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Reg. Welspun Energy Thermal Power PLant in Dadri Khurd, Mirzapur- Comments on Response Received from M/s Welspun Energy U.P. Pvt. Ltd. on our Representation to EAC dated 15th November, 2013

debadityo <debadityo@gmail.com> Sun, Mar 9, 2014 at 11:52 PM
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To,
The Chairman and Members,
Expert Appraisal Committee,
Thermal Power and Coal Mine Projects
Ministry of Environment and Forests

Subject: Reg. Welspun Energy Thermal Power PLant in Dadri Khurd, Mirzapur- Comments on Response Received from M/s Welspun Energy U.P. Pvt. Ltd. on our Representation to EAC dated 15th November, 2013

Respected Sir/Madam,

Kindly refer to the representation sent by Vindhya Bachao alongwith the 'Site Visit Report' dated 15th November, 2013 regarding 1320 MW Thermal Power PLant of M/s Welspun Energy U.P. Pvt.Ltd proposed at village Dadri Khurd in Mirzapur. We have received a response from the project proponent on 15th February, 2014 where they have attempted to counter the facts submitted by us to you.

We are sending our analysis and comments on the response submitted by the project proponent which is being prepared after consultation with our members. Please find attached the same in PDF document attached with this email.

By going through our comments, we are sure that EAC will find the reasons convincing enough to declare the entire EIA process false. The attempts of the company to intentionally conceal the facts, misrepresent the data and mislead the EAC is now very much clear.

We hope EAC will take a final call with respect to this project taking into account the provisions of EIA Notification, 2006 which empowers the EAC to reject the application of the project proponent if the same is based on false data.

Thanks

Regards,
Debadityo Sinha

Vindhya Bachao Secretariat
Vindhyan Ecology and Natural History Foundation
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Copy Marked to:

1. Dr. V RAJAGOPALAN
Secretary,
Ministry of Environment and Forests

2. Dr. Saroj
Director,
Impact Assessment Division
& Member Secretary, EAC
Ministry of Environment and Forests

2. Prof. Lalji Singh
Vice Chancellor,
Banaras Hindu University

Vindhya Bachao Arguments to Response from Welspun.pdf
1270K

Date: 09.03.2014

Comments on

Reply Submitted by Welspun U.P. Energy Pvt. Ltd (Recvd. on 15th February, 2014)

to

Vindhya Bachao's Site Visit Report submitted to Expert Appraisal Committee-Thermal Power Projects and Coal Mines, MoEF (on 15th November, 2013)

Total Pages- 21

Submitted to:

Expert Appraisal Committee,
Thermal Power and Coal Mines
Ministry of Environment and Forests,
Govt. of India

Submitted By

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

For details of issues raised kindly refer the Site Visit Report submitted by Vindhya Bachao on 15th November, 2013 also available online at http://vindhyabachao.org/embeds/Site_Inspection_Report_Welspun_TPP.pdf

1. The project involves forest land.

S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	There is no way one can evade forest land before reaching the project site. Transfer of coal by railway lining or even construction of road cannot happen without clearing of forest.	The approach road connecting project site from SH-5 is passing through forest land. The work for road widening will be Initiated only after grant of all statutory clearances from State Forest deportment and Forest Advisory Committee. The coal transport route will be finalized based on alternative route analysis. The route which has minimum forest land will be selected.	Referring to the MoEF OM dated 5th February, 2013 as quoted follows, this project should be not considered further for Environmental Clearance: *"Further, it would be necessary to provide details in the EIA/EMP report regarding the port for the import of coal, its capacity for coal handling, transportation of coal from port to the thermal power plant by road or rail and railway rolling stock availability etc. If it is proposed to establish port, jetty or any other coal handling facility, as also construction of road/laying of railway line, etc., the same need to be covered under the EIA/EMP report of thermal power plant."*
ii)	The bamboo plantations shown in the EIA report also belong to Forest Department. This makes the entire region except the project sites a forest area including the portion of SH 5 which has forest land on both of its side.	We agree about the fact that forest department has developed Bamboo plantation as a part of social forestry in and around the Mirzapur belt. However, we are confirming that we have neither encroached/cut any Bamboo plantation nor plan to do so in future due to our proposed project activity without statutory permissions.	Not only the project site is surrounded by forest land and the project site itself qualifies as a forest, but the biological variations inside the project site are same as it is in surrounding forest. Also, the project site itself is part of forest. The fact was discussed in EIA Report. It again makes the EIA report of no significance.
iii)	The proposed pipeline for pumping water from the river Ganga falls well within the forest land even though it Is claimed to be motorway	Water is proposed to be transported through underground pipeline network which won't affect forest area. The maintenance shaft and air vent will be on ground Therefore it will have negligible	40,00,000 liters of water per hour is to be pumped which will involve pipes of very big diameters to be laid As the project site is surrounded by forest areas including the road which is claimed to be common road by the project proponent. In such case, lying of pipelines and establishment of maintenance shaft and air vent will

