



HSAP Sustainability Partner Sarawak Energy is building the Murum Dam, which will displace 1,500 indigenous people and flood vast areas of the Borneo rainforest.

Greenwashing Dams

A CRITIQUE OF THE HYDROPOWER SUSTAINABILITY ASSESSMENT PROTOCOL (HSAP)

A dam industry effort threatens to greenwash dams and undermine the recommendations of the World Commission on Dams (WCD). The Hydropower Sustainability Assessment Protocol (HSAP) is a voluntary, non-binding auditing tool that allows dam builders to score the sustainability of their own dam projects. This civil society fact sheet examines how the HSAP works, its shortcomings, and why it could end up legitimizing destructive dams.

The HSAP was created between 2007 and 2010 by the Hydropower Sustainability Assessment Forum (HSAF), an initiative of the International Hydropower Association (IHA), a lobbying group formed in 1995 to represent the interests of dam builders. Participation in the HSAF was limited to a

self-selected group of industry representatives, government agencies, financiers, and large non-governmental organizations (NGOs). Meanwhile, civil society organizations from the Global South and dam-affected people were excluded.





HSAP "Sustainability Partners" include thirteen of the world's most controversial dam builders. Check the list (as of May 2013) here: <http://hydrosustainability.org/Sustainability-Partners/Sustainability-Partners.aspx>

THE HSAP IS NOT A STANDARD

The HSAP is not a precautionary measure, a standard, or a safeguard. Instead, it is a voluntary auditing tool that scores individual dams on 19–23 categories related to dam-building. These include *Communication and Consultation; Governance; Environmental and Social Management; Infrastructure Safety; Project Benefits; Project Affected Communities and Livelihood; Resettlement; Indigenous Peoples*; and others. There are four types of HSAP assessment, one for each phase of dam building: **Early Stage, Preparation Stage, Implementation Stage, and Operation Stage.**

The HSAP has no basis in international convenants, declarations, or laws. The HSAP does not require compliance with national laws as a condition of sustainability; there is only a stated expectation that developers will do so. In areas such as human rights, gender impact, and cumulative impact assessment, the Protocol falls short of existing best practice.

to the benefit of dam builders. There are three baseline scores: 1, 3, and 5. Yet, scoring follows a twisted logic: dams automatically receive a score of 3 to begin with, and points are only subtracted if evidence shows otherwise. Assuming a project will meet "basic good practice" provides an easy opportunity to greenwash the dam. If no points are subtracted, a dam automatically receives a score of 5, and points are subtracted again if necessary. Dam builders are never required to make improvements if they obtain scores lower than 3.

- A score of 1** represents "significant gaps relative to basic good practice."
- A score of 3** represents "basic good practice."
- A score of 5** represents "proven best practice."

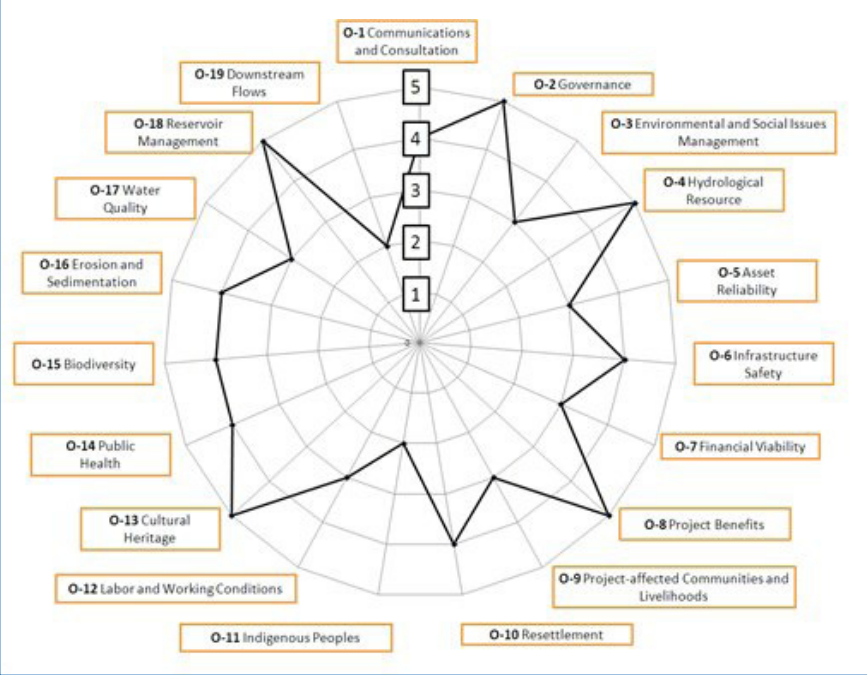
A LACK OF TRANSPARENCY

Meanwhile, the HSAP is based on poor transparency, access to information, and participation of affected communities in project assessments. The dam industry controls the accreditation and selection of assessors, and the terms of the assessment. Assessors can meet with as few as one community, which limits efforts for engagement. There are no methods for civil society to act as assessment observers, and an assessment's evidence is frequently not made public. As a result, there is great risk that the majority of information collected in HSAP assessments will originate from the dam builder itself. Without an independent oversight committee to guarantee broad participation and truly objective information, HSAP assessments could allow the dam industry to greenwash a dam as "sustainable" while rights violations and poor practices get swept under the rug.

