

Emba Hunutlu coal power plant Turkey

Sectors: Coal Electric Power Generation

Active

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[Project website](#)

Sector	Coal Electric Power Generation
Location	
Status	Planning Design Agreement Construction Operation Closure Decommission
Website	http://embapower.com/#project

About Emba Hunutlu coal power plant

The Emba Hunutlu project is a planned 1,320MW coal power plant in Yumurtalik, at the Iskenderun Bay area, district of Adana in Turkey. The project received its permit in 2015, the first phase of operation is planned for the end of 2021. However, the project is still struggling to secure all funding. The project's sponsor, Emba Electricity Production, is a joint venture between China's Shanghai Electric Power (78.21%), Avic-International Project Engineering Company (2.99%), and two private persons: Mete Bülgün, CEO of the EMBA Electricity Production Company (9.4%), and Adnan Demir (9.4%). The project is expected to cost USD 1.7 billion and is [announced as](#) China's largest direct investment in Turkey.

The coal power plant is [assumed](#) to be partially commissioned between January and April of 2022.

Latest developments

Turkey's current trajectory falls short of its commitments to Paris Agreement

[Mar 22 2022](#)

Expert report related to lawsuits against port and plant construction published

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Why this profile?

The Emba Hunutlu coal power plant is planned at a biodiversity protection zone and faces local and national opposition due to its pollution, health, environmental, and climate impacts.

What must happen

The Paris Climate Agreement goals require a managed decline of fossil fuel production. The construction of new coal-fired power plants is not compatible with this goal. Banks must immediately stop financing new coal-fired power plant developments anywhere in the world. As such, banks should steer clear of financing the Emba Hunutlu coal power project.

Impacts

Social and human rights impacts

Iskenderun Bay in the south-east Mediterranean region of Turkey is a highly populated area with metropolitan cities such as Adana, Mersin and Hatay. The total population of the Cukurova Region with all four provinces is almost six million. The region is expected to grow from migration from within Turkey and Syria. The region also hosts seasonal agricultural workers. The major economic activity is agriculture, due to the optimum climate conditions, geographical features, soil fertility, and irrigation opportunities.

6.8% of [Turkey's total added value](#) of the agricultural sector comes from Adana and Mersin's agricultural production, and the Erzin district of Hatay is home to 20% of the citrus production of the entire country. However, the area is getting more and more polluted due to heavy industrial infrastructure projects. Any new coal projects to operate in Iskenderun Bay, including Emba Hunutlu, will have a major impact on the primary agricultural activity of the local communities.

Environmental and climate impacts

Over its projected life span the Emba Hunutlu coal power plant would be responsible for [emitting about 207.44 million](#) tonnes of CO₂. [Studies](#) on heavy metal contents of soil, water and animals in the larger Iskenderun Bay region have given adequate evidence to conclude that the region has already serious pollution burden due to industrial and agricultural activities. If new coal power plants are built as planned, this would add to this environmental impact and associated burden of disease in the region.

Biodiversity protection The area where the Hunutlu power plant is planned in Yumurtalik is a biodiversity hotspot with reproduction zones of marine turtles which are protected by international conventions. The area is internationally protected by the [Convention on Biological Diversity](#) (1992) to which both China and Turkey are parties, as well as the [Bern Convention on Conservation of European Wildlife and Natural Habitats](#) (1979), especially regarding preservation of *Caretta caretta* and *Chelonia mydas* reproduction areas and population. The site is protected by the circular of 2009/10 on the protection of sea turtles. The project poses severe [risks](#) to these protected species not only via coal shipments and delivery, but also its cooling water discharges.

