

**Testimony to the Tom Lantos Commission on Human Rights**  
**Hearing on “World Bank Lending and Human Rights”**

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## **Refugees Not to War but Development**

### **Introduction**

I am a Kosovar citizen – born and raised in a small town called Podujevo. The town I grew up is only 15 miles away from a large lignite mine. The mine is used to produce coal for two large power plants that produce 98% of Kosovo's electricity. The Kosovar government, with the support of the World Bank, is planning to build a third lignite-based power plant. This has affected many communities living in the area – hundreds of them being already forcefully evicted and thousand waiting for the same outcome - in order to make way for the expansion of the lignite mine. I have been involved in the struggle to defend these communities' rights for many years. In mid-2000, I used to work for Kosovo's energy company and as of 2011 I joined the efforts of Kosovar civil society organizations to ensure the World Bank and Kosovar government address the many social and environmental issues related with the project. As of May 2013 I continue engaging in the project as a Bank Information Center activist. The testimony I am offering is based on my personal knowledge having been involved in the project for as long as 10 years in my different capacities. The basic human rights of the neighbors I grew up with are being breached – and as such this testimony couldn't be more important and heartfelt than it is as I continue raising my voice to defend the rights of the people of my country.

### **Forced displacement for the Kosovo Power Project and Bank involvement**

The World Bank is considering a \$58 million Partial Risk Guarantee (PRG) to the government of Kosovo. A decision is expected within the next 9 - 12 months. This loan is sought to support the Kosovar government's plans to construct an estimated US\$2B lignite coal-based power plant and its associated mining infrastructure. The proposed Kosovo Power Project (KRPP) requires an expansion of an open pit mining operation. This expansion is expected to cause a sizable and complex forced displacement of over 7,000 people living on 16 km<sup>2</sup> of land mostly in the rural Municipality of Obiliq, just outside Kosovo's capital city Prishtina. Hade village is at the forefront of such displacement.

Hade citizens are all too familiar with what forced displacement means. In 1999, as a recent ICIJ report brought into light: "Serbian commandos wearing hoods over their heads and greasepaint on their faces entered this mountain village and executed five men ages 25 to 80. The soldiers forced the surviving inhabitants onto buses headed for Albania and Macedonia. Then they set nearly every home in Hade ablaze. After an American-led bombing campaign ran Serb forces out of Kosovo, the people of Hade returned from refugee camps and from havens higher in the mountains. Over the next few years they rebuilt their village and resumed tending their cows and gardens and mining coal for KEK, Kosovo's state-owned power company."

In 2002, a major mudslide at the existing lignite mines threatened the town's southernmost neighborhoods. In response, the United Nations Interim Administration Mission in Kosovo (UNMIK) and Provisional Institutions of Self-Government (PISG), in charge of governing Kosovo at the time, ordered an emergency evacuation, bypassing the expropriation process previously used by Kosovo's energy company - KEK<sup>ii</sup>. As a result, between November 2004 and February 2005, 158 families (664 people) were forcefully evicted.

In May and June 2005, about 22 families that had refused to move voluntarily were forcibly evacuated to pre-identified shelters, and their houses were bulldozed. Their belongings were stored in the Municipality warehouse. Resettlement experts visiting Hade in March 2013 found that the families were still living in two temporary apartments in Obiliq. An inspection of a planned relocation site at Shkabaj

found the site uninhabited with unfinished infrastructure. The fate of the remaining evicted households remains unclear. The displaced families claimed that their food subsidies were being terminated.

UNMIK and the provisional government (PISG) declared the area surrounding Hade a “Zone of Special Economic Interest”, intending to expand the coal mine for power production needs. This move significantly restricted the rights of families remaining there to use their property. Consequently, residents of Hade, Sibovc, Leshkoshiq and Cerna Vodice villages were ordered to stop new construction or construction of additional floors for the indefinite future in anticipation of possible mining needs<sup>iii</sup>. Until the present day, those families continue living in the same “zone” under the same restrictions.

In July 2004, a World Bank pre-identification mission visited Kosovo amid Hade evictions. They recognized that the Government’s “emergency procedure” approach to involuntary resettlement was unacceptable and noncompliant with international financiers’ policies (OP/BP 4.12 and IFC PS5).<sup>iv</sup> The Bank arranged and financed technical assistance to hastily build a new legal, policy, and institutional structure to deal with resettlement issues.

### **An inadequate policy response**

By the summer of 2013, all the elements of this new structure were in place. The Bank claimed that the Kosovar Resettlement Policy Framework (RPF) and Law on Appropriations, which resulted from this assistance, reflected general international human rights standards.

The World Bank policy permits, in special circumstances, the use of an alternative involuntary resettlement instrument, called a “Resettlement Policy Framework” (RPF), to that commonly used when Bank-funded projects displace people. An RPF is used for sector investment or financial intermediary operations.<sup>v</sup>

However, the difference between the requirements of an RPF and the more commonly-used Resettlement Action Plan is crucial. Given the scale of forced displacement threatened by the KRPP, it is clear that an RPF does not provide adequate protections to affected communities.

The more comprehensive instrument, the Resettlement Action Plan, is intended for such large infrastructure projects as the KRPP. This full resettlement plan has 19 mandatory elements of which 7 have an additional 33 sub-elements. But the RPF is far less comprehensive, requiring only 13 elements. With an RPF, the World Bank’s resettlement policy principles - essential measures to protect people from harm - are completely avoided. These principles are:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs;
- Involuntary resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits;
- Resettlement activities must be implemented with appropriate disclosure of information, consultation, and informed participation of those in the way;
- Projects must assist displaced persons in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms and in the shortest possible time, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

Hade citizens have not witnessed any such protections or outcomes in this World Bank-funded project. The alternatives to coal in Kosovo have never been taken into account and Hade citizens were never offered adequate resettlement, as prescribed by Bank policies.