		impact on forest. However We will obtain all necessary statutory clearances before initiation of project. The pipeline route has been selected considering minimum forest area.	definitely affect forest and animals. The fact was concealed in EIA Report. It again makes the EIA report of no significance.
iv)	The small spur claimed to be road by the project proponent was found to be part of forest land with a banner clearly showing Its legal condition. The said spur through the forest land meets the gate of project site which happens to be also the immediate boundary of the Forest Department. The width of the road is just 6-8 feet wide and purely a road being formed by regular passage of villagers. It is a forest road owned by Forest Department, and cannot be treated as common road. A board being put up by the Forest Department proves the fact very well	The road passing through the forest it not only connecting project site but also connecting many villages and used by villagers to access the SH-5. The road will be used after proper permission from Forest Department.	This road is a forest road and movement of vehicles is prohibited. As it is evident from the board that it should not be mistaken for a common road, it clearly shows that the EIA consultant knew about it but did not included it in the report. The project proponent must be agreeing to the fact that the road is used by villagers for accessing the road by foot and this does not cause any pollution and significant disturbance to wildlife. If this road has to be used, not only it will need widening but it will completely destroy the integrity of forest and will create immense disturbance to the wildlife. The fact was concealed in EIA Report. It again makes the EIA report of no significance.
v)	The project is not barren as claimed in the EIA report. There happens to be similar forest as found in the reserve forest area with good vegetation cover. It can be referred as mix forest with mixture of trees, shrubs and grasses.	The proposed project land area is 875 acres out of which 97.58 % is barren land, 1.78% is single crop agriculture land, 0.62 % is human settlement & 0.02 % is water body as per revenue records received from the District Administration. The project is proposed to be located in revenue land. In case of the forest land, diversion will be done as per the provision of Forest Conservation Act, 1980	As in next para it has been admitted by the project proponent itself that there are 6 Schedule I species, hence no clarification is required if this land is barren. Following points counters the claim of barren land of the project site. Presence of so much diversity of endangered animals and vast floral diversity shows there is good biodiversity inside the project site. A LANDSAT data analysis of forest cover around the world by University of Maryland accessed as on 6th March, 2014 clearly shows forest with very good forest density of around 75% in the project site and the regions surrounding it. The percent of forest cover should be done based on scientific analysis for the purpose of EIA. We want to outline the following points regarding the satellite image provided by the project proponent:

			1. The date of acquisition of the satellite data is not provided in the EIA report. 2. The initial survey and environmental baseline monitoring was carried out during the period of March, 2011 to May, 2011. This is a season of leafless for any deciduous tree species and increased chances of incidents of forest fires. Thus the landscape would more or less be dry and barren. Hence, this is not suitable period for analyzing any forestry related issues. 3. The proponent has not shown any false colour composite of the study area. 4. No vegetation type map at least showing the major forest types of the region is provided in the EIA report. 5. They have not mentioned the accuracy of the classification. 6. Besides, their survey has mentioned that *Butea monosperma* and *Zizyphus* species are dominant in scrub, *Butea* occurs in groups between there is lot of empty space, thus it gives a mixed spectral response with the soil, thus giving the appearance of a barren land. **7. In the land use map they have provided in the EIA report, it itself shows forest boundary crosses the plant site**. It also shows scrub, fallow and human settlements. Surrounded on all sides are dense forests, degraded forest and scrub. 8. As per para 3.10.203 and para 4.3.1 in the EIA report, the project site is repeatedly claimed to be barren, scrub and fallow agricultural land. However in the satellite image they have provided, there is no fallow land in near proximity and is at far off distance. 9. They have not defined in the EIA report, which definition they have followed for declaring any region as 'forest land', 'forest', 'barren land', 'fallow land' , 'degraded forest'. They should have given the reference for all those in the EIA report.

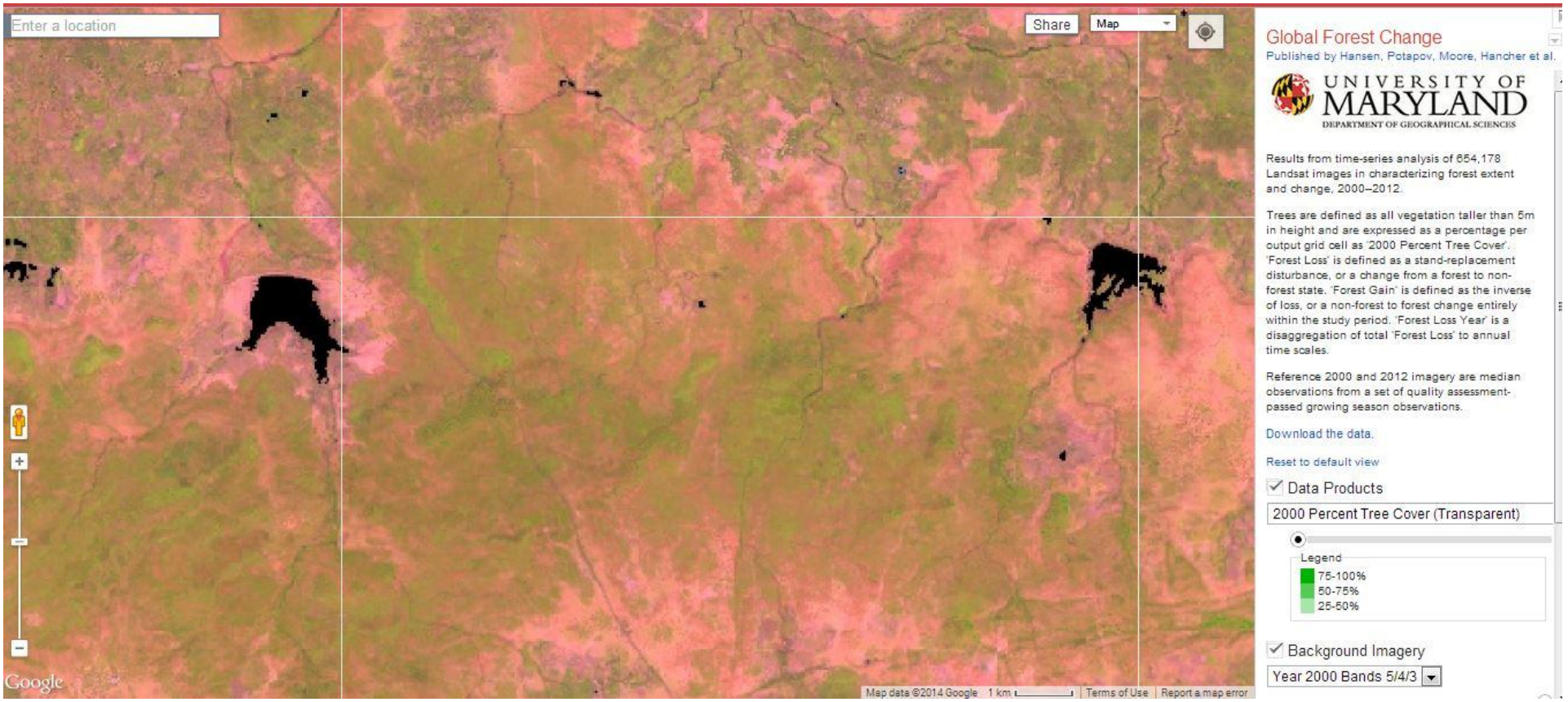


Fig. 1: LANDSAT data analysis acquired from University of Maryland-Global Forest Cover Mapping Tool

