

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE**

**APPEAL NO. 49 OF 2019**

**BETWEEN**

Protection of Environment and Public ..... Appellant  
Service Committee

**VERSUS**

Union of India & Ors ..... Respondent

**SHORT REPLY AFFIDAVIT ON BEHALF OF  
RESPONDENT NO.2 (HPCL SHAPOORJI ENERGY PVT.  
LTD.) IN TERMS OF ORDER DATED 12.02.2020  
PASSED BY THIS HON'BLE TRIBUNAL**

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FILED BY:  
Date: 14.10.2020  
Place: Mumbai



**R.B.Mahabai रघुनाथ भालचंद्र महाबळ**

BE (Mechanical), ME (Industrial Management) VJTI-Mumbai, LLM (Mumbai)  
Chartered Engineer, Fellow of Indian Institution of Engineers, IIE Arbitrator  
ex-Govt. Environmental Laboratory Analyst, NABET Accredited EIA Consultant

**Advocate National Green Tribunal**  
Bombay High Court [Roll No. MAH/349/2012]

B - 202, Chandravijay Society, Opposite Bansuri Hotel,  
Phule Road, Mulund East, Mumbai 400081, Maharashtra  
mahabal60@gmail.com 7400116222 / 022-21631573

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**APPEAL NO. 49 / 2019**

IN THE MATTER OF:

**Protection of Environment ..... Appellant  
and Public Service Committee**

VERSUS

**Union of India & Ors. .... Respondents**

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RESPONDENT NO. 2 (HPCL SHAPOORJI ENERGY PVT.  
LTD.) IN TERMS OF ORDER DATED 12.02.2020 PASSED  
BY THIS HON'BLE TRIBUNAL**

I, K. Sreenivasa Rao, aged about 55 years, hereby solemnly affirm and state as under:-

1. That I am presently the CEO of Respondent No.2-**HPCL Shapoorji Energy Pvt. Ltd.** (hereinafter referred to as the '**Answering Respondent**'). In my aforesaid capacity, I am conversant with the facts and circumstances of the present appeal and am competent and authorized to file this reply as per the directions of this Hon'ble Tribunal in its order dated 12.02.2020. Information obtained from the other Respondent namely N/s. Simar Port Ltd. is based on the information given by them.
2. I state that as per the Order dated 10.12.2019, this Hon'ble Tribunal has been pleased to direct that the present Appeal shall be listed along with Appeal No.



50/2019 (WZ), Appeal No. 30/2019 (WZ) and Appeal No. 31/2019 (WZ), as similar issues are involved in the present case. It is most respectfully submitted that the answering Respondent has filed its Reply Affidavit in Appeal No. 31/2019 (WZ). The contents thereof are reiterated and may be treated as an integral part of the present Reply Affidavit.

3. That the Appellant has filed the present appeal on 11.04.2019 seeking to challenge the Environmental Clearance and CRZ Clearance dated 05.03.2019, granted to Respondent No. 15 - HPCL Shapoorji Energy Ltd. (HSEPL) - the answering Respondent, by the Ministry of Environment, Forest and Climate Change (MoEFCC) for the project - LNG Terminal of handling capacity 5 million-Metric Ton per Year (MMTPA).
4. At the outset, the answering Respondent most humbly submits that the relevant studies by reputed institutions like CSIR-NEERI, National Institute of Oceanography, Institute of Remote Sensing, Danish Hydraulic Institute (DHI) - had been carried out and the results of those studies were available to the authorities during the consideration of the request for grant of Environmental Clearance (EC). It is most humbly submitted that the entire process of obtaining 'Environmental Clearance' and CRZ Clearance for the project was completed, by following the letter of law and true spirit of the EIA Notification as well as the abovementioned relevant studies by CSIR-NEERI, National Institute of Oceanography, Institute of Remote Sensing, Department of Heavy Industries (DHI).



5. It is further submitted that the consideration for grant of EC in accordance with the provisions of EIA while keeping in mind the supporting studies was carried out by CSIR-NEERI, and an EIA report had been prepared by them. The perusal of the EIA report prepared by CSIR-NEERI reveals that all relevant factors / material including the above-mentioned reports had been taken into account by the concerned authorities including Gujarat Coastal Zone Management Authority (GCZMA), Expert Appraisal Committee (EAC) and MoEFCC. In this process, it is most humbly submitted that the Environment Management Plan (EMP) submitted by CSIR-NEERI alongwith its EIA report, was found to be adequate and sufficient and accordingly the appropriate conditions have been incorporated in the EC to take care of the environment.
6. It is most respectfully submitted that the Appellant did not furnish the Appeal documents to the answering Respondent, either on its own or even after 2 requests sent by the answering Respondent by email on 17.02.2020 and 19.02.2020. The copy of the Appeal on 22.07.2020 has been obtained by the answering respondent by applying to Registry of this Hon'ble Tribunal.

