

October 22, 2010

Shri Sushil Kumar Schinde,
Honorable Union Power Minister of India,
New Delhi.

Subject: Seeking a moratorium on clearances for large dams in Northeast India; withdrawal of clearances granted to 2000 MW Lower Subansiri, 1750 MW Demwe Lower & 1500 MW Tipaimukh; future steps on hydropower projects and dams only after full, prior and informed consent of people in the region; protect the Brahmaputra river basin as a cultural and ecological endowment

Dear Shri Schindeji,

Greetings from the Krishak Mukti Sangram Samiti, Assam! Please find attached a detailed memorandum on the issue of dams in Northeast India from us (with a focus on downstream aspects). We hope you will recognise the significance of these developments and pay urgent attention to the issues raised in the memorandum. In this covering letter, we highlight some of our overall concerns regarding dams in the Northeast, particularly Arunachal Pradesh.

The Northeast of India is an ecologically and geologically fragile, seismically active and culturally sensitive region. There are plans to harness around 63,000 MW of hydropower through 168 large dams in the Brahmaputra and Barak river basins. The state of Arunachal Pradesh alone plans to develop 135 projects for a cumulative capacity of 57,000 MW. MoUs/MoAs have already been signed for over 120 projects until now by the state government. An important role is played by the Central Government which grants environmental and techno-economic clearances to projects. The environmental clearance process also assumes significant importance as it is currently the only clearance in which comprehensive social impact assessment and public consultation has to be done. Recent times have seen many concerns raised both about individual and cumulative impacts (downstream and upstream) of multiple dams planned in the region.

After downstream agitations in the Subansiri river basin an expert committee of IIT Guwahati, Gauhati University and Dibrugarh University was set up to study the downstream impacts of the 2000 MW Lower Subansiri project. In their report submitted in June 2010 this committee has recommended that: "...*The selected site for the mega dam of the present dimension was not appropriate in such a geologically and seismologically sensitive location...Therefore, it is recommended not to construct the mega dam in the present site...*" A House Committee set up by the Assam Legislative Assembly to investigate the impacts of dams in its final report submitted in July 2010 supported the Expert Committee recommendations on Lower Subansiri.

- **Downstream concerns**

Terms of Reference (ToR) for Environment Impact Assessment (EIA) studies have been granted by the Ministry of Environment & Forests (MoEF) for at least 54 large dams in Arunachal Pradesh since September 2006. In most cases the 'baseline data' collection has been asked to be restricted to only 10 km. downstream and the actual 'impact prediction' has been asked to be restricted to an even smaller distance downstream: only between the dam and powerhouse! There is only one aspect which has been mandatorily asked to be studied beyond 10 km. downstream in all cases; this is the 'dam-break analysis' which predicts what will be flooding downstream in case the dam actually breaks. But dam-break is not the only downstream risk a dam poses. Unfortunately, most detailed downstream studies are only prescribed as post-clearance studies as has been done in the 2000 MW Lower Subansiri project on the Subansiri river, the 1500 MW Tipaimukh Multipurpose project on the Barak river and the 1750 MW Demwe Lower project on the Lohit river as recently as February 2010. This clearly indicates that the projects are being treated as a *fait accompli* and downstream studies and consultations a formality. It is only recently that partial downstream impact assessment in Assam has been prescribed as pre-construction studies in a couple of projects in the lower reaches of rivers such as Dibang and Siang. But these ToRs are clearly inadequate and importantly conduct of public consultation in Assam is still not required for projects impacting the state.

Downstream impact concerns relevant to the Northeast include: loss of fisheries; changes in *beel* (wetland) ecology in the flood plains; impacts on agriculture on the *chapories* (riverine islands and tracts); impacts on various other livelihoods due to blockage of river by dam (e.g. driftwood collection, sand and gravel mining); increased flood vulnerability due to massive boulder extraction from river beds for dam construction and sudden water releases from reservoirs in the monsoons; dam safety and associated risks in this geologically fragile and seismically active region; the ecological and social impacts of drastic flow variations on a daily basis since the projects are peaking hydropower projects (particularly in winter).

For example, the usual winter flow in the Subansiri river is approximately 400 – 500 cumecs (cubic metres per second), flowing uniformly through the day. After the commissioning of the 2000 MW Lower Subansiri project, flows in the Subansiri river in winter will fluctuate drastically on a daily basis from 6 cumecs for 20 hours (when water is being stored behind the dam) to 2500 cumecs for 4 hours when the power is generated at the time of peak power demand. Such fluctuations in the river flow in the

major tributaries of the Brahmaputra are likely to seriously impact critical downstream areas such as Daying Ering sanctuary, Dibru – Saikhowa National Park, Majuli island and Kaziranga National Park. This will also destroy the livelihoods of people in the Brahmaputra floodplains which are adapted to the natural river flows which are like the ‘heartbeat’ of the river.

- **Upstream: The myth of ‘benign’ projects**

While Pandit Nehru and the former adviser to NEFA, Verrier Elwin, argued for development interventions in the state needing to be sensitive to the local indigenous ethos of the state, the current Central and State government policies seem to contradict this philosophy. The current plans involving building of 135 dams to harness 57,000 MW of hydroelectricity, leaving no river or stream to flow free in the state. In parts of the state, for example Dibang and Siang valleys, citizens (particularly youth) are opposing this juggernaut of large dams which threatens the very ecological and social fabric of their homelands. Opponents of dams in the Dibang and Siang basins certainly want development and economic activity, but that which is socially and ecologically appropriate. Not multiple large dams which will: submerge large tracts of forests and agricultural landscapes; destroy the rivers including sacred and historical sites; bring in massive socio-cultural and demographic changes due to influx of large labour populations in the state outnumbering the local populations; give little opportunity of sustainable livelihoods for local populations; cause major downstream impacts both within Arunachal Pradesh and neighbouring Assam.

