

Dated: 7th April 2023

To

Board of Directors and Alternate Board of Directors

Asian Development Bank (ADB)

Subject: Thari Communities' Concerns on Draft Pre-Feasibility Study on the 'Potential for Energy Transition Mechanism Opportunities in the Islamic Republic of Pakistan'

We, the Thari people belonging to district Tharparkar of Pakistan's Sindh province, are writing this letter to you in connection with a pre-feasibility study on the 'Potential for Energy Transition Mechanism (ETM) Opportunities in the Islamic Republic of Pakistan' led by the Asian Development Bank (ADB). Since, as the indigenous inhabitants of Thar, we have been directly affected by coal-mining and coal-fired power generation that have brought devastation to our lives and ancestral lands, we have serious concerns regarding the scope, methodology, design, timelines and current directions of ETM in Pakistan. We have already shared these concerns with ADB's representatives and its team of consultants but to no avail. On the contrary, ADB seems set to proceed with a flawed and lopsided analytic criterion for ETM which is rigged to ensure that no Thar coal power plant is selected for early retirement or even scaling down of operations. Given the damage already caused by coal-fired power projects in our home district, this exclusion is shocking.

For centuries, we, the indigenous inhabitants of Thar, have been living a free and peaceful life in harmony with our natural world. With our *Chanwras* (thatched-roof huts), dug-wells, rain-fed farms, livestock and *Gauchars* (common grazing lands), we were the ‘originally affluent’ people in our beautiful motherland—Thar. The indigenous plants, bushes, trees, insects, reptiles, birds and animals of Thar were like our kith and kin. Every year, monsoon rains would replenish our dug-wells and regenerate vegetation sufficient for our survival and that of our animals. Grass and feedstock of our animals in our *Gauchars* would grow in abundance during the summer rains. Our happiness and that of our animals would know no bounds in this season. Even the scanty rains would be enough to sow and grow our crops—sesame, millet, guar, beans and pulses—in our *Survey* (privately-owned) and *Yaksaala* (leased) lands. This was enough to produce grain and food for our families for an entire year. Free from any restrictions, we would openly graze our sheep, goats, cows and camels in our vast and rich *Gauchars*. Our *Gauchars* were a shared communally-owned resource that tied our lives with those of our animals and the flora and fauna of our homeland. Leaving our beautiful motherland had never been our choice. Rarely, and that too in the incidence of extreme droughts, we would migrate for some months to canal-irrigated areas of our province. With news of the very first rain in Thar, we would immediately start our journey back home. Since times immemorial, we have remained unfailingly attached to our homeland—in times of both abundance and scarcity.

Then came coal-mining and coal-fired power plants and an insatiable demon was unleashed upon our motherland. Coal-based power plants have destroyed our environment, in most cases irreversibly. Due to the mining, transportation and

combustion of coal, we have been facing critical and life threatening crises of land degradation, water contamination, water scarcity, air pollution, weather changes, cattle deaths, biodiversity loss and rapidly increasing incidence of dangerous diseases. Since extensive dewatering is an essential component of open-pit coal-mining, it is ironic that such water intensive operations have been started in a water-scarce arid zone like Thar. Consequently, water table in villages around coal mines is fast depleting. Similarly 200 cusec of fresh water from Nara Canal is now being brought into Thar to quench the rapacious thirst of coal-fired power plants which, indeed, have colonized our desert lands. This water supply scheme has endangered access to water for numerous Thari villages located close its origin.

Coal-fired power plants have not only stolen water from our children and animals, they have also poisoned underground aquifers which have sustained us for centuries. Toxic water is being released both from coal mines and power plants into these aquifers through reservoirs built for duping this water. This is mainly being done in Gorano and Dukar Chou villages where wastewater produced during de-watering of coalmines and power generation is dumped routinely. Wastewater seepage from Gorano reservoir has already resulted in high toxicity levels in water found in dug-wells in neighboring villages. Contamination of groundwater in these villages has increased water-borne diseases besides degrading their land and vegetation. We have also observed how our animals writhe in distress from stomach diseases after consuming this water and how trees and shrubs have shrunk and died around the banks of these demonic reservoirs. The level of Total Dissolved Solids (TSDs) in these poisonous lakes is threatening to turn our land into a hazardous salt pan once water from them evaporates in the coming decades. Coal and power companies have also been directly injecting toxic water from mines and power plants into the underground water aquifers besides releasing it into fields and grazing lands of the villages neighboring Thar Coalfield Block-I (TCB-I) and Thar Coalfield Block-II (TCB-II). Hundreds of our sheep, goats, cows

