

Comments on the ToR application of Pinjal HEP in District of Thane, Maharashtra by Municipal Corporation of Brihan Mumbai, Government of Maharashtra

Subject:

- 1. Please do not consider Pinjal Dam during this meeting as it violates CIC Orders**
- 2. Serious concerns about Pinjal Dam, submerging 2000 hectares of tribal and forest land in the Western Ghats**

Respected Chairperson and Members,

We see that EAC will be considering Pinjal HEP for TORs in its upcoming 69th EAC Meeting on the 11th and 12th of November, 2013.

Firstly, we would like to point out that none of the relevant documents pertaining to the project have been uploaded on the MoEF Website, a mere 2 days before the meeting. This is blatant violation of the CIC orders which directs the MoEF to upload relevant documents at least 10 days before the meeting. This has also been said publicly by the Hon. Minister Ms. Jayanthi Natarajan

We see that in his letter to the MoEF (uploaded on the MoEF website), the Commissioner of Mumbai has submitted all relevant documents including PFR, Form I and EIA Report way back in 4th July 2013. However, the documents are still not uploaded on the MoEF Website.

This violation of CIC orders has a very serious bearing on the project and we urge the MoEF not to consider the project in this meeting, as it will be bad in law.

Concerns about Pinjal Dam:

1. Options Assessment for Mumbai not done: While Mumbai is demanding more water from sources in the Western Ghats by submerging thousands of hectares, no options assessment study has been carried out to assess the sustainable water supply options for Mumbai. In fact the Chitale Committee Report (1993) mentioned in the Mumbai Commissioner's report also stresses for Waste Water reuse, Water use Efficiency and Rainwater harvesting in Mumbai as water supply options for the city.

However, these are not taken seriously, but the proposition that will submerge 2100 hectares of area in Western Ghats World Heritage Site is being taken up from the Chitale Committee Report.

As urban areas and urban population is increasing, need for a sustainable approaches to solve the crisis is becoming very critical. The EAC should proactively ask the user agency to explore these options before building a dam that will destruct the watershed of Mumbai, Western Ghat Forests and displace tribals from their homes.

Rainwater Harvesting in Mumbai: ORFs report "Why is there a drought of Rainwater harvesting in Mumbai" [1]indicated MCGM's Rainwater harvesting Cell is functioning dismally and does not even have data on number of building that have functioning rainwater

harvesting systems. The condition of the cell is pathetic and it functions in a small room, which has leakages, no place for paperwork and severely limited manpower.

This indicates how serious MCGM is about Rainwater Harvesting in the City which receives average 2500 mm rainfall annually.

While Rainwater harvesting in new facilities is working to some extent, it has been vouched by builders and residents that if it is made mandatory for all existing structures (prior to 2009) then the impact will be tremendous. The efforts of some citizens and older complexes were shown inspiringly in a television series.[2]

Waste water Reuse: Waste water reuse should be made mandatory for all apartment complexes with 100 +flats as well as all industrial and commercial complexes. Currently, it is mandatory for large complexes only post 2009. It has shown its potential, if replicated.

At the same time, River Mithi still continues to flow as a sewage channel. None MCGM's will in cleaning up the river can be seen. The treated river water can recharge ground wells effectively.

Water use efficiency: According to reports, Mumbai loses about 25% water supplied from source. Another report claims that : "Mumbai has enough water for a 24-hour supply but water gets wasted because there are too many leakages in the old pipe network," said David Ehrhardt, chief executive of Castalia Ltd, a global infrastructure consultancy firm that in June 2007 studied Mumbai's water supply supported by the World Bank. "The amount of water Shanghai loses in its 24-hour supply is lost in Mumbai's six-hour supply process." Mumbai loses 670 mld of water. [3]

2. Existing irrigation projects around Mumbai performing dismally: The Commissioner's letter states that of the 837.5 MCM water from Pinjal Dam, 393 MCM is reserved from drinking while 442.5 MCM is reserved for irrigation. Before sanctioning any more dams for irrigation water, it will be pertinent to see the situation of existing irrigation dams. Surya Dam near the proposed Pinjal Dam, was built in 90's to supply water for irrigating tribal areas. Now, the dam is mainly used for supplying water to sub urbs of Mumbai.. 12 tribal villages were displaced for this project and the project was built using tribal funds. However, the canals of the dams are still not complete [4]and only a fraction of irrigation has been achieved.

We urge the EAC not to clear any further irrigation dams in the region till the time existing infrastructure put up at high social, ecological and economic costs is put to use.

3. Submergence in Western Ghats: Pinjal dam proposes to submerge a massive 2000 hectares of land in Western Ghats. In addition it will require 100 hectares of land. This is the comparatively lesser studied region of the Western Ghats. Jawahar Taluka, where Khidse village is located lies in ESZ I as per the WGEEP Report which recommends that no large Dams should come up in ESZ I regions. In fact Khidse village, where the dam is coming up, belong to Ecologically Sensitive Area (ESA) as per the Kasturirangan Committee Report. This entails settling of Forest Rights Act, careful consultations with the Gram Sabhas and their consent.

4. Cumulative impact of Dams coming up around Mumbai: There are plans of around 14 dams coming up around Mumbai to supply drinking, domestic and industrial water to Mumbai. Many of the dams will not require Environmental Appraisal process as they are outside the purview of EIA Notification 2006.

Together, all these projects in Thane and Raigad Districts will submerge more than 14,929 hectares of area include 6,062 hectares of forest land and will affect more than 30,000 tribals. A development of this scale requires a cumulative impact assessment.

We urge that no individual dams should be sanctioned prior to a cumulative impact assessment of all dams coming up to supply water to Mumbai in Western Ghats.

In fact, the Forest Advisory Committee has recommended the same while giving a conditional, in principle clearance to Kalu Dam, also near proposed to supply water to Mumbai.

The FAC says: “A cumulative impact assessment of all drinking water projects in the region in the flora and fauna of the area will be undertaken by the state government at the cost of the User Agency and mitigative measures and other conditions suggested in the study will be binding on the User Agency.”

Hence, we urge the EAC not to grant TORs to this project prior to cumulative impact assessment of the region. However, we primarily urge the EAC not to consider the project in its upcoming meeting due to non-availability of related documentation as per the CIC Orders.

Looking forward to your response,

Yours Sincerely,

Indavi Tulpule, Shramik Mukti Sangathana, Murbad, District Thane

Parineeta Dandekar, SANDRP

[1]http://www.academia.edu/4706476/Why_is_there_a_Drought_of_Rain_Water_Harvesting_in_Mumbai-Rishi_Aggarwal_and_Janki_Pandya

[2] www.satyamevjayate.in/issue12/learnmore/detail/66/

[3] <http://www.hindustantimes.com/india-news/the-mumbai-project-24-hour-water-supply-it-s-no-pipedream/article1-261739.aspx>

[4] White paper on Irrigation Projects, Water Resource Department of Maharashtra, December 2012