



Dumping in the Teesta River, India.  
Photo by Manju Menon.

# The HSAP: Weakening Global Dam Standards

## AN INTERNATIONAL RIVERS FACT SHEET FOR CIVIL SOCIETY

**A** new industry effort threatens to undermine the recommendations of the World Commission on Dams (WCD). The Hydropower Sustainability Assessment Protocol (HSAP) is a voluntary, non-binding scoring system to assess the social, environmental, and economic sustainability of dams. This fact sheet examines how the HSAP works, some of its shortcomings, and why it could end up greenwashing destructive dams.

The HSAP was created between 2007 and 2010 by the Hydropower Sustainability Assessment Forum (HSAF), an initiative of the International Hydropower Association (IHA), an industry group that was formed in 1995. Participation in the HSAF was limited to a self-selected group of indus-

try representatives, government agencies, financiers, and large non-governmental organizations (NGOs). Meanwhile, Southern civil society organizations and dam-affected people were largely excluded.





Check the list of HSAP members from your country here: <http://hydrosustainability.org/Sustainability-Partners/Sustainability-Partners.aspx>

**VOLUNTARY SCORES, NOT STANDARDS**

The HSAP is not a set of standards, but a series of voluntary scores. The scores are meant to be applied to a number of different categories such as *Communication and Consultation; Governance; Environmental and Social Management; Infrastructure Safety; Project Benefits; Project Affected Communities and Livelihood; Resettlement; Indigenous Peoples;* and others. These categories are assessed across four stages that correspond to stages of hydropower development: **Early Stage, Preparation Stage, Implementation Stage,** and **Operation Stage.**

HSAP assessments are based entirely on a scoring system that has no basis in international agreements. There are two baseline scores: 3, which represents “basic good practice,” and 5, which represents “proven best practice.” However, developers are not penalized for obtaining a score less than 3 in any category, and there is no safeguard to assure that higher scores are accurate and independent of industry influence.

**A score of 1** represents “significant gaps relative to basic good practice.”

**A score of 3** represents “basic good practice.”

**A score of 5** represents “proven best practice.”

In general, project assessment should be transparent, guaranteeing access to information and participation of affected communities. However, the HSAP does not require any of this. Assessors are not required to meet with affected communities, and the HSAP does not establish clear methods for civil society representatives to act as assessment observers. Instead, the HSAP only promotes civil society observation if “there are reasons to have a high level of transparency or partnership.” Without an independent oversight committee to establish third-party assessors and methodologies, the hydropower industry could grab further control over deciding what a “sustainable dam” really is.



**WEAK CRITERIA**

Further, the HSAP does not require developers to meet even the conditions of national legislation in a host country. As a result, assessment scores simply inform decision-makers, they do not act as standards which could correct industry behavior. The HSAP scoring system itself suffers from many weaknesses that threaten to undermine hard-fought hydropower standards. In important aspects, the Protocol falls well short of existing social and environmental standards such as the recommendations of the World Commission on Dams (WCD). To read and endorse our full critique of the shortcomings of the HSAP, please visit <http://www.internationalrivers.org/node/5905>.

## AN HSAP TRIAL ASSESSMENT: THE TEESTA V DAM<sup>1</sup>

The 510 MW Teesta V hydroelectric project was constructed in the Eastern Himalayan state of Sikkim in India between the years 2000 and 2008. The project is one of a series of cascade dams on the Teesta River, a 315 km long tributary of the Brahmaputra River. The Teesta V project has a 96.45 m high dam which diverts water through a 17 km long tunnel to the powerhouse, bypassing a 23 km length of the river. The Teesta V trial assessment report, published in 2010, measured how well the Teesta V project met the guidelines of the HSAP's Operation Stage Assessment. The report gave the Teesta V project mostly 4 and 5 scores in the Operation Stage guideline categories. However, independent assessments by civil society organizations in India illustrate that significant problems remain in the Teesta V Dam that contradict the trial assessment report's conclusions.



Construction of Teesta V Dam, Sikkim, India, 2008.  
Photo by Samir Mehta, International Rivers.

### ENVIRONMENTAL IMPACTS

The Teesta V project faces high flooding and siltation problems. The impediment to natural flows due to the dam seriously impacted the Dikchu town bordering the reservoir during a flash flood in 2008. The left bank of the river caved in, the risks magnified due to lack of appropriate 'reservoir rim treatment'. Even during the normal operations local residents are observing the banks caving in due to the impact of constant diurnal fluctuation in water levels in the reservoir as per power generation patterns. With upto 85–90% flow diverted through the tunnels in the lean season, the impact on downstream ecology has been serious.