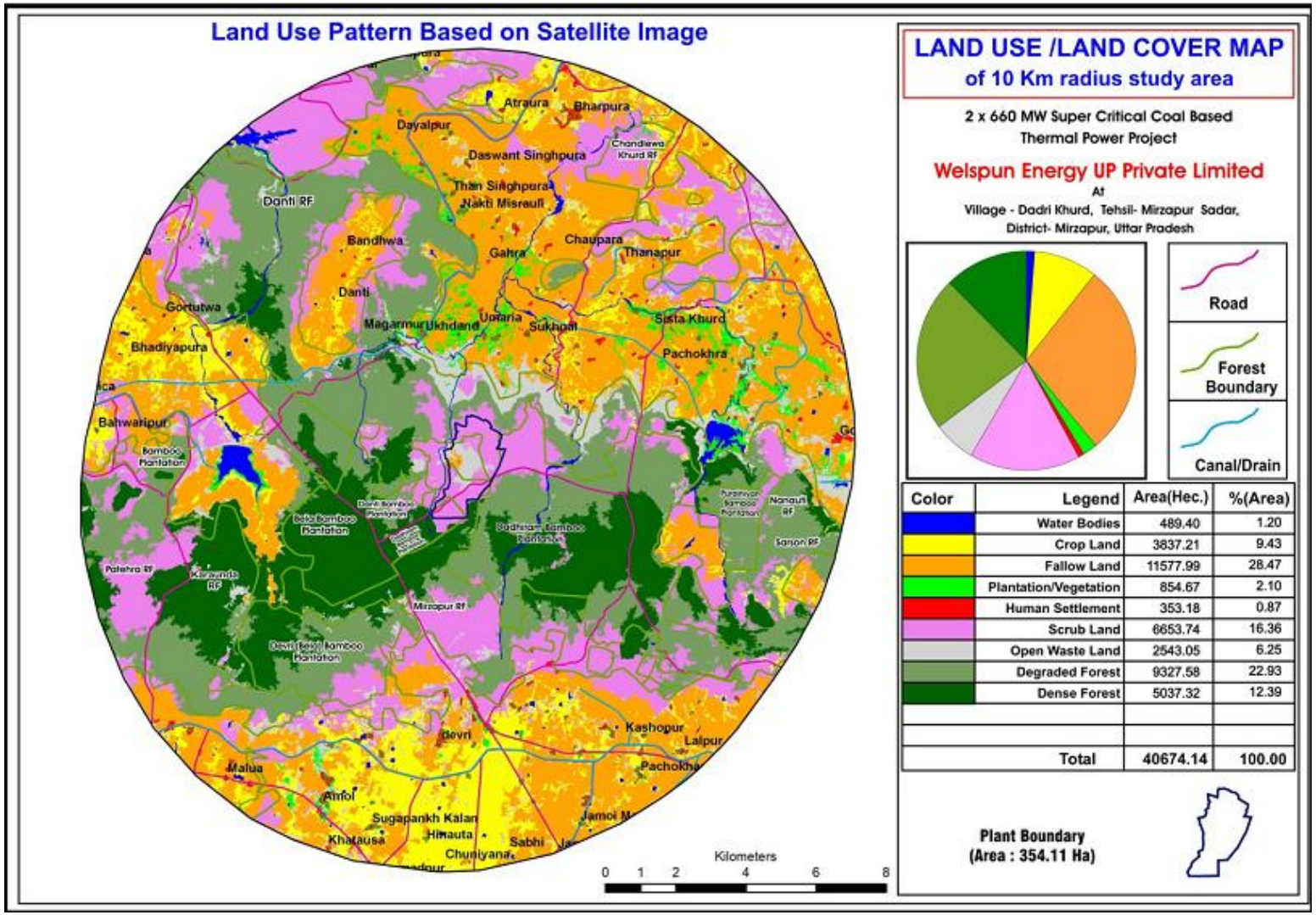


Fig. 2: Land Use Map provided in the EIA Report submitted by the project proponent

2. The project site is surrounded by critical wildlife habitat and old forests

S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	The project site is surrounded by critical wildlife habitat and old forests	The EIA study covers primary & secondary survey of flora and fauna of project site as well as study area. However, a detailed Biodiversity study is carried out by M/s Green future Foundation, a reputed organization, in which more than 73 plant species are recorded in study area which are common plant species for the region Out of these, 7 threatened floral species were recorded in the study area namely *Terminanalia arjuna* & *Boswellia seret*. During the study, 6 Schedule I fauna species were recorded in study area namely common monitor lizard. Indian Peafowl, Egyptian vulture, Four-horned Antelope, Common leopard & sloth bear. A proper Wildlife Conservation & Management Plan along with budgetary allocation of Rs. 184.15 lakh has been made & submitted to CCF (Wildlife) through DFO for their approval. Moreover, we shall also agree to any conditions stipulated by CWLW.	Presence of 6 Schedule I species in the area was never been made available in the EIA report. It is only after our report that they have accepted the presence of such species. Also, the wildlife management plan was submitted only after EAC demanded that while considering the EC in previous meeting. Again, the facts were concealed in the EIA report making it of no significance.

