

CORAP

« COALITION REFORMES ACTION PUBLIQUE »

Coalition des Organisations de la Société Civile pour le Suivi des Réformes et de l'Action Publique

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Kinshasa, January 31st, 2014

To the Members of the Board of Executive Directors

The World Bank
Washington, DC
USA

Dear Sirs/Madams;

Re: The Inga 3 Technical assistance grant.

We, organizations of the congolese civil society met in CORAP, understand that the Board of Executive Directors will be deliberating on the funding of a technical assistance grant for the proposed Inga 3 hydroelectric project on the Congo River, on the 14th of February, 2014. The Congo River is the second largest river in the world by flow and is vital for the economy of our country, supporting the livelihoods of millions of people.

The Inga 3 project is viewed by many as a positive economic development project, mainly on account of its potentially significant macroeconomic impacts in supplying power for export and promoting industrial and mining development in the Katanga region of DRC. Sadly, we the Congolese continue to ask whom this energy is for? Much less attention is being paid to the potential impacts of this scheme on the environment and our communities whose livelihoods are entirely dependent on the river; and even worse the inappropriateness of the project to address the energy poverty gap of the DRC.

Notable concerns with the project include:

- i. **Lack of needs options assessment; and potential for renewable energy solutions:** An inclusive assessment of the needs of society needs to be the first step of a sound energy planning process. After billions of dollars have been invested in the sector, more than 90% of our population, and 99% of our rural population, don't have access to electricity. Meeting these needs must be the priority of future energy projects in the Democratic Republic of Congo (DRC).

A number of potential hydropower sites were identified on the Congo River and its tributaries in past studies. No needs assessment was ever carried out, and we are not aware of any comprehensive assessments of other alternative energy options apart from identifying the hydropower potential sites. A comprehensive analysis of alternative energy supply options would have been of great benefit. We still believe that it is not too late to incorporate this aspect into the proposed SEIA with the investigations being broadened to include all possible options, costs involved, the benefits to the majority of the Congolese and to the overall economy. It would not only enlarge the debate on appropriate energy solutions for DRC, but also lead to better-informed energy sector planning and prioritization of projects that will be cost effective, sustainable and best suited for addressing energy needs and energy poverty in DRC.

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A key prescription of the World Bank standards is that project-affected people should be made project beneficiaries. We note with concern that most of the benefits from the proposed hydropower scheme will be enjoyed by urban, industrial and mining consumers, mainly in foreign countries, with little if any benefits accruing to the majority of Congolese. The project's trickle-down development model assumes that foreign earnings from power exports will propel development in the DRC, thereby benefiting local people. Yet evidence is mounting that this model does not work well in developing countries weakened by corruption and lacking strong national institutions, such as the DRC.

The DRC has a huge population without modern electricity. This population needs to access modern energy sources for all the benefits it can bring, as well as to reduce their need for unsustainable forest products for primary energy use. There is a large potential for clean and renewable energy in DRC, and a huge need for finance for its development. It is time to move more quickly to develop these resources, rather than destructive mega-hydro plants. Decentralized energy is the only feasible way of meeting the energy needs of the majority in such a vast country with limited capacity for maintaining huge infrastructure.

- ii. **Public participation and access to information:** The Government of DRC, assisted by the World Bank and the African Development Bank, has formulated the Inga 3 Dam projects without full involving other stakeholders, especially DRC citizens. Apart from press articles, we in the DRC do not have any reliable sources of information with regard to the Inga projects. There are no government bulletins or official press releases, nor have there been public consultation meetings. Public engagement throughout the project cycle – from formulation, the feasibility studies, construction and operation – is critical to successful development outcomes. Related to this, there is no mechanism or communication channel for local people to air their views on the project. A notable exception is the recent call for the public to comment on the Inga 3 Environmental Impact Assessment Terms of References. Also, various interested parties have made numerous requests to the DRC government and the World Bank for the feasibility study report but it remains unavailable and confidential. This including discounting of important Congo river ecosystems such as the estuary and the plume, is a major flaw in the Environmental and Social Impact Assessment (ESIA).*
- iii. **Addressing outstanding social legacy from previous projects:** Many of the negative social and environmental issues associated with Inga 1 and 2 have not been fully addressed. For example, the communities that were displaced by the two earlier dams are still waiting for compensation. The now-infamous Camp Kinshasa community from the earlier projects will need to be compensated and properly resettled before Inga 3 and the Grand Inga move forward.*
- iv. **Adhering to WB standards:** We assume that the Bank is keen for the proposed ESIA to be conducted in compliance with its own policies and guidelines. Our reading of the Terms of Reference for the SEIA for the Inga 3 leave us with a few major concerns in particular the scope of the studies that treat the Inga 3 as separate from the overall Grand Inga*

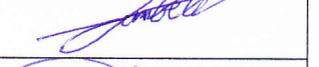
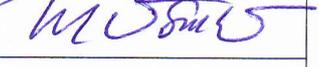
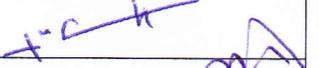
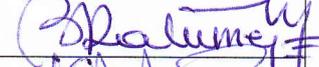
scheme, yet they share the same environment. The proposed ESIA excludes the river's estuary, and does not include a cumulative assessment of the impacts of all proposed dams at the Inga site. The studies as presently conceptualized are not fully compliant with international best practice or the World Bank's own guidelines.

Conclusion

In conclusion, we are appealing to the World Bank to ensure that

- The energy needs of the DRC population are prioritized in a comprehensive needs assessment
- An options assessment for projects that meet these needs is conducted,
- A basin wide-EIA is carried out, which includes cumulative impacts of the Grand Inga project and impacts on the estuary
- Information is openly shared
- Mechanisms are in place to include citizen participation and
- That the Inga 1 and 2 legacies are addressed.
- We are asking the World Bank to adhere to these minimum acceptable options for the Inga project.
- We are also asking that if this project was to go ahead at least 50% of the power generated should be
- For the people of the DRC and used to reduce the energy access gap.

Signed :

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