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Citizen consumer and civic Action Group

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To,
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Dr. Jayesh Ruparelia
Dr. (Mrs.) Mayuri H. Pandya
Dr. M. V. Ramana Murthy
Prof. Dr. P.S.N. Rao
Mr. Kushal Vashist

February 5, 2019

Dear Sirs and Ma'am,

I write to you from Citizen consumer and civic Action Group (CAG), a 33 year old non-profit, non-political and professional organisation that works towards protecting citizens' rights in consumer, civic and environmental issues and promoting good governance processes including transparency, accountability, and participatory decision-making.

This is with regard to an application for consideration of the Proposed Revised Master Plan Development of Kattupalli Port, by Marine Infrastructure Developer Private Limited (MIDPL) at Kattupalli, Tiruvallur District, Tamil Nadu, which is to be considered in the 38th EAC Meeting (CRZ- Infrastructure 2 Projects), on February 6, 2019.

It is required of Project Proponents to consider alternate sites, when presenting a proposal. This has been enshrined in the MoEF's [guideline](#) for a Project Feasibility Report, which requires it to detail 'alternate sites to be considered, and the basis for choosing the proposed site, particularly the environmental considerations gone into it should be highlighted'.

For the project in question though, alternate sites have not been considered. In fact, the consultant concedes that 'no other site selection criterion has been considered' for the project, since it is a strategic location with an existing draft, reliable power supply and allows for multimodal connectivity, among other things [3.1]. This approach completely ignores the ecological sensitivity and environmental significance of the proposed project area.

Trustees

Mr. Sriram Panchu (*Senior Advocate*)
Dr. Arjun Rajagopalan (*Surgeon*)
Dr. R. Hema (*Associate Professor*)

Dr. Suchitra Ramkumar (*Doctor and Teacher*)
Dr. George Thomas (*Orthopaedic Surgeon*)
Dr. C. Rammanohar Reddy (*Economist and Editor*)
Mr. Keshav Desiraju (*IAS, ret'd.*)

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Ms. Tara Murali (*Architect*)
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This is especially significant when the Expert Appraisal Committee for Thermal Power, when deliberating about a LNG based power plant in the same locality in May 2018 for issue of ToR, noted the 'Ennore creek is already under severe anthropogenic pressure due to the several industrial establishments along the creek which have reclaimed intertidal areas, mangroves, mudflats, salt pans, etc.'. That project proponent's proposal was deferred, with the EAC asking that the proponent submit an alternate site analysis.

For the proposed master plan, the project proponent proposes that port development take place in a total area of 2,472.85 HA, including a sea reclamation of 796.15 HA. This includes the conversion of 2,807 acres of the Ennore Creek and its associated wetlands into industrial real estate for the expansion of the Kattupalli port. These areas have been earmarked as Salt Pans, Mangroves, Intertidal Areas and No Development Zone (CRZ 1-A, 1-B, CRZ III (NDZ) and CRZ IV) as per the approved Coastal Zone Management Plan 2018. Activities like reclamation for construction of such facilities is a prohibited activity in these areas.

The proponent also proposes reclamation of wetlands, including salt pans and tidal marshes. Under the Wetland Conservation and Management Rules, 2010, reclamation, setting up of new industries or expanding existing industries on protected wetlands is prohibited [4.(1)(ii)]. The Ennore Creek and its backwaters, with more than 10,000-acre water spread area, is a "protected wetland" under these Rules.

In the vicinity of the proposed project site (within 15 kms), the feasibility report notes, is land with industrial use (such as Kamarajar Port, North Chennai Thermal Power Station, IOCI bottling Plant, Chettinad Stockyard, HPCL Terminal, proposed plastic park, Cement Plants, other Thermal Power plants etc.), beside habitations. The increase in vehicular movement that will be a result of this port expansion, will further deteriorate the air quality of this region, which is already grappling from the impacts of the above-mentioned industries.

The entire backwater area area slotted for reclamation by the port falls within the 'Hazard Line' prepared by the Survey of India, taking into account the dangers of natural hazards, sea level rise due to global warming etc. Location of critical- high investment infrastructure like ports in areas degraded/damaged by climate change needs to be looked at critically.

Areas around Ennore Creek are already experiencing increased instances of flooding due to encroachments on the creek and flood plains, blocking the west



to east macro-drainage pattern. Reclamation of the backwater in this case will only further exacerbate the flooding situation in Ponneri Taluk.

Although the project feasibility report mentions that the project does not entail rehabilitation and resettlement of existing settlements [3.1], villages located on the shoreline north of the existing port- like Goongankuppam, Vairavan Kuppam, Korai Kuppam, Lighthouse Nadu Kuppam, Kadal Kanniyur, Kattupalli, Kalanji, Karungali, Arangankuppam and Thirumalai Nagar- are likely to be displaced by erosion and privatising for the port.

Bearing in mind the ecological significance of the area, we kindly urge the Expert Appraisal Committee members to

- (1) Demand that the project proponent undertake an alternate site analysis given that the wetland reclamation proposed is illegal
- (2) Undertake a site-visit of the location along with an interaction with the local communities around the proposed study area

Regards,
Sharadha Narayanan
Senior Researcher