

16 Feb 2011

To,

**Prof. Madhav Gadgil,**

**Chairperson,**

**Western Ghats Ecology Expert Panel,**

**India**

**Subject: A Submission to the WGEEP for declaring the rivers in Western Ghats as Ecologically Sensitive Areas**

**Respected Prof. Gadgil,**

It has raised the hopes of the civil society to know that the Western Ghats Ecology Expert Panel has been constituted under your leadership. We are glad that recently, the WGEEP team visited proposed sites for the Thermal, Hydro and Atomic power plants, chemical and mining industries in planned in the Western Ghats eco region of Maharashtra, Goa, Karnataka and Kerala and have interacted with the local population. We are also happy to see papers on the WGEEP website which talk about the value of rivers in Western Ghats and the threats that these are facing.

As you are aware, the proposed projects in the WG threaten not only the wildlife habitats and ecological sustainability of the region but also its water security, especially in the downstream regions. Pollution and destruction of river systems and their fisheries like Vashishthi, Periyar and Kali by chemical industries is well documented and also noted in your report on Ratnagiri Sindhudurga Region. Mining is destroying the riparian areas and water quality of rivers like Terekhol and Mandovi whereas sand mining is posing a severe threat to the bank stability, aquatic life and water yield of rivers like Pampa and Bharathpuza. Damming of biodiversity rich rivers like Sharavathy and Chalakudy has had a severe impact on the already-fragmented ecosystem.

Most of the west flowing rivers are small, with steep gradient and originate in dense primary evergreen forests and Shola grassland systems creating rich riparian areas while flowing down. All these rivers form productive estuaries and extensive mangrove systems at their mouth. The head waters, riparian corridors and estuarine systems of these rivers support a number of rare and endangered species. According to WWF, "The small rivers and streams draining the old, isolated,

and relatively stable Western Ghats host a highly endemic aquatic biota with over 100 fish, about 20 per cent of mollusc species, and 100 amphibian species endemic to this ecoregion.” Latest estimates from NBFGR indicate that 231 fish species are endemic to the Western Ghats out of a total of 339 fish species. We are sure that the numbers will rise steeply with further studies. New species of fish are still being discovered from these rivers rapidly, recent examples being the discovery of *Puntius rohani* and *Betadeavrio ramachandrani* from SeethaNadi and Kodayar River respectively. Fish and amphibian species (especially frogs) are also being discovered from rivers like Chalakudy and Sharavathi. Endangered *Myristica* swamps and species like otters are a part of many rivers originating and flowing through the Western Ghats, with a recent proposal to bring the *Myristica* swamps of Kulathupuzha forest in Kerala Western Ghats under the UNESCO Natural Heritage site indicative of the uniqueness of the ecosystem. Tradition of community conservation through Fish sanctuaries is rich and worth emulation and dissemination. Several fish sanctuaries on rivers like Tunga, managed by Temple Trusts in Karnataka have contributed in conserving endangered fish like Mahaseer.

At the same time, these rivers provide invaluable ecological goods and services to the local population. Unfortunately, the economic angle of this is not well studied and hence, a true cost benefit analysis of ecological destruction in the name of development is not done. Any decision without such analysis will be short sighted and detrimental to the ecosystem and the dependent communities. There are several examples that illustrate the immense importance of these rivers to the communities. River Shastri, which supports dense forests and rich fisheries, also provides drinking water throughout the year to all the population along its banks *without any dams*, while river Aghanashini in Uttar Kannada provides livelihood and nutritional security to nearly 10000 households through bivalve collection alone. River and estuarine fisheries is an important source of nutrition and livelihood in the region and fisheries richness off the coast can be directly attributed to the richness of the nutrients carried down by the rivers from the mountains.

Considering this, the present and proposed developmental pressures on rivers including Damanganga, Pinjal, Gargai, Gundia, Sharavathi, Netravathi, Seetha Nadi, Kali and Chalakudy, etc., necessitate us to take a strong stand against any further short sighted development plans.

**We therefore propose that rivers originating and flowing through the Western Ghats be declared as Eco sensitive Areas till their confluence with the sea, with a special focus on ensuring that the last remaining free flowing rivers and high biodiversity stretches of dammed rivers in the region remain without dams, hydropower projects and diversions.**

This includes the head waters, tributaries channel, mouth and riparian areas of all the west flowing rivers originating in the Western Ghats and meeting the Arabian Sea as well as the source regions of rivers flowing to the east and meeting tributaries.

**We propose that under Ecological Sensitive Areas:**

- 1. Large dams and hydropower projects should not be allowed on rivers flowing through the Western Ghats. The last remaining free flowing rivers should be protected on priority.**

**This includes saying a final no – clearance to the controversial Athirappilly and Gundia Hydro electric projects referred to the esteemed panel by the Minister for Environment and Forests.**

- 2. A thorough credible, independent assessment of performance as also the social, environmental and economic aspects of the present projects should be performed to consider various alternatives including decommission the projects that are causing more harm than good and the results should be made public so that other regions like East Himalayas can draw lessons from our experience.**
- 3. Source regions of the west flowing as well as east flowing rivers especially the shola grassland ecosystems and primary evergreen forests should be protected from development and deforestation and declared as a no-touch area.**
- 4. In case of existing dams and hydropower projects including the ones on the rivers like Sharavathy and Chalakudy, environmental flow analysis should be performed, involving local communities and freshwater releases should be made mandatory accordingly. Pending such an analysis, the projects should be immediately mandated to continuously release at least 25% of the seasonal flow and also at least one flood flow in monsoon every year. Fish ladders should be made where ever feasible and necessary.**

Also, there is a need to re-design the reservoir operation models of existing dams in such a way that they meet the downstream flow requirements (both in terms of environmental flow and own stream livelihood and domestic water needs) . Such a model is being worked out in the context of Chalakudi River by the Chalakudi Puzha Samrakshan Samiti (CPSS).

5. Thermal Power plants and industries should not be allowed to abstract freshwater (which is an invaluable resource in the Ghats) from the rivers or release warm water in the rivers and their estuaries. No such projects should be cleared without a free, prior and informed consents of the concerned gram sabhas, renewable on annual basis.
6. Industries should not be permitted on the lateritic plateaus which are the freshwater storage zones of rivers and communities and along riparian zones which are critical for river connectivity with main land and gene pool areas. Looking also the rich biodiversity of lateritic plateaus, they should be declared as no development zones.
7. Zero Discharge Norms should be enforced for the existing chemical industries and learning for our past failures, licences for new chemical industries in Western Ghats should not be issued. In case of operation of existing and future units, the representatives of the gramsabhas of the area should have a significant, decisive role in monitoring and ensuring compliance with the environmental norms.
8. Strict Laws for regulation of sand mining should be brought in place including declaration of 'sand holidays' in over mined rivers/ river stretches and any permissions to mine should precede no objection from the local gram sabhas.
9. Ecological goods and services obtained from rivers should be studied, documented and such reports widely disseminated
10. Small drinking water supply schemes, rainwater harvesting projects, revival of traditional water supply systems, sustainable fishery management projects, units processing fruits and medicinal plants, and responsible eco tourism managed by local communities should be encouraged.

Expecting a positive response from the panel regarding this,

Yours Sincerely,

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