

Ken Betwa River Link EIA from NWDA received in November 2009

WHY THIS EIA IS NOT ACCEPTABLE

This is in response to NWDA letter **No.: NWDA(SCILR)/Tech-1/200/3/2006 (Vol.X)/67-86 Dated 23.3.10**, requesting expert committee members to submit comments on the DRAFT Ken Betwa EIA, a soft copy of which was sent to the committee members in Nov 2009.

EIA AGENCY IS BIASED

- In the very second para of the executive summary, EIA says Betwa is “Water short”. EIA agency is supposed to be unbiased and cannot parrot the assumptions of the developing agency, NWDA.
- In para 1.02 (chapter 1, volume 1), it says, “It is noted that dams with reservoirs are among measures mostly resorted to as long term solution to mitigate flood losses as well as to prevent drought situations.” This is completely wrong statement, with no basis in reality, and in any case shows the bias of the agency at the outset.
- In para 1.16 it says, “The anticipated benefits of the project include the following. The transfer of water to deficient areas from surplus areas;...” This clearly shows that the EIA agency has uncritically accepted the conclusion of the project developer, without so much as even an attempt to assess its correctness. How can such an agency be accepted as an objective EIA agency?
- In Para 1.17 it says, “There is no other alternative for irrigating the proposed CCA of about 3.436 lakh hectares, providing drinking water facilities to 16.98 lakh population and generating 78 MW power. This project is inevitable for removal of the backwardness and poverty of this Bundelkhand region of Madhya Pradesh. The no project option will adversely affect the development of this backward region of Bundelkhand and thereby increase the regional disparities. Such disparities contribute for large scale migrations from and unrest in the region. Therefore, no project option is an alternative to be considered.” Here again we can see the clear and repeated bias of the EIA agency. Firstly, the EIA agency does not even say what is the no project alternative. Secondly, it assumes that the project would remove the backwardness and poverty of the Bundelkhand region of MP, without any substantiation. Lastly, it says, no project option is to be considered!!! What does it mean??

EIA AGENCY IS INCOMPETENT

- In para 14 of the Exe Sum, it says, “Out of the above, forest land accounts for to 5258 ha, rest of the area being agricultural lands, settlements, scrubs and water bodies. Ten villages are likely to be submerged. Area of Panna national park or Tiger reserve accounts for about 65.13 percent of total forest area under submergence with 4163 ha.” Simple calculation shows that 4163 is 79.2% of 5258, and not 65.13% as stated by the EIA. The EIA also does not explain why the forest land has reduced from 6400 ha in Feasibility report to 5258 ha and area of Panna tiger reserve has come down from 4586 ha in FR to 4163 ha now.

- In Para 56 the EIA says, “The area (Daudhan project) under irreversible impacts is neither a home nor an important habit for the wildlife including birds”. To say this when the project is going to submerge over 4600 ha of Panna Tiger Reserve is shocking.
- In para 58 EIA says, “Interlinking of these basins through link canal will facilitate rapid migration of the fish easier.” How can this become possible?
- In Para 60 EIA says, “Stagnated body can get rid of their pollutants by sedimentation”. This is clearly wrong.
- In Para 73 EIA says, “The budget for different management activities required to be carried out for mitigation and prevention of dam break is **Rs. 60 lakh.**”, However, none of the measures listed there can prevent dam break.
- In para 1.04 it says, “In the nineteenth century British colonialism introduced technical and hydraulic principle by introducing perennial irrigation in the sub-continent... A third wave in hydraulic manipulation emerged in 1930s with new technologies put into operation to effect the virtual industrialization of river control. Now the entire river basin had become the focus for water planners and engineers. This facilitated to train the river through interconnected dams, reservoirs and diversions all the way to its estuary by harnessing its waters simultaneously for navigation, irrigation, flood control and power generation.” These statements make no sense and in any case are irrelevant and also show the ecological illiteracy of the agency and also its bias for such systems.
- In para 1.10 it says, “The Gangau weir was constructed to augment supplies from Bariapur PUW for transferring the water from Ken basin to Betwa basin, as the construction of a reservoir is proposed at Daudhan village in Chhatarpur district. Before selecting the Daudhan site for construction of a reservoir, an assessment of two other alternative sites were considered.” Makes no sense. There are many other such paras and statements, but these samples should be good enough for any objective reader.
- In Para 1.18 it says, “National Water Development Agency, New Delhi taken up feasibility studies of Ken-Betwa Link Project in Madhya Pradesh to cater to the needs of irrigation besides providing drinking water, power generation and diversion of waters to Betwa basin. Though there are large benefits that may accrue after assuring irrigation they are *out weighed by social, environmental and economic costs.*” (Emphasis supplied.) If the benefits are out weighed by the costs, than the project is non viable is it not? Why that conclusion is then not reflected in the rest of the report?

