

BEFORE THE NATIONAL GREEN TRIBUNAL

EASTERN ZONE BENCH, KOLKATA

ORIGINAL APPLICATION NO. 70/2024/EZ



News item titled "Rising Sea, shrinking sands erode vibrancy of Ganga Sagar Mela" appearing in the Hindu dated 15.01.2024

STATUS REPORT IN THE FORM OF AFFIDAVIT BY THE ADDITIONAL DIRECTOR, INSTITUTE OF ENVIRONMENTAL STUDIES AND WETLAND MANAGEMENT ON BEHALF OF RESPONDENT NO.1

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Filed by:

MADHUMITA BHATTACHARJEE

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Dated: 06.08.2024

SL. NO. 777/2024

BEFORE THE NATIONAL GREEN TRIBUNAL

EASTERN ZONE BENCH, KOLKATA



ORIGINAL APPLICATION NO. 70/2024/EZ

News item titled "Rising Sea, shrinking sands erode vibrancy of Ganga Sagar Mela" appearing in the Hindu dated 15.01.2024

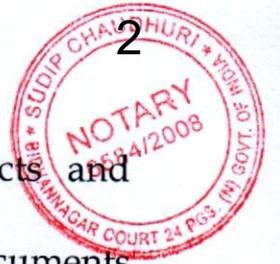
BEFORE THE NOTARY PUBLIC  
AT BIDHANNAGAR  
DIST.-NORTH 24 PARGANAS

STATUS REPORT IN THE FORM OF AFFIDAVIT BY THE  
ADDITIONAL DIRECTOR, INSTITUTE OF ENVIRONMENTAL  
STUDIES AND WETLAND MANAGEMENT ON BEHALF OF  
RESPONDENT NO.1

**Most Respectfully Sheweth**

I, Smt. Tripti Sah, D/o Mahesh Lal Sah, aged about 44 years, by faith-Hindu, by Occupation- Government Service, working as Additional Director, Institute of Environmental Studies and Wetland Management having office at DD-24, Sector-1, Bidhan Nagar, Kolkata- 700064 hereby solemnly affirm and submit as follows:

21 MAY 2024



- 1) That, I have made myself well acquainted with the facts and circumstances of instant case and have gone through the documents and reports pertaining to the subject matter of the instant Original Application. Hence, I am authorized to affirm the instant affidavit before the Hon'ble Tribunal on behalf of Respondent No.1
  
- 2) That, this affidavit is being affirmed and filed in compliance with the solemn order passed by this Hon'ble Tribunal on 23.02.2024, wherein the Tribunal was pleased to direct West Bengal State Coastal Zone Management Authority (WBSCZMA) to file counter reply in the said matter.
  
- 3) That with regard to the allegations made in the news item titled "Rising Sea, shrinking sands erode vibrancy of Ganga Sagar Mela" appearing in the Hindu dated 15.01.2024, letters were issued to Irrigation & Waterways Department, the Forest Department and District Magistrate (South) 24 Parganas requesting them to give report on the activities undertaken by them in Sagar Island countering the allegations as raised in this Application.

21 MAY 2024



4) That it is humbly submitted before this Hon'ble Tribunal that the Department of Environment, Government of West Bengal every year sanctions fund to the district authorities for eco-friendly Ganga Sagar Mela. That an amount of Rs 93,31,050/- was sanctioned by the Department of Environment during 2023-2024.