The World Bank has recently come under fire over its resettlement practices. A study released this year by the International Consortium of Investigative Journalists (ICIJ) found that over the last decade, projects funded by the World Bank have physically or economically displaced an estimated 3.4 million people, forcing them from their homes, taking their land or damaging their livelihoods. Kosovo coal project was one of the cases ICIJ investigated.<sup>vi</sup> The ICIJ's findings were echoed by the Bank's own internal watchdog's audits, which found similar figures and exposed major fault lines in the Bank's implementation of its own policies. The Bank admitted its fault, with President Kim declaring the Bank "must and will do better".<sup>vii</sup>

With the World Bank agreeing to such a resettlement policy for Kosovo, communities are being negatively affected and their rights are being breached. Remaining Hade citizens fear that they will be forcefully evicted at any time. Their human rights have been breached ever since 2004 when the area was declared a zone of special interest. These communities have requested twice from the World Bank's Inspection Panel to investigate their case. The first request was submitted in March 2012, and the second in June 2015.<sup>viii</sup> An investigation is now underway.

#### **Other rights affected by the Kosovo Power Project**

Besides resettlement, the project is expected to have many other serious environmental and social impacts - discussed in more detail below. Such impacts will greatly affect the lives and livelihoods of communities of Obiliq and beyond. Some of the basic rights, described below, are being breached or at risk of being breached in the near future. The Bank must demonstrate how project activities would respect the following relevant rights within the context of the broader environmental and social impacts of this project:

**The right to health:** the Kosovar Constitution guarantees the right to health. The proposed project will have numerous negative, long-term impacts on the health of the population in the affected region. The Bank has identified these impacts<sup>x</sup> and must address them in the context of the right to health.

**The right to food:** The United Nations Declaration on Human Rights recognizes the right to food, and the same is guaranteed by the Kosovo Constitution.<sup>x</sup> The project will have impacts on land-use patterns in the project area as well as serious broader impacts on access to water for irrigation for agricultural uses. Moreover, pollutants emitted from the power plants and mines can contaminate local produce and livestock. The Bank must assess and address the impacts of the project on the right to food.

**The right to water:** The right to water is necessary for the enjoyment of the right to food. This right should further be viewed in the context of the 2010 United Nations General Assembly resolution recognizing the right to water and sanitation.<sup>xi</sup> The project is likely to have severe impacts<sup>xii</sup> on local water supplies and the Bank should assess and address these impacts in the context of the right to water.

**The right to housing:** Kosovo recognizes "the right to a standard of living adequate for the health and well-being of himself and of his family, including ... housing."<sup>xiii</sup> Particularly, in the context of

resettlement related to the project, the Bank must assess and address the impacts on this right. Furthermore, the Bank must assess whether the implementation of the resettlement schemes, and the application of the “special economic interest” designations are sufficiently protective of affected communities’ rights under the Kosovo Constitution and their interests under Bank policies.

## **Recommendations**

To prevent further rights abuses and to redress harms already suffered by affected communities as a result of the Kosovo Power Project, the World Bank should take immediate action as follows:

1. **Ensure adequate protections and redress for displaced communities:** Affected communities’ demands for their basic human rights to be protected and to be treated in accordance with Bank policies when it comes to resettlement need to be met right away. We urge the US Congress to request from President Jim Kim of the Bank and the US Government a thorough plan to address the serious problems identified in the Bank’s resettlement practices.<sup>xiv</sup> Such a plan would ensure redress for harms already caused as in Kosovo: the Bank must urgently address the ongoing unfair treatment of hundreds of families in Hade village in Kosovo. The plan should also aim to put in place policies and adequate plans for their implementation to ensure that communities do not suffer the same fate in future.
2. **Respect human rights:** The World Bank does not recognize nor requests from its borrowers the protection of basic human rights in its projects. The current ongoing review of World Bank environmental and social policies represents a rare opportunity for the Bank to introduce language on the matter. We urge the US Congress to request from the World Bank President Jim Kim and the US Government to commit to adhere to international human rights law and to ensure its projects do not violate human rights.
3. **Consider alternatives:** When engaging in a project, the Bank must carry out a full alternatives assessment, including the no-project option, to mitigate possible negative environmental and social risks. Kosovar communities and civil society are demanding the Bank to look deeper into Kosovo’s energy options to avoid coal-based projects. The Bank’s former chief renewables and energy czar, Daniel Kammen, has produced an analysis on Kosovo’s Energy Options and has publicly called on the Bank to avoid more coal for Kosovo – as it is the most costly option for the country.<sup>xv</sup> The US Government, however, supports<sup>xvi</sup> the Bank’s approach to Kosovo’s energy sector, without adequately considering alternatives. Such a coal-based power plant would not be possible to be constructed in the US. We urge the US Congress to demand from the US Government to support an agenda that helps Kosovo diversify its energy sector. Currently, 98% of Kosovo’s electricity needs are met through coal-burning plants. More coal would lock the country into burning fossil fuels for another 40 years to come – with devastating environmental and social impacts.

## Background

### World Bank's Involvement History

The Bank is proposing to assist the Government of Kosovo to address problems associated with the energy sector through building a new coal-based power plant, known as “Kosova e Re Power Plant” (KRPP). Kosovo’s energy sector is plagued with a host of problems: regular electricity outages and blackouts, continuing reliance on polluting lignite power, and an inefficient transmission and distribution grid that results in enormous losses.<sup>xvii</sup> The stated objective of the KRPP, a Category A project per World Bank’s risk categorization procedures, is “to reduce the environmental impact of electricity generation and strengthen security of supply in Kosovo in an economically efficient, environmentally sustainable, and a carbon-neutral manner.”<sup>xviii</sup>

Kosovo’s second largest lignite-based power plant (“Kosovo A”) is due to be decommissioned in 2020s (initially it was planned to be shut down in 2017) and is expected to cause a shortfall in power supply. As originally proposed, the KRPP would have three components: (1) replacing the lost capacity of Kosovo A by rehabilitating the existing Kosovo B Power Plant (“Kosovo B”); (2) construction of a new lignite-based Kosovo C Power Plant, also known as Kosova e Re (“KRPP”), with an installed capacity of 600MW<sup>xix</sup> and associated infrastructure; and (3) the development of a new lignite coal mine in Sibofc to meet the fuel needs of the power plants (“Sibofc mine”). Later in the process, the project was modified to foresee only the construction of a new lignite-based power plant (KRPP), with the associated lignite mine left to be developed by the Kosovar government. If approved, the KRPP will be financed through private sector investment, with support of a partial risk guarantee (PRG) from the International Development Association of the World Bank.

