

To

The Chairperson and the Esteemed Members of the Forest Advisory Committee  
Ministry of Environment, Forests and Climate Change  
Government of India

27th May, 2022

**Subject: Petition to the Forest Advisory Committee re. the Etalin Hydro-Electric Project**

Respected Members of the Forest Advisory Committee,

I, Chintan Sheth, am conducting a study on the glaciers and glacial lakes found in Dibang, Lohit, Kurung Kumey, East Kameng and Anjaw districts of Arunachal Pradesh. As you may be aware Arunachal Pradesh has a vast elevation gradient and is drained by Tibetan rivers such as the Subansiri, Lohit and Siang. It is well known that these rivers are primarily fed by melting glaciers, snow cover and monsoon rainfall.

However, it is much less known that the rivers in Dibang Valley are also fed by glaciers and glacial lakes. Despite this fact we know very little about the hydrology, geology and geomorphology of these rivers, partly due to the difficult terrain. Using remote sensing methods and satellite imagery along with robust numerical methodology, I have been studying the glaciers and glacial lakes of Dibang Valley district in addition to my research on glaciers in Himachal Pradesh and France.

Dibang Valley has close to 300 glaciers with an area of 200 km<sup>2</sup> while there are about 350 glacial lakes covering an area of 50 km<sup>2</sup>. Glacial lakes indicate these areas historically had much larger glaciers that have now completely melted due to warming. The existing glaciers are retreating rapidly due to historical carbon emissions and ongoing climate change. With rising carbon emissions every year it is expected that global warming will rapidly reduce the glacier area by up to 60% by 2050, even if emissions were to stop now. This implies that the electricity production capacity of these hydro power projects is likely to fall considerably. Furthermore, this has created a potentially hazardous landscape as retreating glaciers are often accompanied by surface lakes that can catastrophically drain downstream as glacial lake outburst floods.

Currently, there are no estimates for the potential flood volume of glacial lakes and rate of glacier thinning. I have currently mapped and detected rapid melting of glaciers since 2009 on the Mathū (Mathun), Dri and Talō (Tangon) rivers as well as recent emergence and expansion of glacial lakes. The Etalin hydroelectric power project proposes two dams on these rivers. The risk of such projects upstream closer to glaciers and glacial lakes, is extremely high due to the unpredictable nature of the volume and flow rate during glacial lake outburst floods. Dam breach model studies, as has been conducted for Etalin, account for only extreme rainfall floods. Additionally it remains to be seen if the dam structure design can withstand multiple glacial lake outburst floods. Even if the dam structures do withstand a glacial lake outburst flood, the dam itself acts as a barrier effectively creating a lake that drains after overtopping. In effect a dam creates a second lake that floods further downstream, after it over-topples, rapidly increasing the energy and flow rate of water. In contrast the natural topography of a river allows the water to spread and dissipate energy across the length and width of the river channel decreasing the flow rates as the flood propagates downstream.

Several studies have found that glacial regions are at the highest risk from climate change related catastrophes. Particularly due to extreme rainfall events that may disrupt the glacier surface, cause landslides and avalanches into the glacial lakes, triggering glacial lake outburst floods. For example, the 2013 Kedarnath disaster was one such flood that killed 6000 people and significantly destroyed

two hydroelectric power plants in Uttarakhand. The 2021 Tapovan disaster is another example of the risks in mountain regions. Glacial lake outburst floods and associated glacial hazards are a considerable risk to communities living in the mountains as well as downstream. They alter the geography and during the surge collect as much debris and material downstream eroding slopes and obliterating anything in their path. In the event of such a flood, villages linked by bridges can be cut off indefinitely.

To further complicate the scenario, Arunachal Pradesh and specifically Dibang valley are part of a seismically active geological region. The mountain building process is ongoing and excessive strain is building up between geological layers. Earthquakes relieve this strain periodically, however, there are cases wherein large earthquakes do not completely relieve this strain, and are followed by great earthquakes. Aruanchal has been victim of such a great earthquake in 1950 that was preceded by a large earthquake in 1947 that did not release enough strain. The April 2015 Gorkha earthquake that killed 9000 people was also one such earthquake that did not release enough strain. It is anyone's guess where the next great earthquake is expected to occur in the Himalaya.

Climate change, extreme precipitation events, receding glaciers, glacial lake outburst floods, and seismic events can trigger a chain of natural hazards in the rivers that can be catastrophic to upstream and downstream communities.

Extreme rainfall events in 2015-2016 completely destroyed villages downstream the Dibang, in Lower Dibang district. Hydroelectric dams on such rivers can significantly exacerbate the problem.

The need of the hour is a massive effort to map the natural hazard risks of the region and keep in place early warning, real-time monitoring and communication systems that can facilitate the protection of communities and their ecosystems from natural hazards. Given the proposal of more than 100 dams across the Eastern Himalaya, the impacts of these dams in the face of climate change and seismic related natural hazards remains real and dangerous. I would sincerely request you to direct various scientific bodies in the country to conduct systematic studies of the natural hazards of the regions and the threat they pose to downstream communities and reconsider the construction of the projects. As to the best of my knowledge this has not been fully assessed for Etalin and the other dams that are proposed in Dibang Valley.

I thank you for your consideration.

Sincerely,

Chintan Sheth, M. Sc.

Independent Researcher; Geosciences and Ecology  
Email: chintz604 [at] gmail [dot] com

To,  
Dr. Sanjay Deshmukh,  
Chairperson, FAC sub committee

Dear Dr. Deshmukh,

It has been brought to my notice that the esteemed members of India's Forest Advisory Committee (FAC) are once more deliberating clearance to the proposed Etalin Hydro Electric Project in Dibang Valley, Arunachal Pradesh, and you are the Chair of the sub-committee appointed to examine the compliance of mitigation measures and ecological concerns regarding this proposal.

As a Goodwill Ambassador for UNEP and the UN Secretary General's Advocate for SDGs I have been following the trajectory of this proposed project for several years and have stayed abreast of the concerns raised by scientists, researchers, and local people regarding the environmental consequences of such a project. I am particularly concerned that the Wildlife Conservation Plan submitted by the Wildlife Institute of India (WII) to the FAC is not a robust scientific document on which a decision can be based. A peer review titled "The Devil is in the Detail" was co-authored by 29 well-respected scientists and exposes a number of shocking deficiencies in the WII plan. I was perturbed to read that WII conducted their studies over a brief four-month period, whereas the FAC had recommended a "multiple seasonal replicate" study. In the past I have also been shown exquisite camera trap pictures of the unique tigers of Dibang Valley, and was surprised to find that despite ample evidence, both the WII's report and the FAC have denied tiger presence in and around the proposed project. Are the tigers and their habitat in the forests of Etalin not important to conserve?

I believe that the biodiverse, old growth forests of Dibang Valley are a global treasure, and protecting this landscape is in line with Sustainable Development Goal 13 - Climate Action and Goal 15 which focuses on "biodiversity, forests and desertification". Listed amongst the SDG 15 targets is the target to "ensure the conservation of mountain ecosystems, including their biodiversity, in order to enhance their capacity to provide benefits that are essential for sustainable development" by 2030. Protecting our eastern Himalayas and acknowledging the ecosystem functions of this region is crucial to the environmental security and climate resilience of the nation. The nearly three lakh trees that will be felled from Dibang Valley's forests if the Etalin HEP is approved are irreplaceable and can not be compensated by ill-conceived and implemented compensatory afforestation programs.

