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1 **Carbon credit for hydroelectric dams as a**  
2 **source of greenhouse-gas emissions:**  
3 **The example of Brazil's Teles Pires Dam**

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21 **Abstract** Carbon credit is granted to hydroelectric dams under the Kyoto Protocol's Clean  
 22 Development Mechanism (CDM) under the assumptions that (1) the dams would not be  
 23 built without CDM funding and (2) over the 7 to 10-year duration of the projects the dams  
 24 would have minimal emissions as compared to the fossil fuel-generated electricity they  
 25 displace. Both of these assumptions are false, especially in the case of tropical dams such  
 26 as those planned in Amazonia. Brazil's Teles Pires Dam, now under construction, provides  
 27 a concrete example indicating the need for reform of CDM regulations by eliminating  
 28 credit for hydroelectric dams.

29

30 **Keywords** Amazonia, Dams, Global warming, Greenhouse gas emissions, Hydroelectric  
 31 dams, Methane, Mitigation

32

### 33 **1 Introduction**

34

35 Carbon credit granted for hydroelectric dams under the current regulations of the  
 36 Kyoto Protocol's Clean Development Mechanism (CDM) represents a major source of "hot  
 37 air," or certified emissions reductions (CERs) that allow the countries purchasing them to  
 38 emit greenhouse gases, but without any real benefit for climate from the mitigation project.  
 39 As of 30 January 2012 the CDM executive board had approved 406 hydroelectric projects  
 40 for credit worldwide totaling 70.2 million tons of carbon-dioxide equivalent (CO<sub>2</sub>-e), or  
 41 19.2 million tons of carbon (Chu 2012). The projects are either for 7 years (with the  
 42 possibility of renewal) or for a fixed period of 10 years (as in the case of the proposal for  
 43 Brazil's Teles Pires Dam). The "pipeline," or projects either registered or seeking  
 44 registration with the CDM, is much larger (Table 1). The 288 million tons total average  
 45 CO<sub>2</sub>-e per year of credit (78.9 million tons of carbon) in the global pipeline is roughly equal  
 46 to Brazil's current emissions from Amazon deforestation. Brazil accounts for 6.2% of the  
 47 pipeline total, and of this the Teles Pires Dam represents 14.0%.

48

49 <Table 1 here>

50

51 The dams have multiple environmental and social impacts (WCD 2000). There is  
 52 also strong evidence that virtually none of the supposed emissions reductions is additional  
 53 (i.e., they would be built anyway, without CDM funding). Virtually all dam projects only  
 54 apply for CDM credit after the investments in project construction have already been  
 55 secured, when the dam is under construction (as in the case of the Teles Pires Dam), and  
 56 sometimes even after the dam has been built. Brazil's current ten-year energy expansion  
 57 plan calls for building 48 new large dams in the country by 2020, 30 of which would be in  
 58 the Legal Amazon region (Brazil, MME 2011). Note that since 2006 Brazil defines "large"  
 59 dams as > 30 MW (most are much larger), while the CDM defines "large" dams as > 15  
 60 MW and the International Commission on Large Dams (ICOLD) defines them as > 15 m in  
 61 height. Building 30 dams in 10 years in Brazilian Amazonia corresponds to one dam every  
 62 four months, thus providing ample opportunity to claim additional mitigation credit if the  
 63 current regulations of the CDM continue unchanged. Brazil's National Plan for Climate  
 64 Change implies that this is, indeed, the expectation of the Brazilian government (Brazil,  
 65 CIMC 2008), although this in no way implies that these dams would not be built without  
 66 CDM credit.

67  
68 The first large dam to request CDM credit in Brazil's Amazon region was the  
69 Dardonellos Dam in the state of Mato Grosso, and this has now been followed by the 1820-  
70 MW Teles Pires Dam, scheduled for construction on the Teles Pires River, a tributary of  
71 the Tapajós River, itself a tributary of the Amazon. The 135-km<sup>2</sup> reservoir will straddle the  
72 border between the states of Pará and Mato Grosso. Bidding was held on 17 December  
73 2010 to choose the consortium of firms that will build the dam and sell the electricity (since  
74 2006 Brazil's dams are offered through bidding on the price to be charged for the  
75 electricity, the dam being awarded to the company offering the lowest price); contracts  
76 were signed on 7 June 2011 and construction officially began on 30 October 2011 (Brazil,  
77 PR 2011, p 82). The goal of the present paper is to examine the proposal for crediting  
78 Brazil's Teles Pires Dam as an example of the widespread problems affecting dams in the  
79 CDM.