The proposed KRPP is closely linked with the World Bank’s technical assistance project (known as LPTAP), spanning from 2006 - 2011. The stated objectives of the LPTAP are: (1) to help the Kosovo government strengthen the enabling policy, legal, and regulatory frameworks conducive to new investments in the energy sector; and (2) to assist the Kosovo government in attracting qualified private investors<sup>xx</sup>. The project focused on three areas: an assessment of expanded lignite mining in the Sibofc Basin, to determine feasibility for providing sufficient raw material to fuel a 600MW thermal power plant for 25 years; feasibility and market analysis for the construction and interconnection of a new power plant; and technical assistance to the Government of Kosovo to develop policies and strategies to promote renewable energy and energy efficiency in Kosovo<sup>xxi</sup>. It was also to provide capacity-building assistance to relevant government ministries; provide a mechanism for civil society input into the design of a new plant; and provide funding to the government to improve public consultations<sup>xxii</sup>. Through the LPTAP, a Category B project as per World Bank risk categorization, the Bank has supported certain preparatory activities related to the KRPP, including completion of a Strategic Environmental and Social Assessment (SESA) in 2008<sup>xxiii</sup> and a Resettlement Policy Framework (RPF) in 2011.<sup>xxiv</sup> The Bank also prepared an Economic Analysis, but it is unclear whether this was developed through the LPTAP. Nevertheless, this analysis was presented for consideration by the Expert Panel that assessed the project against Bank policies and, in this testimony, is assumed to have taken place in the context of the LPTAP.<sup>xxv</sup> Additionally, during the Expert Panel’s deliberations, the Bank released a more recent analysis

of power supply options, updating aspects of an economic analysis, which for the purposes of this testimony, should be considered together with the 2006 Economic Analysis.<sup>xxvi</sup> The Bank has also prepared an environmental analysis for Kosovo, identifying the impacts of burning coal on the citizens of Kosovo.<sup>xxvii</sup>

Given the nature of the proposed activities under the KRPP, a Category A project, these preparatory studies should have followed the higher standards applicable to Category A projects, particularly on consultation and disclosure. These studies are inadequate and violate a number of World Bank policies, as detailed below in this testimony.

The new coal power plant is expected to be developed in the Obiliq municipality, one of the most polluted municipalities in Kosovo<sup>xxviii</sup>, near the site of the existing Kosovo B coal-based power plant, which is ten kilometers southwest from Prishtina, Kosovo's capital, and five kilometers from the Sibofc lignite mine. The mine project will acquire approximately 13% of the territory of the Obiliq municipality, and the Bank notes that this area is "largely composed of fertile land."<sup>xxix</sup> Within the municipality, a number of areas will be impacted by the proposed activities, including: the town of Obiliq; and the villages of Dardhishte, Hade, Cerna Vodica, Sibofc, Shipitulle, Leshkoshiq, Fushe Kosova, Vushtrria, and Drenas<sup>xxx</sup>. The municipality is more densely populated than the rest of Kosovo: according to the latest Kosovo Agency of Statistics data, 21,056 people live in Obiliq, with density of approximately 205 persons per km<sup>2</sup>, which is above the Kosovo average of 175 per km<sup>2</sup><sup>xxxi</sup>. The land surrounding the villages is mainly used for agriculture<sup>xxxii</sup>; 48% of the municipality is composed of agricultural land (6800 hectares)<sup>xxxiii</sup> and the majority of the local population (approximately 60%) is farmers, many of whom are subsistence farmers<sup>xxxiv</sup>. It is expected that the KRPP's approval by the Bank's Board will happen sometime in 2016.<sup>xxxv</sup> The Expert Panel tasked with assessing the project's compliance with the Bank policies has screened the project and recommended that it go forward<sup>xxxvi</sup>. However, for reasons discussed below, this assessment (including the underlying studies conducted under Bank's technical assistance projects) is inadequate and incorrectly finds that the project is consistent with the Bank policy criteria<sup>xxxvii</sup>. If the project proceeds as proposed, it will cause significant harm to Obiliq communities.

### **Project Related Environmental and Health Harms**

Obiliq is one of the most polluted municipalities in Kosovo.<sup>xxxviii</sup> The main source of pollution is the existing coal-burning power stations (Kosovo A and Kosovo B), along with heating and drying processes associated with coal production. The burning of coal releases toxic substances and dust into air and ground water, causing significant contamination of the surrounding environment. Despite deficiencies in pollution monitoring in the area, preliminary studies indicate that emissions levels and heavy metal contamination is concerning. In this context, replacing Kosovo A with a new power plant would significantly extend the time span during which this area would have to continue facing pollution from coal mining and combustion. Although the new plant will be more efficient than the existing plants, efficiency will also increase capacity, therefore it is unclear (absent strict pollution controls, which are as yet undecided) how much the project will result in diminished pollution overall. Due to the already fragile environmental conditions in this area, the cumulative impacts of the KRPP are substantial. The proposed project will contribute significantly to the pollution in the area. While effects of pollution can

be far ranging, the Obiliq municipality and the dense urban capital of Prishtina will be the most heavily impacted by the proposed project.

The communities of Obiliq and beyond will suffer health risks arising from the construction and operation of both the proposed lignite power plants and the lignite mine. These harms include specific disease burdens caused by pollutants and industrial waste, nuisances caused by noise or dust from the operation of the coal mine and coal-fired power plants, and the effects of pollution on vulnerable populations, like children. The Sibofc coal mine and the operation of the Kosovo B and KRPP power plants will release toxic pollutants into the atmosphere, including particulate matter, sulfur dioxide, mercury, lead, heavy metals, oxides of nitrogen, carbon dioxide, and acid gases. These air pollutants cause damage to the nervous and circulatory systems. They also exacerbate existing health conditions, like asthma, prevalent in the populations living in the project area due to years of exposure to air pollution.<sup>xxxix</sup>

Prishtina Children are also at risk from exposure to lead and mercury, which impair cognitive development, and the acid gases like hydrogen chloride, which cause lung damage. The Requesters will also suffer harms from water and land pollution. Pollution of the water will occur from industrial materials including coal ash containing heavy metals, fly ash laced with mercury, wastewater from the washing of lignite coal containing selenium, and overflow or failure of impoundments storing “coal sludge,” a toxic waste product. Impoundments can fail, causing toxic floods of sludge that render rivers dead zones and contaminate ground water sources. The harm from this water pollution will be exacerbated because the riparian systems of the Kosovo Valley are already highly stressed.

