill

Três Lagoas, Mato Grosso do Sul, Brazil

Agribusiness – Pulp & Paper

Financiers: Agricultural Bank of China, China Construction Bank, China Minsheng Bank, Hua Xia Bank, Industrial and Commercial Bank of China

Key Project Developer/Contractors: Eldorado, Andritz

Project Status: Construction

Eldorado is a Brazilian company with a pulp capacity of 1.7 million tonnes per year. The company is controlled by Indonesia's largest paper producer, Asia Pulp and Paper and Paper (APP). Agricultural Bank of China, China Construction Bank, China Minsheng Bank, Hua Xia Bank, Industrial and Commercial Bank of China are exposed to the Eldorado Vanguarda 2 Mill via loans to APP. Due to its role in deforesting approximately 2 million hectares and triggering numerous social conflicts in Indonesia, APP's involvement in the Eldorado Vanguarda 2 Mill has raised concerns with local groups and communities about the company's ability to meet environmental and social requirements in this project.

The Eldorado Vanguarda 2 Mill is a pulp mill project which would require over 100,000 hectares of eucalyptus plantations. Since eucalyptus plantations in the region absorb huge amounts of water, they impact water resources by over-exploiting lakes and rivers. This leads to water shortages for traditional farming communities. Because land for pulp and paper plantations are typically acquired from the cattle ranching industry, pulp and paper plantations are pushing cattle ranchers to the deforestation frontiers, leading to further encroachment of the Brazilian Amazon and Cerrado biomes.

Although still in the construction phase, the Eldorado Vanguarda 2 Mill project has already faced legal challenges for its poor labor practices in its other mills. In 2018 the court imposed a US\$500,000 fine on Eldorado Brasil for not complying with labour laws. Recently, the public prosecutor for labor issues prosecuted Eldorado Brasil for making its employees work twelve or even up to seventeen hours per day. As a result, in January 2020 the court ordered Eldorado to comply with labor legislation.

Due to the negative environmental and social impacts of pulp and paper plantations, local communities demand to halt the expansion of eucalyptus plantations.

- "TRT ratifica decisão liminar que obriga Eldorado a adequar jornada de trabalho de seus motorist", MPT, January 24, 2020. <http://www.prt24.mpt.mp.br/informe-se/noticias-do-mpt-ms/1043-trt-ratifica-decisao-liminar-que-obriga-eldorado-a-adequar-jornada-de-trabalho-de-seus-motoristas>
- "Eldorado deverá adequar jornada de trabalho", Tissue Online, January 17, 2020. <https://tissueonline.com.br/eldorado-devera-adequar-jornada-de-trabalho/>
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- "Justiça condena indústria Eldorado a indenizar sociedade em R\$ 2 milhões por infrações trabalhistas", MPT, August 28, 2018. <http://www.prt24.mpt.mp.br/informe-se/noticias-do-mpt-ms/741-justica-condena-industria-eldorado-a-indenizar-sociedade-em-r-2-milhoes-por-infracoes-trabalhistas>

Emba Hunutlu Coal Plant

Yumurtalik, Adana, Turkey

Energy - Coal

Financiers: China Development Bank, Industrial and Commercial Bank of China, Bank of China

Key Project Developers/Contractors: Emba Electricity Production, Avic International Holding Corporation, ESI Eurosil Netherlands, Mor Group, Shanghai Electric Power Company

Project Status: Construction

The 1,320 MW Emba Hunutlu Coal Plant is located in Yumurtalik. The area is a biodiversity hotspot protected under the Bern Convention on the Conservation of European Wildlife and Natural Habitats. The area has several reptiles, plants, and invertebrates that are classified as under threat per the Red List of the International Union for Conservation of Nature (IUCN). Yumurtalik is also the nesting area of the endangered green turtle (*Chelonia mydas*), and the critically endangered African softshell turtle (*Trionyx triunguis*).

The project does not comply with current Turkish and European Environmental and Air Pollution Limits. For instance, the project is in violation of Turkish law Circular No. 2009/10 of the Ministry of Forestry and Water Affairs on the protection of sea turtles, and the 2014 measures of Turkish Industrial Air Pollution Control Regulation (SKHKKY). Furthermore, the project's environmental impact assessment contains a number of flaws and gaps. For example, although the EIA mentions assessing the cumulative impacts of air pollution in the region, it does not comprehensively report their findings, nor did the EIA disclose the methodology behind the findings.

Local communities and groups strongly oppose the construction of not only the Emba Hunutlu Coal plant, but any coal project development due to their negative climate, public health and social impacts. In 2017, the Hunutlu coal project was sued by civil society organizations on the basis of negative cumulative pollution impacts. Court experts ultimately found local organizations' claims – that the project would negatively impact public health, agriculture, and increase pollution – valid and credible. As of March 2020, local Turkish organizations have called on Chinese banks to withdraw from the project.

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Expansion of the SQM Lithium Carbonate Plant

San Pedro de Atacama, Antofagasta Region, Chile

Mining

Financiers: Unconfirmed

Key Project Developer: SQM Salar S.A.

Project status: Operational

SQM Salar S.A is a lithium mining project located in the Atacama Indigenous Development Area, which is directly adjacent to the Los Flamencos National Reserve and the Soncor and the Ramsar site, Laguna Pilar Hydrological Systems. In 2018, Tianqi Lithium acquired a 24% share of SQM Salar.

In 2018, the company reached an agreement with the government agency Production Promotion Corporation (PPC) to increase its lithium extraction quota until 2030. However, SQM Salar is facing Antofagasta Environment Superintendency sanctions for serious environmental non-compliance, such as the extraction of brine over the permitted levels and confirmed degradation to the carob forests in the area of Camar. The agreement to increase lithium production was rejected by the Council of Atacama Peoples, an indigenous association. The Council, together with the local Irrigation Committee and civil society organizations like Tanti Foundation, have called for temporary protective measures to cancel the agreement.

The demands of the organizations include cancelling the agreement, revoking the Environmental Qualification Resolution granted to the project, conducting an independent hydrological, social and environmental study of the Salar de Atacama basin and reevaluation of mining projects, and respecting the precautionary principle.

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- "Chile: Comunidades indígenas del salar de Atacama logran que Tribunal Ambiental deje sin efecto plan de cumplimiento ambiental de SQM," Business & Human Rights Resource Center, December 26, 2019. <https://www.business-humanrights.org/es/chile-comunidades-ind%C3%ADgenas-del-salar-de-atacama-logran-que-tribunal-ambiental-deje-sin-efecto-plan-de-cumplimiento-ambiental-de-sqm>
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Ghana Integrated Aluminium Development Agenda

Atewa Range Forest, Ghana

Mining

Financiers: Industrial and Commercial Bank of China and/or other banks

Key Project Developers/Contractors: Sinohydro and others to be determined

Project Status: Planning

The Ghana Integrated Aluminium Development Project is located in Ghana's iconic Atewa Range Forest. Atewa Range Forest is an upland forest ecosystem and one of Ghana's last remaining intact forests, serving as an important source of water for over five million Ghanaians. It is also home to several endemic and critically endangered species such as the White-naped Mangabey and Afia Birago Puddle Frog. Any habitat loss may cause their extinction. The location of the proposed bauxite mining will remove critical forest ecosystems serving crucial watershed protection functions, and likely pollute this vital water source with toxic heavy metals. Local dissent is strong: the forest communities do not want the bauxite mining as it would pollute their water, land, and clean air, and cause loss of livelihoods. Furthermore, project developers have not consulted communities living in the forest.

Ghanaian groups are demanding that Atewa Range Forest be excluded from sites targeted for the bauxite mining development project and all project agreements, and for the protection status of Atewa Forest to be upgraded to that of National Park.

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<http://citifmonline.com/2018/03/group-begins-6-day-walk-protest-mining-atewa-forest/>

Global Energy Interconnection (GEI) Scheme

Global

Energy and Infrastructure - Transmission

Financier: Unconfirmed

Key Project Developers/Contractors: China's State Grid Corp, China Three Gorges Corp. etc.

Project Status: Design

The Global Energy Interconnection (GEI) is an initiative to interconnect all major electricity generation centers with major load centers by ultra-high voltage transmission lines globally. To implement this plan, China's State Grid Corp. has proposed a global “Backbone Supergrid”, which is estimated to cost US\$660 billion. The proposal involves partner companies investing in specific clusters of power plants, known as “energy bases”, in which ultra-high voltage (UHV) transmission lines connect these energy bases along pre-planned routes.

Regional GEI designs for Northeast Asia, Africa, and Southeast Asia involve constructing UHV grids which enable or incentivize development of hydropower and coal energy bases in remote wilderness areas, such as the Grand Inga Hydro in Democratic Republic of Congo, Amur and Lena river dam cascades in Russia, Kayan River Hydro in Indonesia, and the Shivee-Ovoo Coal Power Plant in Mongolia, among others. These energy mega projects exemplify the potentially immense negative impact on biodiversity and ecosystem services and the health and well-being of local communities. Mega dam projects typically trigger public protest, displace indigenous peoples, and attract extractive industries. The UHV grid itself leads to ecosystem fragmentation and requires use of massive additional amount of steel, cement and other materials, which would not be needed if alternative local energy sources are used to satisfy demand.

Civil society groups around the world have called on Chinese banks not to support unsustainable energy mega projects. Chinese banks are well positioned to support global renewable energy development, and should avoid supporting mega hydropower and coal energy bases and UHV transmission projects. Instead, the GEI should explore alternatives in local electrification by utilizing new renewable energy, minimizing carbon emissions, and avoiding the destruction of free-flowing rivers.

- “Role and expectation of Mongolia in promoting energy cooperation”, Yeren-Ulzii Batmunkh, North-East Asia Regional Power Interconnection Forum Powerpoint presentation, November 2018.
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- “Developing Africa Energy Interconnection to Promote Hydropower Resource Development and Achieve the Co-development of Electricity, Mining, Metallurgy, Manufacturing and Trade,” GEI Journal, May 17, 2019.
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Golden Veroleum Liberia Palm Oil Plantations

Sinoe and Grand Kru Counties, Liberia

Agribusiness - Palm Oil

Financier: China Development Bank

Key Project Developers/Contractors: Golden Veroleum Liberia, Golden Agri-Resources/Verdant Fund

Project Status: Operational

Golden Veroleum Liberia's (GVL) palm oil concession agreement covers 350,000 hectares. The palm oil concession covers approximately 2.3 percent of Liberia's land mass, and includes the Upper Guinean forest – a globally significant and critical conservation area. After commencing operations in 2010, the company cleared High Carbon Stock forests and High Conservation areas, which includes endangered chimpanzee habitat. The company has repeatedly failed to follow free, prior, informed consent procedures when signing agreements with impacted communities, and destroyed sacred sites which is in violation of the country's Community Rights Law and Land Rights Law, GVL's own company policies, and the principles and criteria of the Round Table on Sustainable Palm Oil (RSPO) of which GVL is a member. These violations have been confirmed by the RSPO which ordered GVL to halt expansion and renegotiate its agreements with local communities.

The Sustainable Development Institute and the Oil Palm Working Group of Liberia, alongside civil society organizations and local communities, have called on GVL to halt all palm oil plantation expansion, return land to communities where taken without consent, and ensure operations adhere to the Land Rights Law and international norms of free, prior, informed consent. Agreements with impacted communities should include long term benefit-sharing mechanisms, including land rental fees, to allow for communities' whose land is being used for palm oil plantations to directly benefit from ongoing operations.

