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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

IN

ORIGINAL APPLICATION No. 270 of 2025

Petitioner : Suo Motu

Versus

Respondent(s) : Kerala State Pollution Control  
Board &Ors.

**AFFIDAVIT SUBMITTED BY THE SENIOR ENVIRONMENTAL  
ENGINEER IN HEAD OFFICE ON BEHALF OF KERALA STATE  
POLLUTION CONTROL BOARD**

**Adv. Jogy Scaria**

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**ADDITIONAL STANDING COUNSEL FOR THE RESPONDENT**



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**VOLUME-I**

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Dated this the 20<sup>th</sup> day of April, 2026

**Adv. Jogy Scaria**

**ADDITIONAL STANDING COUNSEL FOR THE RESPONDENT**



**STATUS REPORT AS PER THE ORDER DATED 09.01.2026 OF THE  
HON'BLE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH IN**

**OA No. 270/2025**

**News Item titled "*Containers from sunken ship likely to drift towards  
Alappuzha, Kollam Coasts in 48 hours: INCOIS*" appearing in The Hindu  
dated 25.05.2025.**

I, Eby Varghese, Aged 55 years son of late T.V Varghese, residing at Perumbavoor, working as the Senior Environmental Engineer, Kerala State Pollution Control Board, Head Office, Pattom, Thiruvananthapuram, do hereby solemnly affirm and state as follows:

1. I am the Senior Environmental Engineer, Kerala State Pollution Control Board (hereinafter referred to as **Board**), Head Office, Thiruvananthapuram. I am aware of the facts affirmed by me in this report. I am swearing that this is the report based on the best of my knowledge, information and belief and the facts revealed from the records. I am filing this report on behalf of the 1<sup>st</sup> respondent, as duly authorized.

2. It is respectfully submitted that, this report is filed in continuation to the report filed on 21/10/2025 and order dated 09/01/2026 concerning the incident that occurred on 24<sup>th</sup> May 2025, involving the sinking of the Liberian-flagged vessel MSC ELSA-3 in the Arabian Sea, approximately 38 nautical miles southwest of Kochi.

**WATER QUALITY MONITORING CARRIED OUT BY THE BOARD TO ASSESS  
POLLUTION:**

3. It is respectfully submitted that, sampling is currently carried out in 3 districts namely Thiruvananthapuram (5 locations - Varkala Papanasam, Muthalapozy



river mouth, Perumathura, Poovar and Pallithura), Kollam (4 locations Valiyazheekal, Neendakara, Thanni and Paravur Pozhikkara) and Alapuzha (4 locations Valiyazheekal, Thrikunnappuzha, Ambalapuzha and Alapuzha). The sampling is being conducted once in two weeks at all locations and the observations and values thus obtained will be shared to National Institute of Oceanography (NIO) so that the implications, if any, pointing to environmental damages due to the shipwreck could be established scientifically.

#### **ENGAGEMENT OF CSIR-NIO AND PROGRESS OF ENVIRONMENTAL DAMAGE ASSESSMENT**

4. It is respectfully submitted that, an agreement was signed between Council of Scientific & Industrial Research - National Institute of Oceanography (CSIR-NIO) and the Board on 16/07/2025 for conducting Environmental Damage Assessment and Long-Term Study to assess the extent of Environment damage caused by the MSC ELSA-3 shipwreck incident. CSIR-NIO submitted a timeline, vide letter dated 25/10/2025, for the completion of the assessment and submission of reports to the Board. The time schedule submitted by CSIR-NIO is furnished below.

<b>SL. No</b>	<b>Work Components</b>	<b>Date</b>
1	Submission of first phase field survey report.	12 <sup>th</sup> September 2025
2	Submission of the detailed report based on the first phase field survey.	10 <sup>th</sup> January 2026
3	Submission of the second phase field survey report	28 <sup>th</sup> February 2026
4	Submission of the detailed report based on the first and second phases of the field survey.	30 <sup>th</sup> May 2026
5	Submission of the third phase field survey report.	30 <sup>th</sup> May 2026
6	Submission of the detailed final report based on all field surveys.	30 <sup>th</sup> July 2026



It is respectfully submitted that, the first phase field survey report was submitted by CSIR-NIO on 07/01/2026. Meeting of the State Level Committee for addressing the MSC ELSA-3 shipwreck pollution was conducted under the chairmanship of Director, DoECC on 13/01/2026 in which Board has sought certain clarification to CSIR-NIO regarding the first phase field survey report. A meeting was conducted with CSIR-NIO on 25<sup>th</sup> March 2026 to discuss about the clarification sought regarding the first phase field survey report. The Board is in the process of awaiting for finalized first phase field survey report by CSIR-NIO.

### **SALVAGE STATUS AND PLASTIC NURDLES COLLECTION STATUS**

5. It is respectfully submitted that, a letter dated 03/12/2025 was issued to the Kerala State Disaster Management Authority (KSDMA) requesting to provide detailed list of containers, materials and their quantity in MSC ELSA-3. In response, an email was received from KSDMA on 06/12/2025 regarding details of containers in MSC ELSA-3. As per that total quantity of plastic nurdles as per cargo manifest of MSC ELSA-3 is 1836.1 MT. Cumulative total weight of plastic nurdles collected and transported from the seashore of Trivandrum and Kollam districts during the period from 24<sup>th</sup> June 2025 to 17/03/2026 to Kollam port for storage is 398.187 metric tons.

It is respectfully submitted that, as per the detailed first-phase field survey report of CSIR-NIO, the quantity of Heavy Fuel Oil is 367 MT, Diesel Oil is 84 MT, and Lubricant Oil is 55 MT, which together sum to a total of 506 MT. As per the letter from the Directorate of General Shipping, Mumbai to Department of Environment and Climate Change (DoECC), the total quantity of oil recovered during the salvage operations has been estimated at 371.86 MT.

### **STATUS OF PREPARATION OF OIL SPILL CONTINGENCY PLAN (OSCP)**



6. It is respectfully submitted that, as stated in the affidavit filed on 21.10.2025 the Board is taking all measures to prepare Oil Spill Contingency Plan (OSCP) for shoreline cleanup for the State of Kerala. It is submitted that Work Order dated 27/06/2025 was issued to M/s. Environ Software Private Ltd. and an agreement was signed on 14/07/2025. It is respectfully submitted that M/s. Enviro Software Private Ltd. has submitted draft Oil Spill Contingency Plan including Hydrodynamic, Oil Spill Modeling, Marine Sensitivity index mapping and Net Environmental Benefit Analysis (NEBA). The draft report is to be vetted by the Committee of experts and then approved by the Indian Coast Guard before it is accepted and published.

7. It is respectfully submitted that, Board has taken all earnest efforts in delivering the duties entrusted as per the Act and Rules.

All the facts stated above are true to the best of my knowledge, information and belief.

Dated this the 20<sup>th</sup> day of April, 2026

For and on behalf of the Kerala State Pollution Control Board (1<sup>st</sup> Respondent)



  
EBY VARGHESE  
Senior Environmental Engineer

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Senior Environmental Engineer  
Kerala State Pollution Control Board  
Head Office - Thiruvananthapuram