**PRELIMINARY OBJECTION**  
**AGAINST MAINTAINABILITY**

7. It is most respectfully submitted that the present Appeal is not maintainable and deserves to be rejected by the orders by this Hon'ble Tribunal on the issue of limitation alone. It is most respectfully submitted that the Application for condonation of delay, filed by the



Appellant, contains misleading and misconceived statements on oath. It deserves to be rejected by the orders of this Hon'ble Tribunal, inter alia, on the following grounds –

<u>S. No.</u>	<u>Submission of the Appellant</u>	<u>Facts</u>
1.	The Appellant came to know about the Environmental Clearance granted for the project when he came across it while browsing the website of Ministry of Environment, Forests and Climate Change on 25.03.2019, which is 20 days after the grant of the impugned Environment and CRZ clearance	<p>That the MOEFCC had uploaded the Environmental Clearance (EC) and CRZ Clearance on its website on 5<sup>th</sup> March 2019.</p> <p>That M/s HSEPL. had advertised the receipt of EC and CRZ clearance in Times of India (English) and Kesari (Gujarati) on 11<sup>th</sup> March 2019. It is unbelievable / unacceptable that none of the 7 Committee Members of the Petitioner-Protection of Environment and Public Service Committee (PEPSC) had seen the advertisements. Further, the Petitioner had not participated in public consultation process.</p> <p>Without prejudice to the above submission, it is brought to the kind notice of this Hon'ble Tribunal that the purported resolution for filing the present Appeal by the Appellant association is dated 20.03.2019 and therefore, the contention that the Appellant had come to know of the EC and CRZ Clearance only on 25.03.2019 is not only self-contradictory but is also untrue and misleading. This clearly shows / establishes that the Appellant has made an untrue and misleading statement in its Application for condonation of Delay and has approached this Hon'ble Tribunal with unclean hands.</p> <p>This also demonstrates the conduct of the Appellant and that the present Appeal is entirely motivated and lacks bonafides. The application for condonation of delay thus deserves to be rejected on this ground alone. The answering Respondent invites the</p>



		<p>attention of this Hon'ble Court to various judgments of the Hon'ble Supreme Court including the judgment in the case of <b>Binod Bihari Singh v. Union of India, (1993) 1 SCC 572</b> wherein at page 580 thereof, the following has been laid down by the Hon'ble Apex Court:-</p> <p><i>"... 12..... Limitation Act is a statute of repose and bar of a cause of action in a court of law, which is otherwise lawful and valid, because of undesirable lapse of time as contained in the Limitation Act, has been made on a well accepted principle of jurisprudence and public policy. That apart, the appellant, in this case, having taken a false stand on the question of receipt of the signed copy of the award to get rid of the bar of limitation, should not be encouraged to get any premium on the falsehood on his part by rejecting the plea of limitation raised by the respondent....."</i></p> <p>The said principles of law laid down by the Hon'ble Apex Court would squarely apply to the present case. The Appellant would not deserve the indulgence from this Hon'ble Tribunal and the present Appeal deserves to be rejected at the threshold itself, being time-barred.</p>
2.	<p>That, after getting the copy of the Environmental Clearance it took about 3 days' time for the Appellants to hold successive meetings and discuss the future strategy, course of action in order to challenge the Environmental Clearance. It further took time of about 5 days for the Appellant to peruse through the</p>	<p>It is most respectfully submitted that the Appellant has stated that he had met the lawyers on 3<sup>rd</sup> April 2019 and took 5 days for finalizing the Appeal and 1 day for assimilating and filing the Appeal. However, it is beyond comprehension how the papers were notarized on 4<sup>th</sup> April 2019 in Pune. This clearly demonstrates that it is an untrue and misleading statement made by the Appellant in the Application for condonation of delay. It is also beyond comprehension that once the papers were signed by the Appellant and notarized on 4<sup>th</sup> April</p>



<p>records of the Project, like the Environmental Clearance, the Environmental Impact Assessment and related documents and other data since the proposed project had to be compared with the breakwater component, which had also been granted EC on the same day i.e. 5<sup>th</sup> March 2019. That further, since the Client is a resident of Gujarat, it took him some time to travel to Pune for filing procedure.</p>	<p>2019, then why were they submitted before this Hon'ble Tribunal only on 11<sup>th</sup> April 2019, i.e. 7 days after notarizing. This once again demonstrates a complete lack of bonafide on the part of the Appellant. It is respectfully reiterated that the present Appeal is entirely motivated. The Appellant, it seems, had sought to extort the answering Respondent, however, once it realized that this is not possible, the Appellant submitted the papers to this Hon'ble Tribunal in Pune, 7 days after their notarization.</p>
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8. It is most respectfully submitted that the aforesaid facts clearly demonstrate the conduct of the Appellant and would justify dismissal of the present Appeal at the threshold itself.