Both the push by the Central Government to accelerate hydropower development in the state and the hurried signing of MoUs with power companies by the State Government has only sown the seeds of conflict. The people of the Dibang Valley have opposed the holding of the public hearing for the 3000 MW Dibang Multipurpose project no less than ten times. With huge upfront premiums already paid by companies’ to the state government before public consultation and green clearances, citizens opposed to the Dibang dam believe that it is pointless having cosmetic public hearings. In the Siang Valley, villagers protesting the 2700 MW Lower Siang project near Pongging had to face violent action by the paramilitary forces in May 2010, injuring several people. This is the first such incident in the state and has set a dangerous precedent in the otherwise peaceful state.

The Expert Appraisal Committee on River Valley & Hydroelectric projects and the MoEF have granted environmental or pre-construction clearances to virtually all projects in the state, indicating a clear pro-project bias. These clearances have only further perpetuated several myths about the projects coming up in Arunachal Pradesh at the national level. One such myth is that ‘*Social impacts of projects in Arunachal Pradesh is less as it is relatively thinly populated as compared to other parts of the country*’.

The small displacement argument to sell dams in AP is one of the most misleading arguments. Firstly project affected persons (PAPs) are being grossly underestimated as only people whose lands are being directly acquired are being treated as PAPs. Rights and resource use of local communities in a much larger landscape will be impacted. These include the following: submergence of jhum lands will shorten jhum cycles over a larger area; land use restrictions over large tracts for Catchment Area Treatment and Compensatory Afforestation (particularly in the context of FRA); impacts on downstream livelihoods due to major fluctuations in flow regimes.

AP is home to small populations of culturally sensitive indigenous communities. Therefore, direct and indirect displacement is high if looked at in the perspective of local population (as opposed to the population of the country). The land in the state has been customarily delineated between different communities and clans and there is no place to resettle people or provide alternative land. Moreover, these large hydel projects being labour intensive and long gestation projects will involve influx of large labour populations for long stretches of time. This will have serious socio-cultural and demographic consequences for this tribal state.

- **Environmental Risks**

Being a geologically and seismologically sensitive region, comprehensive environmental risk assessment assumes great significance in the Northeast (both during construction and operation of project) to decide the viability or otherwise of mega dams in the region. Unfortunately, in the current environmental decision-making process, ‘dam-break analysis’ is the only risk assessment which is done. The Lower Subansiri Expert Committee report has thrown up many issues related to the paucity of understanding of earthquakes and their impacts in the region while planning and designing dams. Beyond the impact on the dam structure itself, there are other risks both during earthquakes, for example: heavy sedimentation impacting viability of dam and overtopping of dam due to heavy landslides in reservoir inducing floods downstream. These and other environmental risks need to be properly understood while evaluating the viability of dams in the Northeast.

- **Social and political movement against dams**

The region (particularly in downstream Assam) has seen a major grassroots social and political movement against the mega dams in the past few years.

The scientific/technical recommendations of the Lower Subansiri expert committee clearly suggest the need for scrapping of mega dams in the Northeast, questioning the reports dished out by pro-large dam technocracies on earlier occasions. This has further strengthened and reinforced the concerns of the people of the region who have been expressing concerns against the imminent dangers of mega dams.

The Expert Committee’s report has been categorically endorsed by the Assam Legislative Assembly’s House Committee in its report on dams submitted to the Assembly in July 2010. The House Committee’s report embodies a clear political mandate against

mega-dams in the region. The House Committee was set up after a major debate in the Assam Legislative Assembly in July 2009. We would also like to draw your attention to the fact that this committee has undertaken widespread discussions with different stakeholders while working on the report.

In light of all the above factors and the detailed concerns raised in the memorandum, our specific demands are as follows:

- A complete moratorium on all clearances (including pre-construction clearances) by the MoEF to large dams/hydropower projects in Northeast India.
- Immediate withdrawal of clearances granted to the 2000 MW Lower Subansiri project, 1750 MW Demwe Lower and 1500 MW Tipaimukh which were granted environmental clearance without downstream impact assessment and public consent.
- Commission of a special study group consisting of Independent Reviewers (including scientists, people's representative) to study the environmental and social impact of all the existing dams in Assam.
- A complete review of pre-construction clearances granted to projects in the region.
- Future steps on hydropower projects and dams to be taken only after full, prior and informed consent of the people of the Brahmaputra & Barak river basins.
- The Brahmaputra River and its tributaries to be protected as a cultural and ecological endowment of the people of the region and the country as a whole. Development plans will need to respect the environmental and cultural sensitivity of the region.

We expect you to give these critical issues the importance it deserves. The Brahmaputra & Barak river basins are our lifeline and addressing these issues is essential to ensure the long-term social and environmental security of Assam.

Thanking you,

Sincerely,

(Akhil Gogoi)

General Secretary,

Krishak Mukti Sangram Samiti