Copy of the list of projects is enclosed herewith and marked as **AnnexureR/1**

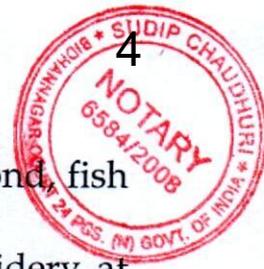
5) That under the Integrated Coastal Zone Management Project of the World Bank, the following activities were undertaken in Sagar Island keeping the Ganga Sagar Mela in perspective:

a) Erection of 30,500 poles, stringing of 1220 km transmission line and installation of 595 distribution transformers through Grid Electrification in Sagar Island.

b) Construction of Dala Arcade, Naat Mandir, Toilet Block, Bus Terminus, Eco-Camp Complex and Solid Waste Management in and around Kapil Muni Temple of Sagar Island.

c) Augmentation of water supply, livelihood generation prompted through homestead backyard poultry, duckery, piggery etc,

21 MAY 2024



fishery based activities strengthened with desiltation of ponds, fish cultivation, hygienic fish drying etc, stitching and embroidery at the household level by the womenfolk.

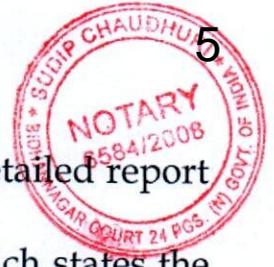
- 6) The Forest Department reported that to arrest / mitigate the fragile landmass at Sagar Island during 2018-19 to 2023-24, 24 Parganas South Forest Division has undertaken close to 373 Ha of coastal shelter belt plantation works in and around Sagar Island.

In a similar manner, in the adjoining district, Purba Medinipur Forest Division has undertaken 232 Ha of coastal shelter belt plantation works for *interalia* stabilizing the soil regime of the island and reducing erosion.

In addition, 100 Ha of mangrove plantation works have been taken up and executed by Purba Medinipur Forest Division in Beliary Char Mouza through CSR funds of Indian Oil Corporation (Haldia Refinery unit).

Copy of the report of Forest Department is annexed herewith and marked as **Annexure R/2**.

21 MAY 2024



7) The Irrigation & Waterways Department has given a detailed report answering the allegations raised in this Application which states the following:

- The administration has put up warning signs encircling the tetrapods, which is 510 m away from the temple towards the waterside. These signs have been put up to avoid mishaps in & around the tetrapods especially during high tides.
- The tetrapods have been placed in a small stretch near the area where pilgrims take a dip in the water/sea. This is unlike the tetrapods that have been deployed at East Midnapore Digha beach front where the entire coastline has been protected by using the tetrapods.
- Char land has been formed in between transmission tower nos. 2 & 3 in river Muri Ganga & is extending upstream towards Ghoramara island & downstream towards Kankramari.
- Average annual expenditure of **Rs. 18.70 Crore** (Approx) has been incurred in last five years, upto 2023-24, for dredging of ferry route between Lot - 8 to Kachuberia. Dredging has been carried out to designated channels - 1 & 3 only on Lot-8 at

21 MAY 2024



Kakdwip side of Muriganga river in between Jetty No. 56 and LCT jetty. Total length of dredged channel is 2.90 Km. Due to sudden formation of char land in between Transmission Tower No. 2 & 3, additional dredging in the extended portion of Channel-1, being demarcated as Channel-2A and 3A, is done during Dec'23 & Jan'24 for a length of 650m.

- No permanent structure/s have been constructed by Irrigation & Waterways Department in and around the Mela ground, but for a few palliative nature of works for filling small ditches have been carried out time to time for installation of temporary establishments by different Departments of Govt. of West Bengal for smooth conduction of Gangasagar Mela. Dumping of Tetrapods and Geobags are to control erosion of sea beach, which are permissible activities in CRZ under CRZ Notification, 2011.
- Notably accretion has also taken place towards the left side of Pilgrim Road No. 1 before Gangasagar Mela'24 probably due to littoral drift which may be attributed to placement of Tetrapods in between Pilgrim Road No. 1 and 3 and pilgrims were able to

21 MAY 2024



take holi dip during Gangasagar Mela'24 in this accreted portion forming sea beach which was not existing earlier.

Copy of the Report of the Irrigation & Waterways Department is annexed herewith and marked as **Annexure R/3**.

8) That as District South 24 Parganas is a Respondent No.3 in this case, and shall file a separate affidavit.

