

April 15, 2011

Vice President Meg Taylor
Compliance Advisor/Ombudsman
International Finance Corporation
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Washington DC 20433 USA
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Dear Vice President Taylor,

We, the **Odisha Chas Parivesh Surekhsa Parishad and the Delhi Forum** would like to bring to your attention our complaint over the serious concerns associated with the IFC's lending through financial intermediaries (FIs) in India.

Odisha Chas Parivesh Surekhsa Parishad (Odisha Agriculture and Environment Protection Council) is a grassroots organization, which deals with the social and environmental issues of people affected by industrial projects in the Dhenkanal and Angul districts of Odisha state. Parishad works on environmental sustainability, farmers' and agricultural security and development project issues through peoples' organizing and public education. Since 2007, Parishad has been working with the people affected by the GMR project.

Delhi Forum is an advocacy, research, media, networking and documentation support organization based in New Delhi. We work with people's movements across the country. Delhi Forum provides strategic and analytical services to local organizations combating the social and environmental problems with sectorial policies and the human rights violations engendered by industrial projects, including coal based thermal power projects. Our mission is to reinforce peoples' organizations' struggles to protect their rights.

Our complaint is about IFC's funding to the India Infrastructure Fund (IIF) (Project No. 26237)¹ which is managed by Infrastructure Development Finance Corporation Limited (IDFC). The GMR Kamalanga Energy Limited in Odisha, a sub-project financed through IIF is highly problematic as it demonstrates the utter absence of fundamental standards to ensure transparency, community engagement, human rights protection and environmental sustainability. Risks are high that not only is this FI-subproject being spared from the safeguards and accountability obligations normally applied to IFC's direct investments; it also engenders human rights violations. Owing to the opaque, almost invisible, and unregulated design and implementation of the FI-subproject, its development effectiveness is highly questionable.

The following section outlines and describes:

- A. The summary of our concerns
- B. Background of GMR Kamalanga Energy Limited in Odisha and elaboration of our issues

¹ Project information is accessible via <http://www.ifc.org/ifcext/spiwebsite1.nsf/1ca07340e47a35cd85256efb00700cee/15378AD7F9E4E3B7852576BA000E2A8D> but is very limited.

- C. Mini case studies
- D. Our conclusion

A. Summary of concerns

1. **Failure to disclose fundamental information.** We are unable to secure the most fundamental information about the GMR Kamalanga Energy Limited in Odisha despite IFC's stated commitment to transparency and in spite of our request to the IFC India mission. We do not see any sound justification why IFC's performance standards and disclosure requirements for its direct investments do not apply to this FI sub-project, and other subprojects with more than minimal risk, when these projects pose a set of comparable risks. As you know, for direct investment projects, the public is able to know *before approval* by IFC's Board of Directors, a description of the project and its purpose, its location, its potential environmental and social risks, key measures and actions to address risks to ensure compliance with Performance Standards, among others. Additionally, communities are provided information about 1) the risks to and potential impacts on communities, 2) the stakeholder engagement process, 3) the grievance mechanism, and action plan for redress and risk mitigation. Project development updates are also provided throughout the entire project cycle.
2. **Our concern with the FI sub-project is deep-seated.** We have no basic information for the GMR Kamalanga Energy Limited in Odisha. The information we gathered thus far is based on our own effort to trace the source and flow of the money. The project information as posted on the IFC's website is vague – and not helpful. It mentions only that IFC is providing USD 100 million in equity investment, and that the "project" will help support a strong local financial institution. Although this goal might be seen as well-intentioned as it could strengthen local banks, we want access to the same sets of information that we can access for IFC's direct investments. We have a right to this information and we want to be able to inform the decision-making process as we, ourselves, support development projects that avoid risks and are intended to be sustainable.
3. **The information we gathered signifies that there are social and environmental problems – and publicly undisclosed risks with the GMR Kamalanga Energy Limited in Odisha that are not addressed.** These problems and risks are elaborated in Sections B and C. Key message here is that –whether the sub-project is 'medium risk' or 'high risk', this classification should have been disclosed and that all relevant information should have been accessible. Until now, we cannot understand the justification for concealing such kind of information when there is a growing overriding public interest. Had the same Performance Standards applied, the name, location, and sector of the subproject should have been known right from the design phase and that community engagement plan, project-level grievance mechanism and other safeguard measures could have been used by us and other affected parties.
4. We believe this utter lack of transparency and vague oversight by the IFC Board and staff runs the risks of causing more harm than good to communities. For us, this systematic failure to disclose information prevents communities and other relevant stakeholders from helping both the IFC and its client/s achieve the project objectives. As IFC has acknowledged repeatedly, the lack of involvement by communities and other stakeholders in IFC projects increases the likelihood that the project will not be successful and that IFC's reputation will suffer.
5. We request:

