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RAMPAL POWER PLANT

Why the EIA study is not acceptable

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The proposed 1,320 MW Rampal Power Plant is an outcome of prime minister of Bangladesh Sheikh Hasina's visit to India from 10-12 January 2010. As per article 35 of the 51 point joint communiqué issued from that visit, a Memorandum of Understanding (MoU) was signed on February 20, 2010 between Indian Energy Secretaries of India and Bangladesh H S Brahma and Abul Kalam Azad in Dhaka. As per that MoU, India's National Thermal Power Company (NTPC) and Bangladesh Power Development Board (BPDB) was to set up the Bagerhat Coal Based power plant at Rampal jointly.

Initially it was proposed that Indian coal shall be used, later it was dropped because of its poor quality. Now they are proposing to bring high quality coal from Indonesia or Australia. This environmentally devastating project is to be financed from costly buyer's credit (Financial Express 22.07.12), but owned by India 50% with almost no direct investment. A joint venture in the name of Bangladesh India Friendship Power Company Ltd. (BIFPCL) is likely to start the project on Bangladesh soil, clearly on India's interest.

Agitation from the local people began to save their agricultural land as soon as government stepped into acquiring 1,834 acres of land. The project area lies only 10 km away from the Environmentally Critical Area of the Sundarbans; so, very soon the environmentalists from all over the country got concerned and stepped in to oppose it. The Bangladesh government fixed the project area without any economical benefit, technical feasibility, social and environmental impact study. Later an eyewash study in the name of Initial Environmental Examination (IEE) was done by the Centre for Environmental & Geographical Information Services (CEGIS), to get environmental clearance. The IEE Executive Summary mentioned many impacts (with several times using words like 'may', 'might') and suggested many solutions (with several times using words like 'should be', 'might be') adopted etc., those might reduce the environmental impacts. But the IEE finally states: 'however, the present electricity crisis demands the project for national development. At the end, it can be said that the potential benefits may outweigh the negative impacts'. Thus, the IEE was full of dubious statements and unpractical suggestions. But, the Environmental Impact Assessment (EIA) made for the power plant at Rampal states that the Site Clearance Certificate for the project was obtained from the Department of Environment (DOE) on the basis of that IEE report (page 433).

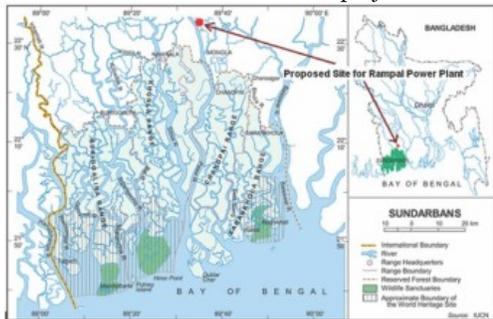


Figure 1: Proposed site for the Rampal coal based power plant.

The CEGIS completed the IEE study in September 2010 and the same has also completed the EIA study in January 2013. This EIA study report is available in the website of BPDB. The EIA writes, the region (project area and study area) is less industrialized. There are few industries near Mongla Port and within the Environmentally Critical Area (ECA) boundary which may cause environmental pollution.

If the responsible authorities impose Environment Conservation Act 1995 and Environment Conservation Rules (ECR) 1997 properly, then the cumulative impacts may be within the acceptable limits of ECR 1997 (page 297). The study gives Environment Monitoring Plan for the project from pages 391 to 398. But in its Cost & Benefit Assessment part (pages 399 to 410), it does not assess the present Environmental, Socio Economic and Agricultural benefits which are to be lost; it shows would be benefits of the project in details, in Article 14.9 from pages 406 to 409.

The EIA report has however the Article 14.8 (page 406) titled Opportunity Cost, which says, "The opportunity cost is the "cost" (as a lost benefit) of a forgone product after making a choice. It is the sacrifice of benefit related to the second best choice through the use of resources. Existing use of 1834 acres of land resources for shrimp farms, agriculture, households and other purposes are the main alternatives instead of the power plant project. Thus, opportunity costs are not restricted to monetary or financial costs: the real cost of output forgone, lost time, pleasure or any other benefit that provides utility should also be considered opportunity costs. However, leasing cost BDT. 50,000 per acre of land in a year (according to feasibility report) will cover the entire opportunity cost satisfactorily. This cost has been included in project financial and economic analysis.'

The activities for acquiring 1834 acres of land started in the Gouramba and Rajnagar unions of Rampal Upazilla by the end of 2010. Responding to a writ petition, filed by the local farmers (with technical and moral support of the environmentalists), the High Court on 28 February 2011, stayed the activities of the project over an 'Environmentally Critical Area' without any prior feasibility study for the project.

On the other hand, referring the Delhi communiqué, India completed a feasibility study by April 2011. The Financial Express quoting BPDB Chairman on 17 April 2011 reported that, BPDB was to pay NTPC \$ 250,000 for the study. It was surprising, why BPDB was to pay when NTPC is an equal partner! Now the EIA study from the CEGIS is on the table, which may appear impartial and wise by its contents, but is not. Normally, an EIA is done to assess the possible negative impacts of a project on the local people, animals and environment; then to recommend for, or go against the project proposed, considering those grounds. But the Rampal power project is imposed on a preselected land.

Well, the CEGIS's EIA report measures the potential environmental impacts, but, instead of commenting on whether the project should be acceptable or not, it suggests (again with several times using words like 'should be' and 'might be') measures to mitigate those impacts. Whether those measures are being practiced in or outside the country, are not mentioned. It says, a good number of people are to be evicted, valuable

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croplands to be vanished and negative impacts shall be there on the environment, but, mitigation measures are suggested (page 434-436). Those suggestions are such that, if the Rampal Project creates hell in the area, appropriate measures can turn it to heaven again. The EIA report does not mention the wind direction from October to May when it flows from north to south, when, the toxic gas and materials to be emitted from the plant are to overlay and devastate the Sundarban areas.

It is now clear that the IEE and EIA studies of CEGIS were aimed only to support the anti-people and environmentally disastrous project to go. The EIA advocates that, the project is taken following the Environment Conservation Rules of 1997(!). The workshops and consultations with the local people were staged and imposed. It states, lots of job shall be created; but does not state how many people will lose their livelihood with the change. It does not compare the disastrous effects on animal and environment with the proposed benefits. To calculate these effects on the basis of leasing money is utter deceiving (page 406). Thus, the EIA study cannot be accepted on the ground of people's interest of this country.

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