- "RSPO Complaints Panel's decision on Golden Veroleum Liberia," Friends of the Earth US, 2018.
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- "Liberia's biggest palm oil project quits eco-certification scheme," Reuters, 21 July 2018.
<https://www.reuters.com/article/liberia-palmoil/liberias-biggest-palm-oil-project-quits-eco-certification-scheme-idUSL8N1UH09X>
- "Palm oil firm under fire over land deals sealed during Ebola crisis in Liberia," The Guardian, 23 July 2015.
<https://www.theguardian.com/global-development/2015/jul/23/palm-oil-golden-veroleum-liberia-land-deals-ebola-crisis>
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Henda-Siberia Industrial Logging Project

Tomsk Region, Russia

Agribusiness - Logging

Financier: Unconfirmed

Key Project Developers/Contractors: AVIC International, Henda-Siberia LLC

Project Status: Operational

The Henda-Siberia Industrial Logging Project is operated by Henda-Siberia, a subsidiary of Avic Forestry. This project is controversial due to its location in an area slated to become a nature reserve. In 1994, the Russian government issued a plan to create in the east of the Tomsk Region the South Fir Taiga Nature Reserve (IUCN type IA) an area of 100,000 hectares to protect the unique fir boreal forest landscape. However, in 2008 the entire nature reserve was leased for logging, and subsequently the government erased it from the "List of Planned Nature Reserves". Timber is harvested by clear-cuts, with each of logging plot covering tens of hectares. As such, the logging intensity is unsustainable, prompting project developers to expand into other protected areas. Reforestation is ineffective due to a lack of regulation and enforcement.

Local groups are calling no logging expansion in existing or planned protected areas. In the areas leased by Henda-Siberia LLC, local groups request that the volume of logging be reduced to sustainable levels, and that genuine reforestation efforts are enforced.

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- "Why Chinese are logging Russian Forests? Tomsk Province Example", Alexey Yaroshenko, Greenpeace Russia, January 1, 2019. <http://www.forestforum.ru/viewtopic.php?f=6&t=23129>

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HUBCO Thar Coal Power Project (Thar Energy)

Tharparkar district, Sindh province, Pakistan

Energy – Coal

Financiers: China Development Bank and Habib Bank Limited

Key Project Developers/Contractors: HUBCO, Fauji Foundation and China Machinery Engineering Corporation (CMEC)

Project Status: Agreement

The HUBCO Thar Coal Power Project is a 330 MW coal project which will use sub-critical technology. As a coal plant and coal mine, the project will lead to negative environmental and social impacts, including: degradation of local bio-diversity/natural habitat, land degradation, water stress/contamination and air-pollution, the displacement of local communities and livelihood losses.

Due to its location, the HUBCO Thar Coal Power Project shares similar land acquisition and legal conflicts as SSRL Thar Coal-I 6.8Mtpa & Power Plant (returned to later in this document). For instance, instead of acquiring the land directly from the local land-owners, power plant developers plan to procure the land from the proponents of the mine, thus absolving themselves from the responsibility of making direct payments to the displaced communities, which violates local land acquisition laws. The Land Acquisition Act requires prior land acquisition for starting a project and provides a detailed procedure for filing and hearing objections. However, most of the land has been acquired under emergency provisions, thus circumventing this process.

Although the project claims that dumped ash will be compacted and mixed with sand to ensure leach protection, the project has not disclosed how seeping of coal ash in ground water would be restricted to storage ponds. The proposed effluent disposal site is a protected wildlife sanctuary declared under the Sindh Wildlife Protection Ordinance, 1972. Furthermore, no guidelines have been provided for release of particles and heavy matter from coal ash into the environment.

Local communities have been resisting acquisition of their land for the project. They demand that instead of buying their land, the government should pay them a coal royalty on the land acquired from them in addition to grazing land for their livestock.

- "Thar Coal Project and Local Community: Documenting Views and Experiences of Stakeholders", National Commission for Human Rights (NCHR), 2019. https://www.boell.de/sites/default/files/2019-12/Thar_Coal_Project.pdf

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Imported Coal-based Power Plant at Gwadar

Balochistan province, Pakistan

Energy – Coal

Financiers: Unconfirmed

Key Project Developers/Contractors: China Communications Construction Co. Ltd., Tianjin Energy Investment Group Co. Ltd., Industrial Investment Holding Company (CIHC), CIHC Pak Power Co. Ltd

Project Status: Construction

The Imported Coal-based Power Plant at Gwadar is a 300 MW coal plant. The project will lead to a number of negative environmental and climate impacts. For instance, discharging the high temperature water used in power plants into the Arabian Sea will affect marine life. Contrary to international standards regarding community consultation and free, prior, informed consent, key information is not available to the local population regarding the project's mitigation measures to limit degradation of marine life. This is important as Gwadar residents are predominantly fisher-folk. As a result, the local population will likely not benefit from the coal project and suffer serious livelihood losses due to physical dislocation and degradation of marine ecology. Moreover, combustion and transportation of coal from jetty to the plant, which is nearby the port, will pose serious environmental and public health risks.

The project's environmental approval was granted on the condition that a coal ash yard was to be built. This has not been operationalized, however, leading to unsafe disposal of coal ash. No guidelines have been provided for anti-seepage at the bottom of the coal ash storage yard. Since there are no guidelines/environmental standards for coal ash disposal in Pakistan, it has been the practice of the Environment Protection Agency to use international guidelines or those provided in the jurisdiction of home country of the investor. However, neither have been followed in this case.

A broad-based public hearing, involving the local communities and civil society activists, should be held before starting the project.

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Inga 3 Hydropower Dam

Congo River, Democratic Republic of Congo

Energy - Hydropower

Financier: Unconfirmed

Key Project Developers/Contractors: China Three Gorges Corporation, PowerChina

Project Status: Planning

The Inga 3 dam represents the first phase of a broader network of dams referred to as Grand Inga. Transparency around the project is very limited, and local people lack information on its design and size. However, it is certain to have extensive impacts. There are concerns about the economic rationale behind the project, and the fear that it could leave the DRC with an unsustainable debt burden. The construction of the dam will displace as many as 30,000 people and have irreversible impacts on biodiversity and river-based livelihoods.

The project is behind schedule, and various partners have already walked away. This includes the World Bank, which pulled out in 2016, and the Spanish company ACS, which stepped out in early 2020. Local civil society groups have communicated concerns about the project to China Three Gorges and PowerChina, as well as state agencies in Beijing and the Chinese Embassy in Kinshasa. Their message is that the project represents an unsustainable investment that would benefit mining companies or be sold to South Africa while 90% of Congolese lack electricity, and that the enormous human, environmental, governance and financial risks posed by this project make it unviable.

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Julius Nyerere Hydropower Plant

Rufiji River, Tanzania

Energy - Hydropower

Financier: Tanzanian government, unconfirmed international financiers

Key Project Developers/Contractors: PowerChina, Arab Contractors LLC.

Project Status: Construction

The Julius Nyerere Hydropower Plant project (also known as Stiegler's Gorge Dam) is located along the Rufiji River in the iconic Selous Game Reserve, a UNESCO World Heritage site home to black rhino, elephants and other threatened species. If developed, the project would irrevocably damage the outstanding universal value of the Selous Game Reserve by destroying critical habitat for endangered species, as well as negatively impacting Ramsar wetlands downstream to the project.

The project's initial feasibility stage is being self-financed by the Tanzanian government. In 2019, the Tanzanian government signed a US\$1 billion contract with PowerChina through intermediary Egyptian firms. The Tanzanian government has described the project as necessary for energy access, but according to experts, this dam is one of the most environmentally and financially inefficient means for increasing energy access in comparison to project alternatives. Another concern is that the project would deepen the country's reliance on hydropower, which is vulnerable to continuing climate change impacts.

According to a Tanzanian official, the development of the project has been marred by attacks against civil society figures who oppose the dam. Local and international groups are also concerned about the project's failure to address compliance with international conventions such as the World Heritage Convention. As documented by International Union for the Conservation of Nature (IUCN), both the environmental impact assessment and the social environmental assessment were subpar and flawed.

Notably, the World Heritage Center, IUCN, the World Wildlife Fund, and local groups are calling for: a complete stop to dam construction and forest clearing; restoration of the World Heritage Site; and consideration of more sustainable energy sources.

- "PowerChina Unit Pens USD969 Million Tanzania Hydro Contract in Third Big Deal This Year", Zhang Yushuo, Yicai Global. September 2, 2019. <https://www.yicai.com/news/PowerChina-unit-pens-usd969-million-tanzania-hydro-contract-in-third-big-deal-this-year> <http://www.chinca.org/cica/info/19080510172411>
- "UNESCO concerned about insufficient Strategic Environmental Assessment of the Rufiji Hydropower Project in Selous Game Reserve", World Heritage Center, December 2019. <http://whc.unesco.org/en/news/2071>
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Kaliwa Dam New Centennial Water Source Project (NCWSP)

Sitio Cablao, Brgy. Pagsangahan, General Nakar, Quezon / Sitio Queborosa, Brgy. Magsaysay, Infanta, Quezon, Philippines

Infrastructure – Water

Financiers: Export-Import Bank of China

Key Project Developers/Contractors: China Energy Engineering Corp

Project Status: Agreement

The Kaliwa Dam is part of the New Centennial Water Source Project, which aims to address increasing water demand in Manila. The dam is situated in the Kaliwa Watershed Forest Reserve, a national park and wildlife sanctuary. As such, any development in the Kaliwa Watershed Forest would violate the National Integrated Protected Areas System (NIPAS) Act, and the Expanded NIPAS Act. The dam would involuntarily displace at least 300 Dumagat Remontados indigenous peoples. If built, it would flood and dispossess local communities and indigenous peoples of their livelihoods and ancestral lands including sacred sites, which is guaranteed by the Indigenous People's Rights Act of 1997.

The Kaliwa Dam has become controversial not only for its longstanding social impacts, but for its environmental and biodiversity impacts as well. The dam would permanently disrupt the connectivity and flow of aquatic species. The project's area is also known to have a number of threatened or endangered species, such as the white-winged flying fox, slender-tailed cloud rat, civet cats, wild boar, the Philippine eagle, and Philippine deer. The environmental impact assessment for the dam is particularly problematic, as it does not account for project alternatives. In order to address increasing water demands, local groups have called on the Philippines government to consider existing and more sustainable alternatives, such as promoting watershed forest conservation, pairing and improving existing dams, repairing and improving water distributions facilities, strengthening conservation policies, among others.

Local communities and organizations are calling for project developers to stop the Kaliwa Dam and actively consider and assess alternative designs. Additionally, local groups and communities are requesting adequate, fair compensation for already displaced people, as well as transparency regarding the loan agreement and bidding process.

- "Dumagat Tribe residents oppose China funded Kaliwa dam", CNN, 15 March 2019. <https://cnnphilippines.com/videos/2019/3/15/Dumagat-tribe--residents-oppose-China-funded-Kaliwa-Dam.html>
- "Kaliwa Dam bidding looks rigged for China Energy – COA", Rappler, 19 August 2019. <https://www.rappler.com/nation/238053-coa-memo-kaliwa-dam-bidding-china-energy>
- "Loan deal with China on Kaliwa Dam worse than 'onerous' water pacts —Bayan Muna", GMA News, 31 December 2019. <https://www.msn.com/en-ph/money/topstories/loan-deal-with-china-on-kaliwa-dam-worse-than-onerous-water-pacts-%E2%80%944bayan-muna/ar-BBYueWi>
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Karsa Waste-to-Energy Power Plant Project

Kyiv Region, Ukraine

Energy – Waste-to-energy

Financier: Kyiv Municipal Administration and Ukraine government

Key Project Developers/Contractors: China Energy Co., Ltd, China Energy Engineering Group, Guangdong Electric Power Design Institute Co., Ltd, Ukraine Karsa Corporation

Project Status: Design

In March 2020, China Energy Co, China Energy Engineering Group, and Guangdong Electric Power Design Institute Co., Ltd. signed a US\$238 million Engineering, Procurement, and Construction contract for the Ukraine Kiev Karsa 1500-ton/day Waste-to-Energy Power Plant Project.