**BACKGROUND OF THIS PROJECT & OTHER  
RELATED PROJECTS IN THE SAME AREA**

9. It is submitted that M/s SPPL (Simar Port Pvt. Ltd.) are developing an all-weather deep-draft port at Village-Chhara Sarakhadi in Taluka-Kodinar in district Gir Somnath Gujarat in phases. MoEF&CC, after following the due process [ including a detailed and comprehensive public consultation process held on 19.11.2010 ], and after obtaining recommendations from both Gujarat Coastal Zone Management Authority (GCZMA) and the Expert Appraisal Committee (EAC), granted both the Environmental Clearance (EC) and the



CRZ Clearance for ***Phase I of the port Project*** on **06.01.2014**.

10. It is respectfully submitted that majority of the contentions raised in the present appeal pertain to the entire project for development of the Port for which the above-mentioned clearances, viz. the EC and CRZ Clearance had been granted by the respective concerned competent authorities to M/s SPPL in the year 2014. All the above-mentioned contentions raised in the present appeal are, therefore, ex-facie, time barred and the present Appeal is not maintainable.
11. It is most humbly submitted that being conscious and aware of this apparent position against maintainability of the present appeal, a camouflage has been sought to be created by the Appellant by sneaking into the present Appeal a few contentions which are related to the 2<sup>nd</sup> Phase of the Project for which the EC and CRZ Clearance have been granted to the answering Respondent on 05.03.2019. Without prejudice to the contention that even with respect to the EC and CRZ Clearance have been granted to the answering Respondent on 05.03.2019, the present appeal is not maintainable, it is submitted that by creating the façade / camouflage - in the garb of seeking to challenge the EC issued on 05.03.2019, the Appellant, in effect, is seeking to challenge the EC dated 06.01.2014 as well and when the same is not maintainable in law. As per Section 16 of the NGT Act, 2010, the period of limitation for filing an appeal against any EC is 30 days. It is, therefore, respectfully submitted that all such grounds and contentions raised by the Appellant which are governed



by the EC dated 06.01.2014 are barred by limitation and deserving rejection at the threshold itself.

12. Without prejudice to the submissions against maintainability of the present Appeal and its being time-barred, it is most humbly submitted that the facilities proposed by M/s SPPL and approved by MoEF&CC in Phase I include construction of:-

- a) **Breakwater** (Length: 1700m, Width: 75m at bottom, Height: 10m above CD level),
- b) **Berth** (One No., Length: 350m, Width: 25m),
- c) **Approach Trestle** (Length: 2265m, Width: 12m);
- d) **Capital Dredging of 1.5 million cum,**
- e) **Maintenance Dredging of 150,000 Cum per annum,**
- f) **Development of Coal Stackyard** (32 Ha), and
- g) **Allied infrastructure facilities.**

13. That Breakwater is an offshore structure [ like a wall ] which protects the harbour from the force of waves. In the present case, the breakwater is being developed at a distance of about 2500 m (or 2.5 kms) from the shoreline, and parallel to the shoreline. The EC dated 06.01.2014 granting approval to the Port project also approved the Breakwater of length of approx. 1700 m originally envisaged in Phase I of the port project.

14. That in Phase II of the port development, M/s SPPL entered into a sub-concession agreement with the answering Respondent - HPCL Shapoorji Energy Ltd (HSEPL) - a Joint Venture of Hindustan Petroleum Corporation Limited [HPCL - a Govt. of India



corporation] and the Shapoorji Pallonji Group – to develop an LNG Regasification Terminal within the port area. Phase-II of the Project had been conceived much after the public hearing / consultation and appraisal process of Phase-I of the Project had already taken place.