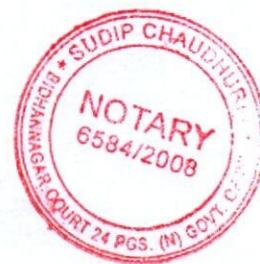
That the reply is true to my knowledge and belief, which I have derived from the office records placed before me.

  
S. CHAUDHURI  
\*NOTARY\*  
GOVT. OF INDIA  
Regd. No.-6584/08  
Bidhannagar Court  
Dist.-North 24 Pgs.

  
DEPONENT

21 MAY 2024

## VERIFICATION



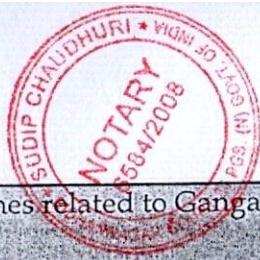
I, Smt. Tripti Sah, Additional Director, Institute of Environmental Studies and Wetland Management, do hereby solemnly affirm and declare that the contents of the report in the form of affidavit are true to the best part of my knowledge and belief. No part of the report is false and nothing has been concealed.

Verified at Kolkata this 21<sup>st</sup> day of May, 2024.

*Tripti Sah*  
DEPONENT

*S. Chaudhuri*  
S. CHAUDHURI  
\*NOTARY\*  
GOVT. OF INDIA  
Regd. No.-6584/08  
Bidhannagar Court  
Dist.-North 24 Pgs.

12 1 MAY 2024



Government of West Bengal  
Environment Department

Annexure R/1

9

List of Projects related to "Green Gangasagar Mela 2024"

| Sl No.       | Schemes related to Gangasagar Mela 2023  | File No.          | HoA                        | Amount released     | Sanctioning G.O                |
|--------------|--|-------------------|----------------------------|---------------------|--------------------------------|
| 1            | Awareness Mascot for building awareness during Eco-Friendly & Green Ganga Sagar Mela 2024.   | 29012(14)/19/2021 | 16-3435-03-003-001-31-02-V | 9,50,000.00         | I/466663/2023 dated 21.12.2023 |
| 2            | Distribution of Eco friendly Compostable Carry Bags among pilgrims at Gangasagar, kachuberia, Rudranagar and Chemaguri in Ganga Sagar Mela 2024.   | 29012(14)/12/2020 | 16-3435-04-103-004-31-02-V | 9,51,000.00         | I/465833/2023 dated 19.12.2023 |
| 3            | Distribution of Bio-degradable organic Bags for carrying Puja materials among the shops of Dala Arcade and other shops at Gangasagar, Kachuberia, Rudranagar and Chemaguri during Ganga Sagar Mela 2024. | 29012(14)/22/2021 | 16-3435-04-103-004-31-02-V | 9,75,000.00         | I/466647/2023 dated 22.12.2023 |
| 4            | Tableaus for building awareness during Eco-friendly & Green Gangasagar Mela 2024.  | 29014(11)/10/2022 | 16-3435-03-003-001-31-02-V | 9,50,000.00         | I/469835/2024 dated 03.01.2024 |
| 5            | Distribution of Eco friendly Compostable cutlery items (plastic cup, plate glass, spoon etc.) among temporary food stalls at Gangasagar, kachuberia, Rudranagar and Chemaguri in Ganga Sagar Mela 2024.  | 29012(14)/14/2020 | 16-3435-04-103-004-31-02-V | 5,81,250.00         | I/469919/2024 dated 03.01.2024 |
| 6            | Sagar Prahari--The frontline volunteers for distribution of eco-friendly materials and plastic exchange programme at Gangasagar area during Gangasagar Mela 2024   | 29012(14)/11/2020 | 16-3435-04-103-004-31-02-V | 9,79,200.00         | I/469535/2024 dated 29.12.2023 |
| 7            | Sagar Prahari--The frontline volunteers for distribution of eco-friendly materials and plastic exchange programme at Kachuberia & Benuban area during Gangasagar Mela 2024                               | 29012(14)/11/2020 | 16-3435-04-103-004-31-02-V | 9,99,600.00         | I/469509/2024 dated 29.12.2023 |
| 8            | Information Education and Communication (IEC) for Eco-friendly & Green Gangasagar Mela 2024.   | 29012(14)/9/2020  | 16-3435-03-003-001-31-02-V | 9,75,000.00         | I/466672/2023 dated 22.12.2023 |
| 9            | Run Paa for building awareness during Eco Friendly & Green Gangasagar Mela 2024.   | 29012(14)/24/2023 | 16-3435-03-003-001-31-02-V | 9,75,000.00         | I/470960/2024 dated 05.01.2024 |
| 10           | Supply and installation of Debris Barrier to arrest trash from 1 no. sea beach to 5 no. sea beach de novo  | 29012(14)/20/2021 | 16-3435-04-800-002-31-02-V | 9,95,000.00         | I/471178/2024 dated 05.01.2024 |
| <b>Total</b> |  |                   |                            | <b>93,31,050.00</b> |                                |