Waste-to-energy plants have significant environmental and climate impacts. Burning waste produces hazardous substances such as lead, mercury, dioxins, furans, acid gases, and others. When released, these toxic emissions cause serious air, water, and soil pollution. Both indirect and direct exposure are particularly harmful to workers and nearby communities. As a result, proper pollution prevention and ash disposal is serious and not easily resolved. For instance, burning one metric ton of plastic results in almost one ton of CO₂ emissions. Another problem is that the project discourages recycling, as materials may be burned instead of recycled. The project is located in Obukhiv district of Kyiv amidst a number of highly polluting facilities, such as the Trypilska coal power plant, a pulp and paper mill, and an operational landfill. As a result, the Karsa Waste-to-energy Power Plant Project would likely significantly contribute to the area's existing negative pollution impacts.

There have been no public consultations prior to the contract signature for construction. Eastern European civil society groups oppose investment in waste incineration. The NGO Centre for Environmental Initiatives 'Ecoaction' and other Ukrainian groups have asked that the project be suspended until a proper environmental impact assessment, including analysis of alternative options, is conducted. Groups are also calling for robust public consultations based on free, prior, informed consent principles.

- "Energy China Signed the EPC Contract for Ukraine Kiev Karsa 1500-ton/day Waste-to-energy Power Plant Project", China Energy Engineering Group, March 12, 2020. http://en.ceec.net.cn/art/2020/3/12/art_138_2081566.html
- "A new waste-to-energy plant planned in Kyiv." Delo News, November 17, 2019. <https://delo.ua/business/v-kieve-planirujut-postroit-novyj-musoroszhigate-360679>
- "Memorandum of the CSO Alliance against waste incineration", SortingWaste, EKA, Greenpeace Russia. 2020. <http://stopmsz.ru/memorandum>

Kingfisher Oil Project

Lake Albert basin, Uganda

Energy - Oil and Gas

Financier: Unconfirmed

Key Project Developers/Contractors: China National Offshore Oil Company (CNOOC)

Project Status: Development

The Kingfisher Oil Project is currently being developed by China National Offshore Oil Company (CNOOC) within and around Lake Albert. The project's components include well pads, flow lines, pipelines, central processing facilities and other infrastructure that will be developed or expanded on the shores of Lake Albert or around the lake.

The project poses serious environmental, social, and transboundary risks. The project will increase the likelihood of oil spills and pollution in the area. Lake Albert is a transboundary lake of birding importance, and is part of the Murchison Falls-Albert Delta Wetland system, which was designated a Ramsar site in 2009. It also threatens to dispossess the livelihoods of over 35,000 fishers from Uganda and the Democratic Republic of Congo (DRC) who rely on Lake Albert to make a living. The right to receive prompt, fair and adequate compensation is required per Uganda's 1995 Constitution. However, it is unclear if the project developer has prepared fair, adequate compensation for any communities to be relocated.

Significantly, the environmental impact assessment did not consult all relevant stakeholders and affected communities based on free, prior, informed consent practices. For instance, DRC communities who also rely on Lake Albert for their livelihoods, were not able to participate in public hearings. Failure to acquire Congolese communities' free, prior and informed consent is not only against regional agreements such as the 2007 Uganda-DRC Ngurdoto agreement, it is also risky as pollution within Lake Albert may potentially trigger resource conflicts between Ugandan and Congolese communities, especially since Congolese communities were not consulted on the project.

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Koukoutamba Dam

Moyen Bafing National Park, Fouta Djallon Region, Republic of Guinea

Energy - Hydropower

Financiers: China Export Import Bank

Key Project Developers/Contractors: Sinohydro

Project Status: Agreement

The Koukoutamba dam is a 294 MW hydroelectric dam located on the Bafing River in the area of Guinea with the largest remaining population of the Critically Endangered western Chimpanzees (*Pan troglodytes verus*). It will also be located in the middle of the Moyen Bafing National Park which was originally established as a biodiversity offset for chimpanzee loss due to bauxite mining activities of two companies, Compagnie des Bauxites de Guinée (CBG) and the Guinea Alumina Corporation (GAC) in 2017.

The dam will displace 8,700 people. Scientists predict that the dam could also result in the death of up to 1,500 chimpanzees within the newly created Moyen Bafing National Park, which would be the largest number of chimpanzees in history to be killed by a development project. These chimpanzees are listed by the IUCN Red List as Critically Endangered, and the area is their last stronghold. Current plans are to locate the worker's camp within the park, increasing the impact to biodiversity even further, as associated project infrastructure such as roads are notorious for triggering if not exacerbating increased critical habitat loss and poaching. Although the World Bank funded the original feasibility study, it withdrew financial support upon discovering evidence that the dam would likely have a catastrophic impact on the chimpanzees and other biodiversity such as leopards, black and white colobus and hippopotamus.

- "Chinese dam project in Guinea could kill up to 1,500 chimpanzees", The Guardian, 28 February 2019. <https://www.theguardian.com/world/2019/feb/28/chinese-dam-project-in-guinea-could-kill-up-to-1500-chimpanzees>
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- "Studies downplay threat that dams pose to primates in Guinea and Indonesia, critics say", Science, 16 July 2018. <https://www.sciencemag.org/news/2018/07/studies-downplay-threat-dams-pose-primates-guinea-and-indonesia-critics-say>
- "Guinea Approves Creation of Largest Sanctuary for the West African Chimpanzee", UNEP GRASP Partnership. <https://www.un-grasp.org/guinea-approves-creation-of-largest-sanctuary-for-the-west-african-chimpanzee/>

Kyauk Phyu Special Economic Zone

Rakhine State, Myanmar

Special Economic Zone/ Industrial Zone

Financier: Unconfirmed

Key Project Developers/Contractors: CITIC Limited, China Harbor Engineering, China Merchants, TEDA Investment, Yunnan Construction Engineering Group, Charoen Pokphand Group

Project Status: Development

The Kyauk Phyu Special Economic Zone (SEZ) was initially approved as a mega project that covers a total area of 4,289.32 acres, including deep-sea port, industrial zone and housing project. It is located in Rakhine State, which for years has been the location of systematic human rights abuses against the Rohingya minority, for which charges of genocide are currently being heard at the International Court of Justice. There is also ongoing armed conflict between the Myanmar military and the Arakan Army and continued reports of crimes against humanity and war crimes. Despite the COVID-19 outbreak, the Myanmar military has refused to a ceasefire. Rakhine State is also one of the regions most threatened by natural disasters and climate change in the country.

The project is expected to cause large-scale displacement of communities, and threatens the environment and peace process. Local groups have protested against the project due to the potential risks, the lack of transparency, and exclusion of Rakhine communities from the process. However, the project has started an environmental and social impact assessment (ESIA) process that appears to only concern the deep-sea port, rather than a site-wide ESIA, which is legally required for a project of this size and scope. Calls to conduct a strategic environmental assessment (SEA) have been rejected. The ESIA process has not been transparent or adequately consultative. The project has also failed to disclose critical project information, including the renegotiated scope after the Myanmar government decided to downsize the total cost from US\$7.5 billion to US\$1.3 billion. This poses legal risks as to whether the project is still legally compliant if the project is scaled down to a port only.

Civil society groups are calling for the suspension of the project until all relevant documentation is disclosed, a sustainable peace is achieved and there is free, prior and informed consent from local communities. Local groups also call on Chinese banks that finance this project to conduct proper due diligence on the companies and their partners to ensure they do not cooperate with military groups.

- "Legal questions arise over Kyaukphyu port's ESIA process", Myanmar Times, 19 July 2019.
<https://www.mmmtimes.com/news/legal-questions-arise-over-kyaukphyu-ports-esia-process.html>
- "China-led port project inches ahead in Myanmar", Asia Times, 15 July 2019.
<https://asiatimes.com/2019/07/china-led-port-project-inches-ahead-in-myanmar/>
- "Arakanese Villagers Call for Suspension of Kyaukphyu SEZ Project", The Irrawaddy, 27 January 2017.
<https://www.irrawaddy.com/news/arakanese-villagers-call-for-suspension-of-kyaukphyu-sez-project.html>

Lamu Coal Plant

Kwasasi, Hindi Ward, Kenya

Energy – Coal

Financiers: Industrial and Commercial Bank of China

Key Project Developers/Contractors: Amu Power Company, PowerChina

Project Status: Agreement – Stalled

The 1,050 MW Lamu Coal Plant is has attracted international attention due to strong local opposition to the project, as well as its proximity and potentially damaging impacts on the nearby UNESCO site, Old Lamu Town. Local communities and organizations have objected to the project’s negative environmental, climate, and social impacts. For instance, the coal plant would harm nearby mangroves and marine life, as well as lead to increased air and water pollution. Local communities and organizations have highlighted that greenhouse gas emissions from the Lamu coal plant would derail Kenya from being able to meet its National Determine Commitments, per the Paris Agreement. Furthermore, recent analysis has shown that energy produced by the coal plant would actually increase the price of electricity in Kenya, and not effectively address energy access issues.

The project has triggered a wave of protests and demonstrations. In 2019, Kenyan courts found that the project developers violated Kenyan laws regarding the need for proper public consultation procedures, and providing key analysis on project alternatives and mitigation measures. These legal issues have led to the project stalling. Shortly after the ruling, the Chinese Ambassador met with environmental and local activists to discuss the environmental, social, and climate concerns of the project.

Local communities in Lamu have called for the project to be cancelled. Since 2016, local environmental network Save Lamu have repeatedly asked the project’s financier, ICBC, to respond to community concerns. To date, however, Save Lamu has reported they have yet to receive any substantive response from the bank.

- “deCOALonize team meets with Chinese Ambassador to Kenya WU Peng over controversial Lamu coal plant”, Decoalanz, July 1, 2019. <http://www.decoalonize.org/decoalonize-team-meets-with-chinese-ambassador-to-kenya-wu-peng-over-controversial-lamu-coal-plant/>
- “Save Lamu Unanswered Letters to ICBC on Lamu Coal”, Save Lamu, August 1, 2018. <https://www.savelamu.org/save-lamu-unanswered-letters-to-icbc-on-lamu-coal-plant/>
- Abdi Latif Dahir, “UNESCO wants Kenya to review plans to build its first coal plant on a world heritage site”, Quartz, July 10, 2019. <https://qz.com/africa/1662956/unesco-calls-on-kenya-to-review-plans-for-lamu-coal-plant/>
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Las Bambas Copper Mine

Cotabambas Province, Apurimac Department, Peru

Mining

Financiers: Bank of China, China Development Bank, Export-Import Bank of China, Industrial and Commercial Bank of China

Key Project Developer: MMG Limited

Project Status: Operational

Located on indigenous territory, the Las Bambas Copper Mine has already led to a number of environmental and social conflicts. For instance, the project has caused health problems to local communities because of noise and dust pollution caused by heavy truck traffic transporting minerals daily from the mine to the port. The project also violates trade union laws. Concerningly, local indigenous and farming communities who raised concerns about the project have faced excessive use of force by the Peruvian national police. The disproportionate police reactions have become controversial due to deaths, injuries, and arbitrary arrests of several community members.

Local communities are asking MMG: to take responsibility for public health issues impacting communities living alongside the roads (known as the “mining corridor”); to be accountable for damage caused by the construction of the “mining corridor” in their lands without their consent; to adequately treat and discharge contaminated water; prevent and mitigate the environmental damage caused so far; and to address the demands from family members on behalf of people killed during the social unrest related to the conflicts caused by the project.

