



June 5, 2019

Hu Xiaolian  
Chairman  
The Export Import Bank of China

Zhang Qingsong  
Vice Chairman and President  
The Export Import Bank of China

Re: The proposed Koukoutamba Hydroelectric Project and its impacts on the Critically Endangered Chimpanzees of Guinea

Dear Hu Xiaolian and Zhang Qingsong,

We are contacting you regarding the impacts on the Critically Endangered Western chimpanzees (*Pan troglodytes ssp. verus*)<sup>i</sup> of Guinea that would result from the proposed project of the 'Organisation pour la mise en valeur du fleuve Sénégal' (OMVS) that involves the construction of the Koukoutamba Dam.

The signatories to this letter are members of the IUCN SSC Primate Specialist Group (PSG) – an international network of scientists and conservationists who aim to prevent all primates from extinction.

Within the PSG, there is a group specifically focused on Great Apes. This group reviewed the Koukoutamba Social and Environmental Impact Assessment (SEIA) conducted by Tractebel and have expressed serious concerns about the number of chimpanzees that will be killed as a result of this dam. We wrote to the President of Guinea about our concerns, as well as the OMVS and the World Bank. We understand that, based on the tremendous environmental and social impacts predicted, the World Bank has pulled out of the Koukoutamba Dam project. We have also learnt that Guinea has instead contracted Sinohydro to construct the dam and that Exim is now considering its financing. We are contacting you to express our

profound concerns about this project, and respectfully request that you reconsider financing it.

The creation last year of the Moyen Bafing National Park was a tremendous achievement for Guinea. This park was created specifically for the protection of Western chimpanzees and it provides home to more of this Critically Endangered species than any other park in the region. The building of the Koukoutamba dam within this new national park, however, now risks undermining its success, and jeopardizes the safety of those chimpanzees Guinea originally sought to protect. This area is one of the last strongholds for these chimpanzees. The Koukoutamba dam and all parties involved in its development will continue to be under international scrutiny for its likely impact on the Western chimpanzees (articles that have already appeared are attached in the annexe). Also, two international petitions arguing against the dam's construction have each received almost 150,000 signatures.

Besides the terrible and irreversible impacts on the chimpanzees, we have broader concerns about the dam. We understand the incredible potential of the Fouta Djallon highlands for energy generated by waterpower as Guinea is home to the source of many of the major rivers of West Africa, including the Senegal and Gambia rivers. However, the fact that the Fouta is the source of these rivers also means that it is critical to protect the forests around the rivers to prevent erosion and silting, critical to protect them from pollution as so many people downstream depend upon them for their livelihoods, and critical to protect their flow to safeguard the biodiversity that maintains all the ecosystem services these rivers provide.

The building of a hydroelectric dam within the Moyen Bafing National Park would jeopardize the safety and wellbeing of people and wildlife. Because most of the electricity is to be sold to other countries and used by extractive industries, and because an estimated 8,700 people will be displaced, it seems that there will in fact be very little benefit for the Guinean people, yet tremendous costs to their livelihoods. Furthermore, it is unclear if local communities have been fully informed of the dam's full impacts and consulted based on free, prior, informed consent principles, an internationally accepted public consultation and participation process.

Hydroelectric dams are an outdated means of electricity generation. Their long-term negative impacts are under evaluated and ultimately put the lives of people and wildlife at risk. In many parts of the world, countries are now working to undo the legacies of poorly-planned dams and are deconstructing dams that are no longer useful, especially as part of larger watershed restoration movements. There are now many new, cutting-edge methods that can provide energy without the large-scale negative environmental and social impacts associated with hydroelectric dams such as solar power, which several other international banks are keen to support.

We also note that financing the Koukoutamba dam would violate China Exim Bank's own environmental policies, as well as Chinese green finance requirements. For instance, China Exim's 2007 Environmental Policy states that "Once any unacceptable negative environmental impacts result during the project implementation, China Exim Bank will require the implementation unit to take immediate remedial or preventative measures. Otherwise, they will discontinue financial support". China Exim's Guidelines for Environmental and Social Impact Assessments of the China Export Import Bank's Loan Assessments also states: "For projects under construction or are operating that cause serious environmental and social problems, China EXIM Bank has the right to require borrowers or project owners to take timely measures to eliminate these impacts. If they fail to eliminate the impacts of the projects, China EXIM Bank has the right to stop disbursing the loans and demand an early payback of the loan, in accordance with contract" (Article 19).

