

**Submission to the United Nations Human Rights Council
45th Session of the Universal Periodic Review
Technical Working Group for the 4th UPR of the People's Republic of China
(January-February 2024)**

**China-Backed Projects that have Neglected the Rights to a Good and Clean
Environment and Safety of Economic Resources**

**Cases of Teluk Sepang Coal-Fired Power Plant in Bengkulu Province, Nagan Raya
Coal-Fired Power Plant in Aceh Province and Pangkalan Susu Coal-Fired Power Plant
in North Sumatra Province, Indonesia
July 2023**

**Joint Submission by Sumatera Terang untuk Energi Bersih
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KANOPI HIJAU INDONESIA



I. Introduction

1. This joint submission¹ to the 4th UPR of China is in regard to China-backed coal-fired power projects by providing loans and engaged in engineering, procurement, and construction contracts that have disregarded the rights to a good and clean environment and economic resource security - in particular, the rights to life, the rights to health, and the rights to a decent livelihood for communities in Bengkulu Province, Aceh Province, and North Sumatra.
2. China has yet to ratify the International Covenant on Civil and Political Rights, but China is still considerably bound by the Universal Declaration of Human Rights² adopted and ratified by the UN General Assembly in 1948, particularly in relation to the right to life. Additionally, China is a state party to the International Covenant on Economic, Social, and Cultural Rights,³ and therefore bound to protect, respect, and fulfill the rights enshrined in the convention, including the right to health, the right to continuous improvement of living conditions, and rights to work and to establish trade unions.
3. According to international law, China's state duty in relation to these rights includes ensuring private entities under its jurisdictions do not interfere with the enjoyment of these rights. Additionally, China has a duty to cooperate and use its "maximum resources" to achieve the realization of ESC rights, including in foreign jurisdictions where Chinese entities are present. The UN Committee on Economic, Social, and Cultural Rights (ECOSOC Committee) has emphasized that states must take "deliberate, concrete and targeted" steps towards progressive realization without delay.
4. The Paris Agreement⁴ has the main point of keeping the Earth's temperature threshold below two degrees Celsius and trying to reduce it to 1.5 degrees Celsius above pre-industrial temperatures. The latest IPCC report states that limiting the global average temperature to 1.5 degrees Celsius can be achieved by completely stopping fossil burning.⁵ Meanwhile, fossil burning, especially coal in Indonesia, has eliminated the right to life, namely premature death of 6,500 people per year.⁶
5. Chinese President Xi Jin Ping made a commitment that China will stop funding coal-fired projects abroad. This commitment must be followed by actions to stop using coal fuel in Chinese projects and to replace it with renewable energy that promotes and respects the rights of local communities.⁷
6. The role of the private sector in coal-fired power plant projects in Indonesia grew after the introduction of Presidential Regulation (Perpres) number 4 of 2010⁸ concerning assignment to PT PLN (Persero), Indonesian State-Owned Enterprise for electricity provision, to Accelerate the Development of Power Plants Using Renewable Electricity, Coal, and Gas. Since then, Chinese companies such as the State-owned Sinohydro and Power China have been dominating coal-fired power plant construction projects in Sumatra.
7. This joint submission is based on the results of direct observations by Consortium of Sumatera at the sites of Teluk Sepang coal-fired power plant in Bengkulu Province, Pangkalan Susu coal-fired power plant in North Sumatra Province, and the Nagan Raya coal-fired power plant in Aceh Province, literature studies, and testimonies of affected communities.

II. Chinese companies and banks are directly involved in the construction of coal-fired power plants in Bengkulu province, Aceh province, and North Sumatra province, Indonesia