- “Gobernanza y Gobernabilidad: El caso Las Bambas,” Cooperación, September, 2018. http://cooperacion.org.pe/wp-content/uploads/2018/09/Gobernanza-y-gobernabilidad-en-Las-Bambas_WEB1.pdf
- “Las Bambas: cronología de los conflictos en toda la historia del proyecto minero,” El Comercio Perú, August 8, 2018. <https://elcomercio.pe/peru/apurimac/bambas-cronologia-conflictos-historia-proyecto-minero-noticia-552597-noticia/>
- “Gobierno Declara Estado de Emergencia por Las Bambas,” La Razón, October 17, 2019. <https://larazon.pe/gobierno-declara-estado-de-emergencia-por-las-bambas/>
- “Las Bambas copper mine-10 protestors acquitted of strike damage charges,” Peruvian Times, March 4, 2020. <https://www.peruviantimes.com/04/las-bambas-copper-mine-19-protestors-acquitted-of-strike-damage-charges/32205/>

Mekong Mainstream Hydropower Dams

Mekong River, Lao PDR

Energy - Hydropower

Financiers: Unconfirmed (Pak Beng, Sanakham); Export-Import Bank of China (Pak Lay)

Key Project Developers/Contractors: Datang Corporation (Pak Beng and Sanakham), PowerChina (Pak Lay).

Project Status: Suspended (Pak Beng, Pak Lay); Planned (Sanakham)

The Pak Beng and Pak Lay and Sanakham dams are proposed hydropower projects on the lower Mekong mainstream in Lao PDR. The 912 MW Pak Beng and 770 MW Pak Lay dams are currently suspended, awaiting approval, and the 1,320 MW Sanakham dam is in the planning phase. Construction of these projects on the lower Mekong mainstream is predicted to cause extensive impacts on the biodiversity and ecological systems of the Mekong River, including transboundary impacts in neighboring countries. Major impacts include destruction of fisheries and loss of aquatic species diversity, alterations in water flows, and the loss of sediment transport downstream. The expected environmental and cumulative impacts of dam-building on the Mekong mainstream will likely threaten food security, as well as the livelihoods and well-being of over 65 million people residing within the lower Mekong basin. Expert reviews of project impact assessments of Pak Beng and Pak Lay dams found them to be inadequate, particularly in relation to transboundary and cumulative impacts.

The Mekong mainstream dams present a major threat to the integrity of the Mekong River system and local populations. These impacts raise the risk of exacerbating water conflicts in the Mekong basin. As such, banks should avoid financing these projects and instead seek opportunities to finance genuinely sustainable and renewable infrastructure to help meet the region's energy needs in a clean and rights-compatible manner in the decades to come.

- "Strategic Environmental Assessment of Hydropower on the Lower Mekong Mainstream", ICEM, 2010.
<http://icem.com.au/portfolio-items/sea-of-hydropower-on-the-mekong-mainstream-summary-of-the-final-report/>
- "Mekong Mainstream dams update", International Rivers, 2017.
http://www.internationalrivers.org/sites/default/files/attached-files/mekongmainstreamdamsupdatejune2017_english.pdf
- "Study on Sustainable Management and Development of the Mekong River including Impacts of Mainstream Hydropower Projects", Mekong River Commission Council Study, 2019.
http://www.mrcmekong.org/assets/Publications/Council-Study/Key-findings-of-the-Council-Study_26-Nov-18_Revised-4-Jan-19.pdf
- "Expert Review of Pak Beng EIA and Supporting Project Documents", International Rivers, 2017.
http://www.internationalrivers.org/sites/default/files/attached-files/independentexpertreview_pakbengdameia_may2017.pdf
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Masindi Park Junction and Tangi Junction Para-Buliisa Road Expansion

Murchison Falls National Park, Uganda

Infrastructure – Roads

Financier: Export-Import Bank of China

Key Project Developers/Contractors: China Communications Construction Company (CCCC)

Project Status: Construction/Operational

In early 2019, China Communications Construction Company (CCCC) started expanding a dirt track through Murchison Falls National Park primarily used by safari tourists, widening and paving it for heavy vehicles. However, paving and expanding the previously dirt road is fragmenting the national park and cutting off critical wildlife corridors. Because of ongoing oil exploration in Murchison Falls, environmental groups and tour operators are concerned that road expansion will expand oil activities in what is considered one of Africa's crown jewels – the area is categorized as an Important Bird and Biodiversity Area (IBA) and a Ramsar site because of its exceptional wetlands.

Furthermore, it is unclear if road development already completed by CCCC is legally compliant, as it is unknown if road expansion was subject to an environmental impact assessment (EIA), or if public hearings on the EIA were carried out. A valid EIA for projects of this size and type, as well as the need to hold public hearings on environmental documents, is required by the 2019 National Environment Act and 1998 Environmental Impact Assessment Regulations.

Road expansion negatively impacts the charismatic biodiversity of the region, which includes elephants, lions, among others, and threatens the integrity of the oldest, most visited, and iconic protected area in Uganda. Roads are notorious for enabling and accelerating major land use changes in previously inaccessible areas, such as logging, mining, poaching, and increased human settlement. Lastly, increased road expansion associated with oil activities would likely damage Uganda's tourism sector, which is one of the country's fastest growing industries and is its biggest foreign exchange earner.

- "Uganda: keep the oil in the ground – save Murchison Falls!" Rainforest Rescue Petition. <https://www.rainforest-rescue.org/petitions/1200/uganda-keep-the-oil-in-the-ground-save-murchison-falls#letter>
- "Change is coming to Murchison Falls", Uganda Conservation Foundation. <https://ugandacf.org/change-is-coming-to-murchison-falls/>

Mirador Copper Mine

Tundayme, Zamora Chinchipe Province, Ecuador

Mining

Financiers: Bank of China, China Development Bank, Export-Import Bank of China, Chinese Mercantile Bank, China Construction Bank, Industrial and Commercial Bank of China

Key Project Developers: Ecuacorrientes S.A. (a consortium made up of China Railway Construction Company and Tongling Nonferrous Metals Groups Holding Company)

Project Status: Operational

The Mirador Copper Mine is located in one of the most biodiverse regions in South America. This project has attracted controversy due to its negative social and environmental impacts. For instance, Ecuacorriente attempted to dispossess indigenous peoples of their land rights by mining on indigenous land without their consent. According to the Ecuadorian Constitution (Art. 254) and the Constitutional Court Ruling No. 001-10-SIN-CC, this is illegal. Ecuacorriente has allegedly forcibly evicted indigenous peoples and farmers in the Tundayme community. In 2018, the Ecuadorian Minister of the Environment pointed out that the company “does not care” about complying with local law and temporarily suspended 40% of the works in the project.

Environmental problems include improper handling and discharge of waste and pollutants during road construction, subpar management of solid waste in the camps, and the lack of treatment of contaminated water at the mine site. The companies also failed to fully comply with environmental permits and labor laws. For instance, the company began mining without obtaining all the proper permits. Local workers have been victims of mistreatment, unlawful dismissals, and mining accidents, some of which have led to worker deaths. The companies have been repeatedly sued in court. Several local communities are asking for the full and permanent suspension of the project.

- “Indigenous Communities Take Legal Action Over Ecuador’s Largest Mine,” Pulitzer Center, July 9, 2019. <https://pulitzercenter.org/reporting/indigenous-communities-take-legal-action-over-ecuadors-largest-mine>
- “La herida abierta del Cóndor: Vulneración de derechos, impactos socio-ecológicos y afectaciones psicosociales provocador por la empresa minera china Ecuacorriente S.A. y el Estado ecuatoriano en el Proyecto Mirador,” Colectivo de Investigación y Acción Psicosocial Ecuador, 2017. <https://investigacionpsicosocial.files.wordpress.com/2017/02/herida-abierta-del-cc3b3ndor.pdf>
- “Ecuador: Nadie sabe quién mató a José Tendetza,” Mongabay, November 11, 2019. <https://es.mongabay.com/2019/11/jose-tendetza-defensores-ambientales-en-ecuador/>

Muse-Mandalay Railway

Shan State and Mandalay Region, Myanmar

Infrastructure – Rail

Financier: Unconfirmed

Key Project Developers/Contractors: Unconfirmed

Project Status: Design (suspended)

As a key project of the China-Myanmar Economic Corridor (CMEC), the Muse-Mandalay Railway is a proposed electric rail project with a total length of around 410 kilometers, consisting of 124 bridges, 60 tunnels and 36 stations. The project is expected to pass through villages and farmlands in 11 townships, some of which are in areas plagued by long-lasting armed conflicts and complex ethnic tensions. China Railway Eryuan Engineering Group (CREEG) are designing the project and have conducted a feasibility study. However, the environmental impact assessment (EIA) process has been suspended due to active armed conflict since October 2019.

The project has been widely criticized for its lack of transparency and consultation. Critical information of the project, such as which villages and how much farmland will be affected, has not been disclosed to the public or the affected communities, despite the feasibility study being submitted in April 2019. There was no public consultation in many communities, and consultations that did take place were not meaningful and lacked transparency.

The EIA consultant has identified serious potential impacts concerning large-scale displacement, the loss of land and livelihoods, improper compensation for untitled land especially customary land owned by ethnic groups, damage to protected forests and watersheds, among others. Experts are concerned that the railway could exacerbate conflicts. However, the feasibility study does not cover any conflict aspect and the EIA has not consulted people displaced from conflict areas.

Civil society groups are calling for the suspension of the project until all relevant documents are disclosed, a sustainable peace is achieved. Free, prior and informed consent from local communities should be required. Local groups also call on Chinese institutions and banks involved in this project to conduct proper due diligence on the concerned companies and their partners in order to ensure they do not cooperate with any military groups.

- “Mandalay-Muse rail project delayed due to unrest in project area”, Mizzima, 12 October 2019.

<http://mizzima.com/article/mandalay-muse-rail-project-delayed-due-unrest-project-area>

- “Mysterious Signs of Impending China-Backed Railway Worry Villagers in Myanmar’s Shan State”, The Irrawaddy, 3 January 2020. <https://www.irrawaddy.com/features/mysterious-signs-impending-china-backed-railway-worry-villagers-myanmars-shan-state.html>

- “Myanmar Watchdog Criticizes ‘So-Called’ Public Consultation Process for China’s BRI Project”, The Irrawaddy, 2 December 2019. <https://www.irrawaddy.com/in-person/interview/myanmar-watchdog-criticizes-called-public-consultation-process-chinas-bri-project.html>

Myitkyina Industrial Zone (also known as Namjin Industrial Zone)

Kachin State and Mandalay Region, Myanmar

Industrial Zone

Financier: Unconfirmed

Key Project Developers/Contractors: Yunnan Tengchong Heng Young Investment Company (YTHYIC)

Project Status: Construction

The 4,700-acre Myitkyina Industrial Zone is a crucial part of the Belt and Road Initiative in Myanmar. Yunnan Tengchong Heng Young Investment Company (YTHYIC) is a joint venture between Baoshan Hengyi Industry Group Co., Ltd. and Baoshan Tengchong Border Economic Cooperation Zone. Because the project is located in a conflict area, it has raised concerns over land rights violations and conflict exacerbation. The area, which had been controlled by the local ethnic armed group Kachin Independence Army (KIA) for many years, is now between checkpoints of the Myanmar government and the KIA. Clashes in this area have displaced around 1,000 people since the ceasefire between the Myanmar military and the KIA broke down in 2011.

Most people in the affected areas have not received land titles and the government only confirmed compensation for land loss for a few people. Local farmers reported that local authorities stopped granting land titles after the project MoU was signed. The project has already started clearing land and construction before fulfilling the legal requirement of conducting the environmental and social impact assessment, while affected communities have received little information and have not been consulted. Even local lawmakers have complained about the lack of information. The Kachin State People's Party (KSPP) released a statement for a halt to all mega projects in Kachin State until peace is restored.

Civil society groups are calling for the suspension of the project until all relevant documents are disclosed, a sustainable peace is achieved, and there is free, prior and informed consent from local communities. Local groups also call on Chinese institutions and banks involved in this project to conduct proper due diligence on the concerned companies and their partners to ensure they do not cooperate with any military groups.