This project violates four [Banks and Biodiversity No Go Policy](#) Areas:

- **Area 1:** The Turkish government has designated 21 beaches as sea turtle conservation sites, per the conservation circular drafted with reference to the Bern Convention in Turkey.
- **Area 2:** The coal plant is located in a protected area recognized under Turkish law, per [Circular no. 2009-10 on the Protection of Sea Turtles](#). This law recognizes and protects the existence of both turtle species in this area, and thus does not allow for power plant construction within the area. However, the coal plant spans across 41 hectares, which directly overlaps and surrounds sea turtle nesting sites.
- **Area 3:** The Emba Hunutlu coal plant is located in an area with both endemic and endangered species.
- **Area 6:** Turkish law Circular No: 2009/10 formally recognizes and protects coastlands for nesting turtle sites, in accordance with the Bern Convention and states the conditions of the Convention regarding those sites.

Air pollution In June 2020, [CREA](#) (Centre for Research on Energy and Clean Air) released a [report](#) about the air quality and health impacts of the proposed EMBA Hunutlu coal power plant. When operational, the Hunutlu plant would together with already operating coal power plants in the area, put 100,000 people in the Iskenderun Bay area at risk of pollution concentrations exceeding the WHO guidelines. The EMBA Hunutlu plant is projected to cause 2,000 air-pollution related deaths over its 40-year lifetime. Other projected health impacts from the report include 15,8 million sick days, 1,9 million lost working days, 240,000 days of asthmatic and bronchitic symptoms in children and 10,000 hospital admissions.

Governance

Bank policies

The following bank investment policies apply to this project:

Bank of China

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

Environmental and social responsibilities

Sep 14 2021 | Bank of China

China Development Bank

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

China Merchants Bank

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

Industrial Bank

Environment and social risk management system

Date listed represents date as accessed on website

Feb 19 2021 | Industrial Bank

Environmental and social policies

Date listed represents date as accessed on website

Feb 19 2021 | Industrial Bank

China Construction Bank

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

Green, Social, Sustainability and Sustainability-Linked (“GSSS”) Bond Framework

Apr 1 2021 | China Construction Bank

Bank of Communications

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

China Everbright Bank

Environmental policy

Date listed represents date as accessed on website

Jan 18 2021 | China Everbright Bank

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

Industrial and Commercial Bank of China (ICBC)

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

China Minsheng Bank

Guidelines on environmental information disclosure for financial institutions

Jul 22 2021 | People's Bank of China

Low carbon business and operation policy

Aug 12 2019 | Ping An Group

Commerzbank

Position on climate change

Date listed represents date as accessed on website

Apr 6 2020 | Commerzbank

Policy framework for handling environmental and social risks in its core business

Jan 17 2022 | Commerzbank

Applicable norms and standards

Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)

Guidelines for Ecological Environmental Protection of Foreign Investment Cooperation and Construction Projects

Net-Zero Banking Alliance (NZBA)

OECD Guidelines for Multinational Enterprises

Principles for Responsible Banking (PRB)

United Nations Convention on Biological Diversity

United Nations Global Compact

Brief history

In July 2015 Emba gained the Construction and Generation Permit from the Turkish Energy Market Regulation Authority (EMRA). The project is planned in Yumurtalik, a small coastal town where communities mainly live on agriculture and fishing. Local communities and CSOs have been taking legal actions and campaigning, against all coal power plants for more than a decade. In July 2017 TEMA (Turkish Foundation for Combating Soil Erosion for Reforestation and the Protection of Natural Habitats) filed a [lawsuit](#) to cancel the urban plan revisions of the Emba Hunutlu project. TEMA objects the legality of the permit on a conservation site designated for internationally protected marine turtles.

Twenty court cases are in progress against planned and operational coal power plant projects in Iskenderun Bay. Among the thirteen that started in 2011 and 2014, on cumulative pollution impacts grounds, three were recognized twice by the plenary session of administrative law divisions, with the same majority of votes (12/3).

Seven of those court cases were opened by local groups gathered under the local platform Doğu Akdeniz Çevre Platformu (East Mediterranean Environment Platform) in 2016 for the cancellation of permits or pre-permits of planned coal power plants, including Hunutlu's operation permit, highlighting the cumulative impact on local livelihoods and ecosystems.

