

**Representation from Civil society Organizations from India
On
Nallakonda wind farms in Andhra Pradesh**

Date: 11th July 2013

To,
Dr. A. DURAISAMY,
Director & Member Secretary
The National CDM Authority (Designated National Authority (DNA))
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**Sub: Demand to take immediate action for the proposed CDM project
“Nallakonda wind farm in Andhra Pradesh”**

Respected Shri Duraisamyji,

We are writing to you in the name of the affected local community in Kalpavalli, an area in the vicinities of the [Nallakonda wind farm in Andhra Pradesh](#) and representatives of civil society organizations from different parts of India working on environmental issues. We would like to draw your attention to several serious concerns related to the proposed CDM project which is currently requesting registration.

Nallakonda wind farm in Andhra Pradesh is a proposed CDM project of 50.4 MW grid connected wind farm in Anantapur district in Andhra Pradesh state. The project is at validation stage at UNFCCC and is currently requesting registration with the CDM. This project is located in the area regenerated by Kalpavalli Cooperative with the support of Timbaktu Collective. Neighbouring communities to the project have identified several negative environmental impacts, such as deforestation, land degradation, affected water bodies and biodiversity loss already occurring from project activities. Most worrying of all, although directly impacted by the construction of the project, the local community was not consulted on the construction of the CDM project, as mandated by CDM rules. Some of the undersigned organizations below have also submitted comments during the global commenting period from 31st July 2012 – 29th August 2012. However, the project PDD contains several problematic claims and false details.

We would like to draw your attention to several specific points with this project and trust you will take this matter seriously. Major problems related to the project are:

- **Local Stakeholder Consultation**-There are serious deficiencies with the local stakeholder consultation process as there has been deficient communication from the project developers' side with the local communities, absence of information through local newspapers or in the local language.

Two neighbouring villages to the project affected area are not mentioned in the PDD. The villages not mentioned are Shyapuram and Kambalapalli.

- **Environmental Impact Assessment (Social impact assessment)**-Though Indian Government has not stipulated submission of EIA for wind power projects, it will be useful to list the possible impact the project may have on biodiversity, noise and other environmental factors, and the measures taken to minimize any impact to the local population.

Our research shows strong dissatisfaction from locals with the project. Therefore, details of the land where the wind farm is located need to be described in the PDD to demonstrate that it is not implemented on forest land or agricultural land. If it is and activities have cause substantial forest loss and land degradation, an option would be to consider improving local participation, social compensation and consideration of resulting emissions in the calculations within the project boundary.

Moreover, contrary as to what was explained in the validation report, there are serious environmental and social impacts from the construction which has not yet been fixed. For example, the construction of 15m wide roads in the region has severely damaged the environment in Kalpavalli area.

- **Additionality of the project**- There are serious concerns about the additionality of the project. This was also the reason why the UNFCCC had already requested a review of the additionality. There are at least 10 other similar wind farms in the same area which is a reason why the Nallakonda project is common practice, and is not eligible under the CDM.

In light of the troubling social and environmental impacts presented above and brought before Indian Green Tribunal (Kalpavalli vriksha Pempakamdarula & Ors Vs. Union of India & Ors, Application 92 of 2013), we urge you to call for an immediate review of this project under UNFCCC guidelines. We urge you, as a director of the Designated National Authority of India, to initiate an investigation into the project proponents misleading activities that will bring about a favorable outcome for all local communities affected, state or otherwise by the PDD.

We will be happy to provide more details and ready to meet you personally, should you need them. We trust that you will take this matter seriously and look forward to your timely response.

Thanking you,

Representatives of different organizations,

- Jairam Reddy, Kalpavalli MACS president, Anantpur, Andhra Pradesh
- K Srinivasulu, SBRpalli village BMC president, Anantpur, Andhra Pradesh
- M C Gopal, Shyapuram village BMC president, Anantpur, Andhra Pradesh
- S Subbaraiudu, Ramagiri mandal BMC president, Anantpur, Andhra Pradesh
- N Gopal, Mustikovilla village BMC president, Anantpur, Andhra Pradesh
- P Ramanjanelu, C K Palli mandal BMC president, Anantpur, Andhra Pradesh
- R Obileshu, Roddam mandal BMC president, Anantpur, Andhra Pradesh
- M Onnurappa, GGPalli village BMC president, Anantpur, Andhra Pradesh
- K Anandappa, Beedanpalli village BMC president, Anantpur, Andhra Pradesh
- Ms. Marry Vattamatam, Timbaktu Collective, Anantapur, Andhra Pradesh
- C.K. Ganguly (Bablu), Timbaktu Collective, Anantapur, Andhra Pradesh
- Viren Lobo, Society for Promotion of Wasteland Development (SPWD), New Delhi
- Dr. Leena Gupta, Society for Promotion of Wasteland Development (SPWD), Andhra Pradesh
- Ms.Falguni Joshi, Gujarat Forum on CDM, Ahmedabad
- Mahesh Pandya, ParyavaranMitra, Gujarat
- Himanshu Banker, Vikalp, Gujarat
- Tushar Pancholi, Paryavarniya Vikas Kendra, Rajkot, Gujarat
- Ms. Alpana Sharma, Paryavaran Jagrukata Abhiyan, New Delhi
- Vijay Pratap Singh, Harit Swaraj, New Delhi
- Ms. G. Vijayalaxmi, Centre for Environment And Development, Visakhapatnam, Andhra Pradesh
- Atal Behari Sharma, Ganga Seva Sankalap, Uttar Pradesh
- Debejeet Sarangi, Living Farms, Odisha
- Dr. Subash Mohapatra, Global Human Rights Communications, Bhubaneswar
- Kanchan Kumar Agrawal, Centre for Science and Environment(CSE), New Delhi
- Krishnakant, National Alliance for People's Movements (NAPM), Gujarat
- Aurélien Berings, Hyderabad, Andhra Pradesh
- Vijay Bharatiya, South Asia Peace Alliance, New Delhi
- Dr.Onkar Mittal, Society For Action In Community Health (SACH), New Delhi
- Dr.Bharat Patel, Machimar Adhikar Sangharsh Samiti, Kachchh, Gujarat
- Dr.Sunil Dubey, Member IUCN World Commission on Environment, Economics & Social Policy, Udaipur, Rajasthan
- Prabhat Sinha, All India Majdoor Kisan Sangharsh Samiti, Chittorgarh, Rajasthan
- Naveen Chhabaria, Timbaktu Collective, Andhra Pradesh
- L.C.Nagraj, Bengaluru, Karnataka
- Ovais Sultan Khan, New Delhi