It would be ignorant of me to write about Dibang Valley, without acknowledging the indigenous Idu Mishmi community whose culture of conservation has safeguarded the biodiversity of this region. I am privy to a letter submitted by Kera-aa Initiatives for Cultural and Ecological Security, a grassroots organisation founded by members of the Idu Mishmi community, that summarises many community members' concerns about the project and would like to reproduce a quote from it here:

***"We urge policy makers and the project proponents to acknowledge that several dams on the same limb of rivers are going to choke this entire mega biodiverse, rich region of the world. All mighty rivers and forests in Arunachal Pradesh must not be sold for power. There must be a limit. We on behalf of our affected community of the greater Dibang region, spirits of holy ancestors and hundreds of unspeakable wild creatures which will be affected irreversibly by this project urge you to take up our cause, protect ecology and present our example as an opportunity towards the country's commitment to international legal obligations. Please do not approve this controversial project, which is filled with faulty, inadequate and contradictory studies, and set a negative precedence in the annals of environmental disasters. We anticipate that our prayer will be heard and bear positive results."***

I will leave further arguments against the project to more learned individuals, but I submit that the esteemed members of the FAC are in a position of great responsibility to the future generations of this country. I urge the scientists and policy makers in this sub-committee to uphold their commitment to scientific integrity and to the principles of fair and evidence-based decision making. Thus, I humbly request that a fresh report on the biodiversity of the proposed project site is mandated and that the issues articulated by experts and expert bodies are addressed in the public sphere.

My gratitude for your time and consideration.

Dia Mirza

Actor, Producer - One India Stories LLP

Advocate - United Nations Sustainable Development Goals

Goodwill Ambassador - United Nations Environment Programme



## Submission Against the Proposed Etalín Hydro-Electric Project in Arunachal Pradesh

To Dr. Sanjay Deshmukh,

2022

Chairperson, FAC sub committee  
[docsvd@yahoo.com](mailto:docsvd@yahoo.com)

May 27,

[sanjaydeshmukh@mu.ac.in](mailto:sanjaydeshmukh@mu.ac.in),

To the respected members of the committee,

This is an appeal to the committee to put a **stop to the Etalín Hydro Electric Project** due to its proven irreversible damage on the Dibang Valley and Arunachal Pradesh's ecosystem. The project is going to have an immense negative impact on the social and ecological fabric of the region. **Please consider our arguments below:**

1. If approved, the project will cause **destruction of over 2,70,000 trees** in Dibang Valley, which is also the ancestral homeland of the Idu Mishmi community. It cannot be compensated by plantations. In Fact, compensatory measures for such projects are and have been sidestepped.
2. 26 scientists from 16 institutions released a peer review of the Wildlife Institute of India's (WII) Etalín Wildlife Conservation Plan on May 4, 2020. They state, "incomplete and inaccurate data lead to an erroneous and inadequate assessment of the impact potential of the proposed HEP on biodiversity". They also mention that:
  - The basis of FAC's singular mandate was to conduct a 'biodiversity assessment', why it was converted into a Wildlife Conservation Plan is unclear.
  - Even after clear instructions to conduct a multi-seasonal study, WII **only spent four months in the field and surveyed a limited number of sites using biased sampling methods**. Which led to hugely under-assessed results in their report.
  - The Wildlife Conservation Plan **does not account for the damage to the greater landscape by the construction** of over 50 km of new roads and widening of an additional 30 km of existing roads. The true 'Zone of Influence' due to road construction, quarrying and debris dumping is likely to be much larger on account of the extensive slopes on either side of the steep river valley, and their very high susceptibility to landslides.
  - By suggesting mitigation measures, the **WII report presumes the project to be cleared** and presents it as a fait accompli. This implies that the report's finding has no bearing on the FAC's decision on the project, ultimately making it an exercise in futility.
  - The report also concluded that no tigers were present in the river valley despite evidence of the same available in scientific literature, local news, and years of lived experience of locals.
  - This expert committee by the FAC must not base their decision on the largest hydropower project proposed in the country on such a **faulty report**.
3. The minutes of the FAC meeting held on 11th May 2022 state that "almost all issues have been addressed in detail by the SubCommittee and the State." However, there is **no recorded evidence that any concern raised by experts or citizens have been addressed**. This raises the question to the basis on which this statement was made? As an expert body, the FAC and its sub-committees are crucial to the process of decision making on this project and protection of our country's ecology. It is of paramount importance that the ecological and social concerns raised by scientists and experts be addressed and recorded in the proceedings.
4. We would also request the committee to take into consideration the fact that **Dibang Valley is at risk of natural hazards since it lies on a seismically active zone** and has rapidly melting glacial lakes. It is currently experiencing dozens of landslides from the incessant rain.

There is ample scientific evidence and protests from citizens and experts to see why this project is entirely unfit for Dibang Valley as well as irreversibly damaging to the social and ecological fabric of the region.

We urge the committee to take action to stop this project and save our country's rapidly declining ecosystem. We need to save our environment now more than ever - not only to keep up with India's international commitments in the Paris Agreement but also save a developing country like ours from the worst effects of climate change. Our natural ecosystems, such as Dibang Valley, play a huge role in the mitigation process. We trust that your decision will safeguard our biodiversity and vulnerable communities.

**Yours sincerely,**  
**Team Let India Breathe**



**About Let India Breathe (<http://letindiabreathe.in/>):**

We are a youth environmental communication and advocacy collective working on climate and social justice movements. Our team of volunteers along with collaborators work tirelessly to bring light to important issues with resources across the world and nation, speak to authorities and engage them in a meaningful conversation, and bring people together to fight for the rights of people of this country.

27<sup>th</sup> May 2022

To  
Dr Sanjay Deshmukh  
The Chairperson,  
Sub-committee  
Forest Advisory Committee (FAC)  
Ministry of Environment, Forest and Climate Change  
Government of India

**Subject: 29 Independent scientists review the Wildlife Conservation Plan for Eatalin Hydropower project**

Dear Sir,

I have had the opportunity to read the minutes of the Forest Advisory Committee's (FAC) 11<sup>th</sup> May, 2022 meeting where the Eatalin Hydro-Electric Project (3097 MW) in Arunachal Pradesh's Dibang Valley was considered for forest clearance.

I write today on behalf of 29 scientists from 16 Indian research institutions who had conducted a peer review of the Wildlife Conservation Plan for the Eatalin Hydro-Electric Project (3097 MW) in Arunachal Pradesh's Dibang Valley, prepared by the Wildlife Institute of India (WII). We had submitted our findings to the FAC in May 2020 when it had met to deliberate forest clearance to the project. Since no new studies have been conducted in the past two years to address the serious shortcomings of WII's Conservation Plan, we find it pertinent to remind the committee of the need to conduct fresh, unbiased scientific studies to fully understand the impact of the country's largest proposed hydro-project on this region's fragile ecology and people. We believe that such decisions of national importance should not be based on faulty and erroneous science.

Before reminding the FAC about the key findings of the peer review, I find it important to highlight that the minutes of the FAC's meeting on 11<sup>th</sup> May record that the concerns raised on the project's impact on Dibang Valley's biodiversity have been addressed by the state govt and other concerned authorities. However, there is no recording of the reasons raised by numerous scientists and citizens, including the scientists on this submission, have been addressed. As an expert body and its sub-committee, it is expected that the FAC will publish how exactly the concerns have been expressed. Importantly, the FAC's role is crucial in decision-making on forests as per the Forest Conservation Act, and as emphasised by the Honourable Supreme Court. It is therefore paramount that the reasons are recorded in the proceedings as to how the ecological, social and safety concerns raised by numerous scientists have been addressed.