8. Business partnerships are forged between Indonesian and Chinese companies such as the following: Sinohydro and PT Tenaga Listrik Bengkulu for the Teluk Sepang Coal-Fired Power Plant project in Bengkulu Province⁹, PT Meulaboh Power Generation and PT PLN and PT Sinohydro Co. Ltd for the Nagan Raya Coal-fired power plant project in Aceh Province¹⁰, and PT Perusahaan Listrik Negara (PLN) and a consortium of PT Nusantara Energi Mandiri and Sinohydro Co. Ltd for the Pangkalan Susu Coal-fired power plant project in North Sumatra¹¹.
9. The two financial institutions that provide loans for the above-mentioned coal-fired power plant projects in Sumatra Island are the Industrial Commercial Bank of China (ICBC) and the Export Import Bank of China. These two banks have lent USD270 million for the Teluk Sepang project¹², USD373 million for the Pangkalan Susu project¹³ and at least USD124.34 million for the Nagan Raya project¹⁴.
10. In implementing these projects, the Chinese entities/corporations involved have neglected the adverse environmental impacts caused and ignored mitigation efforts listed in the Environmental Impact Assessment (EIA) document, developed, and proposed by the project owners and approved by the Indonesian government.

III. Chinese companies violate the applicable domestic standards of environmental protection and management, and ignore Indonesian law enforcement

A. Case 1: Teluk Sepang coal-fired power plant

11. Teluk Sepang Bengkulu coal-fired power plant is a power plant construction project under the 35,000-Megawatt (MW) program¹⁵. This project kicked off in 2016 to fulfill the need for electrical energy in the South Sumatra Bengkulu Jambi (WS2JB) region.
12. The funding for the construction of the coal-fired power plant comes from ICBC in the amount of USD135 million, EXIM Bank of China in the amount of USD135 million, and PT Intraco Penta, Tbk. in the amount of USD90 million¹⁶.
13. PT Intraco Penta, Tbk. (INTA) formed a subsidiary named PT Tenaga Listrik Bengkulu, while Sinohydro carried out the plant's construction.¹⁷ This agreement was signed between PT Tenaga Listrik Bengkulu (by its President director Cao Yuesheng) and PLN (by its President Director Sofyan Basir,) on November 25, 2015¹⁸.
14. PT Tenaga Listrik Bengkulu and Sinohydro constructed the power plant in Teluk Sepang based on inaccurate spatial recommendations. Spatial planning recommendation No. 650/0448/Bappeda¹⁹ requires that the constructed power plant shall be powered by renewable energy, however, in implementation, the project was approved as coal-fired power plant.

A.1. Violation of the right to the safe, clean, and healthy environment

15. PT Tenaga Listrik Bengkulu has been subject to three administrative sanctions for non-compliance with environmental management regulations as follows: 1) an order to improve the management of hot water, including the reconstruction of hot water-cooling ponds destroyed by waves²⁰; 2) an order to improve the management of fly ash and bottom ash (FABA)²¹; and 3) an order to fix the hot water heat retaining building damaged by abrasion²². In addition, in the context of the environmental management rating program, PT Tenaga Listrik Bengkulu is rated "red" by the Ministry of Environment and Forestry (KLHK), which means it is very non-compliant²³.
16. Despite the three administrative sanctions, based on Consortium Sumatera field observations, PT Tenaga Listrik Bengkulu has not made any progress to improve its wastewater disposal system and FABA waste management²⁴. Instead, PT TLB now dumps its FABA waste into the conservation area of Pantai Panjang-Pulau Baai Nature Tourism Park (TWA)²⁵.
17. PT Tenaga Listrik Bengkulu has caused the sea waters around the effluent discharge to warm up. The average sea surface temperature around the discharge of wastewater has increased from 29.5 degrees Celsius in 2018 to 38 degrees Celsius in 2019. Research by students at the Bengkulu University Marine Department on the quality of water parameters in the Teluk Sepang coal-fired power plant wastewater discharge area in 2019 showed that the point closest to the mouth of the wastewater discharge had a temperature of 38 degrees Celsius²⁶.
18. PT Tenaga Listrik Bengkulu has also failed to manage the traffic impacts caused by its coal transportation. The EIA document requires the coal to be transported by sea but in fact it is transported using public roads. In addition to violating environmental regulations, this has also harmed the Teluk Sepang community²⁷ as the coal transportation results in road congestion, damage to the road from North Bengkulu Regency to the port at Baai Island²⁸, and increased noise and air pollution. This unlawful use of roads has also increased the accident risk of the people throughout Bengkulu Province.