## 80 81 **2 The Teles Pires project**

82  
83 The Project Design Document (PDD) for the Teles Pires Dam (Ecopart 2011) is  
84 revealing both of the flaws in the current CDM system and of the inconsistencies between  
85 Brazilian government's stated concern for climate change and its engaging in maximum  
86 exploitation of loopholes in CDM regulations. The document begins by stating (p 3) that  
87 "*The Project will make use of the hydrological resources of the Teles Pires River ... in*  
88 *order to generate greenhouse gases (GHG) emission free electricity*". No literature is cited  
89 here or anywhere in the document to substantiate the claim that Amazonian hydroelectric  
90 dams such this one are emissions free. Instead, the calculations later in the document rely  
91 on a CDM procedural clause related to the power density of the dam as the justification for  
92 using a value of zero for the project's emissions in the calculations. Unfortunately, the fact  
93 that Amazonian dams produce large amounts of greenhouse gases, especially during their  
94 first ten years of operation (the time horizon for the current CDM project), has been shown  
95 in many studies in the peer-reviewed literature (e.g., Galy-Lacaux et al. 1997, 1999;  
96 Fearnside 2002, 2004, 2005a, b, 2006a, 2008, 2009a; Delmas et al. 2004; Abril et al. 2005;  
97 Guérin et al. 2006, 2008; Kemenes et al. 2008, 2011; Gunkel 2009; Pueyo and Fearnside  
98 2011). While caveats and assumptions are detailed in all of these studies, their overall  
99 conclusion that tropical dams emit substantial amounts of greenhouse gases in their first ten  
100 years is clear and robust.

101  
102 Despite the document's using zero as the emission for the project in its calculation of  
103 climate benefits, a table is included (p 10, Table 3) indicating that the dam would produce  
104 methane (CH<sub>4</sub>), although no quantities are mentioned. The same table also states that  
105 emissions of CO<sub>2</sub> and N<sub>2</sub>O are zero, each of these being only a "*minor emission source.*"  
106 Unfortunately, both of these gases are also produced. Creating the reservoir will kill forest  
107 trees in the flooded area, and these generally remain projecting out of the water; the wood  
108 decays in the presence of oxygen and produces CO<sub>2</sub>. The quantities are quite substantial  
109 over the ten-year time horizon of the current CDM project, as shown by calculated  
110 emissions from this source in existing Amazonian reservoirs (Fearnside 1995). CO<sub>2</sub> will  
111 also be emitted by deforestation activity stimulated near the dam and by clearing of cerrado  
112 (savanna) further upstream in order to produce the soybeans that would be transported on  
113 the Teles-Pires/Tapajós waterway, of which this dam and its locks form a part (Fearnside

114 2001, 2002b; Millikan 2012). Nitrous oxide (N<sub>2</sub>O) is also emitted by tropical reservoirs, as  
 115 has been shown in French Guiana (Guérin et al. 2008).

116

117 The proposal takes advantage of a CDM regulation that allows zero emissions to be  
 118 claimed if the power density is over 10 W/m<sup>2</sup> (p 27):

119

120 *“Emissions from water reservoir are set to zero if the power density of the project activity*  
 121 *is greater than 10 W/m<sup>2</sup>. The Project power density is 19.18 W/m<sup>2</sup>, thus by definition*  
 122 *emissions from water reservoir are zero”.*