- "Kachin Locals Stand to Lose Land to Namjin Industrial Zone", BNI Online, 25 November 2019.
<https://www.bnionline.net/en/news/kachin-locals-stand-lose-land-namjin-industrial-zone>
- "Land Dispossession and Indigenous Livelihoods in Myanmar", ArcGIS StoryMaps, 2 February 2020.
<https://storymaps.arcgis.com/stories/c48e69578c31405581661e8e74b651bb>
- "密支那经济开发区迈出新步伐·中缅双方公司签署合作谅解备忘录", 缅甸中文君, 10 May 2018.
<https://xw.qq.com/cmsid/20180510A0J1UX00>
- "推进缅甸密支那经济开发区项目建设情况", Baoshan Municipal Government, 27 July 2018.
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Nam Ou Hydropower Dam Cascade

Nam Ou River, Lao PDR

Energy - Hydropower

Financiers: China Development Bank (Phase 1: Nam Ou # 2, 5, 6); China Development Bank, Export-Import Bank of China, China Construction Bank (Phase 2: Nam Ou # 1, 3, 4, 7)

Key Project Developers/Contractors: PowerChina

Project Status: Operating (dams 2, 5 and 6), Construction (dams 1, 3, 4, and 7 are slated for completion and operation within 2020).

The Nam Ou Cascade Hydropower Project consists of seven large-scale dams, with a combined installed capacity of 1.27 GW. The Nam Ou dams have already had severe impacts on the biodiversity and ecology of the Nam Ou basin and the food sources, livelihoods and cultures of local populations. The Nam Ou Basin is home to over 400,000 people, including Khmu, Akha, Songsiri, Hmong, Lue, and Lao ethnic and indigenous groups. The majority of people in the Nam Ou basin rely on the river and surrounding forests for their food, income and well-being. Tourism, which used to be a significant source of income for local people, is no longer possible as the river has been blocked by the cascade of dams. The Nam Ou cascade has displaced thousands of villagers and reduced their access to fisheries and natural resources important for their livelihoods.

The Nam Ou cascade is contributing cumulatively to the impacts of hydropower on the Mekong mainstream and within the lower Mekong basin, including blocking migratory fish species, altering water flows, and blocking sediment transport in the Mekong River. The Nam Ou basin is the tenth largest river basin in the Lower Mekong. The catchment area of the Nam Ou includes 112,409 hectares of agricultural land and 14,596 km² of natural forest. An estimated 139 species of fish are found in the Nam Ou Basin. The lower part of the Nam Ou is listed by the International Union for Conservation of Nature (IUCN) as a Key Biodiversity Area because of the presence of a critically endangered fish species, the Giant Barb, and provision of a key spawning, nursery and feeding grounds for many others.

The Nam Ou cascade represents a major threat to the biodiversity and integrity of the connected Nam Ou and Mekong River systems and local populations in the Nam Ou basin. As such, banks and companies should avoid financing these projects and instead seek opportunities to finance genuinely sustainable and renewable infrastructure to help meet the region's energy needs in a clean and rights-compatible manner in the decades to come.

- "Watered down: How big hydropower companies adhere to social and environmental policies and best practices", International Rivers, 2019. http://www.internationalrivers.org/sites/default/files/attached-files/watered_down_eng_full_report_web_0.pdf. See Nam Ou 6 (pp. 84-97) and Nam Ou 2 (pp.98-112).
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Northern Sea Route Oil and Gas Projects

Russia

Energy and Infrastructure - Transportation

Financier: Silk Road Fund, China Development Bank, Export-Import Bank of China, Russian National Wealth Fund, Sberbank and Gazprombank, and other sources.

Key Project Developers/Contractors: Novatek, China National Petroleum Corporation, China National Offshore Oil Corporation Ltd (CNOOC), Total, Chinese Offshore Oil Engineering Co. (Yamal LNG and Arctic-2 LNG projects); VostokUgol, Coal India Limited. (Taimyr Coal project); Gazpromneft co., Rosneft corp. (Arctic Oil projects); Zvezda Shipyard, China State Shipbuilding Corporation (CSSC), Hudong-Zhonghua Shipyard, Rosatomflot, COSCO Ltd. (Arctic shipping and shipbuilding).

Project Status: Operation, construction and exploration

The Russian “Northern Sea Route” Program involves developing shipping lines from Asia to Europe for transporting fossil fuels from several gas, oil, and coal projects. Projects include the Yamal LNG, Arctic-2 LNG projects, Taimyr Coal project, and Arctic shipping and shipbuilding investments.

The Arctic is an extremely sensitive and at-risk ecosystem due to climate change. Fossil fuel extraction in the region thus threatens fragile Arctic terrestrial and marine ecosystems. Shipping increases the likelihood of oil and fuel spills. The extraction, transportation, and burning of fossil fuels in the area causes pollution which cannot be mitigated due to ice conditions. Furthermore, permafrost thaw increases the risk of releasing infectious diseases stored in the ice for centuries.

Environmental groups have called for a freeze on fossil fuel-related development on and off the coast of Arctic Ocean.

- “Final Investment Decision Made on Arctic LNG 2 project”, Novatek, September 5, 2019. http://www.novatek.ru/en/press/releases/index.php?id_4=3405
- “Chinese Banks keep silence about Unaddressed Environmental and Social Risks of the Yamal LNG project”, Rivers Without Boundaries, February 2, 2017. <http://www.transrivers.org/2017/1860/>
- “Arctic gas plant threatens native peoples”, Jenny Johnson, China Dialogue, April 3, 2018. <https://www.chinadialogue.net/article/show/single/ch/10551-Arctic-gas-plant-threatens-native-peoples>
- “Investing in a Green Belt and Road? Assessing the Implementation of China’s Green Credit Guidelines Abroad”, Friends of the Earth US, December 2017. <https://foe.org/resources/investing-green-belt-road-assessing-implementation-chinas-green-credit-guidelines-abroad/>

Obi Island Battery-grade Nickel Smelter Project

Obi Island, North Maluku, Indonesia

Mining

Financier: Unconfirmed

Key Project Developer/Contractor: PT HPL, Ningbo Lygend, Harita Group

Project Status: Construction

The Harita Group has invested US\$700 million to mine and smelt laterite nickel ore via the Obi Island Battery-grade Nickel Smelter Project, the majority of which will likely be exported to China. Harita Group has proposed to relocate Kawasi Village due to its close proximity to the smelter. However, local communities are concerned that the new location is too far for them to go fishing, which is their traditional livelihood.

PT HPL also plans to dispose of their tailings in deep sea. However, this plan has been rejected by local communities who are concerned that fisheries will be negatively affected by deep sea tailing placement plan.

- "Land conflict between Harita and local people", Indotimur, 10 January 2019. <https://indotimur.com/sofifi/pt-harita-group-gusur-lahan-warga-tanpa-izin>
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PLTA Hydropower 1-5 Sungai Kayan

Balungan, North Kalimantan, Indonesia

Energy - Hydropower

Financiers: Unconfirmed

Key Project Developers/Contractors: PowerChina, PT Kayan Hydro Energy Co. Ltd

Project Status: Construction

A series of five dams are proposed to be built along the Kayan River in North Kalimantan province with an ultimate combined capacity of 9,000 MW, making it the largest hydropower dam cascade in Southeast Asia if each dam is built. The cost of the five dams is estimated at US\$17 billion and the dams are planned to be developed over twenty years. The dams will impact 184,270 hectares of remote, pristine forest.

The first of the dams will negatively impact the Kayan River ecosystem and involuntarily displace local and indigenous communities. The dam will fundamentally disrupt hydrology cycles and biodiversity, as the river is part of critical habitat for endangered species such as orangutans and gibbons. The dam will flood two villages, Long Lejuh and Long Peleban, which are inhabited by 160 indigenous households. Some indigenous peoples, such as the Dayak Kayan, have irreplaceable, ancestral ties to the land, but will be subject to involuntary resettlement. The project will seriously impact another twenty villages located along the river by destroying their homes and dispossessing communities of their traditional livelihoods. According to WALHI, Indonesia's largest environmental group, most local communities have not been consulted or made aware of the dam development.

There are significant legal and procedural problems with the development. Even though the construction permit has been issued, a Strategic Environmental Assessment (KLHS), which is required prior to issuing the permit, has not yet been conducted. KLHS is needed as reference for Spatial and Regional Planning of Bulungan Regency, where the project takes place. This violates Law Number 32/2009 concerning Environmental Protection and Management and Government Regulation (PP) Number 46/2016 concerning The Procedures of Strategic Environmental Assessment.

- "PLN to build Indonesia's biggest hydropower plant in N. Kalimantan", Jakarta Post, 26 July 2019.
<https://www.thejakartapost.com/news/2019/07/26/pln-to-build-indonesias-biggest-hydropower-plant-in-n-kalimantan.html>
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<https://www.thejakartapost.com/news/2018/04/19/PowerChina-to-build-hydropower-plants-for-17-8-billion.html>
- "Massive hydroelectricity project planned for Indonesian Borneo", Mongabay, 7 November 2016.
<https://news.mongabay.com/2016/11/massive-hydroelectricity-project-planned-for-indonesian-borneo/>

Port Qasim Datang Coal Power Plant

Port Qasim, Karachi, Sindh province, Pakistan

Energy - Coal

Financiers: China Development Bank

Key Project Developers/Contractors: China Datang, China Machinery Engineering Corporation, K-Electric (majority-owned by Shanghai Electric Group)

Project Status: Construction

Amidst a number of coal power plants in the highly industrialized urban area of Port Qasim on the Arabian Sea, the 700 MW Port Qasim Datang Coal Power Plant will further exacerbate public health and livelihood losses due to coal ash and hazardous emissions, as well as cutting of mangrove forests.

Mangrove tree forests are declared protected forests under the Forest Act, 1972. Project proponents have obtained No Objection Certificates (NOC) from the Sindh Forest Department on the condition that they will replant trees with the ratio of 5 for 1. However, the Forest Department is not empowered under the law to issue NOCs for cutting trees from a protected forest. Secondly, replantation in place of mature trees should not be considered an equal offset, as generally mature trees absorb more carbon than young trees.

Because the projects are in the territorial jurisdiction of Port Qasim Authority, which controls entry and exit in the area, monitoring and enforcement of environmental and labor laws have always been problematic. Due to this reason, most of the industries do not install proper treatment plants and are known to discharge untreated effluent into the Arabian Sea.

Concerned lawmakers, engineers and environmentalists have urged the Sindh government to put strict regulations in place for environmental safety.

- "Supreme Court issues notices over alleged air pollution at Port Qasim", Express Tribune, 20 August 2019. <https://tribune.com.pk/story/2037541/1-sc-issues-notices-alleged-environmental-pollution-port-qasim/>
- "Supreme Court seeks Port Qasim response over environmental pollution", Express Tribune, 31 July 2019. <https://tribune.com.pk/story/2024887/1-sc-seeks-port-qasim-response-environmental-pollution/>
- "Proposed coal power plants at Port Qasim would add to pollution levels", The News International, 22 October 2016. <https://www.thenews.com.pk/print/158929-Proposed-coal-power-plants-at-Port-Qasim-would-add-to-pollution-levels>

Port Qasim Lucky Coal Power Plant

Port Qasim, Karachi, Sindh province, Pakistan

Energy - Coal

Financiers: Industrial and Commercial Bank of China and numerous Pakistani banks

Key Project Developers/Contractors: Lucky Electric Power Company Limited

Project Status: Construction

The Lucky Coal Power Plant at Port Qasim poses serious threats to marine ecology, mangrove forests and livelihoods of the local fisher-folk community. As a coal plant, the project will cause health problems for the area's population and sea pollution due to coal ash, carbon dioxide and other hazardous emissions.