A.2. Violations of the right to life and health

19. In the next 30 years of operation, the Teluk Sepang Coal-Fired Power Plant Units 1 and 2 are estimated to cause 47 to 107 premature deaths from chronic obstructive pulmonary disease, diabetes, ischemic heart disease, lung cancer, lower respiratory tract infections, stroke, and other cardiovascular and respiratory diseases.²⁹
20. In addition, increased cases of illness due to the operation of the Teluk Sepang coal-fired power plant is expected to contribute to 29,959 to 40,413 productive days (working days) lost due to illness cumulatively, during the 30 years of the plant operation.³⁰ The total economic loss due to these illnesses is estimated to be between USD32.99 million and USD75.34 million.³¹
21. In addition, the residents of Teluk Sepang contracted skin diseases due to the dirty environment. An independent inventory of residents shows that at least 39 residents of Teluk Sepang suffer from skin diseases. The Bengkulu City Health Office on October 31, 2022 has examined the residents' illnesses and revealed that these illnesses were caused by the dirty environment³².

A. 3. Violation of the right to livelihood

22. PT Tenaga Listrik Bengkulu seized the cultivated land of 30 Bengkulu City residents which was their source of income³³. The farmers were evicted at night without prior notice.

Testimony of Teluk Sepang Farmer "We were never consulted about crop compensation. The day before I was still in my plantation but the next day 315 of my oil palm trees were cut down". (Famer 1)

"Palm oil farmer in the power plant site: I was given RP9,000,000 as a compensation for my land delivered to my house at night. They said they were from the Teluk Sepang coal-fired power plant, forcing me to accept the money tied with a rubber band". (Farmer 2)

23. During the Teluk Sepang coal-fired power plant's testing between November 2019 to January 2020, 28 sea turtles (*Cheloniaidea* sp), which are endangered and protected animals, were found dead in the waters of Teluk Sepang ³⁴.
24. Since the Teluk Sepang coal-fired power plant commenced operation, fishermen's catches have decreased drastically³⁵, forcing 82 traditional fishermen in Teluk Sepang Village to stop going to sea ³⁶.
25. The Teluk Sepang coal-fired power plant has destroyed 10 hectares of mangrove forest where fishermen usually catch crabs. Although crabs are not the main catch for all fishermen, for some fishermen this commodity is a strategic livelihood diversification as well as a source of subsistence food³⁷.

B. Case 2: Pangkalan Susu Coal-Fired Power Plant

26. The Head of the North Sumatra Environment Agency has approved the Environmental Impact Assessment (ANDAL) document No. 249/DLH-SU/BTL.A/2010, dated March 08, 2010, concerning approval to the Environmental Impact Assessment Document for the construction of the Pangkalan Susu Steam Power Plant (PLTU) units 3 and 4 with a capacity of 2X200 MW in Tanjung Pasir Village, Pangkalan Susu District, Langkat Regency, North Sumatra, Indonesia³⁸.
27. The contract for the construction of PLTU Pangkalan Susu units 3 and 4 was signed on July 15, 2013 by the President Director of PLN Nur Pamudji and the Chief Representative of Sinohydro Corporation Limited Deng Xi representing the Sinohydro Corporation Limited - PT Nusantara Energi Mandiri consortium as the construction contractor³⁹.
28. The coal-fired power plant unit 3 and 4 project is funded by the Preferential Buyer's Credit of the Government of the People's Republic of China, EXIM Bank of China, with a transaction amount of USD235.9 million⁴⁰.
29. The Pangkalan Susu unit 3 and 4 coal-fired power plants are a consortium consisting of the Chinese engineering company Sinohydro Co. Ltd, a subsidiary of Power Construction Corporation of China (also known as Power China), and the Indonesian power plant/mining company PT Nusantara Energi Mandiri and operated under the

banner of PT Indonesia Power ⁴¹.

30. The Pangkalan Susu unit 3 and 4 coal-fired power plants require 89,200 tons of low-range coal per month with a calorie content of around 4,200 kcal/kg.⁴² This type of coal is known to be dirtier and more polluting.

