

To
The Chairperson
Environmental Appraisal Committee
Ministry of Environment, Forest & Climate Change [IA-I Division]
New Delhi

Date: 24th January, 2019

Subject: Submission for the EAC's upcoming discussion on the draft report of Satluj river basin's Cumulative Impact Assessment and Carrying Capacity Study

Respected Sir

As the EAC schedules on discussing the draft report of Satluj river basin's Cumulative Impact Assessment, we request EAC to consider the following suggestions:

1. Panel for Environmental and Social Expert's report should be perused (Annexure 1, PESE report):

As part of the CEIA study the Directorate of Energy, Himachal Pradesh had set up an expert committee to give comments on the CEIA report and also be part of the stakeholder consultation process. The PESE submitted its own report which raises several issues and gives recommendations on the study. At the forefront this reports highlights that the *'impacts of blasting and tunneling leading to drying up of natural springs'* has not been dealt with adequately and *'impacts on cracks in buildings and agricultural lands'* has not been dealt at all. The report says that the area is already very fragile and there is no guarantee that constructing HEPs will make it more susceptible to landslides. **This is a serious claim and deserves thorough scientific attention in the CEIA appraisal by the EAC**

One would expect the CEIA to be more scientific in nature, however **the report proves out to be rhetoric on serious environmental damages caused due to HEP**. The same is also pointed out in the PESE's report where it is said, *"The conclusion drawn in the study – "that all the major adverse cumulative impacts can be mitigated to acceptable levels through the measure proposed in EMP----- The gap between prospective projects in Sutlej basin is sufficient for the river to recuperate itself". It is matter of the opinion and not supported by facts and figures"* (p. 4).

The PESE's report further demands the following inclusion in the CEIA study:

- Determining 'effective zone' for blasting.
- Scientific study on the effect of project activities and transmission lines on agricultural and horticulture land.
- Scientific study on e-flow and determining the free flowing riparian distance to be maintained between two successive projects in a cascading series in the basin.

2. Minutes of public hearing/consultation should be perused:

Public consultation and approval is an important aspect for any development activity in a democracy. To discuss the draft CEIA public consultations were held in several places. The last public hearing, organized in Rekong Peo and Pooh, was attended by over 200 people. In that, the local people made detailed

objections and proposals to improve the CEIA. All the suggestions/opinions/approvals/disagreements of the public recorded in the minutes of the stakeholder consultations should be placed in front of the EAC and taken into account in the appraisal process. Some glimpses of the public consultation held on the 8th of December 2014 can be seen here. Link: <https://youtu.be/INQInHas-JM>

3. Clearances and ToRs given during the study period should be re-examined:

The PESE report states, “Completed projects in the basin have not demonstrated any success model which would make the people to support the construction of projects. In fact they have done great harm” (p.4). **Conforming to this, ToRs and Environment Clearances given to individual projects on Satluj river basin** (for example, ToR was allotted to Luhri Stage-I, Luhri Stage-II and Sunni) **during the study period (from 2013 till date) should be re-examined thoroughly. The EAC must look into the gaps in the terms of references issued and the environment clearance compliance conditions should be made stricter wherever possible.** A detailed submission for re-examining the same was made in the case of the Luhri I to the EAC on 25th August, 2018. (Annexure 2, memorandum)

4. Safety issues and Negligence, and a stricter ToR for CEIA study:

The tragedies caused by blasting, tunneling and ill-managed muck dumping are on rise in the Satluj river basin, specifically and across the state, in general (Annexure 3, news clip; News link: <https://www.hindustantimes.com/punjab/dams-brimming-in-himachal-pradesh-water-being-released-without-warning/story-Rz0XzopYoBapjrYlhm2A6N.html>; <https://blogs.agu.org/landslideblog/2018/10/09/shongtong-1/?fbclid=IwAR2r1DSdIgm-lrEJRX5HFTTEJabdcTEDhPKfDVwFU9SguLZ6ifWy8U2Bpqw>). Changing climate and erratic rainfall have added to the vulnerability of the people in the hills. The concerned departments seemed to have gone in a slumber and to make the matter worse, the dam safety cells of individual projects, to implement dam surveillance, as required by the Directorate of Energy’s notification have not been formed (Annexure 4, CAG report). Further, the State’s Safety authority for the same is dysfunctional and failing to monitor compliance of safety regulations and no action is being taken in incidences of negligence. A memorandum raising the safety and negligence issues was submitted in 2015 to the Principal Secretary of Directorate of Energy, HP (Annexure 5, memorandum). **In light of the same, EAC should mandatorily ask project proponents, of existing dams, to form safety cells and do regular dam surveillance. In the CEIA appraisal special attention needs to be paid to the vulnerability of various project sites to landslides, floods, seismicity and all other kinds of disaster proneness.**

5. Critiques and written objections presented by local people and Himdhara group should be perused:

On the matter of draft CEIA several written objections were submitted by us **highlighting a series of issues and inadequacies in the data collected and the conclusions drawn in the report.** A separate submission was made by Himdhara, Environment Research and Action Collective to DoE highlighting several issues with regards to the CEIA (Annexure 6, critique of CEIA Satluj). We urge you to peruse this submission thoroughly which raise the following concerns:

- **Inadequacies of baseline data on water resources, forest resources and land use change**
- **Impact on biodiversity, geology and hydrology**
- **Omissions of impacts of tunnels and transmission lines**

- **Issues around environmental flows and climatic changes**

6. No-go areas and free flowing river stretches:

*The CEIA study report mentions at the end about declaring certain areas as “no-go” zones for hydropower projects given the biodiversity, impact on fish fauna and the fragility of the trans-Himalayan region. This is a critical recommendation but this point in the report has been kept ambiguous and not put under the section titled “recommendations”. **This needs to be thoroughly examined especially for areas which are located in the high altitude regions like the Spiti river basin (which is a tributary of the Satluj).** This river basin is particularly an ecologically fragile area and a hotspot for wild diversity that needs to be protected.*

We urge you to examine the CEIA of the Satluj river basin in the light of the fact that Satluj is already a river in crisis with several commissioned projects, which have caused visible ecological and socio-economic damages in the area and have been well documented and raised by the people of the region as well as experts from time to time. For an area which is reeling under the impacts of climatic variations, disasters like floods, landslides and earthquakes, building more projects is not just environmentally unviable but economically too. We hope that the EAC will make an unbiased and scientific assessment in this matter.

Thank You

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Nek Ram Sharma and Shyam Singh Chauhan, Satluj Bachao Sangharsh Samiti

Shanta Kumar Negi, Hangrang Ghati Sanrakhsan Samiti, Nako

Subodh Bodh, Lara Sumata Sangharsh Samiti, Tabo

Yogesh Upadhyay and Manshi Asher, Himdhara Collective

Copy to:

**Member Secretary, EAC
All other members of EAC**