- that the fundamental information about the GMR Kamalanga Energy Ltd. (GKEL) in Odisha, financed by IFC via IIF, be immediately made public, including impact assessments, and any action plans to ensure compliance with standards, among others. If this request were denied, we would like IFC to provide detailed justification for denying this fundamental information to communities; and
- that IFC apply the same sets of transparency, social, and environmental requirements to FI subprojects as applied to direct investment projects. More specifically, we request that IFC make public, as soon as it secures information from its FI clients, the location, potential impacts, action plans, etc. of all subprojects in India that pose more than minimal risk to communities. We also request assurances from IFC that the same environmental and social standards that apply to direct investment projects will apply to FI subprojects in India.

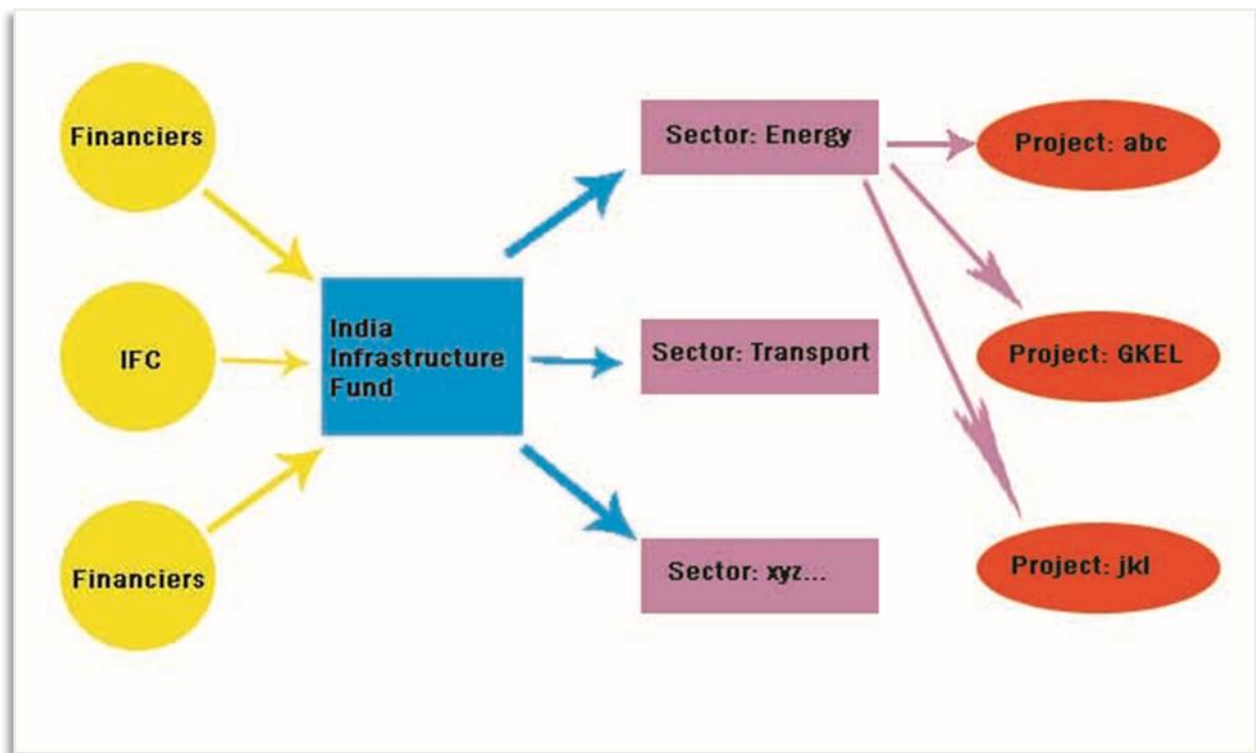
B. Background of GMR Kamalanga Energy Ltd. in Odisha