B.1. Violation of the right to a good and healthy environment

31. PT Indonesia Power has spread the coal combustion ash, fly ash and bottom ash (FABA) to dozens of residents living around the power plant ⁴³. This act is contrary to Regulation of the Minister of Environment and Forestry No. 19 of 2021 concerning Non-B3 Waste Management ⁴⁴ as FABA contains heavy metals and toxic compounds such as mercury and arsenic and lead that are harmful to human health ⁴⁵.
32. A total of 145 hectares of mangrove forests have disappeared resulting to tidal floods which caused damage to nearby residential areas and rice plantations ⁴⁶.
33. PT Indonesia Power discharges wastewater with a temperature of 42 degrees Celsius⁴⁷ which is contrary to the Decree of the Minister for the Environment No. 51 of 2004 concerning Seawater Quality Standards and Regulation of the Minister for the Environment No. 8 of 2009 concerning Wastewater Quality Standards for Businesses and/or Activities of Thermal Power Plants⁴⁸. The maximum temperature according to the regulation is 40 degrees Celsius.
34. The Ministry of Environment and Forestry Directorate General of Law Enforcement has never given any response to complaints filed by Srikandi Lestari Foundation on May 24, 2023 regarding the alleged absence of fly ash filters in the Pangkalan Susu coal-fired power plant⁴⁹.

B.2. Violation of the right to life and to health

35. In the next 30 years of operation, the Pangkalan Susu coal-fired power plant is expected to cause 2,824 to 6,693 premature deaths from chronic obstructive pulmonary disease, diabetes, ischemic heart disease, lung cancer, lower respiratory tract infections, stroke, and other cardiovascular and respiratory diseases⁵⁰.
36. In addition, increased number of illnesses due to the operation of the Pangkalan Susu power plant is estimated to contribute to 1,339,068 to 1,794,182 productive days (working days) lost due to illness, cumulatively, during the 30 years of the plant operation.⁵¹ The total economic loss due to these illnesses is estimated to reach USD 2,052.31 to 4,933.27 million.⁵²

B.3. Violation of the right to livelihood

37. PT Indonesia Power has harmed the rights of 659 traditional fishermen to fish and anchor their boats around the power plant area, which has been the fishermen's fishing area for decades ⁵³. As a result, Teluk Aru fishermen can no longer rely on fishing as their main source of livelihood.

Teluk Aru Fishermen: "Since the power plant began operating, my income has dropped dramatically from Rp450,000 per day to only Rp50,000. We have asked
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PT Indonesia Power not to dump waste into the sea but there has been no response let alone improvements. We are now forced to sell our boats to cover our debts and our wife has to work odd jobs to cover our living expenses.”

38. In addition, PT Indonesia Power has never fulfilled its promise made in 2011 to fix infrastructures such as farming roads and public roads to the markets ⁵⁴.

C. Case 3: Nagan Raya Coal-Fired Power Plant

39. The Nagan Raya coal-fired power plant units 1 and 2 in Aceh were built under the partnership between PT PLN and Sinohydro Co. Ltd, a Chinese state-owned company⁵⁵.
40. The Nagan Raya coal-fired power plant units 3 and 4 were built under the partnership between PT Meulaboh Power Generation in collaboration with Group Overseas Investment Co, Ltd, PT PP Energi (Persero) and PT Sumberdaya Sewatama⁵⁶.
41. The Nagan Raya coal-fired power plant units 1 and 2 with a capacity of 200 Megawatts is funded by the Export - Import Bank of China worth USD124.34 million and by syndicated credit from the Association of Regional Development Banks (Asbanda) amounting to Rp 614.34 billion⁵⁷.
42. The Nagan Raya Coal-Fired Power Plant units 3 and 4 have a capacity of 400 Megawatts with a project fund of USD600 million⁵⁸, consisting of the consortium's equity and domestic and international loans.