The impact of water and land pollution on farmers, who comprise 60% of the population in the affected area, will be particularly profound: farmers rely on agricultural land and water for crop cultivation (including commercial and subsistence farming), thus their livelihoods will be significantly affected by pollution. Food contamination from such pollution is also likely. Moreover, coal waste not only creates surface water contamination, it also pollutes soil and ground water.

### **Project Related Social Harms - Resettlement**

Coal mining and the operation of coal-fired power plants will require the resettlement of populations throughout the 16 km<sup>2</sup> area of the “New Mining Field” (NMF), assessed in the spatial plan for the KRPP prepared under the LPTAP.xi Impacts resulting from involuntary resettlement will cause widespread harm to Obiliq communities. Many, including complainants of the Inspection Panel cases, expressed concern during consultations about the adequacy of the resettlement plans, and in particular about proper compensation for destroyed homes and impacts on their work and livelihoods. Physical and economic displacement will also harm subsistence farming in the region, and diminish the livelihoods earned from forest timber products and other secondary income streams. Resettlement will require compensation for agricultural families in the form of productive agriculture lands. However, there is significant doubt that sufficient fertile land exists for this purpose. Resettlement will also harm the social and cultural fabric of communities such as Hade, Leshkoshiq, Shipitulle, and Sibofc. Resettlement could also mean the destruction of important mosques, schools and historic monuments in the region.xli As described above, Kosovo’s legislation on resettlement is not in line with World Bank’s policy on resettlementxlii, despite Bank’s involvement in producing such legislation. Implementation of such

legislation will ultimately lead to forced evictions and will fail to meet the basic resettlement principles laid out in Bank policies. These principles are:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs;
- Involuntary resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits;
- Resettlement activities must be implemented with appropriate disclosure of information, consultation, and informed participation of those in the way;
- Projects must assist displaced persons in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms and in the shortest possible time, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

### **Project Costs and Externality Costs**

The Bank claims “Kosovo’s lignite is currently the least-cost option even after accounting for externalities.”<sup>xliii</sup> However, the Bank failed to adequately consider project costs, including externality costs. For example, the analysis fails to appropriately account for the costs of: improved water provision and transportation infrastructure; employee training; environmental and health harms, abatement technologies and associated impacts; lost agricultural production and resettlement; and mine closure. These costs, if properly factored in, will significantly increase overall project costs.

The Bank’s analyses are silent on the costs of managing and already stressed water system, and the costs of building adequate transportation infrastructure.<sup>xliv</sup> Stress on the supply of water is a significant concern in the Iber-Lepenc water system,<sup>xlv</sup> which is the expected source of water for the new mine and power plant. To meet the increased demand, the costs of improving the water systems must be accurately measured.<sup>xlvi</sup> Additionally, the project will require updating transportation infrastructure. The heavy industrial equipment needed for the KRPP may need to be shipped from outside of Kosovo and airlifted into the project site.<sup>xlvii</sup> Updating this infrastructure, or alternatively airlifting industrial parts around it, has not been adequately priced.

With respect to local employment, although the Bank’s analysis assumes that the project will create jobs,<sup>xlviii</sup> it does not examine the cost of training programs necessary to ensure that local populations will have employment at the coal mine and the coal-fired power plants. The Bank does not adequately address costs associated with damage to the environment and human health. First, the analyses so far focus solely on the environmental costs of air pollution.<sup>lix</sup> Beyond air pollution, the Bank’s analysis fails to cover other relevant costs, such as waste management and health impacts of land and water pollution. Furthermore, the cost of abatement technologies and related impacts, particularly for dealing with harmful air pollutants is not adequately considered.<sup>1</sup> Also, the Bank’s economic analysis compares the environmental costs of the lignite power plants only with fuel and gas alternatives, not renewables.<sup>li</sup> This significantly affects the cost benefit analysis in relation to project alternatives. Second, the assumptions used for the 2006 environmental cost estimates are unclear and the estimates do not

provide a clear picture of the environmental and health costs associated with the project. The Bank's projection for environmental costs for the Kosovo plants is 15 Euros per MWh, and it is unclear what assumptions were made in the modeling that led to this figure.<sup>lii</sup> As yet, it is unclear what specific pollution controls will be in place for Kosovo B and KRPP, and thus what the emission levels and associated costs will be.<sup>liii</sup> The Bank's analysis also does not adequately account for lost agricultural land and costs of resettlement. Sixty percent of the population in the project site relies on agriculture for their livelihood, either through subsistence farming or cash crop production. In addition to lost production because of competition for water resources, the mine is converting fertile land. The Bank's analysis does not account for these opportunity costs, nor does it account for the lack of agricultural land to resettle persons who rely on farming for their livelihoods.<sup>liv</sup> Furthermore, the SESA contemplates the use of "reclaimed land" for agricultural uses, presumably for populations displaced by the project.<sup>lv</sup> Converting reclaimed land into land suitable for farming will entail substantial costs.<sup>lvi</sup> These costs were not included in the Bank's analysis.<sup>lvii</sup>

Finally, at the end of the project period, the Sibofc mine will need to be closed and the land returned to its previous condition.<sup>lviii</sup> The Bank's economic analysis does not address these costs, though the costs associated with mine closure and reclamation will be substantial.<sup>lix</sup>

### **Meaningful Alternatives to the Project**

The omissions of significant costs and a failure to capture key variables in its risk analysis are symptoms of the Bank's general failure to conduct a proper analysis of meaningful alternatives, which is "one of the most important features of proper project analysis."<sup>lx</sup> The Bank's analysis does not examine a meaningful mix of base, load-following and peaking units.<sup>lxi</sup> It also fails to analyze the cost-effectiveness of a common clean source peaking unit: hydropower.<sup>lxii</sup> Hydropower resources are particularly relevant for the KRPP project area, as the Bank describes the Kosovo's river system as a "well developed hydrological network."<sup>lxiii</sup> The Kosovo Energy Plan discusses at least two feasible hydropower sources: the HPP Zhur and the HPP Ujman.<sup>lxiv</sup> In another study the Bank and the EU Commission describe Kosovo as having "significantly more potential" for hydropower development than is currently utilized.<sup>lxv</sup> Furthermore, the analysis does not contain assessments of other renewable energy sources, such as the potential for wind and solar power, nor adequate consideration of energy efficiency measures.<sup>lxvi</sup> As noted above, recent studies show that Kosovo could meet its energy needs by using a combination of an upgraded Kosovo B, energy efficiency measures, and renewable energy sources.<sup>lxvii</sup> The Bank should consider these alternatives before deciding to fund a new power plant in an already stressed environment.