1. Sub-project is financed (in part or in full) by the IFC through the India Infrastructure Fund

- 1.1 There is little information to ascertain IFC's support to this particular subproject. Our worry stems, in part, from the fact that neither the IIF nor the 'fund manager' as represented by IDFC has clear, robust and predictable disclosure, social or environmental standards in place that is comparable to IFC's standard requirements for its direct investment project clients. While IDFC says on its website about an Environmental Management and Social Development Group working towards rigorous environmental and social due diligence and benchmarking IDFC investments against best practices, we are not aware neither of the application of such standards or policies, nor reports if due diligence had been verified.
- 1.2 We engaged with the IFC and IDFC regarding our information request. We had a formal meeting with the IFC staff in Delhi by the end of January 2011 to personally request information about the FI funding, including those financed through IIF. Stating procedural and technical issues, they refused to give any information on the location, the client company (ies) or name of sub-project/s.
- 1.3 We also requested IDFC in October 2010 about basic project information including location, company, name of the project and the social and environmental safeguard policies applied for the sub-project. They were unwilling to share those types of information. How can we trace their funding source and the money flow and how can we determine if an appropriate project-level grievance mechanism is in place and actually effective if we are denied of our basic right to these types of information?
- 1.4 With IDFC and IFC being averse to disclosing such information, we decided to do the research ourselves by connecting the dots (i.e. building on web-based information to identify the most likely project locations, collecting and collating the information that we could gather from other community members).

Our findings

- 1.5 One, there is circumstantial evidence that IFC's investment to IIF funds the GMR Kamalanga Energy Limited in Odisha. We believe our feared risks are confirmed by the ground-level information and testimonies we have put together.
- 1.6 Two, IFC has an equity investment of \$100 million (total target fund of the project is \$ 1 billion) in India Infrastructure Fund (IIF). IIF's identified sectors for investment includes energy, with electricity generation, electricity transmission and distribution networks, oil and gas pipelines, oil and gas import terminals, storage and processing facilities, among others.
- 1.7 Three, based on newspaper reports, the GMR Kamalanga Energy Limited ("GKEL") is a special purpose vehicle ("SPV") floated by GMR Energy Limited ("GEL") to implement a 1,050 MW (stepped up the capacity to additional 350 MW in the second Memorandum of Understanding [MoU]) captive coal based thermal power plant in Dhenkanal district, Odisha.²
- 1.8 As such, we believe the following diagram illustrates how IFC finances GKEL through IIF.



- 1.9 Based on our research, the GMR Kamalanga Energy Limited is 1050 MW (with an additional 350 MW) coal based thermal power project located at Kamalanga village, Odapada Block, Dhenkanal district, Odisha. This sub-project is being built and will be owned by GMR Energy Limited. Odapada block falls within the Talcher, Angul, Meramandali industrial region. It is now at an advanced stage of development and commissioning is expected to begin by the end of 2012.

² http://www.idfc.com/project_equity/investments/project_portfolio8_gmr_kamalanga.htm

- 1.10 The source of water for the power plant is Bhramani River, which runs along Kamalang village. The coal used for the project would be sourced from Talcher Mahanadi Coal field, which is about 43 kilometer from the GMR Kamalanga Energy Limited. The land acquired belongs to four revenue villages in Dhenkanal District namely: Kamalang (a big village with six hamlets including Durgapur, Bhagamunda, Maniabada, Achalakot, Kaliatalia, and Barashahi); Mangalpur (a village with one hamlet called Manpur); Bhagvatpur; and Senapati Berana.
- 1.11 The Infrastructure Development Finance Company (IDFC), one of India's largest local financial institutions, has provided a rupee term loan of INR 50.5 billion for the project³ using money from the India infrastructure Fund (IIF).
- 1.12 The Revenue Block where the project is being constructed is identified as a critically polluted area, which led the Government of India's Ministry of Environment to impose a temporary moratorium on all new projects in the area in 2010⁴. This Block is the 7th among 88 highly polluted hot spots the Ministry has identified.⁵
- 1.13 The land that has been acquired for the project used to be a fully irrigated agricultural land. The entire area was irrigated by the water from the Rengali project through its sub canals. The project has been running for the last 10-15 years, however, the Rengali Canal reached the project area in 2002. Rengali left bank canal system was funded by the World Bank.⁶ Currently, the entire irrigated land ins acquired for GMR power project. The sub-canal system in the area is now blocked owing to project construction. Flow of water has been stopped.
- 1.14 For us, this shows contradiction in Bank's investments. On one hand, it finances a water system to irrigate agricultural land. It's a commendable use of money. On the other hand, it finances a thermal power plant requiring the acquisition of the same agricultural land which is at risk of being devastated and polluted.
- 1.15 The project is marred with serious social and environmental issues, which at present is not addressed by the company. There is also no mechanism for consultation, project participation and grievance redress for affected communities, including the indigenous people of Kharia tribe.
- 1.16 We believe six out of the eight performance standards should have been applied to this project given the risks posed. For us, this would have been an environmental Category A project. IFC's failure to ensure that this subproject complied with the performance standards and information disclosure requirements is tantamount to avoiding accountability, denying affected communities of their right to information and concealing from public the ongoing harassment and other forms of intimidation to concerned community members just to move the sub-project forward.

