

# BANKTRACK

**RECIPIENTS:**

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**SUBJECT:**

INCLUDING THE SUNDARBANS OF BANGLADESH ON THE AGENDA OF THE  
WORLD HERITAGE COMMITTEE'S ANNUAL MEETING 2018.

07 MAY 2018

Dear UNESCO and IUCN representatives,

BankTrack supports adding the Sundarbans World Heritage site to this year's World Heritage Committee agenda to allow the Committee to address the Government of Bangladesh's gross violations of the Committee's 2017 decision<sup>1</sup> concerning the site. By ignoring the Committee's decision, the Government of Bangladesh places the outstanding universal values of the Sundarbans at risk. Its disrespect threatens to undermine the effectiveness of the Committee to protect the Sundarbans and all other World Heritage sites.

We write in solidarity with dozens of Bangladesh civil society organizations that have banded together under the umbrella of the National Committee for Saving the Sundarbans (NCSS), which submitted a letter detailing these violations on April 12, 2018.

As NCSS has explained, the Government of Bangladesh is violating the World Heritage Committee's 2017 decision in four ways:

1. Hundreds of large scale industrial and infrastructure developments have been approved and are proceeding in the Ecological Critical Area (buffer zone) of the Sundarbans prior to completion of the Strategic Environmental Assessment, despite the Committee's request for the State Party "to ensure that any large-scale industrial and/or infrastructure developments will not be allowed to proceed before the SEA has been completed."
2. Although the Committee also requested the State Party to "put in place a management system for shipping to minimize negative impacts on the property", the Government has not made any progress on this issue. Indeed, a barge carrying 775 tons of coal sank in the Passur River upstream from the World Heritage site on April 15.<sup>2</sup> It is the sixth such cargo shipping disaster in the Sundarbans in the past four years.
3. Since the 2017 decision, in which the Committee reiterated its request undertake the Environmental Impact Assessment (EIA) for any future dredging of the Passur River to include an assessment of impacts on the Outstanding Universal Value (OUV) of the property", capital dredging of the Passur River has since been financed, approved and initiated without an EIA.

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<sup>1</sup> <http://whc.unesco.org/en/decisions/7028>

<sup>2</sup> <https://www.dhakatribune.com/bangladesh/nation/2018/04/19/probe-body-blames-captain-coal-laden-ships-capsize-near-sundarbans/>



4. The Committee noted the 2016 monitoring mission’s “concerns about the likely environmental impacts of the Rampal coal-fired power plant on the property arising from air and water pollution, a substantial increase in shipping and dredging, and additional removal of freshwater from an already increasingly saline environment” and requested the State Party to “ensure that these impacts are comprehensively assessed as part of the SEA and adequate technological measures are put in place to mitigate these impacts and to put in place adequate measures to mitigate these impacts, in order to avoid damage to the OUV of the property.” There is no evidence that the environmental impacts of the coal plant at Rampal will be assessed as part of the SEA, and there are no adequate technological measures planned to mitigate these impacts. As NCSS has explained, minimal mitigation measures for the coal plant at Rampal would include:

- a) No coal ash should ever be disposed of in this low-lying, seismically active region.
- b) State-of-the art emissions control technologies for SO<sub>2</sub>, NO<sub>x</sub>, PM and mercury must be used: flue gas desulfurization (FGD), selective catalytic reduction (SCR), fabric filter/baghouse (FF), and activated carbon injection (ACI).
- c) Shipping of coal and coal ash on the Passur River should be avoided entirely.

The World Heritage Committee must not wait until July 2019 to raise express its concern about of these violations. The Committee should urge Bangladesh to place an immediate and complete moratorium on industrial projects – including dredging and shipping of coal on the Passur River and construction of the coal plants at Rampal and Payra – that will irreversibly damage the World Heritage site.

As the world’s largest mangrove forest and home to endangered dolphins, Bengal tigers, and rich biodiversity, the Sundarbans is a major carbon sink, and a source of food and protection from storms for millions of people in Bangladesh and India. The Committee took important steps to safeguard the site in its 2017 decision. The Committee should not allow the Government of Bangladesh to undermine its important work.

Thank you for your efforts to protect this precious World Heritage site and its supporting ecosystem.

Sincerely,

Johan Frijns,

Director, BankTrack