The World Bank is expected to publish two new studies on the project within 2015 – an Energy Alternatives Options Study and the Environmental and Social Impact Assessment for the KRPP project. University of California Berkley in the meantime has produced its third version of Kosovo's Energy Options that recommends a shift from coal-based energy sources to renewables as a cheaper and cleaner option for Kosovo.<sup>lxviii</sup> The Bank is yet to comment on this new version.

## Compliance with Human Rights Protected by the Kosovo Constitution

Bank policies require that financed projects do not contravene country obligations as found in “national legislation[] . . . related to the environment and social aspects[] , , , and obligations . . . under relevant international environmental treaties and agreements.” Similarly, the Bank “tries to work within existing law to the extent possible.”<sup>lxxix</sup> Kosovo’s Constitution incorporates the following agreements and instruments directly into their constitution: (1) Universal Declaration of Human Rights; (2) European Convention for the Protection of Human Rights and Fundamental Freedoms and its Protocols; (3) International Covenant on Civil and Political Rights and its Protocols; (4) Council of Europe Framework Convention for the Protection of National Minorities; (5) Convention on the Elimination of All Forms of Racial Discrimination; (6) Convention on the Elimination of All Forms of Discrimination Against Women; (7) Convention on the Rights of the Child; (8) Convention against Torture and Other Cruel, Inhumane or Degrading Treatment or Punishment.<sup>lxxx</sup> Article 22 of the Constitution guarantees the human right and freedoms protected by these instruments. Further, Article 3(2) of the Constitution accords “full respect for internationally recognized fundamental human rights and freedoms.”<sup>lxxxi</sup> Additionally, Article 53 of the Constitution states that Kosovar interpretation of those “human rights and fundamental freedoms” shall be consistent with the jurisprudence of the European Court of Human Rights.<sup>lxxxii</sup> The human rights guaranteed pursuant to those provisions are incorporated directly into Kosovo’s national laws via the Constitution. Thus, the Bank must evaluate whether the project complies with Kosovar law and what effect this project will have on relevant human rights. There are a number of areas where rights are implicated. The Bank’s SESA currently under consideration makes no mention, nor provides even a framework for assessing the impact on the following rights.

The Bank must demonstrate how project activities would respect the following relevant rights within the context of the broader environmental and social impacts of this project:

**The right to health:** the Kosovar Constitution guarantees the right to health. The proposed project will have numerous negative, long-term impacts on the health of the population in the affected region. The Bank has identified these impacts<sup>lxxxiii</sup> and must address them in the context of the right to health.

**The right to food:** The United Nations Declaration on Human Rights recognizes the right to food, and the same is guaranteed by the Kosovo Constitution.<sup>lxxxiv</sup> The project will have impacts on land-use patterns in the project area as well as serious broader impacts on access to water for irrigation for agricultural uses. Moreover, pollutants emitted from the power plants and mines can contaminate local produce and livestock. The Bank must assess and address the impacts of the project on the right to food.

**The right to water:** The right to water is necessary for the enjoyment of the right to food. This right should further be viewed in the context of the 2010 United Nations General Assembly resolution recognizing the right to water and sanitation.<sup>lxxxv</sup> The project is likely to have severe impacts<sup>lxxxvi</sup> on local water supplies and the Bank should assess and address these impacts in the context of the right to water.

**The right to housing:** Kosovo recognizes “the right to a standard of living adequate for the health and well-being of himself and of his family, including ... housing.”<sup>lxxxvii</sup> Particularly, in the context of

resettlement related to the project, the Bank must assess and address the impacts on this right. Furthermore, the Bank must assess whether the implementation of the resettlement schemes, and the application of the “special economic interest” designations are sufficiently protective of affected communities’ rights under the Kosovo Constitution and their interests under Bank policies.

## Recommendations

To prevent further rights abuses and to redress harms already suffered by affected communities as a result of the Kosovo Power Project, the World Bank should take immediate action as follows:

1. **Ensure adequate protections and redress for displaced communities:** Affected communities’ demands for their basic human rights to be protected and to be treated in accordance with Bank policies when it comes to resettlement need to be met right away. We urge the US Congress to request from President Jim Kim of the Bank and the US Government a thorough plan to address the serious problems identified in the Bank’s resettlement practices.<sup>lxxviii</sup> Such a plan would ensure redress for harms already caused as in Kosovo: the Bank must urgently address the ongoing unfair treatment of hundreds of families in Hade village in Kosovo. The plan should also aim to put in place policies and adequate plans for their implementation to ensure that communities do not suffer the same fate in future.
2. **Respect human rights:** The World Bank does not recognize nor requests from its borrowers the protection of basic human rights in its projects. The current ongoing review of World Bank environmental and social policies represents a rare opportunity for the Bank to introduce language on the matter. We urge the US Congress to urge World Bank President Jim Kim and the US Government for the Bank to commit to adhere to international human rights law and to ensure its projects do not violate human rights.
3. **Consider alternatives:** When engaging in a project, the Bank carry out a full alternatives assessment, including the no-project option, to mitigate possible negative environmental and social risks. Kosovar communities and civil society are demanding the Bank to look deeper into Kosovo’s energy options to avoid coal-based projects. The Bank’s former chief renewables and energy czar, Daniel Kammen, has produced an analysis on Kosovo’s Energy Options and has publicly called on the Bank to avoid more coal for Kosovo – as it is the most costly option for the country.<sup>lxxix</sup> The US Government, however, supports<sup>lxxx</sup> the Bank’s approach to Kosovo’s energy sector, without adequately considering alternatives. We urge the US Congress to demand from the US Government to support an agenda that helps Kosovo diversify its energy sector. Currently, 98% of Kosovo’s electricity needs are met through coal-burning plants. More coal would lock the country into burning fossil fuels for another 40 years to come – with devastating environmental and social impacts.