3. Huge impact on water resource and irreparable damage anticipated.

S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	Though the rainfall of Mirzapur District is good, but the proposed plant site lies on hilly region with very less catchment arrangement of water. In fact this is one of the reasons; the local villagers could not grow crops and suffer from poverty. Projects like Bansagar canal are being considered since a long time to solve the water problem. This true fact is well documented in the film 'Vindhyan Scourge' made by us in 2011. Scientists working at Krishi Vigyan Kendra situated in the region also accepts this fact that due to undulating landscape, catchment of water is a big issue and agriculture is done only rain based. Upper Khajuri dam and Lower Khajuri Dam are two such dams which cater to the minimum needs of the local habitants for agriculture and drinking water.	Water use agreement was signed between Irrigation dept. Govt, of UP and Welspun Energy which states that , WEUPPL has proposed to use of Upper Khajuri Dam for storing water for meeting the project's requirement and as well as to provide storage of 9.5 Million Cubic Meter (MCM) per year of water for meeting the irrigation requirement of GoUP during the lean season when no pumping is allowed from the River Ganga and GoUP has accepted the proposed scheme for mutual benefit and agreed that Water abstraction scheme shall be developed by WFIJPPI considering pumping of additional quantum of water for Irrigation Department.' Thus the water requirement for both Proposed WEUPPl project and irrigation for the lean period can be fulfilled by pumping of water from River Ganga and storing it in Upper Khajuri Dam and the local villagers will be benefited by the proposed scheme.	This Issue is incompletely presented by the project proponent. This water use agreement seems to be done exclusively for the benefit of the Thermal Power Plant and it will have more detrimental effect on water resources than to benefit them. The issues related to Ganga are discussed in next section.

4. Storing water from river Ganga in Upper Khajuri will bring more crisis!

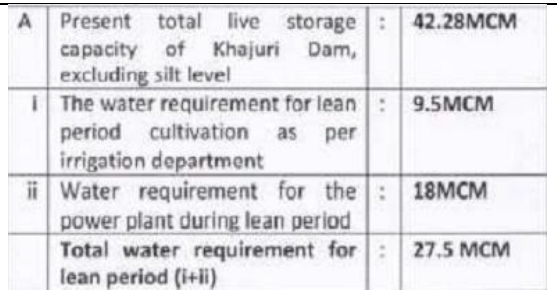
S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	The water stored in the Upper Khajuri dam is mainly rainwater free from contamination and very clean as it is the rainwater which gets stored and the suspended matters water get enough time to settle and self cleansing takes place effectively. Given the vast area and year round slow utilization of water, local people use it for drinking without any extra effort to treat the water. The availability of so much clean water is also a reason that Patehra forest has the highest wildlife diversity in entire district. Once, the water from river Ganga is pumped and started utilized, the entire system of water collection and utilization will be changed drastically. The water which was allowed to present for year around will be rapidly filled and used on daily basis. The water from Ganga will be contaminated with industrial effluents and sewage upstream which will lead the entire Upper Khajuri dam dirty, the Khajuri river and Lower Khajuri Dam and make it unfit for any other use except the power plant. The amount of water is also huge to the extent of impossible to be treated on per hour basis. An impact of this, the region including the university campus will face a huge crisis of drinking water and irrigation. Hence, we strongly suggest not to go even with the plan to fill up the dam with water of river Ganga. Another implication of sucking so much water will lead to severe impact on ecological flow of river downstream. There is expected to be a very good population of Gangetic Dolphins as witnessed by local fishermen and boat owners, though we lack any	The water requirement for power plant is 4002m^3/hr. The water from River Ganga will be withdrawn during monsoon. The Vindhya Bachao observation stated that river ecology have Gangetic dolphins and fishing population which itself indicates the intake point is free from any Industrial and domestic effluent. No major change in water quality Is envisaged In Khajuri river and lower Khajuri dam thus have insignificant impact on wildlife and human habitation except for minimal change in suspended solids. It also mentioned that river gets polluted in Varanasi which is 60 km downstream. Thus in the intake point major issue which is expected Is suspended solids In water during rainy season. The scheme envisaged for withdrawn of water from river Ganges consists of Desilting Chamber at intake point. This chamber will help the suspended solids to settle down at intake point and the De-silted water will be pumped to the Upper Khajuri Dam. In Upper Khajuri Dam again the suspended solids gets retention time. From Upper Khajuri this water will flow 7.5km downstream to reach lower khajuri. Therefore this series of settlement of suspended solids will have very negligible change in lower khajuri dam. The State Irrigation Department suggested the water drawal from Ganga which CWC has approved after detailed analysis of downstream user of river water. The water drawl from Ganges **4 lakh** llt./hr. is **0.0003%** of the total 60,000 Cu.mec. water flow in the Ganges	Presence of Gangetic Dolphins nowhere guarantees that the water is free from industrial or domestic effluent! Dolphins are found all the way from Allahabad till West Bengal including the polluted stretches of Kanpur and Varanasi. In our report we stated that the river gets further polluted in Varanasi which does not means that it is clean in Mirzapur. The water requirement according to 4000 cu.m/hour amounts to 40 lakh liters per hour. **4 lakh liters was part of a typing error in our report.** And relying on our fact simply shows the ignorance of the project proponent and non-application their mind and casual approach to serious issues. Clause 3 of the clearance letter clearly mentions that **Government of U.P shall ensure that during the lean season, the releases downstream of the existing dam remain unaffected.** It is practically impossible to have no impact on downstream of Upper Khajuri dam if this is to be used for the thermal power plant. Not only withdrawal is a problem but water quality will be also severely affected. Our major concern is also on the decision on **lean season** being given by CWC. In the CWC clearance the