The Plan was peer-reviewed by a diverse range of experts from biologists to hydrologists to social scientists, many of whom have multiple years of research experience in Northeast India, including in Dibang Valley. We find several deficiencies in the Wildlife Conservation Plan submitted to the FAC, which we believe have compromised the quality and the veracity of the Plan's findings and conclusions. Most notably, the Plan ignores evidence of tiger presence close to the project site while listing a species of Long-Tailed House bat found

only in Africa and 12 species of butterflies not found in Northeast India. The peer-review is attached to this mail for your urgent and kind attention.

Importantly, in the past year, new evidence has emerged of multiple tigers inhabiting forests close to villages in Talō Valley (misspelled as *Tangon* in the EIA), one of the two limbs of the River Dibang where the project infrastructure will be located and where the WII had asserted there was no evidence of tigers in their Conservation Plan. Please refer to this report in Arunachal Pradesh's largest newspaper:

<https://arunachaltimes.in/index.php/2020/12/04/multiple-tigers-recorded-in-680-mw-atunli-project-affected-apali/>. The article reports tigers close to the site proposed for the 680 MW Atunli Project, which is located on the same river upstream of the Etalin project. Wide-ranging animals like tigers are likely to use the entire river valley.

Below are a few key points from the peer-review that we wish to bring to FAC's kind attention as it deliberates the impacts of the proposed Etalin hydro-power project on Dibang Valley's wildlife (F. No. 8-20/2014-FC, Minutes of the FAC meeting held on 23/04/2020):

1. While the FAC mandated a 'multiple seasonal replicate study', the WII conducted the entire study in under 5 months from February to June, 2018, amounting to serious procedural violations. Within this short period, the fieldwork focused in an area, called the 'Zone of Influence' (ZoI), which is much smaller than the total area that will experience the impacts of the project. Moreover, even within this much reduced ZoI, camera trapping and other field methods were carried out only along roads, riverbeds and human settlements. A short study conducted in a limited area is likely to have underestimated impacts of the Etalin project on the region's many large wide-ranging mammals including tigers.
2. The report downplays the serious impacts the project will have on Dibang Valley's tiger population, which was found to be genetically distinct in an earlier study by WII scientists. In November 2018, WII scientists who had conducted fieldwork in Dibang Valley had published an article in the Journal of Threatened Taxa asserting that, "The Mishmi Hill ranges are now documented to have more tigers than other designated tiger reserves in Arunachal Pradesh". The current Plan notes that "Tiger presence and movement in the project area cannot be completely ruled out based on this few months' survey, as they are long ranging species" and accepts that "the project area is a potential habitat for tigers". Yet, paradoxically, it goes on to state that "this hydropower project is not visualized to restrict the movement of tigers occurring in and around the DWLS into any direction in the entire Dibang Valley". Another previous publication by WII scientists found tigers at a distance of 10.2 km from the Etalin project site. Studies across the tiger range in India have found dispersal distances ranging from 20 to 375 km. For a wide-ranging animal like the tiger, a distance of 10 km is rather small. Moreover, tigers in mountainous ecosystems like that of Dibang Valley tend to have home-ranges as large as 675 sq km, accessing different elevations at different times of the year in response to prey movement.
3. A large district-wide camera trap study in Dibang Valley (not cited in WII's report) estimated a population of nearly 52 (22-144) adult tigers in Dibang Valley's mountains (Nijhawan 2018). A large majority of these tigers hold permanent home ranges in the region's low elevation community-owned forests, outside the

Dibang Wildlife Sanctuary. In fact, WII's own study found evidence of India's highest tigers in these prey-rich community-owned forests.

4. Finally, the Plan failed to study the role of the ecosystems, even within the small ZoI, in mitigating the effects of climate change and the project remaining viable in a changed hydrological regime due to rapidly retreating glaciers and changing rainfall patterns. A detailed study of the role of ecosystems in sequestering carbon, enabling nutrient exchange between ocean and land, and mitigating extreme weather events in Dibang Valley is paramount to assess the impact of Etalin HEP at a regional scale.

We direct the attention of this body in particular to the Abstract, Introduction and Section 7 (pages 19-24) in the attached peer-review.

With these and many other flaws highlighted in the peer-review, we submit that the Plan, prepared by the WII, should not be used to inform decision-making on the Etalin project in the biodiversity-rich and ecologically sensitive area of Dibang Valley. A fresh multi-seasonal replicate study covering a much larger area should be commissioned.

Thanking you sincerely for your attention and consideration, and with my regards,



**M Firoz Ahmed**

Scientist F, Herpetofauna Research and Conservation Division, Aaranyak, Guwahati, Assam  
Email: mfa.aaranyak@gmail.com

*(On behalf of the authors below of the peer review of WII's Wildlife Conservation Plan for Etalin hydro-power project)*

**Chintan Sheth**, Independent researcher, Bengaluru, Karnataka

**Sayan Banerjee**, National Institute of Advanced Studies, Bengaluru, Karnataka

**Neelesh Dahanukar**, Zoo Outreach Organization, Coimbatore, Tamil Nadu

**Shashank Dalvi**, Independent researcher

**Aparajita Datta**, Nature Conservation Foundation, Bengaluru, Karnataka

**Anirban Datta Roy**, Independent researcher

**Khyanjeet Gogoi**, TOSEHIM, Regional Orchids Germplasm Conservation and Propagation Centre, Assam Circle, Assam

**Monsoonjyoti Gogoi**, Bombay Natural History Society, Mumbai, Maharashtra

**Shantanu Joshi**, National Centre for Biological Sciences, Bengaluru, Karnataka

**Arjun Kamdar**, National Centre for Biological Sciences, Bengaluru, Karnataka

**Jagdish Krishnaswamy**, Ashoka Trust for Research in Ecology and the Environment, Bengaluru, Karnataka

**Manish Kumar**, Centre for Ecology Development and Research, Uttarakhand

**Rohan K. Menzies**, Nature Conservation Foundation, Bengaluru, Karnataka

**Sanjay Molur**, Zoo Outreach Organization, Coimbatore, Tamil Nadu

**Shomita Mukherjee**, Sálim Ali Centre for Ornithology and Natural History (SACON), Coimbatore, Tamil Nadu

**Rohit Naniwadekar**, Nature Conservation Foundation, Bengaluru, Karnataka

**Sahil Nijhawan**, Nature Conservation Foundation, Bengaluru, Karnataka

**Rajeev Raghavan**, South Asia IUCN Freshwater Fish Specialist Group

**Megha Rao**, Nature Conservation Foundation, Bengaluru, Karnataka

**Jayanta Kumar Roy**, Herpetofauna Research and Conservation Division, Aaranyak, Guwahati, Assam

**Anindya Sinha**, Professor, National Institute of Advanced Studies (NIAS), Bengaluru, Karnataka.

**Narayan Sharma**, Cotton University, Guwahati, Assam

**Umesh Srinivasan**, Indian Institute of Science, Bengaluru, Karnataka

**Krishnapriya Tamma**, Azim Premji University, Bengaluru, Karnataka

**Chihi Umbrey**, Department of Zoology, Rajiv Gandhi University, Itanagar, Arunachal Pradesh

**Nandini Velho**, Independent researcher

**Ashwin Viswanathan**, Nature Conservation Foundation, Bengaluru, Karnataka

**Rameshori Yumnam**, South Asia IUCN Freshwater Fish Specialist Group.

To,  
Dr Sanjay Deshmukh  
Chairperson - Sub-committee of the Forest Advisory Committee

**Subject: Objections against Etalin Hydro Electric Project in Dibang Valley, Arunachal Pradesh**

27th May 2022

Dear Sir,

We are writing to you to submit our concerns regarding the Etalin Hydro Electric Project (HEP), which is currently under consideration for Forest Clearance by the Forest Advisory Committee. We would like to bring to your notice some grave concerns we have regarding this project and strongly urge you to consider these with the utmost seriousness.