15. That Natural Gas is generally extracted at off-shore facilities. Thereafter, by a process of cooling [ at approx. (-)162°C ], it is converted into LNG (Liquified Natural Gas) for ease of transportation by tanker ships – since LNG occupies only 1/600<sup>th</sup> of the volume of Natural Gas in its gaseous state. LNG Regasification Terminals are used for unloading of LNG from tanker ships. In the Regasification plant, the LNG is then converted into Natural Gas for distribution through gas pipelines.
16. Further, in order to provide tranquil conditions for berthing and safe LNG unloading operations at all times of the year, there had come into existence the necessity for extending the length of the breakwater at the Port from 1700m to 4500m. As mentioned above, the breakwater is intended to dissipate the near-shore wave-energy and maintain tranquil conditions inside the harbour area to facilitate smooth and safe loading and unloading of cargo from large refrigerated vessels carrying LNG.
17. It is most respectfully submitted that the answering Respondent - M/s HSEPL applied for EC and CRZ Clearance for setting up the 5 MMTPA LNG Regasification Terminal.



18. That the Terms of Reference (ToR) EC for establishing LNG regasification facility were granted vide letter No.11-1/2014-1A-III dated 13th June 2014. That a detailed Public Hearing was conducted on 18.12.2015 wherein all concerned stakeholders were present and heard. As per the procedure stated in TOR, the EIA report was submitted by Gujarat Coastal Zone Management Authority (GCZMA) for appraisal on 12.02.2016. Thereafter, GCZMA recommended and forwarded the proposal to Expert Appraisal Committee (EAC) for CRZ Clearance vide letter no. ENV-10-2016-50-E (T cell) dated 02.02.2017.
19. That EAC recommended the grant of Environmental and CRZ Clearance vide Minutes of 18th Meeting dated 25th-27th May 2017 after due deliberations on every aspect related to environment vis-à-vis the project. After following the prescribed process under the EIA Notification of 2006 including the detailed and comprehensive public consultation held on 18.12.2015, the EC had been granted on 05.03.2019.
20. It is most respectfully submitted that LNG is used as an environment friendly green fuel, in industries, vehicles and also as raw material in fertilizer industry. It substitutes the fuels like Furnace Oil and Coal reducing load on environment. As such, the LNG terminal has its own advantage to environment throughout its entire service life by ensuring the steady supply line of green fuel to the country. Furthermore, the LNG industry has an excellent safety record in all aspects of shipping, storage and regassification. LNG has been safely transported across the world's oceans for more than 50 years.



**CONSENTS UNDER AIR AND WATER ACTS**

21. Besides and in addition to the EC, the Answering Respondent has also been granted Consent to Establish (CTE No:78045, vide letter no: GPCB/JNG-C-120/ID50585/352346 dated: 13th April 2016) under the Water (Prevention and Control of Pollution) Act 1974 and the Air (Prevention and Control of Pollution) Act 1981 by the Gujarat Pollution Control Board (GPCB).

**PRESENT APPEAL BEING DEVOID OF MERITS**

22. Without prejudice to the submissions against maintainability of the present Appeal and its being time-barred, it is most humbly submitted that the present Appeal is also devoid of any merits and deserves to be rejected by this Hon'ble Tribunal.
23. It is reiterated that the relevant studies by reputed institutions like CSIR-NEERI, National Institute of Oceanography, Institute of Remote Sensing, DHI had been carried out and the results of those studies were available to the authorities during the consideration of the request for grant of Environmental Clearance (EC). It is most humbly submitted that the entire process of obtaining 'Environmental Clearance' for the project was completed, by following the letter of law and true spirit of the EIA Notification as well as the abovementioned relevant studies by CSIR-NEERI, National Institute of Oceanography, Institute of Remote Sensing.



24. It is further reiterated that the consideration for grant of EC in accordance with the provisions of EIA while keeping in mind the supporting studies was carried out by CSIR-NEERI, and an EIA report had been prepared by them. The perusal of the EIA report prepared by CSIR-NEERI reveals that all relevant factors / material including the above-mentioned reports had been taken into account by the concerned authorities including GCZMA, EAC and MoEFCC. In this process, it is most humbly submitted that The Environment Management Plan (EMP) submitted by CSIR-NEERI alongwith its EIA report, was found to be adequate and sufficient and accordingly the appropriate conditions have been incorporated in the EC to take care of the environment.
25. That the Appellant has not raised any issue in relation to the completeness of various studies carried out by autonomous bodies / institutions, disclosure of important relevant information, procedures followed by the GCZMA and EAC, consideration, appraisal and deliberation on the information required and submitted, and finally, the adequate conditions stipulated in grant of EC to safeguard the environment. However, the Appellant has instead raised issues that are baseless and hypothetical and in the absence of any facts, studies or data to corroborate his claims / contentions.
26. It is most humbly submitted that the concerned Respondent authorities have followed a detailed, rule bound process at every stage and over an extended period of time, providing sufficient and comprehensive opportunities to all stakeholders including the public-at-large, government and civil society to raise their grievances. The Appellant has been unable to point out



even a single violation of any specific provision of any Notification, Rule or Act. The present Appeal deserves to be rejected on this ground alone.