	official data to confirm it. The river gets further polluted in Varanasi as well, which is just 60 Km from Mirzapur. To ensure cleansing mechanism of the river and preserving the remaining wildlife, it is very dangerous to reduce the water flow of Ganga. The envisaged quantity of water required i.e. 4 lakh liters per hour will make it to 3,50,40,00,000 liters of water per year being pumped out from the national river. This will be just creating another dam on the river, only difference being water is pumped to store to some other location that also for industrial purpose in an area where agriculture should be priority. Also, to be noted here importantly is that the elevation of the proposed project site is at 630 feets while the elevation of Upper Khajuri dam is at 510 feets. The elevation of river Ganga is around 260 feets.	during the year. Two Stage pumping is envisaged from River Ganga to Upper Khajuri/ Power Project to take care of elevation difference. Pump Head will be selected accordingly. We have done preliminary study on the pumping & Piping system keeping in view of elevation difference. Auxiliary power consumption is approx 4.2 MW which is very less (0.318 % of Installed capacity). 9.5 MCM water will be also pumped to Upper Khajuri Dam for the agriculture requirement.	lean season is mentioned as '**January to May'** while the stretch of Ganga in Mirzapur **becomes dry in November** itself which one can visually make out as well. The mean flow of any river is not uniform over the whole stretch and shows variations. The clearance letter is based on the proposal by Govt.of U.P and the environmental concerns are not reflected in it. Here we present few figures of Ganga based on data obtained from WRIS-NRSC: Water Resource Potential of Ganga: 525,020 MCM **Utilizable Surface Water Resource: 250,000 MCM** Live Storage Capacity of Completed Projects: 48,677 MCM Total Live Storage Capacity of Projects Under Construction: 7,649 MCM **Balance water: 1,93,674 MCM** Water to be withdrawn by the proposed thermal power plant: 36 MCM **Percentage of water to be withdrawn to actual capacity of Ganga: 0.02%** Not only there are numerous dams, hydro power stations, canals and other hydro engineering structures in upstream which captures the water in Ganga, the river is also severely polluted in Allahabad and Kanpur for which there must be numerous studies with MoEF as well. The river flowing from Mirzapur reaches Varanasi just 60 km downstream where it gets further polluted and lack of enough water is been always blamed for incapability of the

			river to clean its pollution. Also Terms of Reference (TOR) clause XVIII clearly asked for: *"Study on the impact on river/marine ecology (as may be applicable) due to the proposed withdrawal of water/discharge of treated wastewater into the river/creek/sea etc shall be carried out and submitted alongwith the EIA Report."* No such impact of withdrawal of water from river Ganga, impact on river Khajuri and other water sources due to the project is being done in the EIA despite of the TOR clearly says that to be done. Hence, EIA study is incomplete and being done with high level of ignorance and casual approach.
ii)	Water from Ganga to the project site will need to pump the water for more than 400 feet over a distance of 31 Km. This will involve a lot of energy to be wasted for meeting the water requirement. What is the need of the project when there is so much deficiencies in the project plan itself. Forest clearance is also envisaged in case pipelines are to be laid as they have to pass through forest land, though we don't think it will be justified to lay pipeline from the river.	The water supply for the proposed project will be through underground pipeline only ROW will be taken for the same and requisite clearance as per the provision of Forest Clearance Act will be taken	The fact that it involves forest was concealed in the EIA report, making it insignificant. Also, project cannot be considered for EC if this fact is declared later. While Environmental Guidelines of MoEF prohibit setting of thermal power plants at the cost of forests, the MoEF OM dated 31.03.2011 even prevents them to apply for TOR without applying for Forest Clearance.

5. Wrong Siting as per Environmental Guidelines of Thermal Power Stations by MoEF, place of tourism, cultural and religious importance is within 7.5 Km from project site.

S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	According to Environmental Guidelines of Ministry of Environment and Forests for Thermal Power Plants, forest land and agricultural land should be avoided for setting up a thermal power plant or for ash disposal and the location of the thermal power station should be avoided in the vicinity of places of archaeological, historical, cultural, and religious or tourist importance. Apart from involving forest and agricultural land, the proposed power plant impacts three of such sites related to tourism and cultural importance. i) Wyndham Fall, a very old and historical tourism place is revered as pride of Mirzapur. It is approx. 7 Km from the project site. Interestingly, the same water flows to Wyndham Fall which the project proponent plans to exploit for themselves. ii) The newly built south campus of Banaras Hindu University popularly known as Rajiv Gandhi South Campus spreaded over a massive area of 2700 acres is just adjacent to Wyndham fall. It is well within the 7.5 Km radius of the project site. The entire campus depends on Lower Khajuri Dam for its water requirement, which again depends on Upper Khajuri Dam. iii) Ludki Baba temple, a very ancient temple is present at a distance of 7.5 Km. This temple is very old and very important from religious point of view as	The desired water is sourced primarily from Ganga River flowing at a distance of 17 km from project site for which desired approvals have already been obtained from State & Central Government. The same is only intermediately stored at Upper Khajuri Dam, which is finally pumped to reservoir at project site. Therefore, our source of water is not common as Vindham Falls. I. Referring Point No. I, we confirm that Upper Khajuri Dam will be used as intermediate storage of water from Ganga & ultimately will be pumped to our project site after fulfilling the commitment with State Government for irrigation & other purposes of local community. II. Referring Point No. I, we confirm that Upper Khajuri Dam will be used as intermediate storage of water from Ganga & ultimately will be pumped to our project site after fulfilling the commitment with State Government for irrigation & other purposes of local community.	While no response is given on avoidance of forest land and agricultural land: I. The project proponent did not deny that there will be no impact on Wyndham Fall. II. BHU South campus is of great cultural importance and any alteration on Upper Khajuri dam will have impact on not only on Wyndham Fall which is not only important tourist site, but also of great cultural importance to the local people and students of BHU who have been very much attached to it. There is regular cleanliness drives organized by students at Wyndham fall and Kharanja fall. Any damage to the river Khajuri will have direct implication on cultural value of river Khajuri. **It has been also confirmed by the BHU after scientific assessment that using the Upper Khajuri will jeopardize the drinking water source of the campus which is connected to Upper Khajuri dam**. The same has been submitted to MoEF. III. Places of religious importance need not be archeological monument. If the