## ANNEXES

1. “Does the Kosovo Power Project’s Proposed Forced Displacement of Kosovars Comply with International Involuntary Resettlement Standards?” by Dr. Theodore E. Downing
2. “Sustainable Energy Options for Kosovo”, by Daniel M. Kammen
3. Hade citizens and others Inspection Panel complaint

## Endnotes

- <sup>i</sup> [http://action.sierraclub.org/site/DocServer/Final\\_Draft\\_Downing\\_Involuntary\\_Resettlement\\_at\\_KPP\\_Repo.pdf?docID=15541](http://action.sierraclub.org/site/DocServer/Final_Draft_Downing_Involuntary_Resettlement_at_KPP_Repo.pdf?docID=15541)
- <sup>ii</sup> UNMIK's order 2004/6 of March 29, 2004
- <sup>iii</sup> MESP Executive Order No. 4/119 dated 11/3/2004
- <sup>iv</sup> Main Mining Plan for New Sibovc Mining – Technical Planning, Part II. 2005, pages 44-45.
- <sup>v</sup> OP 4.12 ¶ 22 and 25. An abbreviated resettlement action plan is an option for displacements of less than 200 people and is inapplicable to the KPP.
- <sup>vi</sup> <http://www.icij.org/project/world-bank/war-torn-village-faces-new-threat-world-bank-considers-power-plant>
- <sup>vii</sup> <http://www.worldbank.org/en/news/press-release/2015/03/04/world-bank-shortcomings-resettlement-projects-plan-fix-problems>
- <sup>viii</sup> <http://ewebapps.worldbank.org/apps/ip/PanelCases/103-Request%20for%20Inspection.pdf>
- <sup>ix</sup> <http://siteresources.worldbank.org/INTKOSOVO/Resources/KosovoCEA.pdf>
- <sup>x</sup> UDHR, supra note 205, art. 25(1).
- <sup>xi</sup> United Nations General Assembly Resolution, The Human Right to Water, A/Res/64/292 (Aug. 3, 2010) available at <http://daccess-dds-ny.un.org/doc/UNDOC/GEN/N09/479/35/PDF/N0947935.pdf?OpenElement>
- <sup>xii</sup> [http://www.huffingtonpost.com/justin-guay/world-bank-coal-plant\\_b\\_2496695.html](http://www.huffingtonpost.com/justin-guay/world-bank-coal-plant_b_2496695.html)
- <sup>xiii</sup> Id.
- <sup>xiv</sup> The current Action Plan that the Bank has produced is not satisfactory, CSOs wrote to the Bank: <https://www.hrw.org/news/2015/04/15/world-bank-address-failings-resettlement>
- <sup>xv</sup> <http://energyblog.nationalgeographic.com/2012/03/12/coal-rich-kosovo-can-lead-on-clean-energy/>
- <sup>xvi</sup> [http://www.eenews.net/assets/2011/07/11/document\\_cw\\_02.pdf](http://www.eenews.net/assets/2011/07/11/document_cw_02.pdf)
- <sup>xvii</sup> See Kosovo Institute for Policy Research and Development (KIPRED), Forum for Civic Initiatives (FIQ), and Gap Institute, Energy projects in Kosovo, 8 (Sept. 2011), [http://www.kipred.net/web/upload/Energy\\_Projects\\_in\\_Kosovo.pdf](http://www.kipred.net/web/upload/Energy_Projects_in_Kosovo.pdf).
- <sup>xviii</sup> World Bank, Project Information Document for the Kosovo Power Project (July 27, 2011), [http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2011/08/04/000001843\\_20110808120850/Rend ered/PDF/1108030Kosovo00PID000concept0stage.pdf](http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2011/08/04/000001843_20110808120850/Rend ered/PDF/1108030Kosovo00PID000concept0stage.pdf) [hereinafter KPP PID]
- <sup>xix</sup> Strategic Framework for Development and Climate Change Expert Panel, Kosovo: Kosovo Power Project, Report of the SFDC Expert Panel to the World Bank (Jan., 2012) [hereinafter SFDC Expert Panel Report]
- <sup>xx</sup> World Bank, LPTAP Project Information Document (Mar. 22, 2006), [http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2006/03/27/000104615\\_20060327144114/Rend ered/PDF/finalapprpid32206.pdf](http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2006/03/27/000104615_20060327144114/Rend ered/PDF/finalapprpid32206.pdf)
- <sup>xxi</sup> Id. at 5-6
- <sup>xxii</sup> Id. at 6
- <sup>xxiii</sup> Republic of Kosovo Government, Ministry of Energy and Mining and Ministry of Environment and Spatial Planning, Strategic Environmental and Social Assessment (July 11, 2008), [http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2008/07/16/000333038\\_20080716012909/Rend ered/PDF/E13670VOL130Box327408B.pdf](http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2008/07/16/000333038_20080716012909/Rend ered/PDF/E13670VOL130Box327408B.pdf) [hereinafter SESA]
- <sup>xxiv</sup> Republic of Kosovo Government, Ministry of Environment and Spatial Planning, Resettlement Policy Framework for Land Acquisition for the New Mining Field Zone, (July 29, 2011), [http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2011/08/03/000333037\\_20110803021703/Rend ered/PDF/RP11800v20P0970FOECAORIOP0976350RPF.pdf](http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2011/08/03/000333037_20110803021703/Rend ered/PDF/RP11800v20P0970FOECAORIOP0976350RPF.pdf) [hereinafter RPF] (noting that the 2008 SESA also contains a version of the RPF in Annex D). The RPF draws from the Government of Kosovo's Spatial Plan. Kosovo Government Ministry of Environment and Spatial Planning, Spatial Plan: Area of Special Interest 'New Mining Field (Mar. 2011), available at [http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2011/08/03/000333037\\_20110803021315/Rend ered/PDF/RP11800v10P0970IP0976350SpatialPlan.pdf](http://www.wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2011/08/03/000333037_20110803021315/Rend ered/PDF/RP11800v10P0970IP0976350SpatialPlan.pdf) [hereinafter Spatial Plan]
- <sup>xxv</sup> World Bank, Kosovo Lignite Power Initiative, Proposed Lignite Power Development Project: Economic Analysis (2006), available at [http://siteresources.worldbank.org/INTENERGY2/Resources/27\\_KosovoLignite\\_EconomicAnalysis.pdf](http://siteresources.worldbank.org/INTENERGY2/Resources/27_KosovoLignite_EconomicAnalysis.pdf) [hereinafter Economic Analysis]
- <sup>xxvi</sup> World Bank, Background Paper: Development and Evaluation of Power Supply Options in Kosovo (Dec. 2011) available at [http://siteresources.worldbank.org/INTENERGY2/Resources/Kosovo\\_generation\\_options\\_report\\_12312011.pdf](http://siteresources.worldbank.org/INTENERGY2/Resources/Kosovo_generation_options_report_12312011.pdf) [hereinafter Kosovo Power Supply Options]. While this analysis contains more information on project economics, it still does not adequately consider viable alternatives or provide complete information on externalities. See Bruce C. Buckheit & Sierra Club, Reevaluating Kosovo's Least Cost Electricity Option, (Jan. 2012), available at <http://www.youtube.com/watch?v=bnVUHWcynig&ob=av2e> [hereinafter Kosovo's Least Cost Option]
- <sup>xxvii</sup> <http://siteresources.worldbank.org/INTKOSOVO/Resources/KosovoCEA.pdf>

