

1. To: Hon'ble Prime Minister of India
Chairman, National Board of Wild Life
South Block, Raisina Hill, New Delhi 110 011
Via PMO portal

2. To: Hon'ble Minister of Environment, Forests & Climate Change
Vice-chairman, National Board for Wild Life
Indira Paryavaran Bhavan, Aliganj, Jor Bagh
New Delhi 110 003
Via Email

3. To: Additional Director General of Forests (Wildlife)
Member Secretary, NBWL
Indira Paryavaran Bhavan, Aliganj, Jor Bagh
New Delhi 110 003
Via Email

Copy: To Members of Standing Committee & Media

9 June, 2020

Ref: 1. Letter No. 694/FR.5/2020-4 dt/19.03.2020 from Principal Secretary, Govt of TN, to Member Secretary, NBWL
2. G.O. Ms. No. 199, Environment & Forests (FR.V. (1)) dt/3.7.1998
3. Note by Wildlife Warden, GNP
4. Wetland Action Plan -- Vedanthangal
5. Letter by PCCF dt 23.01.2020 justifying reduction of Vedanthangal WLS limits

Sir:

Through Ref. 1 cited above, the Government of Tamil Nadu has sought the concurrence of the Government of India for its proposal to "reduce the buffer zone of Vedanthangal Bird Sanctuary from 5 kms. . .to 3 km in which first 1 km to be notified as Core Zone including main lake/tank and next 2 km boundary to be notified as buffer zone and to denotify the outer 2 km zone of the existing 5km."

However the letter of Principal Secretary, Govt of Tamil Nadu has mis-stated the facts about the legal status of the Vedanthangal Bird Sanctuary. As per Ref. 2 cited above, the Government of Tamil Nadu had notified the 29.51 ha area of the Vedanthangal tank and 5 km around it as WLS as per the Wildlife Protection Act 1972.

Ref. 2 cited above makes it clear that the entire area – i.e. main lake/tank plus 5 kms surrounding the said lake – is declared as sanctuary with no distinction made for core or buffer. The G.O. also clarifies that all rights were properly settled within the limits of the sanctuary as per the provisions of WPA 1972.

The entire area – 29.51 ha plus 5 km around the tank -- is an integral part of the WLS and the letter from the Principal Secretary is actually asking to denotify an integral part of the WLS and not some "buffer zone" as mentioned in his letter. For sanctuaries, there is no "core" and "buffer." But if one were to refer to a "core" that would mean the entire spread of the sanctuary.

The area within the sanctuary – i.e tank plus 5 km surrounding the tank – includes portions of the Valluvapakkam Reserved Forest characterised by dense scrub and the Koliyalam R.F. The Vedanthangal tank derives its life from the larger wetland complex that it is part of, with the Cheyyar River to the north, the Uthiramerur tank to the west and the sprawling Madurantakam tank to its east. The sanctuary limits include within it several tanks, smaller ponds and canals, agricultural fields and scrub that together provide a variety of habitats that give this landscape the special qualities required to satisfy the scientific criteria of a sanctuary.

The integrity of the catchment and drainage of the Vedanthangal tank and the suitability of the surrounding area is dependent on the vegetation cover and land-use pattern in the region. The proposed move to denotify 2 km wide peripheral area of the existing sanctuary (the “core”) will lead to change in the land use and practices in the said area. This is contrary to the scientific and objective criteria for management of the sanctuary/wetland complex and will harm not only the birdlife and bird habitat, but also overall hydrology in the region.

The note (enclosed) by the Principal Chief Conservator of Forests justifies the denotification by citing the difficulties faced by those wanting to build or operate industries within the limits of the present sanctuary. Denotification will therefore pave the way for commercialisation and industrialisation in the region which is at odds with the conservation objectives for the sanctuary.

Indeed, commercial and industrial development appears to be the primary motivation. On May 30, 2020, Sun Pharmaceuticals submitted proposals to the Tamil Nadu State Environmental Impact Assessment Authority and to the NBWL stating that it is located 0.72 km outside the sanctuary boundary, and 3.72 km from the boundary of the lake. While making this claim, the company has considered the outer boundary as per the redrawn limits for denotification of the sanctuary in the proposal of the Principal Secretary, Government of Tamil Nadu, currently pending before the NBWL. This exposes a possible link between Sun Pharmaceuticals’ proposal and the note of CWLW.