**MOEFCC NOTIFICATION DT. 24.12.2010**  
**FOR APPRAISAL OF PROJECTS WITH**  
**"MULTI-SECTORAL" COMPONENTS**

27. I state and submit that the Appellant has quoted and has relied on MOEFCC OM dated 24.12.2010. It is most respectfully submitted that a plain reading of the said OM dated 24.12.2010 makes it clear that the purpose of said OM ostensibly is that:-

- I. In a given case, interlinked projects may have multisectoral components. Hence, in such cases, the project proponent would be required to obtain TORs from different sectoral EACs.
- II. MOEFCC has separate EACs for different sectors – i.e. different EACs for Mining, Thermal Power, Industry and Infrastructure sectors.
- III. Sectoral EAC considers the project with specific emphasis on the peculiar issues of each respective sector, while prescribing the TORs. It is, however, expected that the TORs for EIA should be prescribed encompassing entire project which may involve different sectors and hence different sectoral EACs.
- IV. Therefore, EIA conforming to TORs encompassing multiple sectors should be



considered by each of the respective relevant sectoral EACs (Mining, Thermal Power, Industry and Infrastructure) and the sectoral EACs should give recommendations relating to particular issue relevant for each respective sector.

V. After recommendation of EACs, individual files should be processed simultaneously for obtaining approval of the Competent Authority.

28. The essence of the aforesaid OM is that in case of existence of inter-linked projects pertaining to multiple sectors –all aspects of the project ought to be considered in coordination with the concerned authorities for undertaking the appraisal process.

29. I state and submit that the Appellant has sought to mislead this Hon'ble Tribunal by placing reliance on the above referred OM, by intentionally omitting the fact that both the Projects in the present case [extension of Breakwater and LNG Regasification Plant] pertain to the same sectoral EAC and were therefore, considered by the same Sectoral EAC in the same meetings for grant of TOR as well as EC. The details of the meetings in which both the projects [extension of Breakwater and LNG Regasification Plant] were taken up together by the same sectoral EACs on various dates are as under:-

Meeting	Purpose	Extension of Break-water	LNG Terminal	Reference
		Agenda Item No.		



131st meeting of Expert Appraisal Committee for Projects related to Infrastructure Development, Coastal Regulation Zone, Building/Construction and Miscellaneous projects, 28.02.2014-01.03.2014	TOR	4.20	4.19	<a href="http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/0_0_3111412412161131minutes.pdf">http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/0_0_3111412412161131minutes.pdf</a>
133rd meeting of Expert Appraisal Committee for Projects related to Infrastructure Development, Coastal Regulation Zone, Building/Construction and Miscellaneous projects 21st-22nd April, 2014	TOR	3.1	3.2	<a href="http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/0_0_51115124012141133minutes.pdf">http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/0_0_51115124012141133minutes.pdf</a>
29th meeting of the Gujarat Coastal Zone Management Authority held on 24-05-2016	CRZ Recom.	29.5	29.3	<a href="http://www.gczma.org/uploads/mom/Final_Minutes%2029th%20meeting.pdf">http://www.gczma.org/uploads/mom/Final_Minutes%2029th%20meeting.pdf</a>
31st meeting of the Gujarat Coastal Zone Management Authority held on 15-10-2016	CRZ Recom	31.4	31.3	<a href="http://www.gczma.org/uploads/mom/Final_minutes-31st%20meeing%20GCZMA02.pdf">http://www.gczma.org/uploads/mom/Final_minutes-31st%20meeing%20GCZMA02.pdf</a>
32nd meeting of the Gujarat Coastal Zone Management Authority held on 14-12-2016	CRZ Recom	32.1	32.2	<a href="http://www.gczma.org/uploads/mom/Minutes%2032nd%20%20GCZMA%20Meeting.pdf">http://www.gczma.org/uploads/mom/Minutes%2032nd%20%20GCZMA%20Meeting.pdf</a>
15th Meeting Of Expert Appraisal Committee (Infra-2) For Projects Related To All Ship Breaking Yard Including Ship Breaking Unit, Airport, Common Hazardous Waste Treatment, Storage and Disposal Facilities, Ports and Harbours, Aerial Ropeways, CETPs, Common Municipal Solid Waste Management Facility, Building/Construction Project, Townships And Area Development Projects 12-14 April, 2017	EC & CRZ Recom	15.4.3	15.4.2	<a href="http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/26042017PCD5FLULFinalMinutes15EAC(Infra-2)12-14April,2017.pdf">http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/26042017PCD5FLULFinalMinutes15EAC(Infra-2)12-14April,2017.pdf</a>