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- <sup>xxviii</sup> Municipality of Obiliq, Local Economic Development Plan 2007-2010 (Nov. 2007), available at <http://lgi.osi.hu/publications/2008/389/Obiliqi.pdf> [hereinafter Obiliq Municipality Development Plan]
- <sup>xxix</sup> Government of Kosovo, Ministry of Energy and Mining, Strategic Environmental and Social Assessment: Executive Summary, 31 (June, 2008), [http://www.wds.worldbank.org/external/default/WDSContentServer/WDS/IB/2008/07/16/000333038\\_20080716005201/Rendred/PDF/E13670VOL1020Box327408B.pdf](http://www.wds.worldbank.org/external/default/WDSContentServer/WDS/IB/2008/07/16/000333038_20080716005201/Rendred/PDF/E13670VOL1020Box327408B.pdf) [hereinafter SESA Ex. Sum]
- <sup>xxx</sup> [http://aoa.pbe.eea.europa.eu/tools/virtual\\_library/bibliography-details-each-assessment/answer\\_7742098328/w\\_assessment-upload/index\\_html?as\\_attachment:int=1](http://aoa.pbe.eea.europa.eu/tools/virtual_library/bibliography-details-each-assessment/answer_7742098328/w_assessment-upload/index_html?as_attachment:int=1)
- <sup>xxxi</sup> Population and Housing Census in Kosovo, Preliminary Results (June, 2011), available at <http://esk.rksgov.net/rekos2011/repository/docs/REKOS%20LEAFLET%20ALB%20FINAL.pdf>
- <sup>xxxii</sup> SESA Ex. Sum., supra note 9, at 13
- <sup>xxxiii</sup> Obiliq Municipality Development Plan, supra note 7, at 17
- <sup>xxxiv</sup> SESA Ex. Sum., supra note 9, at 31
- <sup>xxxv</sup> KPP PID, supra note 5
- <sup>xxxvi</sup> SFDCCC External Expert Panel Report, supra note 6
- <sup>xxxvii</sup> See Steve Herz, Sierra Club, Issues of Non-Compliance with World Bank's Criteria for Screening Coal Projects Under the Strategic Framework for Development and Climate Change (Mar. 6, 2012) (on file with author) [hereinafter Issues of SFDCC Non-Compliance]; see also Bruce C. Buckheit & Sierra Club, Affordable Electricity for Kosovo?: A Review of World Bank Group Cost Estimates For New Lignite-fired Plants in Kosovo (Oct. 2011), available at [http://action.sierraclub.org/site/DocServer/Review\\_of\\_TOR\\_Final.pdf?docID=8341](http://action.sierraclub.org/site/DocServer/Review_of_TOR_Final.pdf?docID=8341) [hereinafter Affordable Electricity]; GAP, KIPRED & FIQ Press Release: Significant errors in the Terms of Reference document for the World Bank's Expert Panel assigned to review new Kosovo lignite based power plan (Sept., 2011), available at <http://institutigap.org/repository/docs/ToREnglish.pdf>
- <sup>xxxviii</sup> Obiliq Municipality Development Plan, supra note 7, at 19
- <sup>xxxix</sup> <http://www.psr.org/news-events/press-releases/coal-pollution-damages-human-health.html?referrer=https://www.google.com/>
- <sup>xl</sup> Spatial Plan, supra note 21, at 19
- <sup>xli</sup> See section V(B)(2), infra, on "Consideration of the Full Extent of Impacts" from Involuntary Resettlement. The destruction of these landmarks such as the Holy Tomb of Sultan Murat II near Obiliq, mean a reduction in cultural tourism
- <sup>xlii</sup> [http://action.sierraclub.org/site/DocServer/Final\\_Draft\\_Downing\\_Involuntary\\_Resettlement\\_at\\_KPP\\_Repo.pdf?docID=15541](http://action.sierraclub.org/site/DocServer/Final_Draft_Downing_Involuntary_Resettlement_at_KPP_Repo.pdf?docID=15541)
- <sup>xliii</sup> KIP PID, supra note 5
- <sup>xliv</sup> See generally Economic Analysis, supra note 22 (failing to examine water supply costs)
- <sup>xliv</sup> SESA, supra note 20, at 303 ("The Water Exploitation Index (WEI), calculated on the basis of the yearly average water demand (198 million m<sup>3</sup>), and the yearly water availability, equal to 410 million m<sup>3</sup> as the multi-annual average and 250 million m<sup>3</sup> as the worst year case, is 48% and 79% respectively which are significantly above the WEI warning threshold of 20%, distinguishing the non-stressed from a stressed region.")
- <sup>xlvi</sup> KIPRED, World Bank Kosovo Lignite Power Project: Full Cost Accounting, 2 (Oct., 2011) (citing reports and concluding that "[t]he cost of these required water system improvements needs to be accounted for by the project financial analysis.") (on file with author) [hereinafter Full Cost Accounting]
- <sup>xlvi</sup> Affordable Electricity, supra note x, at 10 ("Kosovo does not have the capacity to manufacture the specialized components needed – only a few countries do. Accordingly, the plant will essentially be imported and likely have to be shipped several thousands of miles. Kosovo is land locked and so, the large components that will be fabricated elsewhere will then have to be trucked many miles over poorly maintained roads or rails – negotiating switchbacks, tunnels and possibly requiring air lifting of heavy components at certain points.")
- <sup>xlvi</sup> SESA, supra note 20, at 337
- <sup>xlix</sup> Accord Economic Analysis, supra note 22, at 8 ("The model used here is the latest dispersion modeling (ECOSENSE) developed and maintained by the University of Stuttgart.") with ECOSENSE 4.0: USER'S MANUAL, INSTITUTE OF ENERGY ECONOMICS AND THE RATIONAL USE OF ENERGY 1 (2005), available at available at: [http://ecoweb.ier.uni-stuttgart.de/ecosense\\_web/ecosensele\\_web/ecosense4um.pdf](http://ecoweb.ier.uni-stuttgart.de/ecosense_web/ecosensele_web/ecosense4um.pdf) ("Ecosense provides relevant data and models required for an integrated impact assessment related to airborne pollutants.")(emphasis added). Note that Kosovo Power Supply Options analysis also relies on this 2006 analysis
- <sup>l</sup> See generally, Economic Analysis, supra note 22
- <sup>li</sup> See id. at 8 (for the purposes of environmental costs, only "two comparator plants were considered – a heavy oil and a combined cycle gas turbine.")
- <sup>lii</sup> Kosovo Power Supply Options, supra note x, at 97