EIA INCOMPLETE

- In para 66 (under Reservoir Rim Treatment) the EIA says, “The periphery line beyond the MWL will be in submerged condition for a few days only during flood period and will be vacant during other period.” No details are given as to how much area of which specific villages/ districts will be affected over how much period and what will be the impacts thereof.

EIA DRAWS UNWARRANTED CONCLUSIONS/ ASSUMPTIONS

- Para 26 of Exec Sum says, “Due to drying up of leaves of trees, monkeys were found moving from one tree to another for their shelter in Panna Park near proposed Daudhan dam.”

- In Para 40 it says, “Hence impact due to change in the hydrological cycle are not anticipated.” This is completely wrong, the hydrological cycle will change with the building of the dam and there will be impacts there of.
- In Para 57 it says, “The Daudhan reservoir is capable of effecting the distribution of Tigers since the Tiger reserve of 4163 ha (National Park) will be submerged. But at the same time, the reservoir may prevent encroachments of the park and invasion by livestock so that a relatively more secure and compact habitat is formed on Right flank of Daudhan dam which may be beneficial.” There is no obvious logic to what the EIA says here.
- In Para (on growth of aquatic weeds in reservoir) 59 it says, “The problems are manageable through bio-manipulation of reservoirs.” How can that be achieved and what will be consequences?
- In Para 62 it says, “There are no places of tourist interest going to be affected due to the submergence.” This when the Daudhan dam will submerge over 4500 ha of Panna Tiger reserve, which is obviously a place of tourist interest.
- In Para 66 (under compensatory afforestation) it says, “Assuming that non forest land is not available...” when the EIA is not supposed to make such assumptions.
- In Para 69 the EIA talks about development of fisheries in Daudhan reservoir, without understanding that the most of the reservoir will remain under the forest dept and tiger reserve and such activities are not allowed in reserve area.

EIA MAKES CONTRADICORY STATEMENTS

- In Para 69 the EIA says, “Funds to a tune of **Rs. 1000 lakh** are required for conservation of REET species in the submergence area.” However, earlier in para 57 it says, “...impact of the projects on REET species may not be too severe to prevent any recovery.” And in para 58 it says, “None of the species of aquatic plants comes either under rare or endangered or endemic or threatened categories (REET).”
- In Para 69(a) the EIA says, “There is a proposal to develop carp based fisheries in Daudhan reservoir with an anticipated production of 470 MT/ year” and in para 69(e) it says, “Fish production from the reservoir will be increased steadily on a sustainable basis to attain a yield of 60 tones on full development by adopting the measures suggested.”

EIA AGENCY IS CARELESS

- The EIA in para 34 says, “The Daudhan dam and reservoir area comprises of very hard, compact and dense quartz – arsenate”, but does not give any implications of the presence of dangerous Arsenate compound. According to Wikipedia, “An **arsenate** (compound) is any compound that contains this (AsO₄³⁻) ion.”¹
- The EIA says (para 4) that the Full reservoir Level is 288 m. When the FRL in FR was 287 m, the EIA should explain this change. It also claims that the MWL will be same as FRL, which is also a change from FR, no explanation is given.

¹ <http://en.wikipedia.org/wiki/Arsenate>, accessed on March 5, 2010

EIA AGENCY USES WRONG TERMS

- In para 39 it says, “No change in the regime of Ken River due to Daudhan dam or Betwa river due to Makodia dam is anticipated.” The line or the para does not explain what is meant by regime of river. If it means flood regime, since the para is talking about floods, its conclusion that there will be no change is completely WRONG. Such big reservoirs would completely change the flood regime downstream from the dams.

EIA Provisions are inadequate

- In Para 91 the EIA provides for “Provision of land to land to the extent of land acquired, to the ST and SC PAFs.”. However this is completely inadequate. If the displaced population of Sardar Sarovar Dam from the same state of MP are entitled for minimum of 5 acres of irrigated land, why should the displaced population of Ken Betwa get anything less? All displaced families must get at least this.
- The EIA does not indicate the R&R plan for the canal and other categories of displaced. This is also not acceptable. All categories of displaced must be treated the same way.
- The R&R plan does not ensure improved and permanent livelihood for the displacement population. It also does not take into account the total resource base of the affected population, without which one cannot even assess if the affected people are better off or not.

THE EIA PROVIDES NO REFERENCES OR NAMES OF THE SOURCES OR EXPERTS IT USES IN THE REPORT. THIS MAKES SUCH FIGURES AND STATEMENTS UNVERIFIABLE AND HENCE UNRELIABLE.

The EIA also does not address many of the issues I raised following the earlier version of the EIA shared with the expert committee, this is pretty shocking too.

This brief note is sufficient to show why the current EIA for the Ken Betwa link proposal is unacceptable and the best course of action would be to go for a fresh EIA with a more credible agency. Pl include this note in the agenda of the 9th meeting of expert committee on ILR. This is not an exhaustive comment, but provides sufficient reason to reject this EIA and commission a fresh EIA from a credible agency, in consultation with the Expert Committee.

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