The Sikkim Forest Department has fought a litigation against the project developer NHPC Ltd. for illegal encroachment of forest land and violation of conditions of clearance. The Comptroller and Auditor General (CAG) of India, the apex audit institution in the country, in a 2009 report on Sikkim makes a mention of a Sikkim Mines, Minerals and Geology Department

report which has "revealed gross negligence by the NHPC in disposal of muck generated from execution of the Teesta Stage V project. Spoils were thrown along the riverbanks raising the riverbed of the Teesta leading to change in the flood behaviour of the river, acceleration of toe erosion and degradation of the overall geo-environmental setting of the area."

### SOCIAL IMPACTS

There was very little consultation with affected local and indigenous people in the planning and construction of Teesta V Dam, with the mandatory public consultation also being held in the state capital Gangtok and not in the affected areas. The Environmental Impact Assessment (EIA) was very weak on social aspects and an ethnographic study was only commissioned as a post-clearance study!

The project has involved extensive blasting and tunneling in a geologically fragile landscape. Impacts observed include cracks in houses above long tunnel alignments, drying up of water resources and major landslides. The area around the reservoir developed major sink holes, leading an entire village to face severe cracking of houses. Some homes have completely fallen down, rendering people homeless.

### WEAK REHABILITATION AND RESETTLEMENT

Only those whose lands were to be directly acquired for project components were identified as project-affected-persons (PAPs) to be considered for R&R, but the number of people has swelled considerably due to the reasons mentioned above. In fact a November 2010 compliance report by the company acknowledges this by stating that "final list of partially affected people will be issued by the District Collector", two and a half years after the project has been commissioned!

Distribution of monetary compensation for displacement was also uneven. While a majority of displaced people received 4–5 rupees per square foot of their houses, some higher-class families received four times as much. The large discrepancies between the high scores of the Teesta V project trial assessment report and the lasting impacts that affected communities have faced after project completion illustrate the dangers of the HSAP. Limited assessments of this kind could greenwash what are in reality destructive dams.

<sup>1</sup> Thanks to Dawa Lepcha for analysis.

### **A CERTIFICATION SYSTEM TO GREENWASH DAMS**

Despite HSAP's weak guidelines and non-binding nature, the IHA aims to develop the Protocol into a certification scheme to brand, sell, and market the idea of "sustainable dams." The IHA is planning on developing a "sustainable dam" logo to brand the HSAP. The logo would be used as a greenwashing stamp on hydropower projects to raise the profile of the potential certification system.



According to the IHA, the possible certification system would certify any dam that has undergone an HSAP assessment as a "sustainable dam," regardless of the assessment's outcomes or final scores.

As of 2011, the HSAF had yet to agree on methodologies for such a certification system, let alone the criteria to choose and train potential assessors. Given the weak nature of the HSAP's scoring system, the creation of a certification system would be a slap in the face of international standards for hydropower.

### **WHAT YOU CAN DO**

The HSAP threatens to weaken, not improve, the social and environmental responsibilities of the hydropower industry. You can do your part to prevent this from happening. A few ideas include:

#### ***Lobby your government:***

Lobby your government members to not support the HSAP. In your lobbying, you can urge your government to adopt stronger benchmarks for dams that truly address the needs, livelihoods, and rights of dam-affected communities and the environment.

#### ***Lobby industry:***

Lobby existing HSAP industry sponsors to withdraw their support for the HSAP, and lobby other industry members to not join as a sponsor. Check the list of HSAP sponsors from your country here: [http://www.hydropower.org/membership/current\\_members.html](http://www.hydropower.org/membership/current_members.html)

#### ***Monitor project assessments:***

Each HSAF sponsor is expected to self-assess one project using the Protocol by the end of 2012. As a result, 2011-2012 will see a number of HSAP project assessments that need to be monitored. Any hydropower project in your country may be subject to an HSAP assessment, and these assessments need independent monitors and observers. Take initiative by contacting the project developer and assessor, demand to participate in and observe project assessments, and monitor in their status.

#### ***Keep us informed of your efforts!***

We'd like to hear from you. Please let us know if there is an HSAP assessment occurring on a hydropower project in your country, what you are doing about it, and the results of your work!

### **FURTHER RESOURCES:**

**Check the List** of HSAP Members from Your Country: <http://hydrosustainability.org/Sustainability-Partners/Sustainability-Partners.aspx>

**Read and Endorse** our Critique of the HSAP: <http://www.internationalrivers.org/en/node/5905>

**Learn More** about the World Commission on Dams: <http://www.internationalrivers.org/en/node/348>

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