	people from very far off places visit this ancient temple.	 A Present total live storage capacity of Khajuri Dam, excluding silt level : 42.28MCM i The water requirement for lean period cultivation as per irrigation department : 9.5MCM ii Water requirement for the power plant during lean period : 18MCM Total water requirement for lean period (i+ii) : 27.5 MCM Total water requirement for power project including irrigation requirement would be meet by pumping water from river Ganges and storing In Upper Khajuri Dam and there is no conflict of interest as for as BHU and Vindham fall is concerned. III. There is no record of Ludki Baba temple In Archeological Department, Government of India as an ancient Archeological Monument (Please refer List of Monuments under District Mirzapur - S.No. 71 to 89)	project proponent would have gone through the Environmental Guidelines for Thermal Power Plants of MoEF, they would have known that places of religious importance are not necessarily part of archeological monuments. It clearly shows that the project proponent not only concealed critical information and data but did not think it necessary to even consider the Environmental Guidelines for Thermal Power Plants by MoEF. The EIA study is being done with very much casual approach and looks like the project proponent was just doing it as a formality.

6. Wrong Site Selection

S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	Apart from absence of and access of basic raw materials like coal and water both of which have to be transported, the entire siting criteria discussed in the EIA report is a question. As per Site Selection Criteria described in Chapter 2 of EIA report, the project proponent has given a point-wise justification for selecting this particular site. Point-wise contradiction is given in the following table:	EAC has approved our project site through ToR vide letter no. J-13012/112/2011 - 1A. II (T) dated 15* June 2011 on the basis of our Firm proposal on land, water and coal transportation. I The people of this area practice rainfed agriculture based on	Para 3.10.3 of the EIA report says: *Major crops of the study area are cultivated during monsoon period (Kharif crop) & in winter months (Rabi crop). Details are as follows:-* *Rabi - Wheat, Gram, Pea, Arhar, Barley,*

S. No.	EIA Report	Actual
I	Availability of adequate uncultivable and unused land for erecting power plant structures	The land acquisition has been done over multi-crop agricultural land. Rest of the land is forest, scrubland and grasslands and habitat of critical wildlife species
II	Vicinity to the railway line for laying railway siding for coal transportation	The Sakteshgarh railway station is 15 Km far. No road or railway line connects the project site to railway station. The area between project site and railway station is forest land.
III	Adequate land being available for coal storage yard	This could not be criteria for site selection. Air pollution and noise from transportation and handling of coal will have significant impact on environment and forest.
IV	Suitability of land from topography, geological aspects	It is suitable agricultural land and forest area very much suitable for herbivores. Sloth bear and monitor lizards are dominant in the project site.

information of agriculture officer, Mirzapur and Site Inspection report prepared by Vindhyan Ecology and Natural History Foundation. Therefore the proposed project will helpful of the development of the region. Out of 875 acres of the proposed project site, the maximum land is barren land (97.58 %). Only 1.78% is single crop agriculture land & **0.62 % is human settlement. The site is free from human habitation.**

II The coal transportation from the Sarsongram railway station will be done by Rail/OLBC. However, if the Coal transport corridor passes through forest land the work Initiation will be done after all statutory clearance.

III. The coal transportation form the Sarsongram railway station will be done by Rail/OLBC.

IV. The project site is proximate from this location only and has minimal impact on ecology as envisaged from this point. Out of 875 acres of the proposed project site, the maximum land Is barren land (97.58%) Only 1.78% is single crop agriculture land & 0.62% is human settlement. **The site is free from human habitation.**

Lentil, Mustard, etc.

Kharif - Paddy, Gingelly, Arhar, Minor millet, Rapseed, Black gram, Millet, Smaller millet, Green gram, Ground nut

As this information has been admitted by the project proponent itself, hence no doubt **the project site is multi-crop agricultural land. Also, this entire project site is used as a grazing land for cattle and livestock.** Now, following the 'Environmental Guidelines of Thermal Power Plants by MoEF', this area should not be used for siting of the thermal power plant.

The project proponent also contradicts its own statement of 'free from human habitation' where as it writes 0.62% human settlement in the proposed site.

We have earlier submitted that the land for the project site was acquired with help of improper means. An independent investigation on land acquisition for the project site will reveal all the facts and hence, the project proponent should have submitted all details of land acquisition, history of land records and the same shall be also made available in public domain.

