

Date: 27/09/2013

To,  
Dr. A. Duraisamy  
Director & Member Secretary  
Ministry of Environment and Forests,  
National CDM Authority (Indian DNA)  
Core IV B, 2nd floor,  
India Habitat Centre  
Lodhi Road, New Delhi  
India 110 003

**Sub.: Demand to withdraw approval letter for Adani Power's registered CDM project "Grid connected energy efficient power generation" ([Project 2716](#))**

**Ref.: MoEF inspection committee [report](#) on Adani Port and SEZ Ltd released in April 2013**

Dear Sir,

The undersigned organizations would like to bring your attention to the fact that Adani Power's project "[Grid connected energy efficient power generation](#)", which is registered under the United Nations' Clean Development Mechanism (CDM), is in violation with various national regulations, as highlighted in the [inspection committee report](#) of the Ministry of Environment and Forests (MoEF) released in April 2013.

This CDM project is located at the villages Tunda and Siracha, Mundra Taluka, Kutch District of Gujarat, in western India.

In September 2012, the Ministry of Environment and Forests (MoEF) constituted a Committee for inspection of M/s Adani Port and SEZ Ltd., Mundra, Gujarat. The thermal power plant is among the three distinct components of the project area. Among others, the committee was supposed to verify the following:

1. The development of power plant with respect to the approved components.
2. The compliance with the conditions of the Environment Clearance granted for the power plant.
3. The likely impacts on agriculture due to ingress of salinity resulting from creation of huge water body of sea water for Adani Power Plant at Mundra Taluka.
4. The issues related to handling of fly ash by Adani Power Limited and particularly with reference to the Notification on utilization of fly ash.

In April 2013, the inspection committee issued a report<sup>1</sup> presenting factual information and analysis on what has gone wrong, as well as detailed recommendations on the future plan for remedial action.

The official CDM project design document<sup>2</sup> states that the project's contribution to sustainable development, amongst others, because the super-critical technology based power plant would help in

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<sup>1</sup><http://envfor.nic.in/sites/default/files/press-releases/adani-report-290413.pdf>

the improvement of environmental conditions in and around the locality of the project site. The proposed project activity would reduce the requirement of coal combustion and thus avoid emissions of CO<sub>2</sub> and other air pollutants (SPM, Sox) in the atmosphere due to higher efficiency of power generation.

Yet, on April 18, 2011, Gujarat Pollution Control Board (GPCB) issued a directive to the TPP for controlling fugitive emissions. GPCB officials observed fugitive emission due to movement of fly ash loaded dumpers and other heavy vehicles. The report states that even though the company submits that it has adequate pollution control equipments in place, their operation is an aspect that cannot be verified/commented upon by the Committee because of missing monitoring reports. In particular, the report noted that *"It is clear that the company has been less than serious about reporting on compliance with the conditions set at the time of clearance. In many cases non-compliance with reporting conditions have been observed."*

The overall assessment of the inspection report is that there are instances of violations and non-compliance with environmental conditions, which need to be addressed. The report also highlights that it is equally important that urgent steps are taken to repair damage and to mitigate future harm and sets out the agenda for action.

Despite these serious violations of India's air pollution regulation and evidence that the sustainable development criteria as highlighted in the project design document are not met the project remains registered as a CDM project. We therefore strongly demand that:

- **Based on the MoEF's own report that finds non-compliance with national legislation and evidence that the project is not meeting the criteria of sustainable development set up by National CDM Authority (Indian Designated National Authority), the [approval](#) of the National CDM Authority (Indian DNA) for Adani Thermal Power Project to be operating as a CDM project, be withdrawn.**
- **We also strongly recommend that urgent steps are taken to repair the damage and to mitigate future harm as proposed in the inspection committee report's action plan.**

Thank you,

Yours faithfully,

1. Falguni Joshi, Gujarat Forum on CDM, Ahmedabad
2. Mahesh Pandya, ParyavaranMitra, Ahmedabad
3. Alka Palrecha, Ahmedabad
4. Himanshu Banker, Vikalp, Ahmedabad
5. Dr Subash Mohapatra, Global Human Rights Communications, Bhubaneswar
6. Myron Mendes, Laya, Vishakapatnam
7. Ajita Tiwari, INECC (Indian Network on Ethics and Climate Change)
8. Soumya Dutta, Climate & Energy Group, Beyond Copenhagen collective (BCPH), India

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<sup>2</sup>[http://cdm.unfccc.int/filestorage/t/p/9WJXIL3CTZKQ0MV2A5POY1RUBNFG8H.pdf/PDD.pdf?t=UzJ8bXQzc2R3fDCYmT\\_j0eJKwmBwHhTjuaDu](http://cdm.unfccc.int/filestorage/t/p/9WJXIL3CTZKQ0MV2A5POY1RUBNFG8H.pdf/PDD.pdf?t=UzJ8bXQzc2R3fDCYmT_j0eJKwmBwHhTjuaDu)  
<http://cdm.unfccc.int/Projects/DB/DNV-CUK1245932980.89>

9. Bikash Rath, Regional Centre for Development Cooperation, Orissa
10. Gopal Krishna, ToxicsWatch Alliance (TWA), New Delhi
11. Samir Mehta, International Rivers,
12. Dr Leena Gupta SPWD, New Delhi
13. Persis Ginwalla, Ahmedabad
14. Dharmesh Shah, Global Alliance for Incinerator Alternatives (GAIA)
15. Shilpa Vasavda, Ahmedabad
16. Herry Ranva, Bahujan Samajik trust, Rajkot
17. Dipal Dabhi, Adivasi Sarvangi Vikas Sangh, Danta
18. Nirmal Parmar, Charitable Pragati Prayas Kendra, Godhra
19. Jameen Adhikar Aandolan Gujarat (JAAG)
20. Chetan Vyas, Paryavaran Gauchar Bachao Samiti, Rajula (Amerli)
21. Tushar Pancholi, Paryavaraniya Vikas Kendra, Rajkot
22. Naran B. Gadhavi, Kheti Vikas Seva Trust
23. Gautam Thakar, PUCL, Ahmedabad
24. M.S.H.Sheikh, President, Brackish Water Research Center, OLPAD
25. Arvind Padhiyar, Mahisagar Shakti Sangathan, Padra

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1. Secretary, MoEF, Paryavaran Bhavan, CGO Complex, Lodhi Road, New Delhi -110003.
2. Director (Climate Change Division) MoEF, Paryavaran Bhavan, CGO Complex, Lodhi Road, New Delhi -110003.