In the framework of permit cancellation a lawsuit was opened against Emba Hunutlu by local communities, a legal expert visit took place on 13 July 2017. In December 2017, [the expert report](#) agreed with local community arguments on cumulative pollution impacts of Hunutlu, to be added on top of existing coal power plants and other highly polluting industrial facilities. The report also quoted cancer rates in the region, speaking about Hunutlu's potential impacts on air quality and agricultural products.

Due to strong opposition by local, national and international civil society groups, in November 2015 French utility Engie [announced cancellation of the Ada coal power plant](#) planned in Yumurtalik.

Updates

Turkey's current trajectory falls short of its commitments to Paris Agreement

Mar 22 2022

Earlier in 2021 Turkey endorsed the [Paris Agreement](#) to limit climate change, but as of October 2021 policy was still to increase domestic coal share in the energy mix, and planned [increases in coal power](#) were forecast to increase CO₂ emissions. Turkey's Paris Agreement Pledge - or [nationally determined contribution](#) - on its greenhouse gas emissions needs to be updated to meet the agreement.

Expert report related to lawsuits against port and plant construction published

Feb 17 2020

An expert investigation was published in February 2020. The featured arguments from the report say in summary:

- The construction plans for sea and land are not compatible with each other, and together these plans are contrary to the İskenderun Bay (Adana-Mersin-Hatay) Integrated Coastal Areas Plan's relevant principles;
 - In the EIA reports and other reports, important topics regarding spawning grounds of sea turtles are not investigated and addressed comprehensively. There is no mention of how the sea turtles (*Caretta Caretta*) will be affected by coal-carrying ships while trying to reach spawning areas;
 - In one of the reports (scientific report), there are many precautions proposed to be taken to protect the sea turtles under protection. If all of the measures are followed completely, the coal plant can be considered as not risky, but it is not realistic or possible to implement all these precautions completely.
-

Construction of the Emba Hunutlu coal power plant has started

May 31 2019

In May 2019, the company initiated the construction of the coal power plant project. However, it was paused in June because of the tortoise nesting season, according to the local conservation group [EKAD](#).

ESI Eurosilo receives order for large coal silos for the Emba Hunutlu coal power plant

Apr 30 2019

In April 2019, Dutch company, ESI Eurosilo, announced that it received a large order with the request for three large coal silos for the EMBA Hunutlu power plant. The first silo is agreed to be delivered at the beginning of 2020 and full delivery to be finished at the end of 2020 ([Powertechnology.com](#)).

Interventions at the second Belt and Road forum in April 2019

Apr 25 2019

Just before the second Belt and Road forum which took place in Beijing in late April, the groups HEAL, WWF Turkey, TEMA Foundation, Climate Action Network Europe (CAN-Europe) and Eastern Mediterranean Environmental Protection Platform issued a [joint press release](#) describing the unlawful environmental and health effects of the Hunutlu project.

Meanwhile, during the second Belt and Road forum SEP issued [a statement](#), declaring: "SEP will join hands with various parties to construct the project into a clean, efficient, reliable and beautiful world-class power plant, and create a crown jewel of the power industry around the Mediterranean Sea."

Ankara court decides not to cancel Emba Hunutlu project permit

Oct 30 2018

On 30th of October 2018, the hearing of the court case by Adana Bar, Turkish Bar Associations, Medical Chamber of Adana, Agriculture and Engineers Chamber of Adana Doğu Akdeniz Çevre Dernekleri (East Mediterranean Environment Associations) was held in Ankara. Despite the expert report, which stated the harmful effects of the plant, the Ankara District Administrative Court [decided not to cancel the permit](#) of the Emba project.

Expert report confirms impacts of Emba Hunutlu coal power plant project

Jan 31 2018

In January 2018, [the expert report](#) for the court case filed by Adana Bar, Turkish Bar Associations, Medical Chamber of Adana, Agriculture and Engineers Chamber of Adana and Doğu Akdeniz Çevre Dernekleri (East Mediterranean Environment Associations) was published, acknowledging that the Emba Hunutlu coal power plant would harm the public health and agricultural production in the area.