A SUBJECTIVE SCORING SYSTEM

The HSAP scoring system itself is biased

FIGURE 1. A SPIDER GRAPH OF HSAP SCORES



THE HSAP VS. THE RECOMMENDATIONS OF THE WORLD COMMISSION ON DAMS (WCD)

CORPORATE RESPONSIBILITY WITHOUT RIGHTS

The dam industry always had a seat at the negotiating table of the World Commission on Dams (WCD). Yet, industry members did not like the results of the process, claiming that if the Recommendations of the WCD were made operational, “no dam would ever be built.” Rather than accepting the Recommendations of the WCD, they rejected them in favor of making their own, weaker guidelines.

Shortly after completion of the WCD report, the International Hydropower Association created the IHA Sustainability Guidelines, which they published in 2004. The IHA Sustainability Guidelines represented a significant shift from the World Commission on Dams. Compared with the broad-based participation of civil society and dam-affected communities that characterized the WCD process, the process of developing the IHA Guidelines favored the closed approach of corporate social responsibility (CSR) and internal reform. Civil society had no hand in creating the IHA Sustainability Guidelines.

The IHA then stepped towards making their guidelines operational in 2006, by creating the IHA Sustainability Assessment Protocol. The IHA Protocol was an early version of the HSAP in which dam builders could score themselves against a number of criteria, hidden from civil society scrutiny.

In 2007, the IHA moved to open its Protocol to a limited number of civil society organizations. It formed the Hydropower Sustainability Assessment Forum (HSAF) with support from mainstream civil society organizations, banks, and others. The group revised the IHA Protocol, and launched the Hydropower Sustainability Assessment Protocol (HSAP) in 2011. Yet, dam-affected people and civil society were still excluded from negotiating over the final text of the HSAP.

FIGURE 2. A TIMELINE OF HSAP DEVELOPMENT

1995: The dam industry creates the International Hydropower Association (IHA)

2000: The World Commission on Dams (WCD) issues its recommendations for best practices

2004: The IHA creates its own, weaker Sustainability Guidelines

2006: The IHA creates the IHA Sustainability Assessment Protocol

2007: To make its Protocol operational, the IHA convenes the Hydropower Sustainability Assessment Forum (HSAF)

2011: The IHA launches the Hydropower Sustainability Assessment Protocol (HSAP)

2012- : HSAP “Sustainability Partners” begin to carry out HSAP Assessments



The IHA was never pleased by the outcomes of the World Commission on Dams.

DAM-AFFECTED PEOPLE: AN AFTERTHOUGHT

The IHA is far less inclusive of dam-affected people and civil society than the WCD. The HSAP puts internal stakeholders first, and external stakeholders last. The IHA promotes the perspectives of those dam-affected people that are in favor of dam building.

The HSAP is based on the idea that dam builders can sustain their profits by improving their practices. In contrast, the WCD guidelines are based on the idea that citizens' rights must be protected before the decision to build a dam is made, and dam builders must be held responsible for violating those rights. While it is a welcome step for dam builders to voluntarily improve their performance, dams should never be built without the consent of those whose lives they irrevocably alter.

A CERTIFICATION SYSTEM TO GREENWASH DAMS?

Despite HSAP's lack of requirements and non-binding nature, the IHA has stated on various occasions that it eventually aims to develop the Protocol into an "industry-wide, global standard." IHA may try to obtain approval from ISEAL, a voluntary certification body, to create a certification system to market the brand "sustainable hydropower," much like the Forest Stewardship Council created a certification system to brand the term "sustainable forests and forest products."



The risk is that such a certification system could brand any dam that has undergone an HSAP assessment as a "sustainable dam," regardless of the assessment's scores, the legitimacy of its evidence, or concerns from civil society.

As of 2013, the HSAP governance council had yet to agree on methodologies for such a certification system. Still, given the profound impacts that dams cause, the creation of a sustainable dam certification system that is controlled and designed by the dam industry.

WHAT YOU CAN DO

The HSAP threatens to greenwash dams; not improve the social and environmental responsibilities of the dam industry. You can do your part to prevent this from happening. A few ideas include:

Tell your government and banks to support the WCD:

Tell your national government and dam financiers to endorse the Recommendations of the World Commission on Dams, not the HSAP. Urge your government to adopt stronger benchmarks for dams that truly address the needs, livelihoods, and rights of dam-affected communities and the environment.

Monitor and engage with HSAP assessments:

Any hydropower project in your country may be subject to an HSAP assessment. Monitor dam builders' commitments to HSAP and their HSAP assessments. Contact the project developer and assessor, demand to participate in and observe project assessments, and monitor their status.

Submit public comments on official HSAP assessments:

Each HSAP "Sustainability Partner" must publish any official assessment using the Protocol on www.hydro-sustainability.org for a 60-day period of public comment. Use our guide (linked below) to structure your comments.

Let us know what you hear:

Tell us if there is an HSAP assessment occurring or rumored to occur on a dam in your country, what's wrong with it, and what you'd like to do.

TAKE ACTION:

Check the List of HSAP "Sustainability Partners" here:

<http://hydro-sustainability.org/Sustainability-Partners/Sustainability-Partners.aspx>

Download our Guide "Fight Back Against Greenwash" to learn how to engage and submit comments on HSAP assessments: <http://www.internationalrivers.org/node/7938>

Contact your National Media to condemn dam builders and financiers for greenwashing dams

Read and Endorse our Critique of the HSAP:

<http://www.internationalrivers.org/en/node/5905>

Learn More about the World Commission on Dams:

<http://www.internationalrivers.org/en/node/348>

For more information, visit: <http://www.internationalrivers.org/campaigns/stop-dam-greenwashing>

JOIN US!

Join International Rivers today and become part of the global movement to protect rivers and rights
Sign up at internationalrivers.org