

To,

The Central Empowered Committee  
II Floor, Chankaya Bhawan,  
Chankayapuri, New Delhi-110021

Date: 17th September 2025

Subject: Recommendations for Consideration in the Kukrail Night Safari Case (W.P. (C) No. 1164/2023 IA no. 89433/2025, 89434/2025)

Respected Members of the Central Empowered Committee,

We are writing to you in the context of the Hon'ble Supreme Court's ongoing consideration of W.P. (C) No. 1164 of 2023 and the connected IA no. 89433/2025, IA NO. 89434/2025, IA NO. 89437/2025 relating to the proposed **Kukrail Night Safari in Lucknow**. As you have been directed by the Hon'ble Court to provide a detailed report on this matter, we wish to respectfully place before you certain **concerns and recommendations for your consideration**.

[There Is No Earth B \(TINEB\)](#) is a volunteer-driven climate collective that works on environmental awareness, citizen participation, and amplifying voices for ecological justice. Over the past months, we have been [actively engaging the public on the Kukrail issue](#) through fact-based social media campaigns, citizen outreach, and collaborative advocacy. A recent Twitter storm organized by TINEB reached over 93,000 impressions, amplifying diverse citizen voices opposed to the project.

The Kukrail Reserve Forest is ecologically unique. It houses the Gharial Rehabilitation Centre, supports diverse flora and fauna, and maintains the air and temperature of Lucknow city. The introduction of a large-scale night safari and zoo in this fragile landscape raises serious questions of legality, sustainability, and ecological prudence.

Our submission humbly seeks to draw your attention to:

### 1. Procedural and Legal Compliance:

- By its interim order on Forest Conservation Amendment Act 2023 dated [3 February 2025](#), the Supreme Court directed the Centre and States to refrain from any steps that would reduce forest area unless equivalent compensatory land is provided. However, no compensatory land can ever truly replace a living, established forest ecosystem like Kukrail with its decades-old trees, layered biodiversity, and role as Lucknow's natural climate regulator. The proposal for a night safari and zoo in Kukrail should clearly demonstrate how well established principles of environmental law such as the precautionary principle and the public trust doctrine are not being violated. The citizens of

Lucknow recognize Kukrail as an irreplaceable ecological and cultural asset. The integrity of Kukrail must be preserved in situ, not traded away for “compensatory” land or commercial spectacle.

**2. Ecological Safeguards:**

- A comprehensive biodiversity survey (fauna, flora, ecosystem) must be carried out by an independent expert body before any clearance is considered.
- The [Kukrail Gharial Rehabilitation Centre](#) is internationally recognized for reptile conservation. Any night safari project risks disturbance to captive breeding and wild populations. The wildlife conservation and biodiversity implications of the proposal need to be carefully evaluated.
- The assessment by CEC should include cumulative impacts of roads, traffic, lighting, and visitor pressure, not just the core safari infrastructure.

**3. Preservation and Accountability Measures:**

It is recommended that alternative sites outside the reserve forest be considered for large-scale safari infrastructure, while retaining Kukrail purely for conservation.

There are certain non-negotiable safeguards that must be implemented regardless of whether this project proceeds or not. These are owed to the people of Lucknow and to future generations:

- Clear plans for wildlife corridors and buffer areas to reduce habitat fragmentation to be prepared and approved in advance of any activity.
- [Independent monitoring of animal welfare \(night safaris are controversial for stress on animals\).](#)
- Clear plans with assignment and allocation of official responsibilities and legal liabilities in case of resulting damage to the forest or wildlife or any related ecological systems.

We humbly urge the Committee to do its utmost to highlight the numerous grave ecological threats posed by this proposal for night safaris in Kukrail Reserve Forest. When we are seeing dwindling biodiversity and shrinking forest spaces across the country and the world, we believe that it is of utmost importance to protect and preserve the few remaining stretches of forest and wildlife habitat across our country.

We thank you for your kind consideration and urgent attention to this matter. We would be happy to respond to any questions or share any further information that you might require.

Sincerely,

There Is No Earth B