and camels have died from drinking this toxic water. Hundreds more are suffering from decreased fertility, aborted pregnancies and pre-term births. Our own bodies testify to the effects of toxic metal poisoning of our drinking water. Incidences of arthritis and chronic gastrointestinal ailments are rising among local residents and there has been a sharp increase in body system failures and cancerous diseases which were previously unheard of in our area. At least five local people have passed away due to cancer in the last year alone.

We were told that the coal-based development was necessary to rescue Pakistan from its perennial economic and energy crises. We were also repeatedly informed that coal was the cheapest and, therefore, the most economically beneficial source of energy for our country. The government and coal and power companies promised us that coal-fired power projects would usher in an era of progress, prosperity and development for Thar and its residents. They told us that these projects would bring jobs and numerous other socio-economic benefits for the local people. They also promised us that Thar would be provided free electricity, a network of roads would be built across the desert and those living in far-flung villages of the desert would get access to high quality healthcare, education and sweet drinking water. In short, the government and coal and power companies sold us a dream of wealth, affluence and advancement in order to induce us into complying with their diktats. In reality, however, we were told to surrender our homes and lands to coal-mining and coal-fired power projects without any concrete commitment to fulfil the above-mentioned promises. We, therefore, soon realized that the dream shown to us was, in fact, a nightmare and that a terrifying man-made affliction awaited us in the guise of 'development'. We have since learnt of many other communities whose lands were similarly taken to pave way for mindless destruction in the name of development. Unfortunately, ADB itself has

been part of this destructive process— through the disastrous Chashma Right Bank Irrigation Project in southern part of Punjab province, and with its reckless decision to fund coal-fired power plants in Jamshoro in Sindh. So, we Tharis refused to give up our lands—including *Survey*, *Yaksaala* and *Gauchar*—to the coal and power companies.

Our refusal did not work. Today, thousands of acres of Thari people's lands lay captured – both within Thar coalfields (Block-I and Block-II) and beyond (in Goranao, Dukar Chaou and Vijihar villages). Thousands of families have been robbed of their *Survey*, *Yaksaala* and *Gauchar* lands. The compensation paid against these acquired lands has been next to nothing. In any case, its disbursement was restricted to cash payments only against some *Survey* lands. In complete disregard for our compensation, resettlement and rehabilitation needs, coal and power companies refused to even acknowledge our rights over *Yaksaala* lands or our stewardship and shared rights over *Gauchar* lands, false claiming that such communal lands were the government's property.

Even in the payments of compensation, the companies have treated us ruthlessly. Its rate was fixed at a pittance and the method for its payment was entirely arbitrary, with some land owners receiving full compensation and others either getting it only partially or not getting it at all due to the complexities related to land documentation and the failures of proper record-keeping by the Revenue Department. The majority of land owners have also received only a small amount of money as the first installment after surrendering their lands and are still awaiting the remaining payment.

Our lives today testify to the dark reality that contradicts all the empty promises for our development. Coal-fired power plants have robbed us of not just our lands and homes but also of our cultural and livelihood sources. We no longer have our *Survey* and *Yaksaala* lands to grow crops. We do not have our *Gauchars* any more

to graze our animals. In the absence of *Gauchars*, we do not know where to take our animals for grazing. Many of us, indeed, have had no choice but to sell them.

The coal and power companies also promised us that at least one person from each displaced family would be given a job. This promise, too, served merely as gloss for their websites and brochures. The truth is that the majority of Tharis are excluded from whatever jobs have been created by coal-mining and coal-based power plants. The companies have adopted an employment policy which prioritizes non-locals over locals. If a company ever employs a local, he is offered only a low-paid job of office boy, gardener or watchman.