³ http://www.idfc.com/project_equity/investments/project_portfolio8_gmr_kamalanga.htm#
http://www.idfc.com/project_finance/deals/energy_sector.htm

⁴ Office Memorandum J-110113/5/2010-IA.II(I), Ministry of Environment and Forests; dated 13th January, 2010

⁵ Comprehensive Environmental Assessment of Industrial Clusters (2009) *Central Pollution Control Board* Pg 24

⁶ <http://news.webindia123.com/news/articles/India/20091216/1406826.html>

2. Why is GMR Kamalanga Energy Limited in Odisha problematic?

2.1 *Using Performance Standard 1: Social and Environmental Assessment and Management System, we believe the following violations were committed:*

- 2.1.1 There is no information regarding the environmental impact assessment or the social impact assessment publicly available. There is neither disclosure of who the affected people are nor information about the risks and impacts of the project. Even after repeated complaints and requests with the government departments and the company, none of the documents were made available.
- 2.1.2 No public hearing was ever held during the design and implementation of the sub-project. The affected community was never consulted about the land acquisition or project construction.
- 2.1.3 The cumulative impacts of project along with the industries already functioning in the areas of Talcher, Angul, and Meramandali industrial belt, which could be adverse as identified by the Ministry of Environment and Forests, were neither disclosed nor presented for public hearing. It only exacerbates the pollution caused by the existing operations of the following companies:
- National Aluminum Company Limited, the largest integrated Bauxite-Alumina-Aluminum complex in Asia;
 - National Thermal Power Corporation, which has 1500 MW super thermal power station at Kanhia;
 - Mahanadi Coal Field Limited, located in Talcher;
 - Fertilizer Corporation of India, having its unit in Talcher;
 - Heavy Water Plant, located in Talcher;
 - Talcher Thermal Power Station, Jindal Steel and Power Ltd, Bhushan Steel and Strips Ltd., among others.
- 2.1.4 The project is located close to the Bhramani River and is the source of raw water for the project. Pollution of River Bhramani is well documented by now. The industrial waste and dust together pollute the river, which is the lifeline of the district, to a hazardous level. People on the banks use this water for domestic use, including cooking, and for livestock. Dependency on this water source for their basic needs cause several diseases to the people and livestock living around.

2.2 *Using Performance Standard 3: Pollution Prevention and Abatement, we believe the following violations were committed:*

- 2.2.1 There is no information available on the pollution emissions about the sub-project nor disclosure about the pollution mitigation plan. The area where the project is located is a zone already critically contaminated by industrial wastes going into the water streams. The fluorine content in water is very high. People in the area commonly suffer from fluorosis and joint pains. Industrial wastes also severely affect the animal health; skeletal fluorosis and diseases in sole can eventually make them incapable of walking. Respiratory diseases are also common in the area due to pollution, caused in part by emitted ashes. People complain of flying ash as it penetrates into food grains and agricultural crops and they claim food and agricultural crops are inedible. For us, this sub-project worsens the pollution people are already suffering from.

2.2.2 A Comprehensive Environmental Pollution Index (CEPI) published by the Central Pollution Control Board of the Government of India last December 2009 classified 88 industrial clusters of India to be at risk of being unfit for habitation. One of these industrial zones is the Angul-Talcher belt of Odisha. Air and water-borne diseases in the area are caused by industrial pollution. Same report shows that the whole district is becoming unsuitable for human habitation. The Ministry of Environment and Forests in January 2010 imposed a temporary moratorium for environmental clearance for all projects located in these critically polluted zones. For us, this moratorium is a strong indication how environmentally polluted the sub-project site is. But neither the IFC nor the IDFC disclosed this information and they continue to refuse to disclose this kind of information.