Due to its location, the project's negative impacts are similar to those of the Port Qasim Datang Coal Power Plant (discussed above). For instance, discharging the high temperature water used for cooling into the sea will have drastic impacts upon the marine life for which no mitigation measures have been provided. Mangrove tree forests are declared protected forests under the Forest Act of 1972, but proponents have obtained No Objection Certificates (NOC) from Sindh Forest Department on the condition that they will replant trees with the ratio of 5 for 1. However, the Forest Department is not empowered under the law to issue NOCs for cutting trees from a protected forest. Secondly, replantation in place of mature trees should not be considered an equal offset, as generally mature trees absorb more carbon than young trees.

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Concerned lawmakers, engineers, environmentalists and civil society have been urging the Sindh government to put strict regulations in place for environmental safety and livelihood protection of local fisher-folk.

- "Supreme Court issues notices over alleged air pollution at Port Qasim", Express Tribune, 20 August 2019. <https://tribune.com.pk/story/2037541/1-sc-issues-notices-alleged-environmental-pollution-port-qasim/>
- "Supreme Court seeks Port Qasim response over environmental pollution", Express Tribune, 31 July 2019. <https://tribune.com.pk/story/2024887/1-sc-seeks-port-qasim-response-environmental-pollution/>
- "Proposed coal power plants at Port Qasim would add to pollution levels", The News International, 22 October 2016. <https://www.thenews.com.pk/print/158929-Proposed-coal-power-plants-at-Port-Qasim-would-add-to-pollution-levels>

Power of Siberia-II Gas Pipeline

Russia-Mongolia-China

Energy – Gas transportation

Financier: Unconfirmed

Key Project Developers/Contractors: China National Petroleum Corporation and Gazprom

Project Status: Planning

The Power of Siberia-II Gas Pipeline, originally called “Altai Gas Pipeline” has been fiercely opposed by the Russian and international conservation community, in addition to the Altai indigenous peoples. A key reason for international and local opposition was due to the project’s route through the sacred Ukok Plateau, which is part of the Altai Golden Mountains World Heritage site. For many years, Mongolia offered China and Russia an alternative route across its territory. The alternate route was finally backed by presidents Putin and Xi by 2018. However, it will still have negative impacts as it crosses a national park and the Lake Baikal World Heritage site.

The pipeline will affect high biodiversity areas, creating fragmentation and destruction of World Heritage sites and national parks. Affected people have not been properly consulted according to the principles of free, prior informed consent, and as such there is strong opposition to the project in Russia.

Local communities and CSOs are calling for the project to be rerouted to avoid impact on sensitive areas, and to avoid increasing Russia’s vulnerability due to over-reliance on fossil fuels.

- “Why the Lake Baikal May Be Inscribed on the Danger List in 2021?” E. Simonov and M. Kreindlyn (editors), Report to UNESCO submitted by the Rivers without Boundaries International Coalition and Greenpeace Russia, April 2020. <https://www.researchgate.net/publication/340444005>
- “Working meeting between Vladimir Putin and Alexey Miller”, Gazprom Co. September 2019. <https://www.gazprom.com/press/news/2019/september/article487348/>
- “Mongolia, Russia sign MoU on feasibility of pipeline gas deliveries to China”, Xinhua News agency December 6, 2019. http://www.xinhuanet.com/english/2019-12/06/c_138610566.htm

PT Weda Bay Nickel Smelter

Weda, North Maluku, Indonesia

Mining

Financier: Unconfirmed

Key Project Developer/Contractor: Tsingshan Holding Group, Huayou Cobalt Co., Zhenshi Holding Group

Project status: Construction

PT Weda Bay Nickel (WBN) is a unit of PT Indonesia Weda Bay Industrial Park, which is a joint venture company owned by Tsingshan Holding Group, Huayou Cobalt Co., and Zhenshi Holding Group. WBN began preliminary surveys in 1996 and first developed the environmental impact assessment for mining and smelting activities in 2009. However, the company did not start construction until August 2018, meaning that previous environmental analysis, feasibility studies, and other project documents developed then should be considered extremely outdated. As a result, community protests have surged over the past 20 years due to unfair land acquisition and inadequate compensation conflicts. Furthermore, approximately 35155 hectares, or about 60%, of mining concessions owned by PT WBN is located in protected forests, meaning that continued mining activity will likely lead to significant, if not potentially irreversible environmental impacts due to the inherently extractive and harmful process of mining.

- "Conflicts between WBN and indigenous people", Mongabay, 7 June 2013.

<https://www.mongabay.co.id/2013/06/07/weda-bay-nickel-berkonflik-dengan-masyarakat-adat-hutan-lindung-pun-terancam/>

- "Access to Justice for Communities Affected by the PT Weda Bay Nickel Mine – Interim Report", Non-Judicial Human Rights Redress Mechanisms Project, 2013. <https://www.business-humanrights.org/sites/default/files/media/weda-bay-public-report-oct2013.pdf>

Rio Blanco Copper Mine - Ecuador

Molleturo, Azuay Province, Ecuador

Mining

Financiers: Unconfirmed

Key Project Developers/Contractors: Ecuagoldmining South America S.A

Project Status: Suspended

Ecuagoldmining, which is owned by a Chinese consortium, has attracted controversy for its land acquisition process in developing the copper mine. The mining project may impact 70 communities. Local communities allege the company's land acquisitions are illegal, triggering serious social conflicts. Due to their opposition to the project, local Río Blanco leaders, environmental, and human rights defenders have reported harassment and intimidation from the Ecuadorian national police and the military special forces. In 2018, a local court ordered the closure of the project due to lack of compliance with national laws that guarantee indigenous communities' right to free, prior and informed consent.

Mining inherently poses high environmental risks due to pollution, tailings disposal, and extraction processes. As such, the project would negatively impact the nearby Macizo del Cajas, which was declared a Biosphere Reserve by UNESCO, and Cajas National Park's buffer zone, which contains 71 endemic species and 700 water springs.

Several local communities are now asking for the full and permanent suspension of the project.

- "Campamento Minero en Río Blanco fue incendiado por seguridad y policía nacional," CONAIE, May 11, 2018. <https://conaie.org/2018/05/11/campamento-minero-rio-blanco-fue-incendiado-seguridad-policia-nacional/>
- "Judge orders Chinese company to stop mining activities in Ecuadorian town," June 3, 2018. <https://www.mining.com/judge-orders-chinese-company-stop-mining-activities-ecuadorian-town/>
- "Ecuador: Cuenca le dice No a la minería, pero gobierno le abre las puertas a tres proyectos mineros," Mongabay, April 12, 2017. <https://es.mongabay.com/2017/04/mineria-pueblos-indigenas-conflictos-conservacion-ecuador/>

Rio Blanco Copper Mine - Peru

Ayavaca y Huancabamba Provinces, Piura, Ecuador y Cajamarca. Region, Peru

Mining Sector

Financiers: Unconfirmed

Key Project Developers/Contractors: Zijin Mining Group Co. Ltd., Tongling Non-Ferrous Metals Group Holdings Co. Ltd., Xiamen C&D Inc

Project Status: Operational

Ayavaca, one of the provinces where the project is situated, is recognized as an area of private conservation known as “Bosques de Neblina y Páramos de Samanga.” The Rio Blanco Copper Mine is also located on indigenous communities’ land. The project’s location in a highly biodiverse area and on indigenous lands has caused serious social conflicts. Community leaders have reported that project developers have sought to silence opposition through attempted bribery and harassment to local leaders. Alarmingly, when the National Directorate of Special Operations attempted to quell protests against the project, it resulted in the deaths of two people.

According to the Peruvian Supervisory Agency for Energy and Mining Investment, the mining developers have not fulfilled environmental protection regulations, completed remediations for environmental damage, or fully complied with mining safety and hygiene norms. The company has also failed to put in place measures to ensure the safety of its employees, which led to three deaths in 2015.

On multiple occasions, thousands of residents in Piura have expressed their rejection to the project through mobilizations and strikes. Communities demand that the national government respects the 2007 neighborly consultation, in which 95% of the population voted against the development of the project.

- “Río Blanco: Trabajadores murieron de hipotermia, reveló necropsia,” Perú.com, 2015.

<https://peru.com/actualidad/nacionales/rio-blanco-trabajadores-murieron-hipotermia-revelo-necropsia-noticia-386221>

- “Piura: Denuncian que minera Río Blanco quiere cambiar directivas comunales y genera violencia,” Red Muqui, January 20, 2020. <https://muqui.org/noticias/piura-denuncian-que-minera-rio-blanco-quiere-cambiar-directivas-comunales-y-genera-violencia/>

- “Paro total en Ayabaca, Piura, Dice No al proyecto minero Río Blanco de consorcio chino Zijin,” Red Muqui, June 12, 2018. <https://muqui.org/noticias/muqui-informa/paro-total-en-ayabaca-piura-dice-no-a-proyecto-minero-rio-blanco-de-consorcio-chino-zijin/>

- “Zijin Mining’s Rio Blanco project -reports on conflict & company responses,” Business & Human Rights Resource Center, April, 2011. <https://www.business-humanrights.org/en/zijin-minings-rio-blanco-project-reports-on-conflict-company-responses-apr-2011>

Rogun Hydropower Station

Vaksh River, Tajikistan

Energy - Hydropower

Financier: Tajikistan Government, negotiating additional funding with Bank of China and China Export Credit Insurance Corporation.

Key Project Developers/Contractors: Rogun Hydro, Sinohydro 16th Bureau/PowerChina

Project Status: Construction

This 3,500 MW dam is being self-financed by the Tajikistan government via Eurobonds and state bonds. To date, the project has cost over US\$ 2 billion, but still requires an additional US\$3-6 billion due to underestimating costs, corruption, and delays. Chinese banks and the Asian Infrastructure Investment Bank loans supported related transmission and roads, and Chinese companies are participating in dam construction. Project developers are reportedly seeking investment or loans from China to complete the project.

The dam will likely exacerbate if not trigger transboundary conflicts, threaten downstream agricultural communities, and disrupt hydro-ecological balance in the Aral Sea Basin. The dam will interrupt flows in the floodplain forests of the “Tiger Gorge” nature reserve (IUCN category I). It will also necessitate involuntary resettlement of up to 35,000 people. Resettlement commenced with widespread violations, including lack of public access to information and consultations, and some were resettled without consultation. The dam sits on a geologically unstable foundation, and given the increasing project costs, may increase the country’s foreign debt, which may prevent the country exploring better development alternatives.

To avoid major negative consequences, civil society groups recommend stopping or at least downsize the dam. There are also calls to ensure just compensation for any resettled communities, and to minimize the number of resettled communities. Due to the project’s environmental and downstream impacts, groups also advise ensuring biodiversity conservation and developing a regional agreement on environmental flows with downstream countries.

- “Uzbekistan issues warning on Rogun dam”, The Economist, July 24, 2016.

<http://country.eiu.com/article.aspx?articleid=1524460736>

- “中国电建国际公司副总经理王永强到公司中亚分公司调研”， Sinohydro Bureau 16 Co, April 14, 2019.

http://www.mjgcj.com/art/2019/4/19/art_5174_548264.html

- “塔吉克斯坦罗贡水电站投产 中塔两国电力合作前景广阔”，能源科技网, March 15, 2020.

<http://www.geosciencesinstitute.com/htm/7/72303.html>

Rovuma LNG Project

Cabo Delgado, Mozambique

Energy – Liquefied Natural Gas

Financiers: Export-Import Bank of China, China Development Bank, Bank of China, Industrial and Commercial Bank of China, in addition to other international financiers

Key Project Developers/Contractors: China National Petroleum Corporation, ExxonMobil, ENI, Galp, Kogas, and Empresa Nacional de Hidrocarbonetos

Project Status: Construction

The Rovuma LNG Project is a gas liquefaction and export terminal project. The project has triggered numerous negative social impacts on local communities. For instance, construction of onshore facilities has led to the involuntary dispossession of community lands without proper consultation or adequate compensation based on free, prior, informed consent principles. The project has led to the loss of livelihood of local fishing communities, as people no longer have access to the sea. Furthermore, increasing violence is associated with the gas development. Since instability triggered by gas development began in the region in 2017, over 800 people have been killed and 100,000 have fled the region.