123

124 Unfortunately, having a high power density does not, in fact, result in zero emissions.  
 125 A high power density means that the area of the reservoir is small relative to the installed  
 126 capacity. The small area means that emissions through the reservoir surface (from bubbling  
 127 and diffusion) will be smaller than in a large reservoir, but not zero. The installed capacity,  
 128 however, reflects the amount of water available in the river, and this has the opposite effect:  
 129 the more the streamflow the more the emission that will result from water passing through  
 130 the turbines and spillways. The turbines and spillways are, in fact, the major source of  
 131 methane emission in most Amazonian dams (e.g., Fearnside 2002a, 2005a,b, 2009, Abril  
 132 2005). The water passing through the turbines and spillways is normally drawn from a  
 133 depth below the thermocline that separates the layers of water in the reservoir. The deeper  
 134 layer (the hypolimnion) is virtually devoid of oxygen, and decomposition of organic matter  
 135 therefore generates methane instead of carbon dioxide. Each ton of methane has the impact  
 136 on global warming of 25 tons of CO<sub>2</sub> over a 100-year time span according to the last report  
 137 of the Intergovernmental Panel on Climate Change (Forster et al. 2007), and 34 times this  
 138 impact according to a more recent estimate (Shindell et al. 2009). The water with high  
 139 concentrations of methane (under pressure at the bottom of the reservoir) is released to the  
 140 open atmosphere below the dam, and the most of methane quickly emerges as bubbles  
 141 (Henry’s Law). Note that the only valid means of measuring these emissions is by the  
 142 difference in concentration of methane in the water above the dam (at the depth of the  
 143 turbines) and in the river below – not by floating chambers to measure flux through the  
 144 surface of the river some distance downstream, as has been done in several studies that  
 145 claim only small emissions from “degassing” at the turbines (e.g., dos Santos et al. 2008;  
 146 Ometto et al. 2011). See comparative data in Kemenes et al. (2011).

147

148 The Project Design Document calculates reservoir area for the purpose of computing  
 149 the power density, which is the installed capacity in Watts divided by the area in square  
 150 meters. The calculation (p 36) is described as:

151

152 *“The project’s reservoir area under the normal maximum water level of 220 m is*  
 153 *135.4654 km<sup>2</sup>, of which 40.6 km<sup>2</sup> is part of the normal river bed and, therefore,*  
 154 *the increased flooded area is 94.8654 km<sup>2</sup>.”*

155

156 The assumption is that the water located over the “normal river bed” is not emitting  
 157 methane. Unfortunately, this water also emits methane, as shown by numerous studies that  
 158 have measured reservoir surface fluxes at a variety of monitoring points in Amazonian  
 159 reservoirs (e.g., Rosa et al. 1997; Duchemin 2000; Abril et al. 2005; Kemenes et al. 2007).  
 160 The CDM regulation allowing the river bed not to be counted appears to be based on an

161 assumption that the natural river would be emitting the same amount of methane.  
162 However, methane emissions from a free-flowing river are much lower than those from  
163 reservoirs. Rivers do not normally stratify, especially in the fast-flowing stretches that are  
164 appropriate for building hydroelectric dams.

165  
166 The Project Design Document calculates a benefit of 24,973,637 t CO<sub>2</sub>eq over 10  
167 yrs. (p 34, Table 13), based on the loophole of a zero value being permitted for reservoir  
168 emissions if power density exceeds 10 W/m<sup>2</sup>. The proponents state “*Therefore, once the*  
169 *project’s power density is above 10W/m<sup>2</sup>, no calculation of project emissions is required.*”  
170 (p 34). While such a calculation may be “*not required,*” the proponents could have opted to  
171 make such a calculation based on the best available evidence had they wanted to do so.

172  
173 The claim of displacing almost 25 million tons of CO<sub>2</sub>-equivalent over ten years  
174 represents 6.8 million tons of carbon. This “hot air” will contribute to further climate  
175 change by allowing the countries that purchase the carbon credit to emit more gases. The  
176 money paid for these credits also weakens global efforts to contain climate change by  
177 draining funds from the always-inadequate resources available for mitigation. Brazil, as one  
178 of the countries expected to suffer most from projected climate changes, stands to lose from  
179 such an arrangement. The amounts of carbon involved re significant. As an indication of  
180 scale, Brazil’s well-known program for replacing gasoline with ethanol in the country’s  
181 passenger cars in the 1990s is calculated to have displaced 9.45 million tons of carbon per  
182 year (Reid and Goldemberg 1998).