	V	Proximity to Highways for transport of heavy equipments	The highway is 1.5 Km away from project site and there is no road connecting the proposed project site. Only link between SH-5 and the project site is a narrow forest road which is part of forest land.	V. The project site is 1.5 km from SH-5 in south as adduced in the Vindhya Bachao report. The forest road connecting the project site will be utilized only after complying to statutory requirements. Moreover if forest road widening is unavoidable necessary forest clearance will be token 05 per the Statute. VI. Power Evacuation from the Power Plant will be done at 400 KV level. Power generated from the station, shall be evacuated by UPPTCL from power plant 400 KV switchyard. VII. Out of 875 acres of the proposed project site, the maximum land is barren land (97.58 %). Only 1.78% is single crop agriculture land 81 0.62 % is human settlement. The site is free from human habitation. VIII. Accordingly we have ensured the infrastructural facilities to be adopted: o Water transportation through pipeline from Ganga to site via Intermediate storage In Upper Khajuri dam with firm approval from State & Central Government	As the use of imported coal was not included in the EIA report, nor impact of transportation is being properly assessed, the EIA report can be termed as useless and of no signififcance. Referring to the MoEF OM dated 5th February, 2013: "*Further, it would be necessary to provide details in the EIA/EMP report regarding the port for the import of coal, its capacity for coal handling, transportation of coal from port to the thermal power plant by road or rail and railway rolling stock availability etc. If it is proposed to establish port, jetty or any other coal handling facility, as also construction of road/laying of railway line, etc., the same need to be covered under the EIA/EMP report of thermal power plant.*" Also referring to the O.M. dated 31.03.2011 "*in case a project involves forest land, the project proponent shall first explore feasibility to execute the project without use of forest land. In case it is not feasible to undertake the project without use of forest land, the project proponent shall submit application seeking prior approval under the Forest Conservation Act, 1980 for diversion of forest land before submitting the application for grant of Terms of Reference as per the procedure stipulated in the EIA Notification 2006.*
	VI	Facility for interconnection with transmission system for evacuation of Power	There are several high transmission lines already going over the project site. There is an ongoing effort to shift those transmission lines by the Banaras Hindu University and local administration.		
	VII	Environmentally suitable, absence of sensitive areas and major settlements	Very good environmental conditions and ecologically very sensitive as only few patches of such forests are remaining. These areas should be disturbed as less as possible.		
	VIII	Availability of infrastructure facilities	There is no infrastructure suitable for setting up a thermal power plant including water and road.		

		○ 100% land is under possession with diversification to Industrial land ○ Proposed coal transportation through rail, road & conveyer belt.	*The Environment clearance to such projects, as per the guidelines of 31st March 2011, is to be issued only after stage-1 approval under the Forest Conservation Act, 1980 for diversion of forest land required for its execution is obtained."* As it is clear that there has been deliberate attempt to hide the fact of presence of forest and the project cannot proceed without involving forest clearance, there is no question of consideration of the project any more.

7. Taking Signatures by wrongly misleading people for job

S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	A very serious issue observed by our team during the visit is that the company has engaged few local people in a job to get signatures from local villagers by misleading them to ensure job in the proposed power plant. We interacted with few of the people, and what we came to know is the last date of application was told to be 15th September, 2013. When we looked upon the application form it was nothing but a tactic to get as many signatures from local people in favour of the project. A photograph of the sample of the form which is been distributed as 'Job Application' Form is attached as Annexure A (colly). The job application form comes in three pages. The translation of the first page of the form is as follows: *"We residents of the district are very happy that in Village Dadri Khurd, Tappa 84, Pargana Kantit, Tahsil Sadar, District Mirzapur, Welspun Energy UP Private Limited is establishing a 1320 MW Thermal Power Plant. This is very happy moment for us and like dream come true that the state will have an industry which is becoming industry less. This will solve the electric problem, provide employment opportunities for unemployed and will also create self employment opportunities. We all wish for starting of this project as soon as possible, so that multi-dimensional development of Dadri Khurd and neighboring villages can happen.* ***We all are with the project plan, and whosoever becomes obstruction to the project, today or in future will together voice against him and will support the thermal power plant to be established by Welspun Energy U.P. Pvt. Ltd shoulder to shoulder.*** This is nothing but misleading people for getting support by giving greed of employment to poor people. This issue should be taken very seriously by EAC and project proponent should justify why they needed to put the said document in application letter. The project is also blamed to acquire land with help of local property builders and powerful people at meager price by improper means. Farmers have shown opposition regarding the issue several times. It is blamed that the project proponent used local authorities as well to create atmosphere of fear to acquire lands. Few newspaper clippings are shown below.	The facts are wrongly presented by you. Welspun Energy Uttar Pradesh Pvt. Ltd. Received signed documents from villagers with their general opinion about proposed project. The job application was circulated in September 2013 is not related to the **proposed project.**	We have evidenced the incident and we have several witnesses also to prove that the project proponent has circulated the job application form with the front page having the declarations of support in **September 2013.** The company has been using the trick of using words to convince us and the authorities that they are not wrong. The job application form came out in 3 page format with 1st page requiring signature on the declaration of support to the project and the 3rd page saying 'Welspun Group'. Hence, the intention was very clear that the project proponent was making fools of poor people by giving false assurance of job to take support on paper. They have just taken the advantage of the lack of education and awareness of the local villagers. This issue is very serious and independent investigation and action should be initiated immediately against the company. No reply is being given on the issue put by us related to improperly acquiring land. No details of land records, their history are submitted by the project proponent.

