

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTH ZONE AT CHENNAI  
MEMORANDUM OF APPLICATION**

**(Under Sections 14, 15 read with 18(1) of the National Green  
Tribunal Act, 2010)**

**Application No. 183 of 2023**

R.L. Srinivasan

....Applicant

Vs.

TNSCZMA & Ors

... Respondents

**MEMO FILED BY THE APPLICANT**

The applicant submits as follows:

1. The Ennore oil spill has had a debilitating impact on birds, especially diving birds like Pelicans, Cormorants and Darters. Pelicans are the largest waterbirds in Tamil Nadu and are a Near threatened species. They also nest in good numbers around Ennore wetland. Over the last 12 days black oil-drenched Pelicans are being seen across Chennai. Pelicans have a diurnal local migratory pattern - moving from Pulicat/Ennore South to Cooum, Adyar, Pallikaranai, upto Muttukadu and then flying back.
2. Yesterday, Palluyir trust conducted a survey of Pelicans which have moved from Ennore South into Cooum and Adyar. A total of 18 oil-drenched birds were seen. Their feathers were highly matted, and several birds showed difficulty fully-stretching their wings and signs of hyperthermia. In oiled individuals over-preening was also observed as an effort to remove oil from their bodies. In all birds all parts parts were covered in oil except their upper backs which remained white (this rules out them being melanistic individuals, which are very rare and cannot suddenly appear in Chennai). Two birds especially seemed very weak and near mortality. Ingestion and inhalation of toxic compounds is also most like affecting them. Oil can permanently damage the cuticle of their feathers, making birds non-waterproof and not being able to hunt for themselves again.
3. For the affected birds, the Forest department can setup a rehab centre with the help of Besant Animal Dispensary and/or Blue cross. They can tell public to report sightings of oil drenched birds to them for rescue - since they are being seen across the city's wetlands.

Dated this the 18<sup>th</sup> day of December, 2023 at Chennai



Counsel for the Applicant