Government of West Bengal  
Department of Forest

10

No. 635-For/2024

Date: Kolkata, 05<sup>th</sup> Apr 2024To:  
The Director,  
IESWM &  
Member Secretary, WBSCZMASub: Response of the Forest Department in the light of Orders of NGT in OA  
No. 160/2024

Ref. Your Memo No. 033-T-11-04/38/2024 dt. 04/04/2024

- Order of the Principal Bench of hon'ble NGT in OA No. 160/2024 based on their suo moto cognizance of an article in a news magazine, "The Hindu".
- Article published in The Hindu on 15/01/2024 on 'Rising sea, shrinking sands erode fair of Gangasagar Mela'.
- Record of Discussion held on 18/03/2024.

Sir,

- Reference to the subject cited above, you are hereby informed that during 2018-19 to 2023-24, 24 Paragans South Forest Division has undertaken close to 373 Ha of coastal shelter belt plantation works in and around Sagar Island.
- In a similar manner, in the adjoining district, Purba Medinipur Forest Division has undertaken 232 Ha of coastal shelter belt plantation works for, inter-alia, stabilising the soil regime of the islands and reducing erosion.
- In addition, 100 Ha of Mangrove plantation works have been taken up and executed by Purba Medinipur Forest Division in Beliary Char Mouza through CSR Funds of Indian Oil Corporation (Haldia Refinery unit).
- Copies of year-wise plantation done by the respective Forest Divisions are attached for your perusal.

Yours faithfully

Sr. Deputy Secretary to the Government of West Bengal

Encl. As stated above.

No. 635-For/2024

Date: Kolkata, 05<sup>th</sup> Apr 2024

Copy for information to:

The Principal Chief Conservator of Forests &amp; Head of Forest Force, West Bengal.

Sr. Deputy Secretary to the Government of West Bengal



Government of West Bengal  
 Directorate of Forests  
 Divisional Forest Officer  
 24 Parganas (South) Division  
 4<sup>th</sup> floor, New Administrative Building  
 12, Biplabi Kanallal Bhattacharjee Sarani  
 Alipore, Kolkata - 700 027.  
 Tele & fax: (033) 2479 9032,  
 Email -



No 558/200/86-3

Date: 04.04.2024

To,  
 The Chief Conservator of Forest, PGLI  
 Arayan Bhavan, Salt Lake

Sub : Mitigation measures regarding the protection of fragile landmass at Sagar island

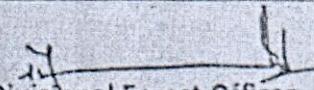
Ref : Memo no 031-T-II-04/38/2024, dated 28.03.2024