We believe that the Etalin HEP must not be granted forest clearance as it will have irreversible and wide-ranging negative impact on Dibang Valley's biodiversity and diverse ecosystems some of which we outline below.

1. **Area of Unique Biodiversity:** The Etalin Project is located in a Global Biodiversity Hotspot and studies confirm the occurrence of extremely high biodiversity richness in the impact area of the project. Rapid surveys have shown 24 mammal species, 230 bird species and the region has a high degree of endemism. Studies indicate six endemic species are found in the basin of the Dibang river.
  - a. **Destruction of biodiversity rich, old growth forests:** The project will cause destruction of at least 2,80,000 trees in the old growth forests of a biodiversity hotspot, **over a total 1178.59 ha (~11 sq. km.)** of land. Such forests provide a spectrum of ecosystem services and are irreplaceable. It is a fallacy to assume that these can be compensated by afforestation and plantations. About six globally threatened mammal species are found in this region, of which three are endangered and three are under the vulnerable category. About 680 bird species have been recorded from this region, including globally threatened, near threatened, critically endangered, endangered and vulnerable species.
  - b. **Compensation:** Compensatory or mitigation measures cannot in any way replace or compensate for destruction of old growth forests, the ecosystem services they provide and the loss of wildlife habitat. Even so, fact is that compensatory measures for such projects are openly sidestepped. The National Green Tribunal has taken *suo moto* cognisance of "how two key hydel power projects in Arunachal were among six mega initiatives in the country, between 2004 and 2020, where stringent conditions to compensate for the high environmental impact were sidestepped, ignored or met only on paper." This includes the controversial Dibang Multi Purpose Project.
  - c. **Tiger presence:** The area hosts a unique, high-altitude population of tigers. Tigers have been recorded at an elevation of 3,630m in Dibang, which is the highest altitude at which tigers have been recorded in India. This important fact and the presence of tigers in this area is not included in the 'Etalin Wildlife Conservation Plan' authored by Wildlife Institute of India in its 2017 report. Additionally, research findings distinctly show that the tiger density in the community forests of Dibang is over four times more than that of the regional reserves - but none of these unique findings find a place in the WII report.

- d. **Underestimation of Biodiversity in the Area:** In 2017, the WII was tasked with preparing a report on the impact of Etalin HEP on the biodiversity of Dibang Valley, following which the WII submitted the 'Etalin Wildlife Conservation Plan'. The report assesses the status of various taxonomic groups including mammals, avifauna, entomofauna, herpetofauna and flora in the HEP site, and forms the basis of any decision taken by the FAC on the project. The WII report records 21 species of mammals, 230 bird species, 31 reptile species, 413 plant species, 14 amphibian species and 159 butterfly species.

What is strange is that the WII report was tasked with making a mitigation plan before the project has been approved – implying a *fait accompli*. The report in itself is problematic. It has been strongly criticised in a peer-review by 29 scientists from 16 research institutions, including ecologists, geographers and social scientists, who conclude that "**incomplete and inaccurate data (in the report) lead to an erroneous and inadequate assessment of the impact potential of the proposed HEP on biodiversity**". Despite clear directives to conduct a multi-seasonal study, WII spent only four months in the field surveying a limited number of sites. Nor does it consider the construction of new roads or the expansion of existing ones, thus hugely underestimating the biodiversity of the region, and the impacts that this project will have.

Etalin HEP is a mega hydropower project, the largest in India and if approved will be based in an extremely ecologically fragile region. The decision for clearance of a project of this scale cannot be based on a faulty and shoddy impact assessment.

**2. High risk of natural disasters:** Etalin HEP is based in Dibang river which is a high-mountain watershed that is prone to natural hazards as a result of its unique and complex geological, ecosystem, weather and climatic conditions. Dibang Valley is thus a hazard-prone area and at risk of frequent landslides and earthquakes.

- a. **Seismic activity:** The dam site is in a seismically active zone, which has seen 34 earthquakes over the last century. A HEP of this scale being built in a seismically active zone has wide-ranging impacts for local ecology and economies, and raises serious considerations about the safety of the people residing in this region.
- b. **Roads and associated infrastructure:** The Etalin HEP involves the construction of over 50 km of new roads and widening of an additional 30 km of existing roads. In addition to this, quarrying and debris dumping is likely to be much larger on account of the extensive slopes on either side of the steep river valley, and their very high susceptibility to landslides. The construction phase of the project will involve extensive mining, quarrying, slope undercutting, and muck disposal, including the disposal of hazardous waste. All these activities will have a deeply damaging effect on the region's wildlife and ecology.  
A team of independent geologists and hydrologists who reviewed the project documents have found that several such contingencies relating to possible natural disasters have not been adequately addressed by the project developers, potentially putting the people, biodiversity and economies at risk.

**3. Lack of Transparency:** The minutes of the recent FAC meeting held on 11th May 2022 state that "almost all issues have been addressed in details by the Subcommittee and the

State." However, there are no records available in the public domain of any of the above valid concerns being addressed. Thus, we can only conclude that these issues brought before the FAC have been either summarily dismissed or not been addressed.

We are very concerned about the grave ecological consequences, and the irrevocable loss of wildlife, of this project. We believe that the colossal ecological, social and fiscal of this project is unjustifiable.

Keeping in view the above outlined concerns, we urge you to recommend that the FAC unanimously rejects forest clearance for the Etalin HEP. It may do well to remember that the FAC has entrusted you to safeguard the country's forests and natural ecosystems and we trust decisions taken will be true to this noble duty and in service of an ecologically secure India.

Yours sincerely,

**Prerna Singh Bindra**

Former Member, Standing Committee, National Board for Wildlife

**Dr Asad Rahmani**

Former Member, National Board for Wildlife

**Kishor Rithe**

Former Member, Standing Committee, National Board for Wildlife

**Shekar Dattatri**

Former Member, National Board for Wildlife.

**Meetu Gupta**

Member, Chhattisgarh State Wildlife Board

**Priya Davidar**

Former Member, State Board for Wildlife, Tamil Nadu

**Vaishali Rawat**

Writer and Wildlife Conservationist

Dr. Sanjay Deshmukh,  
Chairperson, FAC sub committee

Respected Chairperson,

The issues concerning the proposed Etalin HEP that have been brought up by experts from various fields have not been addressed in any satisfactory manner by the FAC or any of its subcommittees. As a scientist, you must also be aware of the disastrous shortcomings of the WII Etalin Conservation Plan. It is the responsibility of every member of the FAC to sanction a fresh study before taking a decision on granting forest clearance to a project of this scale. This decision will be of national significance and will impact a Global Biodiversity Hotspot.