18th Meeting Of Expert Appraisal Committee (Infra-2) For Projects Related To All Ship Breaking Yard Including Ship Breaking Unit, Airport, Common Hazardous Waste Treatment, Storage And Disposal Facilities, Ports And Harbours, Aerial Ropeways, CETPs, Common Municipal Solid Waste Management Facility, Building/Construction Project, Townships And Area Development Projects 25th To 27th May, 2017.	EC & CRZ Recom	18.3.11	18.3.10	<a href="http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/13062017NX7IFJ0Q18thEACfinalMinutes.pdf">http://environmentclearance.nic.in/writereaddata/Form-1A/Minutes/13062017NX7IFJ0Q18thEACfinalMinutes.pdf</a>
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30. The aforesaid factual position, in the respectful submission of the Appellant, clearly demonstrates and establishes that the impact of both the projects [extension of Breakwater and LNG Regasification Terminal] have been considered in relation to all the relevant aspects, by the same sectoral EAC during the appraisal process and therefore, not only the letter, but the spirit of the said OM dated 24.12.2010 has been fully complied with, in the facts and circumstances of the present case.

31. I state and submit that since the Appraisal Committee was the same, both the projects were being considered / examined at the same time, sequentially. The Committee was very well-aware of both the projects, issues involved in them and that both the projects are co-located nearby geographically. It is only on account of the difference in the "nature" of the two projects, that they had required separate EIAs and separate ECs. The entire appraisal process has taken place before / by the same Committee, continuously and at all stages, from ToR to grant of final clearance. All relevant material and



facts in relation to both the projects were available to the said Committee at all stages. As such, the committee has taken due and proper cognizance of this co-location and ease of working due to extension of breakwater, as reflected in the minutes of the initial ToR meeting itself, right from beginning.

32. I state and submit that the said Office Memorandum dated 24.12.2010 was brought into existence for multi-sectoral projects, wherein it was felt that the appraisal ought not to be carried out by different committees without taking into consideration the cumulative impact of the projects. In such eventuality, multiple committees related to different sectors, would have considered the project separately without considering the effects caused by sectoral projects, in the same area, independently. However, here in the present specific cases, both the projects were of and from the same "project and activity" grouping - falling under 7(e) Port and Harbours. Therefore, they were [right from the beginning] being considered by the same sectoral committee / EAC. As such, it is most respectfully submitted that the OM which was meant for projects having multi-sectoral components, is not applicable to these projects, which do not have multi-sectoral components. Without prejudice to the above, it is most respectfully submitted that the spirit of the OM has been fully met when both the projects have been appraised by the same committee. The same EAC by applying their own wisdom, numbered them sequentially as 4.19 and 4.20 and considered them on same dates, throughout the process.



33. Without prejudice to anything mentioned above, it is submitted that the Office memorandum (OM) do not have statutory effect and powers; and are issued as an administrative tool to set the consistent procedures in internal operations of the SEAC/EAC/authorities. National Green Tribunal in OA NO. 37 OF 2015 : S.P. Muthuraman S/o. Ponnusamy Versus UoI in a case challenging the another Om issued by the MoEF has already held that:

*75. The impugned Office Memoranda by and large satisfy the tests and ingredients of an administrative order. They admittedly have not been issued in exercise of subordinate or delegated legislation. Indisputably, they have also not been issued under Sections 3 and 5 of the Act of the 1986. Apparently, they are not in compliance with the Constitutional requirements and other ingredients of exercise of executive power simplicitor. The obvious result thereto would be that these Office Memoranda have been issued by the Ministry in exercise of its administrative power and have to be construed as administrative orders alone.*

34. And therefore, the OMs are not strictly not legally enforceable and its compliance or non-compliance can not be a ground to challenge the EC grated under EC regulation 2006 as amended, as the project proponent has no control or any role in operations of these OM/circulars and it is solely SEAC/EAC/authorities which are required to follow them. Hon'ble Apex court in Civil Appeal No. 1526 of 2016: Alembic Pharmaceuticals Ltd. Vs Rohit Prajapati & Ors., has elaborately discussed the



issue of statutory impact of the OM while noting the submissions of the MoEF that the circulars are purely administrative in nature. Still however, the provisions of the subject OM have been compiled on spirit as both the projects have been appraised by the same committee whereby the committee had opportunity to appraise the projects simultaneously for understanding the combined environmental impacts of the projects in realistic terms.