183  
184 The Project Design Document asserts (p 41), without citing any supporting studies,  
185 that: “*environmental rules and licensing process policies are very strict in line with the best*  
186 *international practices.*” The implication is that dam projects in Brazil will have minimal  
187 environmental and social impacts that might embarrass the countries that purchase the  
188 resulting CDM credits. However, there is a substantial literature examining the deficiencies  
189 in Brazil’s licensing system (e.g., Fearnside and Barbosa 1996; Fearnside 2006b, 2007,  
190 2011; Fearnside and Graça 2006; Santos and Hernandez 2009). In the case of the Teles  
191 Pires Dam in particular, affected indigenous peoples have strongly protested the impacts  
192 and faults in the licensing process (Kayabi, Apiaká and Munduruku 2011). The dam has a  
193 long list of impacts and problems in its licensing (Millikan 2011; Monteiro 2011a, b). On  
194 27 March 2012, Brazil’s Public Ministry (part of the Ministry of Justice) obtained an  
195 injunction halting the dam’s construction pending consultation with affected indigenous  
196 peoples (MPF 2012). While such injunctions are usually short lived due to the existence of  
197 appellate judges who are willing to overturn them, the halting of construction is an indication  
198 of both the seriousness of the dam’s impacts and of inadequacies in the licensing.

199  
200 The Project Design Document mentions a “*growing concern*” in Brazil for  
201 environmental sustainability (p 41). This should include avoiding the creation of “hot air.”  
202 This project generates carbon credit without a real climate benefit in two ways. First, it is  
203 based on the fiction that the hydroelectric dam will have zero emissions, despite extensive  
204 evidence indicating that Amazonian dams have large emissions, especially in the first  
205 decade that is the time horizon of the project. Second, the project is not “additional,” as  
206 required by Article 12 of the Kyoto Protocol in creating the Clean Development  
207 Mechanism. Projects are supposed to gain credit only if the claimed emissions reductions

208 would not have taken place without the CDM funding. In this case, the dam is already  
209 financed and under construction by Brazilian companies with the full expectation of  
210 making a profit from electricity sales without any additional help from the CDM. None of  
211 the 25 million tons of CO<sub>2</sub>-equivalent claimed is additional.

212

### 213 **3 Hydroelectric emissions and the IPCC**

214

215 The inclusion of hydroelectric dams in Intergovernmental Panel on Climate Change  
216 (IPCC) guidelines for national inventories under the United Nations Framework  
217 Convention on Climate Change (UN-FCCC) has evolved over time, but methane is still left  
218 out of the required reporting. The 1996 revised guidelines included release of carbon stocks  
219 in forests that are converted to “flooded lands” (including reservoirs) based on the  
220 difference in stock between the two ecosystems, but presuming that all of the release is in  
221 the form of CO<sub>2</sub> rather than CH<sub>4</sub> (IPCC 1997). The 2003 IPCC good practice guidelines  
222 included an appendix to its wetlands chapter as a “basis for future methodological  
223 development” (IPCC 2003, Appendix 3a3). This suggests a Tier 1 (required) accounting for  
224 reservoir surface emissions from diffusion and bubbling, and a Tier 2 (voluntary)  
225 accounting that would include spillways and turbines. A revision of the guidelines for  
226 national inventories in 2006 maintains the limitation of required reporting to emissions of  
227 CO<sub>2</sub>, but also includes an appendix as a “basis for future methodological development” that  
228 includes methane from hydroelectric dams in the “flooded land remaining flooded land”  
229 category. The author team, which included a representative of ELETROBRÁS, weakened  
230 the proposed future methodology as compared to its predecessor in the 2003 Good Practice  
231 Guidelines, removing information indicating greater emissions and reducing the required  
232 reporting: Tier 1 would only include the relatively modest emissions occurring by means of  
233 diffusion from the reservoir surface, although countries could voluntarily report bubble  
234 emissions from reservoir surfaces at the Tier 2 level, the major emissions of methane from  
235 the turbines only being included at the rarely used Tier 3 level (Duchemin et al. 2006). At  
236 the May 2006 IPCC plenary meeting in Mauritius that approved the 2006 guidelines,  
237 Brazilian diplomats tried unsuccessfully to have reservoir emissions from removed from  
238 the section on “flooded land” (Earth Negotiations Bulletin 2006; IRN 2006, p 19).