Madam,

In a response to the first changing landscape of Sundarban and formation of char land at Sagar, the following measures have been taken to arrest /mitigate the fragile landmass at Sagar Island by South 24 Parganas Forest Division

| Year      | Type of Plantation                                | Location     | Area    |
|-----------|---|--------------|---------|
| 2018-2019 | Creation of non mangrove avenue plantation        | Sagar Island | 22.9 Km |
| 2018-2019 | Creation of non mangrove Institutional plantation | Sagar Island | 1.87 ha |
| 2019-2020 | Creation of non mangrove avenue plantation        | Sagar Island | 16 Km   |
| 2020-2021 | Creation of Mangrove Plantation                   | Sagar Island | 165 Ha  |
| 2020-2021 | Creation of Non Mangrove strip plantation         | Sagar Island | 10 Ha   |
| 2021-2022 | Creation of Mangrove Plantation                   | Sagar Island | 166 Ha  |
| 2021-2022 | Creation of Coastal Shelter Belt Plantation       | Sagar Island | 20 Ha   |
| 2022-2023 | Creation of non mangrove avenue plantation        | Sagar Island | 8 km    |
| 2023-2024 | Creation of Non Mangrove strip plantation         | Sagar Island | 10 Ha   |

This is for your kind information.

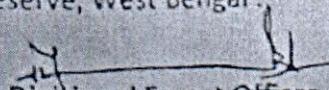
  
 Divisional Forest Officer  
 24-Parganas (South) Division

Date: 06.04.2024

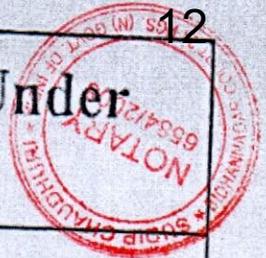
558/200/86-3

For information to:-

Chief Conservator of Forests & Joint Director Sundarban Biosphere Reserve, West Bengal.

  
 Divisional Forest Officer  
 24-Parganas (South) Division

# CSB Plantation Details Last 4 Years Under Purba medinipur Division



| Sl No. | Location Details |                      | Phy(Ha) | Creation Year |
|--------|------------------|----------------------|---------|---------------|
|        | Range            | Beat                 |         |               |
| 1      | Haldia           | Dakshin Royroynachak | 10      | 2023-24       |
| 2      | Contai           | Baguran Jalpai       | 15      |               |
|        | Total            |                      | 25      |               |
| 3      | Contai           | Junput               | 50      | 2021-22       |
| 4      |                  | Sankarpur            | 5       |               |
| 5      | Bajkul           | Khejuri              | 30      |               |
| 6      |                  | Nandigram            | 15      |               |
| 7      | Haldia           | Balughata            | 25      |               |
|        | Total            |                      | 125     |               |
| 8      | Contai           | Junput               | 22      | 2020-21       |
| 9      |                  | Sankarpur            | 10      |               |
|        | Total            |                      | 32      |               |
| 10     | Contai           | Junput               | 30      | 2019-20       |
| 11     | Bajkul           | Nijkasba             | 10      |               |
| 12     | Haldia           | HQ                   | 10      |               |
|        | Total            |                      | 50      |               |
|        | WC Gr.Total      |                      | 232     |               |

In additional to this 100 ha Mangrove plantation is done at Beliary Char, Haldia Funded by IOCL under Purba Medinipur division.

  
 (Dr.A.P.Singh, IFS.)  
 Chief Conservator of Forests,  
 Western Circle, West Bengal.



Government of West Bengal  
Irrigation & Waterways Department  
Jalasampad Bhavan 3<sup>rd</sup> Floor, Salt Lake, Kolkata-700091



No. 1017-IE-2L-04/2024

Date: 09.04.2024

From: Joint Secretary to the Government of West Bengal

To:  The Director, IESWM & Member Secretary, WBSCZMA

**Sub:** Furnishing report in reference to the Order dated 23.02.2024 of the Principal Bench of the Hon'ble NGT passed in O.A. No. 160/2024 in the matter of News Item titled "Rising sea, shrinking sands erode vibrancy of Ganga Sagar Mela" appearing in the Hindu dated 15.01.2024

**Reference:** Your Office Memo No. 032-T-II-04/38/2024 dated 28.03.2024 and No. 034-T-II-04/38/2024 dated 04.04.2024

Enclosed please find herewith A Report (marked as **Annexure-A**) in reference to the Order dated 23.02.2024 of the Principal Bench of the Hon'ble NGT passed in O.A. No. 160/2024 in the matter of News Item titled "Rising sea, shrinking sands erode vibrancy of Ganga Sagar Mela" appearing in the Hindu dated 15.01.2024, which is self explicit.