35. Without prejudice to the above, it is further respectfully submitted that Breakwater extension does not result in any emissions/ effluents/ wastes during operations. Hence, there is no cumulative impact of LNG and Breakwater during operations. All the contentions to the contrary, by the Appellant are not only misconceived and unsustainable, but appear to have been made only with a view to mislead this Hon'ble Tribunal.
36. It is most respectfully submitted that M/s Simar Port Pvt. Ltd. is the port entity. The Port needs stable waters for operational convenience. The second Phase of the port project was not in consideration at the stage when Phase-I was considered. The extension of the breakwater of the said Port Project, for which the clearance has been obtained, is also beneficial to the first Phase. In other words, it is respectfully submitted that the length of breakwater covering the entire frontage of port is always better. However, commercially it was possible to have another perspective at the Phase-I stage, as no specific project of Phase-II was either proposed or coming up at that point of time in the port premises, when the Phase-I of the Project was designed and when the appraisal of Phase-I of the Project had been carried out. However, subsequently, it was decided



to extend the breakwater length of the project for improving the stability / tranquil conditions of the water in the entire port area for all such port activities.

37. It is most respectfully submitted that the Environmental Consultant [CSIR-NEERI] for both the proposals - i.e. Phase-I and Phase-II, was the same. As such, while preparing the separate EIAs as per the ToR given to those respective projects, all facts and issues were known to the same Consultant and were suitably dealt with - in the EIA reports considered by the same EAC. All such facts have been duly taken into consideration by the EIA consultant while doing the study, and also by the EAC during the appraisal. In any case, the responsibility of EMP implementation and EC compliance is with the respective project proponents and the same is being scrupulously complied with.
38. Therefore, considering all above points, it is most respectfully submitted that the contention of the Appellant regarding non-compliance with the OM dated 26.12.2010 is entirely misconceived and incorrect. It deserves to be rejected by the orders of this Hon'ble Tribunal. The appraisal process has been carried out entirely in accordance with law and all the requirements have been met with to fulfil the objective of a fair and complete EIA and appraisal.

### **ECOLOGICAL SENSITIVITY AT THE PROJECT SITE**

39. As per EIA Report prepared by CSIR-NEERI, there are no protected areas like National Parks, Wildlife Sanctuary and Biosphere Reserves within 10 km radius of the



proposed site. Reserve Forest boundaries and forests are present in Sarakhadi, Nanavada and Chhara villages around the proposed project site for LNG terminal. Gir Wildlife Sanctuary and National Park is located at a distance of approximately 22 km from the proposed LNG Terminal site. It is most humbly submitted that the shore line in relation to the present Project site has been found to be rocky in nature **(Photograph-I)** and is not suitable for turtle nesting. It is respectfully reiterated that the aspect of turtle nesting has been duly considered by the concerned authorities and the fact that the shore-line in relation to the present Project site is rocky in nature. As such, there is no merit in any contention to the contrary raised on behalf of the Appellant.

40. Further, the issue of lion movement was deliberated by GCZMA while reviewing the proposal of WCTPL. GCZMA has recorded in letter No.ENV-10-2016-50-E (T cell) February 2, 2017 **(Annexure-A1)** sent to MOEFCC that:-

- I. The proposal was also discussed in the 29<sup>th</sup> meeting of Gujarat Coastal Zone Management Authority, which was held on 24-05-2016.
- II. After detailed discussion and deliberation, it was decided by the GCZMA to ask HPCL-SEPL to prepare the Lion Conservation Plan considering the latest census data, including details about wild life population, distribution and movement, especially for lions in the project area and its vicinity.