The gas will not improve local energy access as 75 percent of the country is not connected to the grid, nor are there plans to build the required infrastructure needed to improve local energy access. Instead, most of the gas will be exported. Local communities and groups have called for compensation and replacement of any land that was destroyed or forcibly taken by developers. They have also asked that fossil fuel companies and related contractors conduct community consultation based on free, prior, informed consent, so as to ensure proper compensation and fair treatment. Lastly, local communities and groups are urgently calling for all project work to be stopped until the health and safety of the workers and local communities can be ensured, as two-thirds of the reported COVID-19 cases in Mozambique have originated in the gas development sector.

- "OPIC Rovuma LNG Comments," Friends of the Earth U.S., Friends of the Earth Mozambique/Justiça Ambiental, Center for Biological Diversity, 29 October 2019. <https://foe.org/resources/opic-rovuma-lng-comments/>.
- "Gas-rich Mozambique may be headed for a disaster," Al Jazeera, 24 February 2020. <https://www.aljazeera.com/indepth/opinion/gas-rich-mozambique-headed-disaster-200223112556449.html>.
- "Villagers suffer at the hands of Mozambique's LNG gas development," Medium, 15 September 2016. <https://medium.com/economic-policy/villagers-suffer-at-the-hands-of-mozambiques-lng-gas-development-e902b0a14c1b>.
- "Total's LNG Project Is Mozambique's Coronavirus Epicenter", Blomberg, April 14, 2020. <https://www.bloomberg.com/news/articles/2020-04-14/total-s-lng-project-is-mozambique-s-coronavirus-epicenter>

Salween River Mainstream Hydropower Dams

Salween River, Myanmar

Energy - Hydropower

Financiers: Unconfirmed

Key Project Developers/Contractors: Hanergy YN holding Group (Kunlong), HydroChina Corporation (Naungpha), China Three Gorges Project Corporation, Sinohydro Corporation, China Southern Power Grid (Mongton), China Datang Overseas Investment Company (Ywathit), Sinohydro Corporation (Hatgyi)
Project Status: Planned

The Salween mainstream dams include 5 large-scale hydropower projects on the Salween River in Myanmar. The projects are the Kunlong Hydropower Project (1400 MW), Naungpha Hydropower Project (1200 MW) and the Mongton Hydropower Project (currently undergoing redesign) in Shan State, the Ywathit Hydropower Project (4500 MW) in Kayah State, and the Hatgyi Hydropower Project (1360 MW) in Kayin State.

The projects would obstruct the Salween River, one of the longest remaining free-flowing rivers in Asia. The Salween mainstream dams negatively impact the river's lower section, inundating large areas of land, displacing local populations, destroying biodiversity and protected areas, and threatening the food, livelihoods and cultural systems of the ethnic populations that reside within the basin. The proposed Salween dam projects are located in active or "conflict affected areas" where there has been protracted and unresolved civil conflict between ethnic armed organizations and the Myanmar armed forces. Exploration and construction work for the planned dams has been repeatedly linked to serious and persistent human rights violations against local communities and indigenous peoples at the hands of the Myanmar armed forces, including forced displacement, extrajudicial killings, land confiscations, rape and other forms of sexual violence, and torture.

In December 2018, a Strategic Environmental Assessment on Myanmar's Hydropower Sector recommended removal of these dams from Myanmar's power plans, due to their extensive environmental and social impacts and disruption to the ecological connectivity of the Salween River. Given the risks associated with the projects, local and international civil society groups have called on banks to avoid financing them and instead seek opportunities to finance genuine renewable infrastructure to help meet the region's energy needs in a clean and rights-compatible manner in the decades to come.

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- "Strategic Environmental Assessment on Hydropower in Myanmar (Final Report)", International Finance Corporation, 2018. https://www.ifc.org/wps/wcm/connect/f21c2b10-57b5-4412-8de9-61eb9d2265a0/SEA_Final_Report_English_web.pdf?MOD=AJPERES&CVID=mslr9yx
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San Carlos Panantza Copper Project

Morona Santiago Province, Ecuador

Mining

Financiers: Bank of China, China Development Bank, Export-Import Bank of China, Chinese Mercantile Bank, China Construction Bank, Industrial and Commercial Bank of China.

Key Project Developers: China Explocobres S.A. (a consortium made up of China Railway Construction Company, Tongling Nonferrous Metals Groups Holding Company)

Project Status: Development

The San Carlos Panantza Copper project is a mega mining initiative located in Cordillera del Cóndor, known for its unique biodiversity. Many rivers and waterfalls that are vital to local communities also originate in this Cordillera. As a mining project, it will lead to negative environmental impacts, such as biodiversity loss, habitat loss, pollution, among others. It has also triggered social conflicts. For instance, consultation was not conducted with local people under free, prior and informed consent principles, and the indigenous Nankints and Shuar Arutam peoples have been forcibly evicted from their ancestral lands. There is unrest among local communities due to the militarization of the area, persecution and arrest of mining opponents and human rights defenders, raids, and judicial investigations. Several local communities are asking for the full suspension of the project.

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San Luis Port Project

Sao Luis City, Maranhao State, Brazil

Infrastructure – Port

Financiers: Industrial and Commercial Bank of China

Key Project Developers: China Communications Construction Company (CCCC), Lyon Capital, WPR Participações

Project Status: Stalled

The Port of San Luis project is located in a vast mangrove area where local and migratory birds and various marine species breed. CCCC did not fulfill official requests to establish a conservation unit in the project area. There are also archaeological and a sacred historical site that the CCC has also failed to protect. Local communities are traditionally fisher people and farmers with land titles granted by the state government.

The environmental licenses for this project have been obtained without consultation with affected communities. The legality of land titles presented by the companies has been contested in court. Since 2014, local communities, social movements, unions, religious institutions and researchers allege that project developers have retaliated against local leaders and people who oppose the project. There have been reports that project developers have threatened local leaders, pressured communities to sell their land, unlawfully demolished houses, and destroyed forests.

Local and nearby communities are calling for the project to be canceled due to its negative environmental and social impacts.

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Sao Manoel Hydroelectric Dam

Teles Pires River, Brazil

Energy – Hydropower

Financiers: Brazilian National Development Bank (BNDES), China Development Bank (CDB)

Key Project Developers: Empresa Energética São Manoel (EESM), a dam consortium led by China Three Gorges/EDP (66.6%) in conjunction with the parastatal energy company Furnas (33.3%).

Project Status: Operational

The 700 MW Sao Manoel Hydroelectric Dam (UHE São Manoel) is located on the Teles Pires River, within the Tapajos basin of the Central Brazilian Amazon. The project is part of a cascade of four large dams that were constructed simultaneously in recent years on the Teles Pires River. The dam is located just 400 meters from the border of the Kayabi Indigenous Territory, where villages of the Kayabi, Munduruku and Apiaka indigenous peoples are located downstream along Teles Pires River. The planning and licensing attracted controversy for its underestimations of social and environmental consequences, including cumulative and synergistic impacts with upriver dams, such as UHEs Teles Pires, Colider, or Sinop Dams.

No process of free, prior and informed consent with indigenous peoples was carried out. The project has provoked severe downstream impacts on the livelihoods and rights of the Munduruku, Kayabi and indigenous peoples, affecting water quality and fish species, threatening food security, and driving public health problems. Dam construction has contributed to destruction of sacred cultural sites, as well as illegal land clearing, logging, and mining in the Teles Pires region.

An urgent plan of action, developed together with indigenous communities, should be fully supported by CTG and CDB to reduce negative dam impacts and safeguard the health and well-being of vulnerable indigenous populations living downstream from the São Manoel Hydroelectric Dam.

- "Protest letter from Kayabi, Apiaka e Munduruku people sent to the Brazilian government in 2011," 2010.

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- "Barragens E Povos Indígenas No Rio Teles Pires: Características e Consequências de Atropelos no Planejamento, Licenciamento e Implantação das UHEs Teles Pires e São Manoel" Fórum Teles Pires", June 6, 2017.

http://philip.inpa.gov.br/publ_livres/Dossie/S_Manoel/Outros/Dossie%CC%82_Teles_Pires_Final_09jun2017_reduzido.pdf

Société Camerounaise de Palmeraies (Socapalm) Palm Oil Plantations

Cameroon

Agribusiness – Palm Oil

Financiers: Bank of China

Key Project Developers/Contractors: Socapalm

Project Status: Operational

Socapalm holds six industrial palm oil concessions in Cameroon totaling 58,063 hectares. Bank of China is exposed to Socapalm investments via loans to Bolloré Group, a major shareholder in Socapalm. Socapalm's six palm oil plantations have faced a number of ongoing environmental, social, legal, and reputational risks.

Palm oil is notoriously environmentally unsustainable due to its reliance on converting native forests to monoculture plantations. The destruction of natural forests to monocultural plantations is doubly problematic due to their locations in biodiversity hotspots, as well as the climate implications of deforestation. Furthermore, Socapalm plantations have been tied to increased human rights violations and loss of community livelihoods. Indigenous peoples and women face specific constraints and impacts to their rights and livelihoods. The Organisation for Economic Co-operation and Development (OECD) national contact points in Belgium and France, which are responsible for identifying violations to the OECD Guidelines, have indicated that Socapalm is not compliant.

Socapalm has also become embroiled in a number of legal disputes. In May 2019, a court case was filed against Bolloré in France for its failure to comply with commitments made in 2013 during the OECD-led mediation. The mediation was intended to improve the living and working conditions in Socapalm plantations. However, legal cases against Socapalm continue – in 2019 dozens of peasants from Cameroon joined another court case against Bolloré in Paris. In response, Bolloré, its subsidiary Socfin and Socapalm have filed over twenty lawsuits against journalists, media organisations and NGOs in order to silence dissent.

Civil society groups in Cameroon advocate for a transition to a community-based smallholder model over large-scale industrial concessions to ensure reduced risk of rights violations and greater guarantee that benefits will flow to communities. Civil society in Cameroon has been actively supporting local communities and indigenous peoples to protect their rights and receive redress and compensation, including efforts to get land back and maintain forests for food gathering, hunting and collection of medicines and construction materials.

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Sombwe Hydropower Plant

Haut-Katanga Province, Democratic Republic of Congo (DRC)

Energy - Hydropower

Financier: Unconfirmed

Key Project Developers/Contractors: Sinohydro/PowerChina, Kipay Investments

Project Status: Construction

In June 2019, PowerChina and the Congolese company, Kipay Investments Sarl, signed a joint venture for the construction of the 150 MW Sombwe hydropower plant in the DRC. The proposed US\$400 million Sombwe hydroelectric power complex includes a dam, reservoir, and road works. It is located inside Upemba National Park, one of the country's oldest national parks, famous for lions, endemic zebras, leopards, buffalo, elephants, among other charismatic megafauna. As the dam is located inside a Congolese Protected Area, the project violates Law N° 14/003 of February 11, 2014 relating to nature conservation. Park staff who have voiced concern regarding the environmental and social impacts of the dam have been offered bribes in exchange for their silence, and have even faced death threats.

Dam construction requires a deep 40 km long reservoir, which threatens migration of the largest mammals. In particular, the dam will block migration paths of the last population of 193 elephants in the Katanga region. The dam will further block fish migration in the Lufira River. Changes in flow rate and sediment load in the extensive network of lakes into which the Lufira runs will dispossess local downstream communities of their livelihoods, as they depend on the fishing resources for their survival. Most alarmingly, any degradation to Lake Upemba's natural ecosystem could trigger a food crisis, impacting nearly 80,000 fishermen who are settled with their families in this conservation area. Compounding the situation is the project developer's failure to design a consultation process based on free, prior, and informed consent, per international best practice. In November 2019, road construction to the dam site began.