Encl: As Stated.

  
Joint Secretary to the Government of West Bengal

No. 1017/1(2) -IE

Date: 09.04.2024

Copy forwarded for information and necessary action to:-

1. The Chief Engineer (South), Jalasampad Bhawan, 1<sup>st</sup> Floor, Salt Lake City, Dist.- North 24 Parganas, Pin-700091
2. The Superintending Engineer, Eastern Circle, Jalasampad Bhawan, 8<sup>th</sup> Floor, Salt Lake City, Dist.- North 24 Parganas, Pin-700091

Joint Secretary to the Government of West Bengal

|             |         |
|-------------|---------|
| W.B.S.C.ZMA |         |
| Dkt No.     | 06      |
| Pg. No.     | 20      |
| Dt.         | 18/4/24 |

## Reply of I&amp;W Dept.

1. "... administration has put up warning signs on the beach..."

a) Where are these warning signs put up and how far from the temple? - (action DM office)

Ans: Warning signs were put encircling Tetrapods nearly 510m away from the temple.

b) When were they put up i.e. in which year?-(action DM office)

Ans: They were put before starting of Ganga Sagar Mela-2024.

c) Whether pilgrims have been diverted to other beach.-(action DM office)

Ans: Beach has no separate nomenclature in front of temple. To avoid mishaps in around Tetrapods, pilgrims were requested to take holy dip away from it.

d) Reasons for putting up warning signs. - (action DM office)

Ans: Avoid mishap during high tide.

2. "We cannot fight nature" statement by MIC, Irrigation & Waterways Deptt.

Reference of his statement & context (action Environment Dept. to coordinate with the I&W Dept).

Ans: Every year this part of the world witness medium to major cyclonic activities and each cyclone left some imprint. Morphological changes have also been observed after hitting of major cyclone like 'YAAS', 'AMPHAN' etc. and apparently this was the intention of the statement of MIC, Irrigation & Waterways Department.

3. Tetrapods

Govt. of West Bengal has put up Tetrapods to arrest sea erosion at Sagar Island.

a) Location of such tetrapods is to be shared. - (action DM office)

Ans: Location of Tetrapods shared.

b) Extent of protection dimensions (compare with East Midnapore Digha beach front protection) - (action Environment Dept with the help of IESWM)

Ans: Since both the beaches have its different importance and Geo-morphological characteristics, naturally protection of Digha beach cannot be compared with beach in front of temple at Sagar Island. Further, due to compulsion of taking holy dip of pilgrims almost all through the year protection like Digha cannot be applied at Sagar.

4. Fast changing landscape of Sundarban and formation of char-land at Sagar.

a) Location of such a Char land that has been formed. - (action DM office)

Ans: Char-land has been formed in between Transmission tower number 2 & 3 in river Muriganga and it is extending upstream towards Ghoramara Island and downstream towards Kankramari.

b) Forest protection measures on Char lands of Sagar Island - (action DM office & Environment to take up with the Forest Dept.)





Ans: Not related with Irrigation & Waterways Department.

**5. Rs.25 Crore has been spent on dredging of Sagar Island.**

a) Where all has dredging been done in the past 5 years at Sagar Island? - (action DM office)

Ans: Dredging has been carried out to designated channels-1 & 3 only on Lot-8 at Kakdwip side of Muriganga river in between Jetty No-5 and LCT jetty.

Total length of dredged channel is 2.90 Km.