239

240 Brazilian influence has been critical in creating and broadening the loopholes in the  
241 CDM’s regulations on credit for hydroelectric dams. The CDM methodology panel (2006)  
242 proposed considering emissions to be zero for projects with power densities over 10 W m<sup>-2</sup>  
243 based on an internal technical paper by Marco Aurélio dos Santos and Luiz Pinguelli Rosa.  
244 Rosa, the former head of ELETROBRÁS, has been advocating 10 W m<sup>-2</sup> as a criterion  
245 since before the Kyoto Protocol (Rosa et al. 1996; see Fearnside 1996) and has long  
246 claimed that dams have only very small emissions (Rosa et al. 2004, 2006; see Fearnside  
247 2004, 2006c). In February 2006 the CDM executive board adopted the 10 W m<sup>-2</sup> threshold  
248 for presumed zero emissions, and, at the urging of the board’s director (José Miguez, head  
249 of the sector of the Brazilian Ministry of Science and Technology responsible for the  
250 country’s greenhouse-gas inventories for the UN-FCCC), expanded the crediting for dams  
251 not meeting the 10 W m<sup>-2</sup> beyond what had been suggested by the Meth Panel: lowering  
252 from 5 to 4 the minimum power density eligible for credit under the rules and lowering  
253 from 100 to 90 gCO<sub>2</sub>eq/kWh the presumed emission for dams with power density in the 4-  
254 10 W m<sup>-2</sup> range.

255  
 256 In 2011 the IPCC produced a special report on renewable energy that reviews life-  
 257 cycle assessments for various technologies. For the typical case (i.e., the 50<sup>th</sup> percentile),  
 258 hydropower is ranked as having less than half the emissions impact of any other source,  
 259 including solar, wind and ocean energy (IPCC 2011, p 982). The basis of this classification  
 260 is unclear from the report: the table presenting the results describes them as “aggregated  
 261 results of literature review”, but the bibliography appears to contain no studies of  
 262 hydroelectric emissions. The report also states (p 84) that “*When considering net*  
 263 *anthropogenic emissions as the difference in the overall carbon cycle between the*  
 264 *situations with and without the reservoir, there is currently no consensus on whether*  
 265 *reservoirs are net emitters or net sinks.*” However, this concept of “anthropogenic  
 266 emissions” would only apply if emissions were limited to CO<sub>2</sub>, ignoring the role of  
 267 reservoirs in converting carbon to methane. Full accounting of emissions, including  
 268 methane, is necessary in order to have valid comparisons of the impact of different energy  
 269 sources.

270

#### 271 **4 Conclusions**

272

273 Carbon credit for the Teles Pires Dam is not additional because the dam had been  
 274 contracted and construction begun independent of CDM funding.

275

276 The presumption that the dam would have no greenhouse-gas emissions is false, as multiple  
 277 studies indicate substantial emissions from Amazonian dams over their first ten years (the  
 278 time span of the project).

279

280 The regulations of the CDM are in urgent need of revision to eliminate creation of “hot air”  
 281 (Certified Emissions Reductions that are not additional) through crediting of dams.

282

283 Full accounting of hydroelectric dam emissions, including methane released from water  
 284 passing through the spillways and turbines, needs to be required in guidelines for national  
 285 inventories and in the IPCC’s comparisons of hydropower with other energy sources.

286

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288

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**Table 1** CDM Hydro pipeline as of 30 January 2012[a]

Country	Total projects[b]	Installed capacity (MW)	CO <sub>2</sub> e[c] average/yr (million t)	% of total CO <sub>2</sub> e
China	1,410	61,280	179.7	62.2
Brazil	117	8,495	17.8	6.2
Other non-Annex I[d]	774	88,577	91.4	31.6
Total	2,301	158,352	288.9	100.0

[a] Data from Chu (2012) based on the UNEP Risoe Centre (<http://cdmpipeline.org/>).

[b] Includes both "large" (defined by the CDM as > 15 MW) and "small" ( $\leq$  15 MW) projects.

[c] 1 ton carbon-dioxide equivalent (CO<sub>2</sub>e) = 1 certified emissions reduction (CER).

[d] Countries without limits on their emissions under the Kyoto Protocol.