I once again submit my opposition to the proposed Etalin Hydro Electric Project for reasons listed below.

Best regards,

Romulus Whitaker

To,  
Members of the Forest Advisory Committee,

**Subject: Opposition to Etalin Hydro Electric Project in Dibang Valley, Arunachal Pradesh**

It has come to my notice that in the upcoming meeting of the Forest Advisory Committee on 11<sup>th</sup> May 2022, the members will be deliberating on File 8-20/2014 FC. This concerns the diversion of 1165.66 hectares of forestland for the proposed Etalin Hydro Electric Project in Dibang Valley district of Arunachal Pradesh.

The proposed project has been mired in controversy and strongly opposed by members of civil society. As you are aware, Dibang Valley lies in a Global Biodiversity Hotspot and is home to the indigenous *Idu Mishmi* community that is world-renowned for its culture of conservation.

It is of grave concern that the Wildlife Conservation Plan prepared by the Wildlife Institute of India (WII) for the proposed project is totally inadequate in scope and depth. In 2020, this Plan was peer-reviewed by 29 reputed scientists from 16 research institutions in the country, who found it to be completely deficient. Many of the authors of this peer review are my colleagues and are highly respected in their various fields of expertise.

Amongst the many shortcomings of the Plan prepared by the Wildlife Institute of India, the following are of special gravity:

1. The WII conducted the study in less than five months, even though the FAC mandated a “multiple seasonal replicate study”. Their field work lasted only from February to June and was limited to a ‘Zone of Influence’ that is smaller than the area to be impacted by the project. The committee should thus note that the report is an insufficient documentation to base a decision on. As herpetology is my field of expertise, I should point out that amphibian and reptile surveys must be conducted in the monsoon season. Recent scientific assessments found 42 reptile and 48 amphibian species in Dibang Valley, and I believe many more additions can be made to these checklists.
2. I was amazed to find that the WII Conservation Plan found no evidence of tiger presence in and around the project site and also claimed that the “hydropower project is not visualised to restrict the movement of tigers occurring in and around the Dibang Wildlife Sanctuary into any direction in the entire Dibang Valley”. However, in an article published in a respected scientific journal in 2018, scientists from the very same institution wrote that “The Mishmi Hills ranges are now documented to have more tigers than other designated tiger reserves in Arunachal Pradesh”. As recently as 2020, a report published in The Arunachal Times evidenced “definitive records of the presence of multiple tigers in Apali village on the Etalin-Maliney road in Dibang Valley district”.
3. Further, amongst the species listed by WII in their Plan were 12 species of butterflies that are not found in Northeast India, as well as a species of long-tailed house bat that is endemic to Africa! This brings into question the very methodology that supported the study.

In light of these and other discrepancies, errors, and procedural violations, it is incumbent upon the Forest Advisory Committee to commission a fresh scientific study and conservation plan that accurately assesses the impact of the Etalin Hydro Electric Project on the region’s socio-ecological fabric.

Beyond my disappointment with the WII Wildlife Conservation Plan, I would like to place my opposition to the Etalin Hydro Electric Project on record. I do not believe the sociological impacts of this mega-project on the indigenous community have been given due consideration. This includes public health impacts that may result from the devastation of Dibang Valley’s

old-growth forests; and socio-cultural disintegration that may ensue following the influx of thousands of migrant workers to construct the components of the dam.

In addition, the respected members of the FAC are surely aware that we are in the throes of a climate crisis, and our best defence against its catastrophic impacts is the protection of natural landscapes, in particular primary forests that sequester large amounts of carbon. Scientific studies have also shown that the Dibang Valley lies in a seismically active zone. The glaciers above the proposed project are also rapidly thinning, and are predicted to lose up to 60% of their volume by 2050. The impact of future natural hazards will be exacerbated, should the Etalin and other hydro projects proposed in the Dibang basin be cleared.

I urge the members of the FAC to take a studied view of the proposed project and make an honourable decision keeping in mind that the WII's deeply flawed Wildlife Conservation Plan can not and should not form the basis of a decision to grant forest clearance to the proposed project.

Yours truly,

Romulus Whitaker

Co-Founder/Trustee, Centre for Herpetology/Madras Crocodile Bank

To,  
Dr Sanjay Deshmukh,  
Chairperson, FAC sub-committee

Dear Sir and Committee Members,

We are writing this letter to you on behalf of the Save Mollem citizens campaign, Goa, regarding the Etalin Hydro Electric Project, a proposed mega infrastructure project planned in Arunachal Pradesh.

The Save Mollem campaign is a voluntary movement that is made up of citizens and experts from all walks of life who have rallied against three destructive infrastructure projects in Goa's largest protected area that were not given due procedural and data-driven considerations by the National Board for Wildlife. The Supreme Court has recently passed two favourable orders (Writ petition number: No. 202 of 1995, dtd. 7th April 2022 and 9th May 2022) in connection with the conservation of these irreplaceable forests, of which there are many parallels that the committee should consider in the case of Etalin.

Given that the courts, as well as citizens and expert groups, have stood by data-driven arguments, we believe there are several grave issues with the Etalin project which we would like to outline below:

### **1) The Dibang valley is a biodiversity hotspot**

These forests are extremely biodiverse and are part of one of the Indo-Malaya biodiversity hotspots. Many unique, endemic and endangered species inhabit these areas such as the Red Panda, Mishmi Hill Wren Babbler and the Mishmi Hill giant flying squirrel. In addition to this, these areas have some of the last old-growth, primary rainforests in the country, adding to their importance in biodiversity conservation.

### **2) The Etalin Project will lead to extensive forest fragmentation**

While the project will lead to the destruction of at least 2.8 lakh trees in the Dibang valley and inundate significant areas of forests and human settlements. It is equally important to consider habitat fragmentation through infrastructure projects such as dams in the case of Etalin and a road, railway line and power transmission line in the case of Mollem National Park and Bhagwan Mahavir Wildlife Sanctuary. In both sites, the destructive projects will divide contiguous forests into smaller patch units<sup>1</sup>. The damage can extend well beyond the edges of the patches. According to a study in Bandipur Tiger Reserve (a tropical forest area), every kilometre or road intrusion detrimentally affects at least 10 hectares of forest habitat by opening up the area to invasive species

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<sup>1</sup> Nayak, R., Karanth, K.K., Dutta, T., Defries, R., Karanth, K.U. and Vaidyanathan, S. (2020). Bits and pieces: Forest fragmentation by linear intrusions in India. *Land Use Policy*, 99, p.104619. doi:10.1016/j.landusepol.2020.104619.

and causing greater tree mortality due to increased exposure of the habitat to wind and heat<sup>2</sup>. This is likely to be the case in the case of Etalin, where the wildlife conservation plan has not considered the impact of roads during the construction process.

### **3) Severe limitations to the WII study, including the omission of the national animal:**

These areas are also home to India's national animal, the Bengal tiger. This population of Dibang tigers is genetically unique as noted by the Wildlife Institute of India. However, the same institution in its Etalin Wildlife Conservation Plan does not include the tiger and the importance of this region to its conservation. This is just one of the many issues with the Conservation Plan that have been described in detail in a peer review conducted by 29 scientists from 16 research institutions<sup>3</sup>. The Plan was a result of your committee's 2017 recommendation to conduct "a multiple seasonal replicate study on biodiversity assessment of the catchment area" of the 3097 MW Etalin Hydro Electric Project (HEP) in Dibang Valley, Arunachal Pradesh. As the peer review points out, the WII study took place over just 4 months, not fulfilling the FAC's stipulation that the study must be multi-seasonal. We urge the members of this committee to make a decision based on consistency, given that the study if accepted, will undermine the recommendation of your committee.