TEMA files lawsuit

Jul 31 2017

In July 2017, TEMA (Turkish Foundation for Combating Soil Erosion, for Reforestation, and the Protection of Natural Habitats) filed a lawsuit to cancel the urban plan revisions of the Emba Hunutlu project, granting the permission to build the coastal structures of the coal plant on biodiversity conservation grounds. TEMA objects the legality of the project's permit on a conservation site designated for internationally protected marine turtles.

Lawsuits filed against seven coal power plant projects

Jun 29 2016

In June 2016, Adana Bar, Turkish Bar Associations, Medical Chamber of Adana, Agriculture and Engineers Chamber of Adana and Doğu Akdeniz Çevre Dernekleri (East Mediterranean Environment Associations) [filed a lawsuit](#) against seven coal plant projects in the region including Emba Hunutlu.

Financiers

The project will be funded by [20% equity and 80% debt](#). The debt (USD 1.381 billion) is financed by a 15 year loan from three Chinese banks: China Development Bank, ICBC and Bank of China. See below for more details.

[Shanghai Electric Power](#) and Avic International are funded by a group of (mainly Chinese) banks. Below are listed loans and underwriting services between 2010 and 2016 to these companies.

Banks

[Bank for Beijing](#)

[Details](#) ▼

Debt – corporate loan USD 189 million 2010 - 2016

Provided corporate loans and underwriting services to Avic International totalling USD 189 million between 2010 and 2016
source: Bloomberg, December 2016; Thomson EIKON, December 2016

[Bank of China](#) China [profile](#)

[Details](#) ▼

Debt – corporate loan USD 460 million 2019 - 2034

Co-financed USD 1.381 billion loan with China Development Bank and ICBC
source: Revolvly.com
[link](#)

Debt – corporate loan	USD 630 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 630 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
Debt – corporate loan	USD 936 million	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 936 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
Bank of Communications China profile		Details ▼
Debt – corporate loan	USD 292 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 292 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
CITIC Industrial Bank		Details ▼
Debt – corporate loan	USD 1.614 billion	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 1.614 billion between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
China Construction Bank China profile		Details ▼
Debt – corporate loan	USD 337 million	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 337 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
Debt – corporate loan	USD 332 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 332 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
China Development Bank China profile		Details ▼
Debt – corporate loan	USD 460 million	2019 - 2034
Co-financed USD 1.381 billion loan with ICBC and Bank of China <i>source:</i> Revolvly.com link		
Debt – corporate loan	USD 549 million	2008 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 549 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
China Everbright Bank China profile		Details ▼
Debt – corporate loan	USD 230 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 230 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
China Merchants Bank China profile		Details ▼
Debt – corporate loan	USD 177 million	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 177 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson, December 2016		
Debt – corporate loan	USD 427 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 427 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
China Minsheng Bank China profile		Details ▼

Debt – corporate loan	USD 357 million	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 357 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson, EIKON, December 2016		
Commerzbank AG Germany profile Details ▼		
Debt – corporate loan	USD 96 million	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 96 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
Industrial Bank of China China profile Details ▼		
Debt – corporate loan	USD 346 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 346 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
Industrial and Commercial Bank of China (ICBC) China profile Details ▼		
Debt – corporate loan	USD 460 million	2019 - 2034
Co-financed USD 1.381 billion loan with China Development Bank and Bank of China <i>source:</i> Revolvly.com link		
Debt – corporate loan	USD 602 million	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 602 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson, December 2016		
Debt – corporate loan	USD 229 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 229 million between 2010 and 2016 <i>source:</i> Bloomber, December 2016; Thomson EIKON, December 2016		
Ping An Bank China profile Details ▼		
Debt – corporate loan	USD 97 million	2010 - 2016
Provided corporate loans and underwriting services to Avic International totalling USD 97 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		
Shanghai Pudong Development Bank China profile Details ▼		
Debt – corporate loan	USD 390 million	2010 - 2016
Provided corporate loans and underwriting services to Shanghai Electric totalling USD 390 million between 2010 and 2016 <i>source:</i> Bloomberg, December 2016; Thomson EIKON, December 2016		

Related companies

Project sponsor

Emba Electricity Production Turkey