C.1. Violation of the right to the environment

43. Coal transportation has caused air pollution due to flying dust in Suak Puntong Village, Kuala Pesisir Subdistrict, Nagan Raya Regency and Penaga Cut Village, Mereubo Subdistrict, West Aceh Regency ⁵⁹.
44. A total of 35 households in Suok Puntong Village have been forced to relocate because they can no longer stand the coal dust. The Suok Pontong villagers moved after the compensation was completed by PT Mifa Bersaudara and PT PLN in December 2020 through a compensation mechanism⁶⁰. One Penaga Cut resident said: "We who live around the power plant are suffering from illnesses such as shortness of breath and coughing because it is so dusty and harms our children's health. We are surrounded by three companies: PT Mifa Bersaudara, PT Meulaboh Power Generation and China Datang Overseas Investment Group Co. Ltd. The people of Gunong Kleng, Peunaga Cut, Suak Puntong cannot do anything”.
45. PT PLN and Sinohydro Co. Ltd have discharged wastewater with an average temperature of 42 degrees Celsius in July of 2023 ⁶¹ which is contrary to the Decree of the Minister for the Environment No. 51 of 2004 concerning Seawater Quality Standards and Regulation of the Minister for the Environment No. 8 of 2009 concerning Wastewater Quality Standards for Businesses and/or Activities of Thermal Power Plants⁶². The maximum temperature according to the regulation is 40 degrees Celsius.

C.2. Violation of the right to life and to health

46. In the next 30 years of operation, the four units of Nagan Raya coal-fired power plant is expected to cause 691 to 1,534 premature deaths from chronic obstructive pulmonary disease, diabetes, ischemic heart disease, lung cancer, lower respiratory tract infections, stroke, and other cardiovascular and respiratory diseases, cumulatively.⁶³
47. In addition, increased illnesses due to the operation of the Nagan Raya power plant is expected to contribute to 287,823.5 to 388,256.6 productive days (working days) lost due to illness, cumulatively, during the 30 years of the plant operation.⁶⁴ The total economic loss due to these illnesses is estimated to reach USD460.54 million to USD1,052.25 million.⁶⁵

IV. Conclusion and Recommendations

48. The cases of Teluk Sepang coal-fired power plant in Bengkulu, Pangkalan Susu coal-fired power plant in North Sumatra, and Nagan Raya coal-fired power plant in Aceh show that Chinese companies and Indonesian private companies have ignored the human rights of the affected populations in Indonesia, especially those living around the power plants as they have lost their source of livelihood and health suffered serious consequences as a result of harmful effects directly caused by the power plants.
49. For this reason, we are making the following recommendations to the Government of the People's Republic of China:
 - I. To create an independent fact-finding team that will conduct onsite investigation to confirm any human rights violations that have occurred in countries hosting development projects financed and/or operated by Chinese companies, especially coal-fired power plants.
 - II. That Chinese companies are held to account and provide remedies for the victims of various violations that resulted from the operations of the plants attributed to Chinese companies, such as Teluk Sepang Bengkulu coal-fired power plant, the Pangkalan Susu power plant in North Sumatra and the Nagan Raya power plant in Aceh.
 - III. To require Chinese companies operating abroad to respect the right to a safe, clean, healthy, and sustainable environment, and the right to health of the affected populations and communities. Chinese companies should be required to participate in providing remedies when these rights are violated.
 - IV. To conduct strict monitoring of Chinese companies operating abroad to ensure compliance with their human rights responsibilities, including by introducing mandatory human rights due diligence legislation with extraterritorial application, due consultations with various stakeholders consistent with international good standards and practices.
 - V. To request all Chinese companies operating abroad to submit environmental management and control reports to all parties, especially to communities in host countries affected by projects that pose high-risk to sectors, such as coal-fired power plants.
 - VI. To require Chinese companies operating abroad to meaningfully consult and respect the rights of the people affected by their business operations, especially the rights of indigenous peoples.

Endnotes:

- ¹ Joint submission by Kanopi Hijau Indonesia, Srikandi Lestari Foundations, and Association of Pembela Lingkungan Hidup. China-Backed Projects that have Neglected the Rights to a Good and Clean Environment and Safety of Economic Resources. Cases of Teluk Sepang Coal-Fired Power Plant in Bengkulu Province, Nagan Raya Coal-Fired Power Plant in Aceh Province, and Pangkalan Susu Coal-Fired Power Plant in North Sumatra Province, Indonesia.
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