If built, the dam will directly cause a number of serious and irrevocable environmental impacts, including the extirpation of an estimated 1,500 endangered chimpanzees – a very significant portion of their surviving numbers. As mentioned, Moyon Bafing National Park was in part established to protect this iconic species, and so financing a dam which would destroy them, in addition to negatively impacting the entire biodiversity of the region, would not reflect sound judgement, let alone alignment with the bank's own environmental policies<sup>ii</sup>.

Furthermore, Chinese bank regulators have published a number of green finance policies to help guide overseas financiers. These include the Green Credit Guidelines, which require financial institutions to comply with host-country law and international norms and best practices. This project would violate a number of host-country laws and international norms and best practices. Chimpanzees are a protected species in Guinea, and it is illegal to kill them.

Furthermore, Article 19 of the Green Credit Guidelines states: "As for projects to which credit is granted, all stages, including design, preparation, construction, completion, operation and shutdown shall be subjected to environmental and social risk assessment. Where major risks or hazards are identified, credit funds appropriation can be suspended or even terminated.<sup>iii</sup>" Again, we believe that the extreme biodiversity and environmental impacts of the dam should be considered a major risk and hazard, particularly since those impacts will be irreversible and jeopardize the survival of the Western chimpanzees, which have already entirely extirpated from several countries where they used to live.

Lastly, should China Exim provide financing, we wish to note that the project contractor Sinohydro is actually already in violation of its own company environmental policies as well.

The company has adopted a set of 'No-go areas', including national parks, World Heritage Listed Areas, habitats of threatened species and internationally listed and protected wetlands<sup>iv</sup>. Their involvement in this project is already a flagrant violation of their own environmental policy, which should be a red flag for any financier considering this dam project. This company is also involved in a project in Sumatra that risks driving the most recently discovered species of orangutan to extinction.

The Chinese government is preparing to host the Convention on Biological Diversity in 2020 which it intends to make a "conference of landmark significance." China Exim therefore has additional reasons to avoid funding any projects which would critically impact endangered species such as the chimpanzees of Guinea. In declining involvement in the Koukoutamba dam, China Exim can play a leadership role to ensure adequate stewardship of globally important wildlife populations.

In summary, we respectfully encourage Exim to reconsider financing construction of the Koukoutamba dam and instead to work with the Guinean government to explore alternative means of electricity generation. We would deeply appreciate if you could possibly acknowledge receipt of our letter. We are keen to arrange a meeting with you to discuss this issue further.

Please accept, Hu Xiaolian and Zhang Qingsong, the assurances of our highest consideration.

Sincerely,



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## Summary:

We respectfully request that China Exim Bank withdraws financing of the Koukoutamba dam in Guinea because:

- The dam will have tremendous negative impacts on both people and wildlife of Guinea, including putting at risk up to 1,500 Critically Endangered Western chimpanzees in a national park that is one of their last strongholds for survival.
- An estimated 8,700 people will be displaced, and it is unclear if local communities have been fully informed of the dam's full impacts and consulted based on free, prior, informed consent principles, an internationally accepted public consultation and participation process.
- The extremely poor Social and Environmental Impact Assessment that is below international standards.
- Financing the Koukoutamba dam would violate China Exim Bank's own environmental policies, as well as Chinese green finance requirements.
- The involvement of Sinohydro, which is a violation of their own environmental policy

Declining involvement in the Koukoutamba dam, China Exim can play a leadership role to ensure adequate stewardship of globally important wildlife populations. Opportunities exist to work with the Guinean government on alternative energy programs, such as solar energy.

## Annexe:

<https://www.theguardian.com/environment/2018/aug/03/chimp-sanctuary-created-by-world-bank-threatened-by-world-bank-backed-dam>

<https://www.theguardian.com/world/2019/feb/28/chinese-dam-project-in-guinea-could-kill-up-to-1500-chimpanzees>

<https://www.rainforest-rescue.org/petitions/1167/guinea-be-smart-go-solar>

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<sup>i</sup> <https://www.iucnredlist.org/species/15935/102327574>

<sup>ii</sup> <https://1bps6437gg8c169i0y1drtgz-wpengine.netdna-ssl.com/wp-content/uploads/wpallimport/files/archive/emerging-sustainability-frameworks-CDB-ChinaExim.pdf>

<sup>iii</sup> <http://www.cbrc.gov.cn/EngdocView.do?docID=C5EAF470E0B34E56B2546476132CCC56>

<sup>iv</sup> <http://eng.sinohydro.com/index.php?m=content&c=index&a=show&catid=26&id=104>