

## Civil Society Letter to the Brazilian Designated National Authority

**Date:** Thursday, June 14, 2012

Mr. Sanderson Alberto Medeiros Leitão  
Global Climate Changes Division Head  
Ministry of Science, Technology and Innovation  
Esplanada dos Ministérios,  
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Brazil

Dear Mr. Sanderson Alberto Medeiros Leitão,

We are writing to express our concern regarding the applications of controversial large Brazilian dam projects for carbon credits within the Clean Development Mechanism (CDM). These projects include the Madeira Complex projects – 3150 MW [Santo Antônio Hydropower Project](#) ([/node/3052](#)) and the 3750 MW [Jirau Dam](#) ([/node/7477](#)) – and the 1820 MW [Teles Pires Dam](#) ([/node/3056](#)) in the Tapajós Basin.

In order to receive letters of approval, these projects must demonstrate to the Comissão Interministerial de Mudança Global do Clima that they meet a series of [criteria on sustainable development](http://www.mct.gov.br/index.php/content/view/320870.html) (<http://www.mct.gov.br/index.php/content/view/320870.html>). However, as we describe below and in greater detail in the Annex, these projects fail to meet these criteria on a number of fronts:

- ▶ **Contribution to local environmental sustainability:** None of these projects contribute to local environmental sustainability, and all three hydropower plants have had their environmental licenses legally questioned by federal prosecutors because of their enormous environmental and social impacts. Experts have criticized their EIAs, citing the lack of consideration for transboundary impacts, underestimation of sedimentation, impact on migratory fish species and subsequent effects for the food security of both indigenous and urban citizens.
- ▶ **Contribution to improvement of labor conditions and net job creation:** It would be absurd to consider that the dams contribute to the development of good working conditions. Repeated strikes and demonstrations by workers at Jirau and San Antônio have exposed poor working conditions, including inadequate sanitary facilities, poor food provision, lack of appropriate medical care, uninhabitable shelters, etc.
- ▶ **Contribution to the distribution of income:** It is well known that these projects have negatively impacted a large number of families in coastal, fishing and farming communities, through the loss of their lands and livelihood resources. In addition, the cost of living, urban violence, and prostitution in the new development areas is expected to rise, thereby negatively affecting local economies and most residents.
- ▶ **Contribution to training and technological development:** These projects clearly have not contributed positively to worker training. In addition, CDM financing could be supporting new and innovative technological developments rather than hydropower, which already contributes 80% to the overall electricity supply.
- ▶ **Contribution to regional integration and linkages with other sectors:** As the energy generated by these projects will be for the interconnected system to meet the national energy demand, the contribution of plants to regional development is small.

In addition, these projects do not meet the CDM criteria for sustainable development and additionality on the following grounds:

- ▶ **Projects emit greenhouse gases:** As demonstrated by the latest research in reservoir emissions, hydroelectric plants in the tropics are intrinsically large emitters of CO<sub>2</sub> and CH<sub>4</sub>. In addition to large emissions produced by decomposition of submerged vegetation in the reservoirs – particularly in the first 10 years of the plant (the period of the CDM projects) – a large amount of methane is released also at the turbines, spillways, and from the surface of the water immediately downstream. Moreover, these projects will lead to greater deforestation of the Amazon rainforest – a key climate regulator and carbon stock – through an increase in migration, land speculation, and through spurring large-scale soybean agribusinesses.
- ▶ **Projects are not additional:** The resources for implementing all three projects are guaranteed by private and public investors and public funding through the participation of state companies and the Brazilian National Development Bank (BNDES). All three dams are already under construction, which proves that they would have been built regardless of CDM funding and are therefore not additional.

We urge you not to issue letters of approval to any of these projects, since they do not comply with your criteria for CDM participation. If approved, these projects would undermine international mitigation efforts and would be prejudicial to the integrity of your criteria and procedures. In addition, we would welcome if you could clarify your vision for Brazil's participation in the CDM and reaffirm its commitment to keeping the guidelines strong.

We would be happy to provide further information on technical data and scientific analyses for these projects, or participate in meetings for further discussion on this matter.

Sincerely,

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6. Associação Interamericana para a Defesa do Ambiente (AIDA) – Mexico
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41. Gujarat Forum on CDM – India
42. IARA – Rio de Janeiro – RJ
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**More information:**

- ▶ [Download the letter and annex in English \(PDF\) \(/sites/default/files/attached-files/brazilianrna\\_intrivers\\_14june2012\\_eng\\_0.pdf\)](/sites/default/files/attached-files/brazilianrna_intrivers_14june2012_eng_0.pdf)

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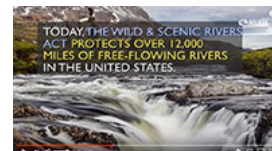
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