2.2.3 Meanwhile, the company has already started acquiring land, up for conversion into an ash pond that has close proximity to the villagers. Is there any pollution control and abatement plan that is publicly available? Not to our knowledge. What we know is that the fate of the villagers now lies on the discretion of the company unless they are ready to share such information and open to community engagement.

2.3 *Using Performance Standard 4: Community Health, Safety and Security, we believe the following violations were committed:*

2.3.1 Due to the dynamite blasting at the project site, a number of houses and even the nearby primary school building have developed cracks. With hundreds of students, the school still functions but in a damaged condition. Risk of building collapse is high, endangering lives of students, if dynamite blasting continues or if natural disaster were to happen.

2.3.2 The Company has hired a private security for the sub-project area. The security guards position dogs and patrol the project area 24/7. A boundary wall has been constructed at one of the access roads from the village to National Highway 55, which passes through the sub-project area. People can still use the route only after being inspected by the security guard with their 15 dogs roaming around. People feel threatened and intimidated to use the route. This route is also the only way for children to go to their secondary school in either Bhagamunda or Kamalang. With no alternate route and with the threats of patrol dogs, heavy vehicles and intimidating behavior of security guards, many parents have stopped sending children to school. Also, it completely depends on the whims and fancies of the guards whether or not people could use the route. Did the company construct an alternative route? No. People avoiding intimidation or threats of being bitten by dogs or hit by big vehicles now have to use longer routes to commute.

2.3.3 The company has never demonstrated any consideration for community health. They use agricultural land and farms which are adjacent to the project area as dumping ground for their garbage. It continues to ignore villagers' requests to not dump their garbage

2.3.4 The company has been using ground water for the project. There is still no official information if the company has been permitted to use ground water for the project. Only water from River Bhradini has been allowed to be taken for the project under environmental clearance. A deep bore well (approximately 300 feet deep) is being used to pump ground water, which results to a considerable drop of ground water level in the area. The bore wells in the villages have very scarce water now, negatively affecting people's water consumption.

2.4 Using Performance Standard 5: Land Acquisition and Involuntary Resettlement, we believe the following violations were committed:

Bad consultation process

2.4.1 Public hearing, which is prerequisite to any kind of land acquisition process in India, was not conducted by the company before acquiring the land. It was only after a number of middlemen who started coming to the villages to acquire land when people voiced their complaints to the district magistrate to hold a meeting to answer the peoples' queries. The complaint to the District Collector was submitted on 14 October 2007. A meeting was held on 23rd of October 2007. The information regarding the meeting, however, was not shared with people. Only a few people, who came to know through some sources, attended the meeting. This was later treated as a public hearing. For many affected families, they never considered this a public hearing since there was not enough time to hear adequate response to peoples' complaints. In the meeting, the people who lost their lands demanded that near the perennial stream there should be a gate, so that the village access is not cut. As they lost their agricultural land, they should be provided with alternative employment and training and that people should be resettled with appropriate livelihood and social services. These requests fell to deaf ears.

Land acquisition is deeply flawed

2.4.2 The total area of land acquired by GMR for the sub-project is 1200 acres. It is divided into: 900 acres for private land and around 300 acres for government land. The private land is mostly agricultural had had been well irrigated by the Rengali Canal System. This private land has affected almost 1,300 families in 4 villages, who have lost their land, crops, trees and other properties. They are now economically displaced; so are the agricultural laborers and share croppers. Roughly, thirty-five percent (35%) of the land belongs to the *Dalits* and twenty-five (25%) to the scheduled tribes. Most of the farmers are small cultivators and small share croppers.

2.4.3 Of the 1200 acres of land acquired, 180 acres belonged to approximately 300 families who are members of the schedule tribe, Kharia. "Scheduled tribes" are indigenous peoples with formal recognition by Indian Constitution and relevant national laws.

