

Via electronic mail

December, 2025

Mr. James P. Scriven
Chief Executive Officer
IDB Invest
1350 New York Avenue
NW Washington, D.C. 20577

RE: Concerns regarding the Manzanillo Bay Energy project and its alignment with IDB climate and development goals

Dear Mr. Scriven,

We write to express our serious concern regarding the recent approval of the [Manzanillo Bay Energy project](#) in the Dominican Republic. This operation confirms a troubling pathway for a development institution that positions itself as a key actor in climate action and the energy transition in Latin America and the Caribbean.

According to information published by IDB Invest, the project includes two combined-cycle gas-fired thermal plants totaling 860 MW, along with a jetty and floating infrastructure for the storage and transport of liquefied natural gas. Although described as a downstream operation, the design incorporates components typical of the midstream segment. This indicates a clear commitment to new storage, regasification, and transport capacity that locks in fossil fuel infrastructure with long-term impacts. We are also concerned about the use of a seawater cooling system and marine transport, which pose significant risks to marine life due to the potential for noise, water and air pollution, thermal discharge, salinity changes, and vessel collisions in an ecosystem of high environmental sensitivity.

Additionally, project documents acknowledge that the original design needed to be modified to avoid a tectonic fault near the site. Replacing a land-based terminal with a floating unit does not eliminate the risks inherent to energy infrastructure and seismic activity or extreme weather events, including hurricanes that regularly affect the region. This combination of natural hazards and high-risk operations raises serious questions about the strength of the risk assessment and the feasibility of managing such infrastructure safely, particularly given the scale of potential impacts in the event of an accident.

The environmental and social assessment falls far short of providing an adequate understanding of the project's risks. The site is located roughly one kilometer from the Estero Balsa Mangroves National Park and within its buffer zone, and lies along the navigation route that crosses Montecristi National Park, a Ramsar-listed wetland of international importance. The project's

area of environmental influence also overlaps with the buffer zone of the Laguna Saladilla Wildlife Refuge. These factors point to high risks for critical ecosystems that are neither properly characterized nor addressed. The documents also fail to consider transboundary impacts, even though the project's location and marine currents make it highly likely that spills or accidents would directly affect Haiti, located one kilometer away in the opposite direction of the national park.

Significant questions also remain regarding financial, environmental, and social additionality. The participation of high-profile financial actors and the project's commercial strength indicate that the operation could likely have proceeded without public development finance. Similarly, no alternatives analysis is presented that compares this operation with renewable options capable of meeting the same demand with lower climate and environmental impacts. The project's own analysis confirms that the government defined the site as a non-negotiable condition from the outset, which contradicts IDB Invest guidance calling for early screening of alternatives for projects with significant impacts.

This project conflicts with the institution's climate commitments and those of the country itself. Given the typical lifespan of combined-cycle plants, the operation risks locking the Dominican Republic into fossil fuel infrastructure for decades, undermining its ability to meet its climate targets, such as emission reductions by 2030 and net-zero by 2050. It also weakens the credibility of the Bank's Paris Agreement alignment commitment, particularly given that approval came on the eve of COP30.

The lack of a robust risk analysis, combined with a clear underestimation of socio-environmental impacts with transboundary implications, heightens fears that advancing this project does not reflect the public interest or support a sustainable development strategy. Local communities and civil society organizations in the Dominican Republic have still not been properly informed about the project's expected impacts or its social and environmental risks. Despite its Category A classification and its location immediately adjacent to the town of Pepillo Saicedo, there has been no meaningful disclosure or engagement to inform affected communities on the scale, nature, and implications of the proposed infrastructure.

We fear that this operation could pave the way for a new wave of gas investments in the region, contrary to the IDB Group's sustainable development mandate. Moreover, the continued reliance on fossil gas is inconsistent with the rapidly evolving global evidence base, which shows that renewable energy systems—when paired with storage, grid modernization, and demand management—can reliably and affordably meet energy needs without the long-term risks associated with gas infrastructure. Supporting new gas assets today not only delays the transition but also exposes countries to future stranded assets, fuel price volatility, and weakened energy security.

Through this letter, we wish to underscore that the approval of the Manzanillo Bay Energy project sets a high-risk precedent for the institution's credibility and for the future direction of its energy portfolio. It is critical that the institution reassess its current course, strengthen its project selection criteria, and improve its financial, social, and environmental additionality to avoid investments that deepen dependence on fossil fuels at a time when the region needs to move toward a renewable and resilient energy system.

At a moment when most development and financial institutions are moving away from fossil gas due to clear economic, environmental, and system-wide risks, this project positions the IDB Group out of step with global best practice. Continuing to support gas expansion will erode the institution's leadership in the energy transition and undermine its credibility in guiding countries toward resilient, future-proof energy systems.

We hope that IDB Invest reconsiders this direction and adopts a path that places clean alternatives at the center, aligned with regional and global climate goals. Civil society in the Dominican Republic also wants to invite IDB Invest to discuss how it can support renewable energy investments in the country instead of gas projects.

Sincerely,

African Industrial Solution Afis Ltd (AFIS-Africa)
Asociación Ambiente y Sociedad (Colombia)
Asociación Unión de Talleres 11 de septiembre (Bolivia)
Bank Climate Advocates, BCA (USA)
Bank Information Center, BIC (USA)
Bretton Woods Project (UK)
Celular internacional para los Derechos Humanos (Dominican Republic)
Centro de Incidencia Ambiental (Panamá)
Centro Socio Cultural y Ambiental Pedro Mir (Dominican Republic)
Coalición Ambiental del Este (Dominican Republic)
Colectivo Voces Diversas (El Salvador)
Comité Nacional de Lucha Contra el Cambio Climático, CNLCC (Dominican Republic)
Federación Nacional de Madres, Padres y Familias de Personas con Discapacidad de Honduras, FENAPAPEDISH (Honduras)
Foro Social de la Deuda Externa y Desarrollo de Honduras, FOSDEH (Honduras)
Fundeps (Argentina)
Fundación CAUCE: Cultura Ambiental-Causa Ecologista (Argentina)
Germanwatch (Germany)
INSAPROMA (Dominican Republic)
Interamerican Association for Environmental Defense, AIDA (Regional)
International Accountability Project (Global)

Jubilee Australia Research Centre (Australia)
Observatorio Ambiental Ciudadano (Putumayo, Colombia)
Red del Gran Caribe Libre de Fósiles (Caribbean)
Re•generation (Canada)
Sustentarse (Chile)
The Big Shift Global (Global)
The Climate Reality Project América Latina (Regional)
Urgewald (Germany)