Due to sudden formation of char land in between Transmission Tower No. 2 & 3, Additional dredging in the extended portion of Channel-1, being demarcated as Channel-2A and 3A, is done during Dec'23 & Jan'24 for a length of 650m.

b) How much money has been spent on dredging in Sagar Island annually? - (action DM office & Environment Dept to take up with the I&W Dept).

Ans: Average annual expenditure of last five years – Rs.18.70 Crore (Approx) upto 2023-24 for dredging of ferry route between Lot-8 to Kachuberia.

**6. Earlier temples of Kapil Muni have gone under the Sea.**

a) Date of construction of Kapil Muni Temple that stands today. - (action DM office)

Ans: Not available with Irrigation & Waterways Department.

b) Plot no. & land details of the temple. - (action DM office)

Ans: Not related with Irrigation & Waterways Department.

**7. "There were sand dunes & vegetation that were cleared and flattened for Mela Ground and therefore since these barrens were removed, attacks of waves increased."**

a) After CRZ Notification 2011 all construction that  
i) has been undertaken

or

ii) allowed from and around the Mela Ground. -(action DM office)

Ans: No permanent structure/s have been constructed by Irrigation & Waterways Department in and around the Mela ground, but for a few palliative nature of works for filling small ditches have been carried out time to time for installation of temporary establishments by different Departments of Govt. of West Bengal for smooth conduction of Gangasagar Mela. Dumping of Tetrapods and Geobags are to control erosion of sea beach, which are permissible activities in CRZ under CRZ Notification, 2011.

b) Supply of CRZ 2011 Map of Sagar Island to DM Office. (action IESWM)

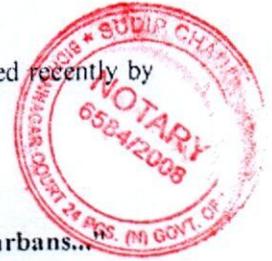
Ans: Not related with Irrigation & Waterways Department.

c) Whether permissions undertaken for such construction? - (action DM office)

Ans: Not related with Irrigation & Waterways Department.

8. "Most of the construction of Sagar Island has been done violating the CRZ", said Prof. 16 Ghosh.

CZMP 2019 is being readied by updating CRZ 2011 & shoreline maps provided recently by GOI. By when will this reconciliation be done? - (action IESWM)



Ans: Not related with Irrigation & Waterways Department.