2.4.4 How has the company acquired the irrigated land? At lower prices. Families in the affected villages of Mangalpur, Kamalanga, Senapati Baran and Bhagabatpur were paid compensation of INR 500,000 per acre which are below the price of non-irrigated land in Angul district acquired by Jindal Steel and Power (they paid INR 700,000 per acre) Occupants/owners of the irrigated land still have not received land compensation. Around eighteen percent (18%) of the families listed by the Land Acquisition Office of Dhenkanal as families whose agricultural land was acquired have not received their compensation.

2.4.5 The company also forcibly or illegally acquired the remaining private land which has an area of around 100 acres belonging to about 150 families. Their land was acquired without proper procedure and without compensation. Nine families went to the local court demanding appropriate compensation and job in the project in lieu of their land and livelihood dispossessions. In 2010, however, the District Court passed a judgment in favor of the company.

They appealed to the High Court seeking to reverse the district court's verdict. The case remains at the High Court.

- 2.4.6 Almost 300 acres of government land acquired includes cremation ground, grazing land (100 acres), small forest (70-80 acres comprising of perennial and social forestry), 6 ponds and a perennial stream. The company assigned an alternate land for cremation ground while an alternative grazing land offered is 50 kilometer away from the sub-project site. It is practically impossible for people to take their cattle for grazing to the new site.
- 2.4.7 Sources of water have also been lost. The company has blocked the perennial stream which used to run through the agricultural and government land. It was a source of water for the villagers. Trees that have been felled are scattered in whatever little grazing land is left for the cattle, making it impossible for them to graze and move around.
- 2.4.8 There are some families who were farming on the government land and were paying the tax for the same as well. They have not been given any compensation stating that the land belongs to the government. They are left with no source of livelihood.
- 2.4.9 The company has also forcibly acquired the village pond outside their campus and is using it as water reservoir. They have also put barbed fencing around it. The villagers cannot use their own pond now. Also, the company dumps its waste in the agricultural land outside the campus.
- 2.4.10 The crops mainly grown have been cereals, pulses and groundnut (cash crop). The area also has a number of trees. Immediately after the land was acquired, the company started razing the crops (to level the ground for sub-project construction) that were about to be harvested without informing the affected croppers. People were denied of their last crop from their lands.
- 2.4.11 When the boundary wall around the project area was not completed, they had made a temporary boundary using barbed wire. Villagers lost a number of cattle that died after being entangled in those wires. Villagers lodged complaints several times but no action was ever taken by the company or the district government.
- 2.4.12 There were almost around trees 3000 palm trees, 1000 babool trees (*Acacia nilotica*), mango trees, lemon and teak plantation on the land that has been acquired by the company. When the private land was acquired, the trees were cut and uprooted. The tree owners were not even asked to collect their cut trees. The forest department was given responsibility of surveying trees on the private land. Although the list and description of these trees are in the Land Acquisition Office in Dhenkanal District, people were not provided of such information despite repeated requests. Compensation for trees has been arbitrary while most people never received their due compensation. One of the affected persons who planted 500 teak trees on his private land (which was acquired by the company) was never compensated.

Exacerbating poverty and economic displacement

- 2.4.13 Farmers neither received the right compensation value for their lost land nor have they been provided with any source of employment. About 80 families, completely dependent on farm labor or share cropping, are now without decent jobs. Having not provided with livelihood restoration plan, they are now practically economically displaced. There is no resettlement and

livelihood reparation plan ever presented to the community until now. The people are neither aware of the land acquisition process nor involved in any kind of rehabilitation or resettlement planning.

2.4.14 Economically displaced families have been forced to migrate to other districts in search of work. Only few are now working as laborers in brick kilns. Nearly 500 kilns have come up on the banks of River Bhramani for the use of project construction. Earlier, there were only a few, for construction of houses. Now they are rampant. The fertile agriculture lands are either bought or leased from farmers by contractors supported by the company. These kilns are run by both local and outsiders, who serve as contractors for the project.

Harassment and intimidation

2.4.15 On June 7, 2010, the Rehabilitation and Periphery Development Advisory Committee (RPDAC)⁷ was holding a meeting to decide over the rehabilitation plan. There should have been a representation of affected people in the committee. When about 500 affected people went to attend the meeting, they were locked out of the gate. They waited for the whole day but were now allowed to get in.

