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Honourable Minister of State (Independent Charge),  
Ministry of Environment, Forest, and Climate Change (MoEF&CC)  
Indira Paryavaran Bhawan  
Jor Bagh Road,  
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May 2, 2017

Honourable Minister,

Please consider this joint letter from an informal coalition of environment and wildlife organisations as a collective note of protest against the proposed Ken-Betwa River Link Project.

This contentious project purports to transfer water from the Ken river to the Betwa basin to address water scarcity in parts of Uttar Pradesh and Madhya Pradesh. It has been mired in controversy since it was prioritised by the central government in 2004. The project has been plagued by sloppy, intentionally misleading and inadequate impact assessments, procedural violations and misinformation at every step of the way, and has been opposed by innumerable experts and organisations, including all of the undersigned. A few key points in this regard are listed below:

- The figures on the water availability in the Ken and Betwa rivers and their water balance have not been shared in the public domain and remain shrouded in secrecy. The Detailed Project Report (DPR) has been prepared by the project proponent and, against all good practices, no independent study has been commissioned on the project. An analysis by the South Asia Network on Dams, Rivers and People shows that less than 10 per cent of cultivable land in Bundelkhand will benefit from the project, even if the questionable claims on paper are taken on face value. In reality, this is likely to be even less, since, as noted in the Forest Advisory Committee meeting minutes of March 30, 2017, few Indian hydroprojects, if any, have delivered their claimed promises.
- Moreover, as noted by the project DPR, the main objective of the project is not to benefit Bundelkhand, but to transfer water from Bundelkhand to the Upper Betwa basin districts, which are outside Bundelkhand. If the objective was to really help Bundelkhand, there are better, quicker, less expensive and less damaging options available, but these alternatives have been ignored.
- The downstream impact of the project on Uttar Pradesh's Bundelkhand region has not been considered. Several experts concur that the project will push this area to 'water destitution' even in the monsoon season, by hindering the recharge of water.
- According to official documents, 10 villages will be displaced by the project dam. Important data, including the Environment Impact Assessment and Environment Management Plan, were kept out of reach of communities that will be impacted by the project, even though these documents formed the basis of the public hearings on the matter. These documents were not made available to the public in a format that would invite understanding and participation in public hearings. The Executive Summaries were incomplete and the Hindi translations had glaring and misleading errors. This violates the principle of informed public consent. The above was brought to the attention of the MoEF&CC, Expert Appraisal Committee (EAC) and Madhya Pradesh State Pollution Control Board, but no attempts were made by them to address these legitimate and constructive concerns.

- The EAC recommended project clearance even though it went against the decision taken in five prior meetings of the EAC. It also went against the National Board for Wildlife's condition to move the non-essential power component of the project out of the Protected Area, and was based on a shoddy EIA. In addition, it ignored the legal requirement that projects on the Ganga or any of its tributaries need to be cleared by the District, State and National Level Ganga Conservation Authorities as per the Government of India Ganga Notification dated October 7, 2016.
- The colossal environmental devastation that will be wreaked on the Panna Tiger Reserve and the Ken Gharial Wildlife Sanctuary is indefensible. The felling of 18,04,962 (Minutes of FAC meeting on March 30, 2017) (with girths above 20 cm. at breast height) to over 23 lakh trees (as given in the DPR) from the Panna Tiger Reserve in just the submergence area of the project is short-sighted given that these are the very forests that feed water into the rivers. The domino carbon impact of such forest destruction has not been made public. That India's and the world's most trusted scientists confirm these forests are our best defence against the worst impacts of climate change, brings into question the intention of the promoters of the project. The project will involve massive financial investment with little chance of delivering the claimed social and financial benefits. What is more, no environmental and wildlife clearances have been obtained for the Ken Gharial Wildlife Sanctuary. It should also be noted that the project will completely negate the success of the lauded tiger reintroduction programme in Panna.

Given the above points and a slew of other procedural and environmental concerns, it is our collective opinion that the Ken-Betwa River Link Project should be stopped. Bringing water to drought-prone areas should remain a priority for the Central Government, but more cost-effective, ecologically-sustainable and socially acceptable options must be explored. The current course will irreversibly damage one of India's most irreplaceable biodiversity vaults.

Realigning India's rivers, destroying India's Protected Areas and dismissing democratic, bottom-up decision making and the advice of experts in the field will leave India impoverished and infinitely more vulnerable to adverse climate change impacts.

As Minister of Environment, Forest and Climate Change, we request you to act to protect the country's ecological security. If the project is pushed through, despite clear forewarnings of disaster, it will be an indictment of your failure to take preventive measures to protect India's vital water sources during your tenure as Union Minister, Environment, Forest and Climate Change. In this eventuality, history will hold you and your ministry responsible for ignoring the timely warnings that could have warded off an economic and ecological debacle.

A delegation of signatories will be pleased to meet with you and explain at length the issues that have only briefly been listed here. May we request an appointment with you for this purpose?

Yours truly,

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