### **4) Not just one Dam- Etalin will lead to massive downstream environmental damage**

Dams have devastating impacts on freshwater fauna and these have been recorded across rivers around the world<sup>4</sup>. The waters of Dibang are home to hundreds of species of freshwater fish, amphibians and invertebrates including the endangered golden mahseer, one of the largest freshwater fish in the world. Further downstream, the nationally protected Gangetic dolphin is dependent on the waters that flow through the Dibang and onto the Brahmaputra. There are many dams planned on the various tributaries of the Brahmaputra in Arunachal Pradesh including 17 on the Dibang river itself. It is unclear how multiple dams will impact the fauna and hydrology of these rivers. These issues must be addressed in cumulative impact assessments. The Supreme Court, in its recent judgment on the railway double tracking in Mollem also pointed to the importance of conducting cumulative impact assessments when multiple projects are planned for the same area.

## **Conclusion**

Much like the Mollem movement which has seen a lot of experts, young people, residents and citizens coming together, the socio-ecological system in the Dibang valley is also unique and has seen a similar struggle. Point 3 of the Supreme Court order on railway double-tracking states that:

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<sup>2</sup> Shankar Raman, TR, Framing ecologically sound policy on linear intrusions affecting wildlife habitats

<sup>3</sup> SSeth et al 2020, 'The devil is in the detail': Peer-review of the Wildlife Conservation Plan by the Wildlife Institute of India for the Etalin Hydropower Project, Dibang Valley

<sup>4</sup> Wu, H., Chen, J., Xu, J., Zeng, G., Sang, L., Liu, Q., Yin, Z., Dai, J., Yin, D., Liang, J. and Ye, S. (2019). Effects of dam construction on biodiversity: A review. Journal of Cleaner Production, 221, pp.480–489. doi:10.1016/j.jclepro.2019.03.001.

“Apart from the objection to the project by Goa Foundation, a large number of appeals/representations were received by the CEC from scientists, researchers, ecologists, environmentalists, lawyers, veterinarians, filmmakers, musicians, tourism and travel trade, artists, painters, sculptures, illustrators, students, villagers etc.”

This statement highlights the importance that the court has placed on the views of local people and researchers. In light of the above points, we urge the Forest Advisory Committee to pay heed to concerns expressed to it which include representations on the sensitivity of the area to natural hazards, those that point to scientific deficiencies in the wildlife plan, the lack of financial viability, the lack of due process as pointed out by State Wildlife Board members and importantly from the members of the Idu Mishmi society who are raising their voices in protection of their homes and livelihoods.

Regards,

Farai Divan Patel, Ecologist

Shivangini Tandon, Researcher

Marishia Rodrigues, Ecologist

Akshay Surendra, Community ecologist

Omkar Dharwadkar, Naturalist, Wildlife Photographer

Sinead D'silva, Researcher

Nirmal U Kulkarni, Ecologist, Mhadei Research Center.

Rhea Lopez, Ecologist

Anushka Rege, Ecologist

Lisa Gonsalves, Ecologist

Arpitha Jayanth, Ecologist

Malaika Mathew Chawla, Researcher

To,  
Sanjay Deshmukh  
Chairperson - Sub-committee of the Forest Advisory Committee

**Subject: Submission to Etalin HEP Committee**

27th May 2022

Dear Dr. Sanjay Deshmukh,

I'm writing this letter to you as a concerned citizen, a river lover & researcher, a conscious young Indian worried about climate change and also the future of our democracy. I hope my letter will offer you some thoughts as your committee submits your report for the proposed Etalin HEP in the upcoming FAC meeting.

Over the past few years, I've spent my time walking along rivers in India, and through my own organisation Veditum India Foundation - getting other young Indians to also do the same. Through these 1000s of kilometers of walked experience, and documented experience of other cases, it is obviously clear that hydropower projects have been disastrous for local ecologies, communities and water systems. In a time when we're seeing across the globe that barriers on rivers are being taken down, we must question our own zeal in building large barriers on our rivers in pristine ecosystems.

Please find below some arguments that outline why going ahead with the proposed Etalin HEP is antithetical to all environmental and social justice learnings that we possess today:

1. The big question mark at the start itself is of course WII's report. I am sure it is not hidden from your view that the report has been marked as unscientific by many of India's leading scientists as well as research institutions. We must ensure a thorough study, so that even if we decide to go ahead with this project at a future date, we know what we are losing.
2. The river, which is a part of the glorious biodiversity of the Dibang Valley, including the Idu Mishmi tribe - indigenous residents of the valley, are tied together through an age-old relationship that is harmonious and carries great cultural value. We are seeing an increased recognition of the rights of indigenous people across the globe, and their role in preserving our biodiversity hotspots. The Idu Mishmi, in no uncertain terms, have presented their objection to this project time and again. We must listen to them, they must be our guides into a secure future.
3. Today we have irrefutable evidence about the presence of tigers in and around the proposed project area. It is unclear how the FAC as well as other coordinating agencies are taking into account this extremely critical piece of information concerning our most protected species.
4. For a Hydro Electric Project to work, one of the most key elements is to have stable bedrock. Given that this proposed project, and the subsequent web of hydropower projects in the Dibang Valley are situated on a seismically active and fragile Himalaya, coupled with increased erratic

climatic behavior, are we not destroying an existing eco wonder to endanger downstream citizens? This is apart from the enormous fiscal expense linked to this project that we will lose. Recent examples from Joshimath in Uttarakhand are still fresh in our memories, and incidents triggered by extreme climate events and “over development” are evidently increasing every day. How then, is this project justified?

5. And finally - we are seeing the emergence of ‘competitions’ for fast and wide carbon capture technologies. The situation is dire and even the most oblivious silicon valley CEOs are jumping in for ‘solution building’. However, with the proposal of the Etalin HEP, and subsequently other projects linked to the Dimang Multi Purpose Project, we are making the way to destroy the most ancient and intelligent carbon capture mechanisms - old growth forests that include the trees, the moss, the grasses, the lichen, the animals, the water, and everything within this ecosystem. And this project will make this happen at a scale that we cannot afford, as a state, as a nation, as a planet. Given our abysmal track record with ‘plantations’ in lieu of forest destruction, it only seems like a negative sum game.

I hope you will take these thoughts into consideration as you prepare the final report for the FAC. The youth of this country stand unitedly with our ecosystems, with our indigenous communities and all those working for the conservation of these two.

Warmly,

Siddharth Agarwal (Asid)

Founder, Veditum India Foundation  
[www.veditum.org](http://www.veditum.org)

Convenor, India Rivers Forum  
[www.indiariversforum.org](http://www.indiariversforum.org)

To,  
Dr. Sanjay Deshmukh  
Chairperson,  
FAC Sub-Committee  
Ministry of Environment, Forest and Climate Change

Dated: 30.05.2022

Subject: Representation with respect to the proposed diversion of 1165.66 ha (including 91.331 ha underground area) of forest land for construction of Etalin Hydro Electric Project (EHEP) (3097 MW) in Dibang Valley, District of Arunachal Pradesh by M/s Etalin Hydro Electric Power Company Limited, Arunachal Pradesh (File No:- 8-20/2014-FC) discussed in the FAC meeting dated 11.05.2022.

