



Submission by International Rivers to the CDM/UNFCCC as a contribution to the review of the Teles Pires Hydropower Project

The Teles Pires Hydropower Plant should clearly not be eligible to receive financial incentives under the CDM. Despite growing scientific evidence attesting to the major significance of GHG emissions from hydroelectric dams in the tropics,¹ the Environmental Impact Study (EIA) for the project simply sidestepped this fundamental question, including its cumulative impacts with four other large hydroprojects slated for construction along the Teles Pires river. The dam cascade itself is linked to the opening of an industrial waterway (*hidrovia*) along the Teles Pires-Tapajos rivers (including navigation locks on dams) aimed at increasing exports of large-scale mechanized soybeans from the agribusiness frontier in Northern Mato Grosso state - a further stimulus to clearing of the *cerrado* (tropical savannah) and Amazon forest biomes which play key roles in carbon storage and regulation of the regional and global climate system.²

Another highly relevant issue, that deserves careful consideration within the CDM validation process, concerns the rights of local indigenous communities. As described in a December 2011 letter from Kayabi, Apiacás and Mundurucu indigenous tribes to authorities of the Brazilian government, the environmental licensing process of the Teles Pires Hydropower Plant has been marred by: i) grave deficiencies in the analysis of impacts on indigenous peoples and their territories, ii) political pressures on federal agencies responsible for indigenous rights and environmental protection (FUNAI and IBAMA, respectively) to illegally approve licenses and iii) lack of free, prior and informed consultations and consent among threatened indigenous communities.

The following section of the letter from Kayabi, Apiacas and Mundurucu communities to Brazilian government authorities, regarding the Teles Pires Hydropower Project, is translated from the Portuguese original, available at: <http://www.internationalrivers.org/en/node/7187>

The indigenous component of the (Teles Pires) hydroproject, that should be part of the environmental impact study (EIA) has not yet been completed. Even so, IBAMA issued a Preliminary License in late 2010 and an Installation License for the hydroproject in August 2011. However, we are already aware of the extent of its environmental, social and cultural impacts that will affect our people. The

¹ See: P. M. Fearnside, 2011. Methane Emissions from Hydroelectric Dams”, *Science* (July 2011)

http://www.sciencemag.org/content/331/6013/50.short/reply#sci_el_14254

Pueyo, S. and P.M. Fearnside, “Emissions of Greenhouse Gases from the Reservoirs of Hydroelectric Dams: Implications of a Power Law”, *Oecologia Australis* 15(2): 199-212, June 2011

http://philip.inpa.gov.br/publ_livres/mss%20and%20in%20press/Pueyo%20&%20Fearnside-GHGs%20FROM%20%20RESERVOIRS--engl.pdf.

² GHG emissions from hydro-projects in the tropics are linked not only to flooded vegetation and sedimentation in reservoirs but also increased forest clearing and burning associated with intensified land speculation, migration and weak governance in the areas of influence of dam projects. For additional information on dams and climate change, see: http://www.internationalrivers.org/files/IntlRivers_WrongClimate_4.pdf

Sete Quedas rapids, which would be flooded by the dam, is the place where fish that are very important to us go to spawn, such as the pintado, pacu, pirarara and matrinchã. The construction of this hydroproject, drowning the rapids of Sete Quedas, polluting the water and drying up the Teles Pires river downstream, would eliminate the fish that are the basis of our sustenance. In addition, Sete Quedas is a sacred place for us, where the Mãe dos Peixes (“Mother of Fish”) and other spirits of our ancestors live - a place that should not be messed with.

All this is already being destroyed by explosions of dynamite at the Sete Quedas rapids as the construction of this dam of death has commenced. IBAMA issued environmental licenses without any process of free, prior and informed consultations with indigenous communities, violating rights guaranteed by article 231 of the Brazilian Constitution and ILO Convention 169, as well as other international agreements that Brazil has signed. Now, the government invites us to participate in meetings to discuss mitigation and compensation of the Teles Pires dam’s impacts, yet how are we to do this if the impacts have not been duly studied and discussed, and the project was illegally licensed?

Finally, given the availability of other sources of funding for the Teles Pires Hydropower Project, via the budget of the parastatal energy company Eletrobras, state pension funds, subsidized credit from the Brazilian National Development Bank (BNDES) and tax incentives, it may be concluded that there are no grounds for arguing the *additionality* of the project.

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