In short, coal power generation has devastated Thar beyond what words can convey. Continuity of this operations spells doom for Thar's land, its water, its air, its non-human inhabitants and its people who are its children, its stewards and its keepers. Being the direct victims of coal-fired power plants, we are appalled that our testimonies and these socioecological realities are being deliberately and nonchalantly ignored by your team, supposedly for the reason that they "fall outside the agreed scope, TORs and timeline of the ongoing ETM pre-feasibility study." Such a callous dismissal of our lived reality forces us to question the ADB's sincerity and commitment to a just transition away from dirty fuels. We have not agreed to your "scope, TOR's, and timelines", just as we did not agree to coal-fired power plants, or the pillage, plunder and destruction of our motherland. We strongly question and protest the present methodology and direction of your pre-feasibility study on ETM in Pakistan. We are, therefore, conveying to you the urgent need to amend the pre-feasibility study design and include Thar coal projects in the final ETM plans. Below we summarize our concerns once again:

- ***Coal-mining has been excluded from the study's scope:*** A number of our social, economic and environmental problems stem from ongoing coal-mining operations in Thar whereas the ADB-led pre-feasibility study has excluded the effects of coal mining from its scope.

- ***Parameters and scope for an environmental assessment of coal-based thermal power plants are inadequate and insufficient:*** The present data and analytic parameters for the assessment of environmental impact of coal-fired power plants is restricted to CO2 emissions, water stress and air pollution metrics. These parameters are wholly insufficient as they omit significant parameters including, for instance, water contamination, land degradation, long term changes in aquifer flows, local weather changes etc. The health costs, biodiversity losses and long term cumulative and interactive effects of different environmental factors associated with coal mining and coal-fired power plants must also be accounted for in order to develop a sufficient assessment of environmental costs.

- ***Draft study and consultation process ignore the spirit and principles of climate justice:*** We believe that the question of energy transition is an issue of climate justice. Restitution and rehabilitation of the victims of fossil fuel usage must, therefore, be a high priority. Full participation of communities affected by coal or any other fossil fuel and prioritization of their perspectives are indispensable for designing and carrying out any study on energy transition mechanisms. Their input must also find meaningful incorporation in the design of the consultative process, in the accountability mechanisms and in the transparency, scope, methodologies and execution of the actual study. ADB's pre-feasibility draft study purports to address matters of just transition and climate justice but in practice it has entirely ignored or disregarded our input even though we have been directly impacted by coal-fired power plants.

- ***Draft study has systematically excluded the full range of socio-ecological impacts of coal on Thar's indigenous communities from the scope of its analysis:*** As described at length, coal-mining and coal-fired power plants in Thar have resulted in a number of social impacts on local communities but these impacts remain unaddressed under the framework suggested by the draft study. This is against the spirit and principles of a just transition.

- ***Secondary data used for the study is outdated and inappropriate:*** A number of reports and studies have been carried out on the environmental impacts of Thar coal projects on local land, water and air. The draft study makes no mention of any of these studies and fails to account for their various findings. The water-related data used in the draft study, in fact, has been taken from the country-wide generic statistics, containing no information about the actual empirical impacts of coal power projects on local water bodies. We believe that relying on such weak secondary data for the draft study is totally inappropriate.

- ***The Environmental score for Thar coal plants in the MCA fails to account for the on-ground realities of heavy metal contamination of Thar's water aquifers caused by coal-fired power plants:*** Water tests have revealed alarmingly elevated levels of heavy metal toxins such as Arsenic, Selenium, Chromium, Lead, and Mercury in Thar's aquifers and drinking water samples taken from dug wells across Thar Coalfield Block II. Mercury levels, for instance, have been recorded at 9400% of the recommended limits in some villages of this area. The draft study fails to consider the long term socio-ecological effects of such heavy metal contamination and does not factor them into its analysis of environmental scores.

We hope that you will get back to us on our above-mentioned concerns regarding the ADB-led pre-feasibility study on the 'Potential for Energy Transition Mechanism Opportunities in the Islamic Republic of Pakistan'.

Looking forward to hearing from you

With regards,

Leela Ram

Advocate, Sindh High Court

On behalf of Thar Coal *Rajjounri Katth* (People's Tribunal on Thar Coal)