Sir,

The above-mentioned proposal was discussed in the FAC meeting held on 11<sup>th</sup> May 2022. This representation is made in perusal of the FAC meeting wherein a sub-committee under your chairmanship has been constituted to look into the representations made against the proposal. It is submitted that the forest diversion proposal for the project is facing huge public opposition and despite the same no independent investigation has been made by the FAC to look into the concerns raised by the public. The undersigned through this representation wish to bring to your kind notice the following facts before arriving at any decision with respect to the said project proposal and seeks an independent site visit of your good self to the affected area to understand the issues related with the project.

1. **Major Flaws in WII Study-** The FAC meeting held on 11<sup>th</sup> May 2021 observes that the "WII and NTCA have suggested to take cognizance of certain safeguards and mitigating measures for the better conservation and protection of Wildlife in the area while considering the approval of project" It is important to bring to your notice that the Etalin conservation Plan prepared by the WII was peer reviewed by 26 scientists from 16 institutions wherein grave inadequacies and shortcomings were pointed out in the plan as the same is highly short sighted and does not take into account the damage to wildlife and biodiversity in the Dibang valley which would occur during the construction and operation phase of the project. It is requested that an independent and fresh study shall be undertaken to assess the damage in the concerned area. It is submitted that the mitigation measures suggested by the WII are highly flawed as there is no proper damage assessment of the area without which suggesting safeguards and mitigation measures would be entirely useless.
2. **Evidence of Tiger presence:** Several evidences suggest presence of multiple tigers in Apali village on the Etalin-Maliney road in Dibang Valley district. The local villagers have also claimed presence of tigers in and around the project site, the fact which is

completely ignored in the WII report. The construction of the project will definitely aggravate the situation of man-animal conflict leading to massive killings of tigers which has still not been considered by the FAC in any of its meetings.

3. **No discussion of the concerns raised by the public:** The minutes of the FAC meeting held on 11th May 2022 state that, "*After thorough deliberation and discussion with Pr. Secretary (Forest)/PCCF (HoFF), the FAC desired that almost all issues have been addressed in detail by the Sub Committee and the State*". However, none of the minutes or documents reflect any discussion on the concerns raised by both experts and citizens despite the fact that there has been major opposition to the project since the project proposal was initiated. As a principle of public trust doctrine, it is mandatory upon the State and its public authorities to deal with the representations of the public and the same shall also reflect in the discussions and meetings of the authorities/committees as part of their decision-making process which has not been done in the present case.
4. **Prone to natural disasters:** The Dibang valley is at high risk of natural disasters as it lies on a seismically active zone and has rapidly melting glacial lakes. It is currently experiencing dozens of landslides from the incessant rain. The project zone has experienced several earthquakes in the past which had led to destruction of property. It is important that one must take examples of Uttarakhand disaster where construction of dams in geologically sensitive area led to massive destruction in the downstream during the floods of June 2013. An investigative study prepared under the chairmanship of Dr. Ravi Chopra, also reported to the Hon'ble Supreme Court that construction of dams which leads to blasting, mining, deforestation, tunnels etc. in highly sensitive areas have massive and irreversible impact on the ecology and environment of these areas. As a result, many new hydro-power projects proposed in the Alaknanda and Bhagirathi basins were immediately stopped by the Supreme Court. Knowing that Dibang valley is already prone to natural hazards and the project would involve deforestation of around 2,80,000 trees which would ultimately change the landscape of the area, the project shall not be allowed to constructed.
5. **Opposition of the Idu Mishmi community not considered-** Despite a detailed representation by the indigenous Idu Mishmi community was sent to the DGF, Chairperson, FAC (MoEF&CC), the same has not been addressed by the FAC. The community has raised substantial concerns with respect to grave impact on the wildlife, biodiversity, ecology and environment of the area and also the social and economic impacts the project would cause after there would be a large influx of outsiders on their lands. The FAC has also not taken into consideration the view of the National Green Tribunal where it has observed that forest clearance conditions of the projects approved in Arunachal Pradesh in the past years have not been complied with. The observation was made with respect to the controversial Dibang Multi-Purpose Project that violated indigenous rights.

We would request that the above submissions shall be taken into due consideration by the FAC through the sub-committee and make an independent assessment of the project proposal before arriving at a conclusion.

Thanking you,



Parul Gupta, Advocate

For Vindhyan Ecology and Natural History Foundation  
36/30, Shivpuri Colony, Station Road, Mirzapur, U.P.- 231001

**Forum for Policy Dialogue on Water Conflicts in India**

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26 May 2022

To  
Dr. Sanjay Deshmukh,  
Chairperson, FAC sub committee

**Sub: Reconsider the proposed Etalin HEP in Dibang basin**

Dear Dr. Sanjay Deshmukh,

We, the members of the Steering Committee (SC) of the Forum for Policy Dialogue on Water Conflicts in India (Water Conflicts Forum to be short), would like to draw your attention to the destructive content of the proposed Etalin HEP in Dibang basin with a plea to reconsider the project. Water Conflicts Forum, a network of about 800 individuals and organisations who are involved in water sector issues in general and water conflicts in particular, has been functioning since 2004-05 (for details: [www. waterconflictforum.org](http://www.waterconflictforum.org)).

We are deeply concerned about the all-round destruction this project can cause – the ecology of the region, the socio-cultural milieu of the people especially the Idu Mishis communities and their nature dependent livelihoods. Some of our specific arguments against going ahead with the project include:

1. The project will involve the destruction of nearly 300,000 trees in the old growth forests of a biodiversity hotspot. As you are well aware, the ecosystem services of such a forest cannot be compensated in any way by plantations or compensatory afforestation programmes. There are evidences to say that even the compensatory measures for such type of projects are sidestepped. The NGT did take suo moto cognisance of such violations including two important hydroelectric projects in Arunachal Pradesh (and this includes the controversial Dibang Multi-Purpose Project that violated indigenous rights).
2. The Dibang Valley is prone to natural hazards as it lies on a seismically active zone and also has melting glacial lakes. There are also quite a few landslides/landslips reported from the area because of heavy rains.
3. Twenty nine scientists from 16 research institutions have critically peer-reviewed the WII report and have found it to be unscientific and full of mistakes. It is our hope and plea that as an expert committee, the FAC must not base such an important decision

that can have unimaginable consequences – in fact, a decision that concerns the largest hydropower project proposed in the country – on such an error ridden report. It is important that the concerned authorities commission a fresh comprehensive study.

4. Also, evidence of tiger presence in and around the proposed project site has been ignored by WII in its report, despite evidence of the same available in both scientific literature (including a previous WII report itself) and in the local news.
5. Though the FAC claims that "almost all issues have been addressed in details by the Sub Committee and the State" as per the minutes of the FAC meeting held on 11th May 2022, there is no evidence to say that any of the concerns raised by both experts and citizens have been addressed.

As an expert body, the FAC and its sub-committees are crucial to the process of decision making on forests and it is of paramount importance that the ecological and social concerns raised by scientists and experts are addressed and recorded in the proceedings.