8. Few other important issues related to the thermal power project

S. No.	Issues Raised by Vindhya Bachao	Welspun's Reply	Vindhya Bachao's Suggestions to EAC
i)	***Banaras Hindu University and local people is strongly against the project.*** Banaras Hindu University, which has its south camps very close to the project site has already showed its concern to Ministry of Environment and Forests regarding health impacts on students and impact on drinking water if the project comes. There are already several incidences of local opposition and demonstrations against setting up the power plant. A copy of the letter from BHU to MoEF is attached as 'Annexure B'.	Successful completion of Public Hearing by State Administration & Pollution Control Board is the best evidence in favor of project by local community. Welspun is keen for the environment and human value for the local community. Our EIA study reveals insignificant impact on human health due to plant activities with robust Environment & social Management Plan. Moreover, south campus of BHU and other local community does not fall under the influence area ie. 2 km (refer air dispersion model in EIA study).	The Public Hearing was done without proper publicity. We were not aware of the Public Hearing and it was never communicated properly. The people present during the Public Hearing were mostly from far off places. The local villagers were reportedly not allowed to speak and their views were suppressed. The procedure and manner in which the public hearing was conducted were not as per the EIA process demands. Moreover, the influence area cannot be decided based on only one parameter. The impact of water discharge and withdrawal, transportation and other fugitive emissions will lead to wider influence on the area. With establishment of the thermal power plant, lots of other developmental activities will take place as well. No Cumulative Impact Assessment is been done.
ii)	***No details provided where the wastewater will be discharged*** As per the EIA report, it is written that the wastewater will be utilized within the project area and excess wastewater will be discharged in a neighboring nalla. Practically no power plant can achieve the zero-waste water discharge and significant amount of water laden with ash and high temperature goes into local water body. Also, it must be noted that the project site falls in the drainage area of several rivers. River Khajuri, which is the main river in the region, is 6-7 Km from the project site. River Jamithwa is 1.3 Km, River Pahiti is 3.5 Km and River Jogiadar is 2 Km from the project site.	Estimated Fresh Water Requirement (4002 Cum/hr) works out to about 3 cum/hr MW which Is being adopted in the Industry and recommended in CEA document. ○ Water Requirement is optimized by adopting high COC of 5 for CW system. ○ Major quantity of effluent (CW blow down) shall be used In the plant. Out of 888 Cum/hr, about 860 Cum/hr shall be utilised i.e. about 96% ○ Estimated Waste Water Quantity to be disposed off is 28 Cum/hr is about O.G9%	**<u>Drinking Water Crisis</u>** As the upper Khajuri dam and rivers in the project area is free from any influence, the water is clean and is used for drinking purpose and agriculture. As per the project proponent's reply the BOD will be less than 30 mg/l which is the minimum standard for discharge of industrial effluent. According to CPCB designated best uses, this water would not even stand as category 'C', the lowest standard where one can use the water for drinking after disinfection.

	As it is evident from situation of all thermal power plants in India, thermal pollution and ash disposal is huge problem. Combating both of them is practically not achievable in any circumstances. These issues are common in any thermal power plants.	of fresh makeup water quantity of the project. o Waste water quality will be maintained while discharge in nearest nallah drain. o Expected Discharge Water Quality o PH 6.5-8.5 . TSS < 100 mg / l , COD< 250mg/l , BOD< 30 mg/l, Oil& Grease S 5 mg/l o The live storage capacity of Upper Khajuri Dam is 42.28MCM o Power Plant and Irrigation requirement of water during lean season Is 18MCM +9.5MCM-27.5MCM. o Considering 20% for loses due to evaporation, water requirement is 33MCM. o Thus, the water requirement for both power plant and irrigation during lean period can befulilled by utilizing the Upper Khajuri Dam. And there will be no impact on lower khajuri dam.	As the Upper Khajuri dam and river Khajuri is being used extensively for drinking water, this will severely affect the water quality. As the length of river Khajuri is very short, one cannot expect the self cleaning capacity of the river will be too good. Also, the water from Ganga will have very very high levels of BOD and other pollutants, which will cumulatively just jeopardize the water quality in the streams leaving this entire region in severe crisis of drinking water. Apart from that, contaminants like Zinc, Chromium, Phosphate, Copper will impose heavy threat to the water quality of the local water sources as the water will be finally discharges in local nallah which will drain into either Khajuri river or some other wetland. **Impact of IRON in water ignored** The soil in the entire project area is very rich in iron content. Using Lower Khajuri dam or any other water storing reservoir will lead to increase in iron content in the water. As per CPCB standards for Thermal Power Plants, the total Iron content should not exceed 1mg/l for boiler blowdowns. It is much anticipated that the iron content will not be maintained as per CPCB standards due to the same reason. **Impact of MERCURY and other metals is also not included when it is a very critical issue with thermal power plant with severe health hazards.**

iii)	***The Water Source for January to May is still not clear*** As per CWC condition and pointed out by EAC in its 70th Meeting, the proposed project must ensure water availability for the period of January to May as it prevents them to use water from Ganga during the said period of time. Instead of pointed out by EAC, the project proponent plans to create a temporary reservoir which storage capacity of 4 days, the water source for the reservoir will be again Upper Khajuri Dam. In such case, where is the application of EAC suggestion? And how come the construction of a reservoir for 4 days will solve the problem of water for 5 months? Creating a dam inside the project area is not going to solve the actual issue until a new alternate source of water is developed. The Expert Appraisal Committee of Coal and Thermal Projects in its 70th meeting has already raised this issue in its 70th meeting and asked for some alternate water resource. EAC clearly asked the project proponent to develop its own water harvesting structure pointing out that Upper Khajuri dam is very old built dam and using it for any other purpose other than drinking and irrigation will create conflict of interest. EAC clearly stated that the project proponent shall ensure that the power project is self-sufficient in its water requirement for which necessary water conservation practices shall be done.		The reasons and responses are discussed in previous sections.
iv)	***Coal Source still not defined*** The total coal requirement for the proposed plant will be 6.74 MTPA as per the EIA report. Regarding the source of coal it is written in the EIA report that 'the required coal will be sourced from proposed nearby coal mines such as NCL / SECL /CCL as per the availability through railway line.' It will create tremendous amount of mobile sources of air pollution from vehicles. Impact of coal dust will have larger	Application was filed for long term coal linkage from MCL/ NCl/SECL mines & submitted to MoC in 29th December, 2010. Due to delay in grant of coal linkage, WCUPPL has decided to use Imported coal from Indonesia as interim arrangement. An agreement for 5.50 MTPA coal supply is signed with Sirdi Sai Good earth International PTE Lid We will convey to MoFF further after getting firm linkage of domestic	Response is discussed in previous sections.

	impact on the human health and forests up to several kilometers. EAC has also raised the issue of uncertainty of coal availability in its 70th meeting held on 26th March, 2013, when the project proponent talked for importing coal from Indonesia due to lack of domestic coal. As there is no agreement on coal source till now, the entire justification of setting up a thermal power plant at this area is totally mindless.	coal.	

We thank our Supporters and Advisors who have devoted their precious time and energy in preparing this document.