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<sup>liii</sup> Additionally, it is useful to assess whether new models are available for calculating externality costs. European Environmental Agency's (EEA) damage cost figures, based on 2009 data, for damage costs of air pollutants released from coal plants is presented as an aggregated range. See EEA Report, *Revealing the Costs of Air Pollution in Europe*, 25 (2011), available at <http://www.eea.europa.eu/publications/cost-of-air-pollution>. For example, the TETs Maritsa Iztok-2 coal plant in Bulgaria (at 1450MW, which would be 250 MW more than Kosovo B and KRPP combined), has an aggregated damage cost range of 1432-3339 million Euros for select air pollutants. Id

<sup>liv</sup> See generally *Economic Analysis*, supra note 22 (failing to evaluate the opportunity cost of agriculture and the economics of agricultural land provision)

<sup>lv</sup> WORLD BANK, DRAFT SIBOVIC DEVELOPMENT PLAN, 22 (contained in the SESA, contemplating land reclamation for agricultural activities)

<sup>lvi</sup> Full Cost Accounting, supra note 163, at 2 ("The Resettlement Framework seems to imply that it will rely heavily on the usage of reclaimed land, which would pose substantial costs and time to make it suitable for living/farming – costs currently not accounted for in the World Bank project analysis.")

<sup>lvii</sup> See generally *Economic Analysis*, supra note 22

<sup>lviii</sup> This is required by THE WORLD BANK, TOWARD SUSTAINABLE DECOMMISSIONING OF OIL FIELDS AND MINES: A TOOLKIT TO ASSIST GOVERNMENT AGENCIES, (2010)

<sup>lix</sup> Id. at Forward. ("These operations and the associated infrastructure will require complex and costly dismantling; technical and environmental restoration and rehabilitation measures; and socioeconomic investments to counteract retrenchment, post-closure economic downturns and other effects associated with the end of the project's productive life.")

<sup>lx</sup> OP 10.04(3)

<sup>lxi</sup> For definitions of these terms see *Affordable Electricity*, supra note 16, at 10-11 ("[B]ase load units [] have a high capital cost, but low operating costs and overall COE [“cost of electricity], load-following units [] have lower capital costs, higher operating costs and overall COE and peaking units, with lowest capital costs, but high operating costs and COE.”)

<sup>lxii</sup> Id. at 14

<sup>lxiii</sup> SESA ex. sum., supra note 8, at 22 (emphasis added)

<sup>lxiv</sup> Energy Law Strategy for Kosovo, 25-26

<sup>lxv</sup> THE WORLD BANK & EU COMMISSION, KOSOVO: TECHNICAL BACKGROUND PAPER ENERGY SECTOR, 15 (July 7, 2008)

<sup>lxvi</sup> See generally, *Economic Analysis*, supra note 22

<sup>lxvii</sup> Kosovo Power Supply Options, supra note 97; Kosovo's Least Cost Option, supra note 23

<sup>lxviii</sup> [http://www.kosid.org/file/repository/Sustainable\\_Energy\\_for\\_Kosovo\\_Energy\\_Policy\\_kosid.pdf](http://www.kosid.org/file/repository/Sustainable_Energy_for_Kosovo_Energy_Policy_kosid.pdf)

<sup>lxix</sup> World Bank Operational Policy 7.00, Lending Operations, 7.00(14)

<sup>lxx</sup> Kosovo Constitution, art. 22, available at <http://www.kushtetutakosoves.info/repository/docs/Constitution.of.the.Republic.of.Kosovo.pdf>

<sup>lxxi</sup> Id. art. 3(2)

<sup>lxxii</sup> Id. art. 53

<sup>lxxiii</sup> <http://siteresources.worldbank.org/INTKOSOVO/Resources/KosovoCEA.pdf>

<sup>lxxiv</sup> UDHR, supra note 205, art. 25(1).

<sup>lxxv</sup> United Nations General Assembly Resolution, The Human Right to Water, A/Res/64/292 (Aug. 3, 2010) available at <http://daccess-dds-ny.un.org/doc/UNDOC/GEN/N09/479/35/PDF/N0947935.pdf?OpenElement>

<sup>lxxvi</sup> [http://www.huffingtonpost.com/justin-guay/world-bank-coal-plant\\_b\\_2496695.html](http://www.huffingtonpost.com/justin-guay/world-bank-coal-plant_b_2496695.html)

<sup>lxxvii</sup> Id.

<sup>lxxviii</sup> The current Action Plan that the Bank has produced is not satisfactory, CSOs wrote to the Bank: <https://www.hrw.org/news/2015/04/15/world-bank-address-failings-resettlement>

<sup>lxxix</sup> <http://energyblog.nationalgeographic.com/2012/03/12/coal-rich-kosovo-can-lead-on-clean-energy/>

<sup>lxxx</sup> [http://www.eenews.net/assets/2011/07/11/document\\_cw\\_02.pdf](http://www.eenews.net/assets/2011/07/11/document_cw_02.pdf)