Apart from the above specific issues we also would like to bring to your kind notice that Dibang basin is the home of Idu Mishmi community. As you will be aware, the total population of Idu Mishmi community will be around 10,000 or so. With nearly 17 HEPs planned in the Dibang basin (Etain HEP is one of them), large number of outsiders will come into the area making the Idu Mishmis minorities in their own land and in the process destroy their socio-cultural ethos, practices, and way of life and also the biodiversity of the area. There are empirical studies that show that two-way relationship between the socio-cultural-spiritual traditions and practices in an area and its biodiversity.

In the light of the above, we are hopeful that the FAC will not allow the project to go ahead and instead it will recommend an independent, comprehensive study of the project especially its likely impact on the forest and biodiversity of the area and also the local community.

Yours sincerely,

K. J. Joy, Abraham Samuel, Chicu Lokagariwar, Eklavya Prasad, Gorky Chakroborty, Himanshu Kulkarni, Janakarajan Srinivasan, Manoj Misra, Nafisa Barot, Neha Bhadbhade, Partha Jyothi Das, R. Murali, Sarita Bhagat, Shripad Dharmadhikary, Soma K.P, S. P. Ravi, Veena Srinivasan

To,  
Dr. Sanjay Deshmukh  
Chairperson - Sub-committee of the Forest Advisory Committee

25th May 2022

**Subject: Concerns Regarding the Proposed Etalin Hydro Electric Project**

Dear Dr. Sanjay Deshmukh and Committee Members,

We write to you with grave concern regarding the proposed Etalin Hydro Electric Project (HEP) in Dibang Valley. The project is not only ecologically alarming but also socially destructive. The Etalin HEP is just one of 17 proposed mega dams on the Dibang river, and will add to the immense stress that the region will face if these dams are erected. The impact of these dams on the social and ecological fabric of the region is already unimaginable and several other organisations of the indigenous *Idu Mishmi* community [have submitted their opposition to the project too](#). We write to you in support of these local communities whose rights and needs should be put first by the government.

Before we list the concerns that we have over the proposed Etalin HEP, we want to stress that while hydropower may be considered a source of renewable energy, it is not sustainable and does not help address climate change concerns. Switching from fossil fuels such as coal to hydroelectricity creates around the same amount of damage due to the clearing of forest cover, the displacement of communities, long term impacts on river systems and ecosystems, droughts and a loss of local livelihoods. Once a dam is built, it restricts the flow of organic matter down the river and this builds up in the reservoir, releasing tonnes of methane as water is released from the dam - methane is one of the greenhouse gases most responsible for climate change. Furthermore, when local communities lose their livelihoods, they are forced to either migrate to urban centers or find work at factories etc. nearby, which reduces their standard of living and increases the pressure on the state to provide resources and jobs. India is already facing a huge unemployment crisis as thousands of people migrate to cities after being displaced from their lands due to irregular weather patterns (in the case of farmers), rising prices and economic demands, and mega-infrastructure and extraction projections (such as the Etalin HEP) that displace communities.

We want to list some major concerns we have specifically regarding the proposal of the Etalin HEP:

- The WII report that has been employed is unscientific and error-ridden. This has been confirmed by 29 scientists from 16 research institutions. Being an expert committee that is making a decision regarding the largest hydropower project in the country, the FAC must consider commissioning a fresh study that is conducted ethically and scientifically, taking into consideration local demands. [A summary of the peer review can be found here](#)
- Within the WII report, evidence of tiger presence in and around the proposed project site has been ignored, despite evidence of the same available in both scientific literature and in the local news. The tiger population in this region is genetically and behaviourally unique and we want to ask why the FAC and WII continue to ignore the importance and presence of the species. You can find more information in [this news article](#).

- The minutes of the FAC meeting held on 11th May 2022 state that "almost all issues have been addressed in detail by the SubCommittee and the State." Yet, there is no evidence that any of the concerns raised by citizens and experts have been addressed, or even considered. As an expert body, the FAC and its sub-committees are crucial to the process of decision making on forests and it is of paramount importance that the ecological and social concerns raised by scientists and experts are addressed and recorded in the proceedings. How exactly have these concerns been addressed?
- Approving the Etalin HEP in a region that is at risk to [natural hazards](#), is irresponsible and careless on the part of the FAC. Dibang Valley lies on a seismically active zone and has rapidly melting glacial lakes. It is currently experiencing dozens of landslides from the incessant rains. If the dam breaks due to earthquakes or other natural disasters, entire forests and communities will be wiped out.
- The project will involve the destruction of at least 2,80,000 trees in the old growth forests of a biodiversity hotspot. The ecosystem services of such a forest can not be compensated by plantations. It is a matter of fact that compensatory measures for such projects are sidestepped, and the NGT has taken suo moto cognisance of "[how two key hydel power projects in Arunachal were among six mega initiatives in the country, between 2004 and 2020, where stringent conditions to compensate for the high environmental impact were sidestepped, ignored or met only on paper.](#)" This includes the controversial Dibang Multi Purpose Project that violated indigenous rights.

As a group of young citizens of this country, we demand that the proposed Etalin HEP be reconsidered as per local demands and studies conducted by experts. As the next generation who will have to bear the brunt of such rash and profit-oriented decisions, we encourage you to refer to the [Save Dibang Valley FAQ page](#), compiled by several individuals, scientists and locals over years, which has resources and expert comments that explain why the proposed Etalin Hydro Electric Project should be scrapped.

Sincerely,

The Yugma Network

[www.yugmanetwork.org](http://www.yugmanetwork.org)

To,  
Dr. Sanjay Deshmukh, Chairperson, FAC subcommittee

**Subject: Protect Dibang Valley - The Etalin dam is an ecological, economic and a climate disaster**

21st May 2022

Dear Dr. Sanjay Deshmukh,

Palluyir is an [organization](#) in Tamil Nadu working actively with nature-education and conservation, especially with youth networks.

We are writing to you with a deep concern about the Dibang Valley eco-region in Arunachal Pradesh, threatened with erasure now by the Etalin hydropower project.

We want to strongly recommend that the Dibang valley landscape is protected and more comprehensive studies are done of the biodiversity and eco-sensitivity of this place.

Through our research, we wish to point out the following which calls for this -

1. The region is home to a unique tiger population which has evolved to live at high altitudes, with behavioural and genetic attributes found nowhere else.
2. The project site is seismically active, and also has rapidly melting glaciers. This has been [reported](#) extensively with evidence. The dam is both an ecological and economic hazard.
3. The project threatens to fell nearly 3 lakh old growth trees in a biodiversity hotspot, and wipe out the native lands of the Idu Mishmi - a serious violation of indigenous rights.
4. The report submitted by WII on the project has been shown false by a comprehensive paper authored by various foremost Indian scientists in this peer-reviewed [paper](#). To do justice to a vast rainforest such as Dibang, a much more intensive, multi-season and comprehensive study is a legal requisite.
5. The recently released IPCC report warns that impacts of dam construction significantly exacerbates the overall impact of changing climate on human societies and ecosystems. Moreover, it points out that the global warming potential of hydropower may exceed that of thermal power, in the tropics. In this light, Etalin dam is also an impending climate disaster.

We urge you to take these into consideration, and put the well-being of ecology and people first, and protect Dibang valley for posterity.

Yours Sincerely,

Yuvan Aves (on behalf of all trustees and team members)

Managing Trustee - Palluyir Trust for Nature Education and Research