It is a shocking fact that a number of industries, including Sun Pharmaceuticals, Ordain Healthcare, Amco Batteries etc, are located within the core area of the Vedanthangal WLS.

The Tamil Nadu State Board for Wild Life has also shown undue haste and ignored due process while recommending denotification. The decision was reportedly taken by circulation and not in a proper board meeting.

The Wetland Action Plan 2013-2018 for Vedanthangal WLS prescribes a number of measures to reduce the conflict between Forest Department and the surrounding communities. However, these measures were not implemented by the Forest Department.

We sincerely request you to reject the proposal to denotify 2 km peripheral area from the sanctuary limits. We also request you to notify suitable area around the existing sanctuary as Ecologically Sensitive Zone(ESZ) under the Environment Protection Act 1986. This will help the state Government to release some area from 10km ESZ (as per SC order) and make it available for the land use change and development.

The management plan of the said ESZ should take utmost care to protect the requirements of birds and decide the activities to be prohibited, restricted and regulated carefully. The prescriptions for sanctuary as well as ESZ must be mentioned clearly in the Wetland Action Plan. Issues such as failure to flush the tank before monsoon refill, controlling the population of invasive fish species by facilitating local fishing livelihoods and encourage return of prey fish for birds by suitable habitat management should be addressed in the plan.

A well-managed sanctuary will be a boon not merely for the wildlife but also to local communities who will enjoy the benefits of improved water availability, healthy living environment and the economic benefits of tourism.

The region has a history of bird conservation by local people. If the government is really keen to help local people, it should strive to give local communities an active, decision-making role in the management of the Protected Area. The government should build support for the long term water, biodiversity and livelihood conservation centred around this unique landscape rather than encourage a few profit seeking industries to wipe it out of existence. The government's move to shrink the sanctuary is against the principles of ecological protection and local development.

We wish to reiterate that the NBWL should:

- a) Reject the proposal of the Principal Secretary, Government of Tamil Nadu, to denotify 2 km from the core area of the Vedanthangal WLS.
- b) Direct the concerned authorities to ensure that no activities – such as operation of polluting industries – are permitted inside the WLS, and initiate enquiries to identify violators and hold errant officials and offending parties accountable.
- c) Direct the Tamil Nadu Forest Department to implement the Wetland Action Plan;
- d) Direct the Government of Tamil Nadu to declare a scientifically determined Ecologically Sensitive Zone around the existing sanctuary keeping in mind the conservation objectives and facilitating the development needs of surrounding communities without compromising the integrity of the sanctuary.

Sincerely,

(Sent by email)

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2. Asad Rahmani, PhD. (Former Director, Bombay Natural History Society)
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3. Prerna Singh Bindra, Former Member, Standing Committee, National Board for Wildlife

4. Kishor Rithe, Satpuda Foundation. Member, Maharashtra State Board for Wildlife. Former Member, Standing Committee, National Board for Wildlife

5. Ashish Kothari. Kalpvriksh, Pune

6. Neha Sinha, Conservation Biologist and Environmental Writer

7. Manshi Asher, Himdhara, Himachal Pradesh

8. Suprabha Seshan, Environmentalist, Ashoka Fellow

9. Janaki Lenin, Writer, Chengalpattu

10. S. Theodore Baskaran, Former honorary wild life warden. South India Representative of International Primate Protection League. Trustee, WWF-India
11. Romulus Whitaker, Founder of Madras Snake Park and Madras Crocodile Bank.
12. Cara Tejpal, Sanctuary Nature Foundation.
13. Bittu Sahgal, Founding Editor, Sanctuary Asia. Former Member, National Board for Wildlife, Animal Welfare Board, Maharashtra State Board for Wildlife.
14. Manju Menon, Researcher, Environmental Resource Politics
15. Kanchi Kohli. Researcher, Environmental Law and Policy
16. V. Arun. Coordinator, Student Sea Turtle Conservation Network
17. M.Yuvadeeban, Independent writer and researcher. Executive Committee - Madras Naturalists Society
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