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South Pulangi Hydroelectric Power Plant Project

Damulog, Bukidnon, island of Mindanao in the Philippines

Energy – Hydropower

Financier: Unconfirmed

Key Project Developers/Contractors: Pulangi Hydro Power Corporation and China Energy Co

Project Status: Agreement

The 250 MW South Pulangi Hydroelectric Power Plant is proposed to be located on the Pulangi River. The river flows through the remote Pantaron range of central Mindanao, one of the largest untouched, primary forests left in the Philippines. Recent scientific study of the area has led to the discovery of four new species of carnivorous pitcher plants (*Nepenthes*). If the dam is built, it would likely permanently alter the old growth forest's ecosystem by fragmenting habitat, facilitating biodiversity loss, disrupting aquatic river species, increasing soil erosion, and creating water and soil pollution.

With a 143-metre dam, the project's reservoir will flood about 2,833 hectares of indigenous peoples land in four towns, including the Manobo indigenous peoples. Approximately 30,000 people live in the area. Although not all impacted communities require resettlement, estimates and development plans have not been provided to the communities. According to local communities and indigenous peoples, the project developers did not adequately consult local communities, nor did they follow proper legal processes regarding public consultation. Due to the lack of transparency regarding the project, there is currently a pending court case with the Supreme Court regarding the release of the loan details. Lastly, dam development will likely lead to increasing militarization in the area, as the area has been under martial law for nearly three years.

- "Four New Species of *Nepenthes* L. (*Nepenthaceae*) from the Central Mountains of Mindanao, Philippines", Plants Journal, 2014. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4844298/>

- "China-backed dam threatens Indigenous people in the Philippines", Aljazeera, 19 January 2020. <https://www.aljazeera.com/news/2020/01/china-backed-dam-threatens-indigenous-people-philippines-200115050855015.html>

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SSRL Thar Coal-I 6.8Mtpa & Power Plant

Tharparkar district, Sindh province, Pakistan

Energy – Coal

Financiers: Unconfirmed

Key Project Developers/Contractors: Shanghai Electric Group Company and State Power Investment Corporation, Shanghai Electric Power Co. Ltd., Sino Sindh Resource Limited and China Coal Technology and Engineering Group

Project Status: Agreement

The SSRL Thar Coal-I 6.8Mtpa & Power Plant is a 1,320 MW coal plant and coal mine, with coal sourced from Thar coalfield Block 1. As a sub-critical coal plant, the project will lead to negative environmental and social impacts. Construction of a reservoir for the water discharged from coal mining field and power plant will contaminate the groundwater, and both local coal mining and power generation will cause land degradation, water stress and air pollution, damaging local vegetation, biodiversity, natural habitat, wildlife and public health.

Hundreds of livestock-dependent families belonging to different villages of Thar coalfield Block-I will be displaced and suffer serious livelihood losses. Instead of acquiring the land directly from the local land-owners, project proponents plan to procure the land from the proponents of the mine, thus absolving themselves from the responsibility of making direct payments to the displaced communities, which violates local land acquisition laws. The Land Acquisition Act requires prior land acquisition for starting a project and provides a detailed procedure for filing and hearing objections. However, most of the land has been acquired under emergency provisions, thus circumventing this process. Although the project claims that dumped ash will be compacted and mixed with sand to prevent leaching, the project has not disclosed how seeping of coal ash in ground water would be restricted to storage ponds. The proposed effluent disposal site is a protected wildlife sanctuary declared under the Sindh Wildlife Protection Ordinance, 1972. Further, no guidelines have been provided for release of particles and heavy matter from coal ash into the environment.

Local communities have been resisting acquisition of their land for the project. They demand that instead of buying their land, the government should offer coal royalties on the land acquired from them in addition to ensuring grazing land for their livestock.

- "Mining firms halt process of handing over compensation cheques to Thar villagers", Dawn, 9 January 2020.

<http://tiny.cc/kjoknz>

- "Thar Coal Project and Local Community: Documenting Views and Experiences of Stakeholders", National Commission for Human Rights (NCHR), 2019. https://www.boell.de/sites/default/files/2019-12/Thar_Coal_Project.pdf <http://tiny.cc/zkoknz>

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Sumsel 1 Coal Plant

Kabupaten Muara Enim, Sumatra Selatan, Indonesia

Energy – Coal

Financiers: Bank of China, China Construction Bank, Industrial and Commercial Bank of China

Key Project Developers/Contractors: PT Shenhua Gouhua Lion Power, Shenhua Group Corporation Limited, Lion Power

Project Status: Development

The US\$750 million mine mouth coal power plant Sumsel 1 is a combined coal power plant and coal mine project with a capacity of 600 MW. The coal plant and coal mine are approximately 500 meters apart. The project was built with an investment of US\$750 million. The project has encountered social and labor conflicts. Located in Muara Enim Regency, the project is opposed by local communities from Tanjung Menang Village, as they do not wish to sell their land.

The coal project has also not provided construction workers adequate salaries, as regular and overtime wages are currently below the district minimum wage standards. Some workers have reported that adequate health insurance and safety equipment such as uniforms and shoes have not been provided. Workers who have raised concerns have reportedly been intimidated by the Indonesian military, who have maintained a presence in the project site. In addition to the well-known public health, environmental, and climate impacts of coal plants, developing the coal plant has blocked three tributaries which has flooded community rubber plantations and farms.

Tampur Dam Project

Aceh, Indonesia

Energy - Hydropower

Financiers: China Minsheng Bank, Industrial and Commercial Bank of China, other international financiers

Project sponsors: PT. Kamirzu

Project Status: Suspended

The 428 MW Tampur Dam project is located in the heart of the Leuser Ecosystem, one of the largest and most biodiverse forest ecosystems in Southeast Asia, spanning across Aceh and North Sumatra provinces. The Leuser Ecosystem is internationally recognized for its outstanding biodiversity and primary tropical forests, and is part of Gunung Leuser National Park, one of three national parks which collectively comprise the Tropical Rainforest Heritage of Sumatra, a World Heritage Site. The Tampur Dam would require flooding 4,000 hectares of primary forest. The area contains key elephant corridors that connects the elephant population in Gunung Leuser National Park to the forests of North Sumatra, and also contains critical habitat for numerous endangered species such as Sumatran tiger, orangutan, rhino, among other charismatic species.

In addition to environmental impacts, the Tampur Dam would have a number of social impacts. It would block access to the Lesten River and inundate 4,000 hectares, impacting communities from 3 districts and requiring involuntary resettlement of 75 families. In March 2019, WALHI Aceh filed a lawsuit to Banda Aceh State Administrative Court against the Aceh Government on the Borrow-to-Use Forest permit (IPPKH) of the Tampur Dam project. The court deemed it illegal for the Aceh Government to issue the permit, as the authority to do so lies with the Ministry of Environment and Forestry. The judges ruled in favor of the complainants in September 2019. In January 2020, the Medan State Administrative court also ruled in favor of the complainants after the Aceh Government filed an appeal.

Currently, local communities are pleased the dam has been cancelled. Any plans to revive the Tampur Dam would likely revive conflicts and controversy.

- "WALHI Wins the Judge Ruling of PLTA Tampur-I", WALHI, 28 August 2019. <https://walhi.or.id/walhi-wins-the-judge-ruling-of-plta-tampur-i>

- "Desa Lesten akan Ditenggelamkan, Demi Alasan PLTA Tampur", Change.org petition. <https://www.change.org/p/gubernur-aceh-batalkan-mega-proyek-pltatampur-yang-mengancam-jutaan-jiwa/u/24975763>

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Toromocho Copper Mine

Morococho District, Yauli Province, Junín Region, Peru.

Mining

Financiers: China Development Bank and Export-Import Bank of China

Key Project Developer: Aluminum Corporation of China (Chinalco)

Project Status: Operational

The Toromocho Copper Mine is located within indigenous territory and has become controversial due to an opaque relocation process. The company built a new town –Nueva Morococho– where local communities have been resettled. However, Nueva Morococho represents various safety risks for the community, including: seismic vibrations, presence of heavy metals, and accumulation of groundwater leading to dangerous levels of humidity and mold. Communities living in Nueva Morococho are concerned about environmental pollution and poverty, as there is a lack of economic opportunities in the new town. According to the media, Chinalco has secured agreements with state security forces that have resulted in harassment, intimidation, and surveillance of local residents who have voiced concerns.

The community demands that Chinalco engage in a transparent and participatory process to establish a Framework Agreement with the communities. Through the Framework Agreement, communities ask that Chinalco avoids and minimizes the environmental and social impacts of the project, and provides fair, adequate compensation for those affected.

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Water Infrastructure Mega-projects in the “Blue Horse” Program of Mongolia

Selenge River, Onon River, Kherlen River, Ulz and Khovd river basins, Mongolia
Energy and Water Infrastructure

Financiers: Export-Import Bank of China, Mongolian government funding, and international sources

Key Project Developers/Contractors: China Gezhouba, Tractebel Engineering (Egiin gol Hydro and likely Erdeneburen Hydro), Prestige Group (Kherlen-gobi and Orkhon-gobi water transfer), XinXin Mining Co (Oon-Ulz water transfer), and other unconfirmed developers

Project Status: Egiin Gol Hydro – suspended; other four projects are in planning

Sponsored by the Mongolian government, the “Blue Horse” Program includes five large water infrastructure projects: the Egiin Gol Hydropower Dam, Erdeneburen Hydropower Dam, Orkhon-Gobi Water Reservoir Dam, and the Kherlen-Gobi and Onon-Ulz inter-basin water transfer projects.

Collectively, the projects threaten two World Heritage and three Ramsar sites, blocking fish migration, and dewatering key rivers. If built, the dams would likely create transboundary tensions with China (via the Kherlen River) and Russia (via the Selenge River and Ulz River). No public consultations based on free, prior and informed consent principles were conducted for the projects. According to scientists and experts, Mongolia has insufficient water resources to support hydropower and massive industrial water-consumption.

Both the Export-Import Bank of China and World Bank have ties to these projects. Since 2012, Mongolian and Russian civil society and communities have informed both institutions of the cumulative, environmental, social, and transboundary water impacts of the Egiin Gol Dam and other planned dams. Notably, in 2016, Export-Import Bank of China shifted their financing away from the Egiin Gol Dam to less harmful projects, in light of civil society concerns. In 2017, the World Bank stopped feasibility studies for other dams. This essentially halted international support to hydropower development in the fragile Selenge River basin.

Civil society groups are calling for all water megaprojects in Mongolia to be closed; for financing to be directed to renewable alternatives such as wind and solar and transmission, based on emerging good practice; development of governance systems for efficient equitable use of water resources; and prioritization of traditional local users and ecological safety over supply to mining megaprojects.

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Zashulansky Coal Mine

Location Zabaikalsky Province, Russia

Mining

Financier: Russian government financing and undisclosed financiers

Key Project Developers/Contractors: Razrezugol LLC, Shenhua, EN+ Group

Project Status: Construction

The Zashulansky coal mine is being developed by Razrezugol LLC, a joint venture between En+ Group and Shenhua. It is estimated the project will cost US\$280 million. En+ Group has applied for preferential status and state subsidies from the Russian government for an associated road infrastructure and a wastewater treatment plant.

The project and associated infrastructure threaten to fragment primary forest known for high biodiversity. The project will also degrade existing local roads due to increase coal transportation. Significantly, project developers did not conduct any consultations based on free, prior and informed consent principles. As a result, local groups are calling to stop the project, and recommend that any roads damaged by coal plant development should be repaired.

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