2.4.16 Dejected and cast out, some affected people used some physical force to enter the company office and the sub-project site. This promoted the police to randomly arrest and threaten people from 6 hamlets of Kamalang village. People came to know later that GMR Company filed a complaint against the affected people stating that they had pelted stones on the company's properties. We believe that the attack on the project was staged by the company. We also believe the company instigated the attacked. Almost 500 people including women were randomly arrested; they were later released.

2.4.17 Within 4 days following the bogus meeting, 46 innocent men and women were arrested (including 4 women) by the police. They were identified as community leaders, are vocal against the below-the-market-rate compensation for their land. They were tortured and beaten in police custody before their release. Despite this, the police arrests, threats and highhandedness continue, creating a climate of fear amongst the villagers. The 46 arrested and released people have to go to the police station every Monday to sign police registry. Most of them remain unaware of the charges and are denied of their basic rights.

2.4.18 Grievances of the affected villagers:

- Denied the affected people of their right to pass through the project area to get to their work or homestead;
- Denied the affected people (whose land has been acquired) to work on the project, in spite of earlier promise by the company to provide them jobs. Residents of Durgapur village lost the land, received inadequate compensation and have no work at the project site;

⁷ Rehabilitation & Periphery Development Advisory Committee (RPDAC) means the committee constituted by the Government under relevant provisions of ORISSA RESETTLEMENT AND REHABILITATION POLICY – 2006 to look after rehabilitation and periphery development matters in case of industrial projects etc.

- Provides no information about livelihood restoration plan in spite of repeated requests and complaints;
- Showed no compliance to established laws and procedures on land acquisition;
- The pump house that is being built on the banks of River Bhramini for the project is being built on the land that belongs to the Kamalang High School. 14 acres of school land have been acquired. The company has acquired land for grazing, which had been earlier assigned for upper primary schools at the villages of Achalkut, Barasahi and Kaliaod;
- Company has also identified few influential people from the company by giving them special privileges and money, who engineered conflict within the community.

2.5 *Using Performance Standard 7: Indigenous People, we believe the following violations were committed:*

- 2.5.1 Of the 1200 acres of land acquired, 180 acres belonged to approximately 300 families who are members of the schedule tribe, Kharia. "Scheduled tribes" are indigenous peoples with formal recognition by Indian Constitution and relevant national laws.
- 2.5.2 The company did not conduct proper public hearing. No separate consultation with the affected indigenous people. There was no information disclosure or informed participation as far as indigenous communities are concerned. The broad community support of these communities for the project was never sought.

C. Mini case studies

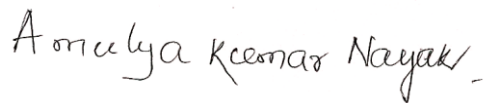
[Case studies have been removed before disclosure of the complaint on request of the complainants.]

D. Conclusion

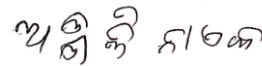
We believe the above demonstrates the various policy violations in the GMR Kamalanga Energy Limited in Odisha, a sub-project financed by IFC through IIF. We strongly view that given the clear and present economic, social, environmental and cultural harms inflicted by GKEL to communities, a cumulative impact assessment should have been conducted and shared at least with the affected people for meaningful consultation to inform decisions. Such violations have serious implications to the communities, particularly the marginalized farmers, laborers and tribal families, as well as to the environment. Unless greater transparency, stringent safeguards, close monitoring, supervision, punitive and corrective measures are in place, the irreversible social, economic and environmental damages caused by IFC's funding will worsen. Affected communities are now left with no options to access information and to press for mitigation for the loss of their livelihood or redress of their grievances.

We request your office to register our complaint for appropriate and just action.

Sincerely,



Amulya Kumar Nayak
Convenor, Odisha Chas Parivesh Surekhsa Parishad



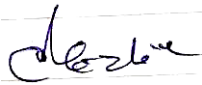
Anjali Naik (Ms)
Member, Odisha Chas Parivesh Surekhsa Parishad
Village: Durgapur



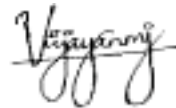
Jitendra Pradhan
Member, Odisha Chas Parivesh Surekhsa Parishad
Village: Kamalang



Bhakta Bandhu Behera
Member, Odisha Chas Parivesh Surekhsa Parishad
Village: Manibeda



Manju Gardia (Ms)
General Secretary
Delhi Forum



Vijayan M. J.
Coordinator
Delhi Forum