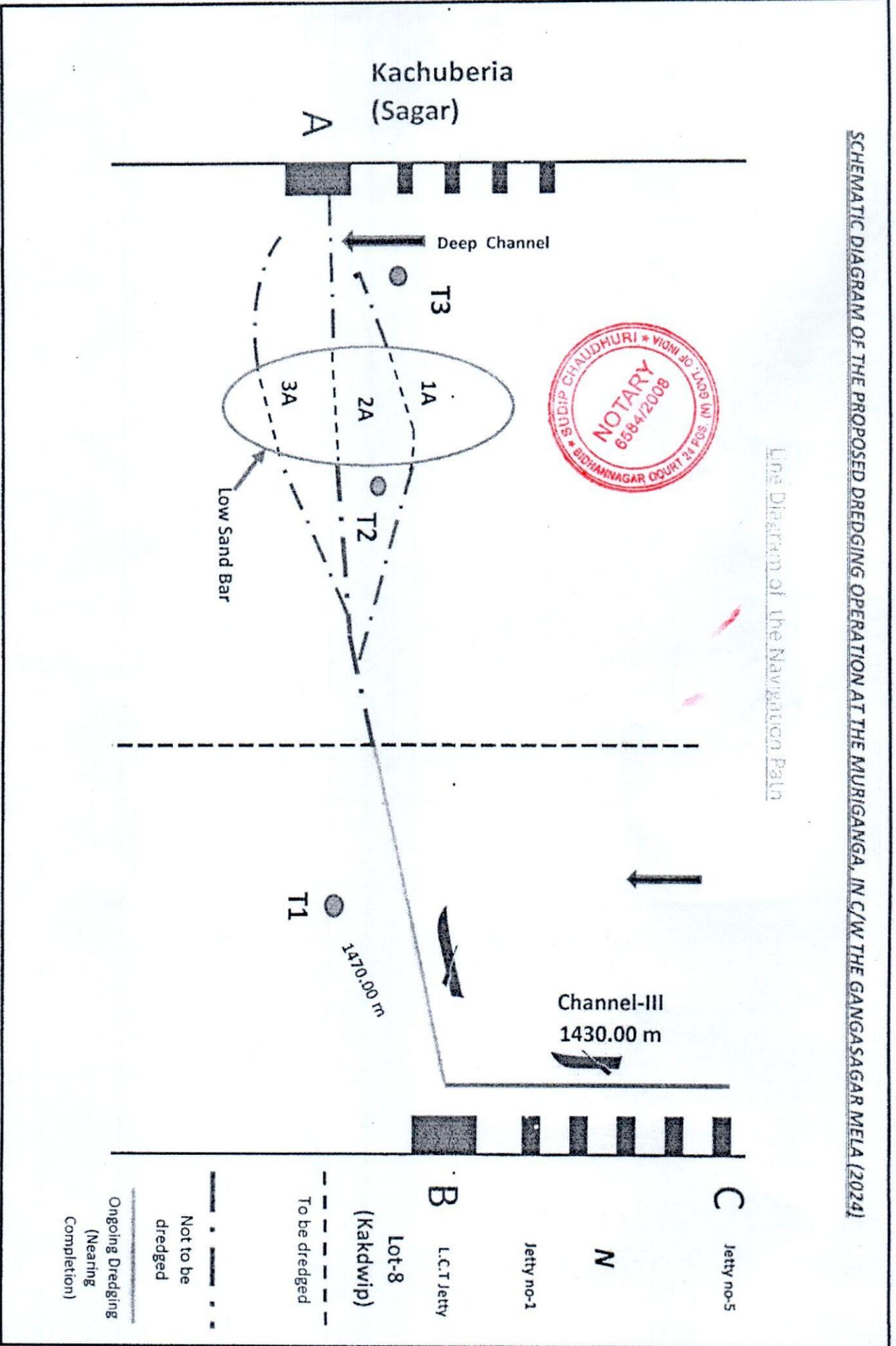
9. "...Accretion of landmass towards Bangladesh. We are losing land in Sundarbans..."
- a) Farakka Water Treaty & Ocean current effects on this phenomenon. - (action Environment Dept.)

Ans: Farakka water treaty has been formulated in accordance with National strategies in between two neighboring countries for mutual benefits of people of India as well as of Bangladesh. Since operation of Farakka Barrage came in picture, there are so many activities in relation to fetching of river water for use of various industries starting from Farakka itself up to confluence of river Hooghly to Bay of Bengal, for drinking water projects, for irrigation of agricultural lands and many more other seen/unseen activities also affected the discharge carrying capacity of river Hooghly, affecting both the flow and silt load of the Hooghly river including its tributaries/erstwhile branches. Ocean currents and other active morphological activities are also responsible for change in land mass on Indian side. It requires thorough studies by river/ocean experts like Chennai IIT/Kharagpur IIT etc.

Notably accretion has also taken place towards the left side of Pilgrim Road No.1 before Gangasagar Mela'24 probably due to littoral drift which may be attributed to placement of Tetrapods in between Pilgrim Road No. 1 and 3 and pilgrims were able to take holi dip during Gangasagar Mela'24 in this accreted portion forming sea beach which was not existing earlier.

9/1/2024

Line Diagram of the Navigation Path



- C Jetty no-5
- N
- Jetty no-1
- B L.C.T Jetty
- Lot-8 (Kakdwip)
- - - - - To be dredged
- . - . - . Not to be dredged
- . - . - . Ongoing Dredging (Nearing Completion)