- III. Accordingly, details were called from HPCL-SEPL vide letter dated 05-07-2016. The HPCL-SEPL submitted the details vide its letter dated 29<sup>th</sup> July, 2016 alongwith Lion Conservation Plan prepared in July 2016.
- IV. The proposal was again discussed in the 31<sup>st</sup> meeting of the Gujarat Coastal Zone Management Authority, which was held on 15-10-2016, wherein the representative of the HPCL-SEPL made a presentation before the Authority and submitted their proposal.
- V. The Authority deliberated the issues and the Lion Conservation Plan submitted by the Project Proponent. After detailed deliberation, it was decided that the Principal Chief Conservator of Forests, Wild Life - PCCF(WL) in consultation with the Project Proponent, would study the Lion Conservation Plan and submit his comments/suggestion within 30 days and the proposal would be discussed in the next GCZMA meeting.
- VI. Accordingly, the PCCF(WL) examined the Lion Conservation Plan in consultation with the project proponent and after detailed examination, submitted its letter / report dated 02-12-2016 alongwith comments/suggestions. The PCCF (WL), inter alia, apprised the Authority that the DCF Gir (West) Junagadh visited the site on 21-22<sup>nd</sup> October, 2016 and discussed the proposal with the user agency. The CCF(WL) Junagadh submitted the findings of the DCF Gir(West) Junagadh with his



recommendation, which were contained in the letter / report dated 02-12-2016 of PCCF(WL).

VII. The proposal of SPPL was again discussed in the 32<sup>nd</sup> meeting of GCZMA, which was held on 14-12-2016, wherein the Authority was apprised that the PCCF(WL) vide its letter dated 02-12-2016 has submitted their comments/suggestions. The Authority deliberated the proposal of HPCL Shapoorji Energy Pvt Ltd and after a detailed discussion, it was decided to recommend the Project to the Ministry of Environment Forests and Climate Change, Government of India to grant CRZ Clearance for Development of LNG Storage and Regasification Terminal at Village Chhara, Taluka: Kodinar, Dist: Gir-Somnath by M/S HPCL Shapoorji Energy Pvt Ltd with some specific conditions.

41. It is most respectfully submitted that Dr. H. S. Singh, whose paper has been referred by the Appellants, is a member of GCZMA and was present in the meeting held on 14.12.2016, wherein the project was recommended to MoEFCC by GCZMA. (**Annexure-A2**).
42. Therefore, considering the aforesaid facts and aspects, it is most respectfully submitted that it is clear and beyond any doubts that all ecology related concerns were taken into consideration in the EIA report, were deliberated in detail by the appraisal authorities and appropriate mitigative measures were recommended, wherever necessary.



**PUBLIC HEARING**

43. I state that the Public Hearing was conducted on 18<sup>th</sup> Dec 2015 at Venue: Survey no. 845/paiki 2, which is the project site located at village Chhara in Taluka Kodinar of District Gir-Somnath.
44. I state that the Public Notice dated 16-11-2015 in English language was published in "The Times of India" informing the stakeholders about the time and venue of the Public Hearing as well as places/offices where the Draft EIA report was made available for public review. The same notice was published in Gujarati language on 16-11-2015 in the Rajkot edition of "Sandesh", a leading Gujarati newspaper, which is widely circulated in the area.
45. I state that the notice also requested the concerned stakeholders to submit their comments/views regarding the project in writing to the regulatory authorities. The offices where the draft EIA report was made available for public review are as follows:-

- I. The District Collector Office, Gir-Somnath
- II. District Development Office, Gir-Somnath
- III. District Industry Centre, Gir-Somnath
- IV. Taluka Development Office, Tal. Kodinar, Dist. Gir-Somnath
- V. The Chief Conservator of Forests, Ministry of Environment, Forests & Climate Change, Government of India, Regional Office (West Zone), Kendriya Paryavaran Bhavan, E-5, Arera Colony, Link Road 3, Ravisankar Nagar, Bhopal 462 016



VI. Regional Office, GPCB, Opp. Saint Anne's Church, Pankaj Bungalow, Station road, Junagadh.

46. That the Public Hearing was Chaired by Additional District Magistrate around 1500 persons participated in the public hearing.
47. That Regional Officer, GPCB, Junagadh & representative of Member Secretary, GPCB welcomed all present in the Public Hearing. He outlined the project details and added that it was as per the advertisement of public notice in "The Times of India" dated 16/11/2015 in English and in "Sandesh" dated 16/11/2015 in Gujarati. He also mentioned that the documents related to the project were displayed at the various places mentioned in the advertisement. He added that after the presentation is over, the forum would be opened to the concern of the local affecting people of the area.
48. That the representative for HSEPL gave a brief Introduction of the Company and Environmental Management Plan. She also explained technical details for the proposed project.
49. That out of the total 304 oral/written representations, as many as 280 representations were in favour of the project and 24 representations sought clarifications regarding the project. Most of the representations (oral/written) received from the local public were related to local employment, education facility for local student, medical facilities, cattle grazing & livelihood of fishermen etc.



50. That the complete proceedings of the Public Hearing along with the Video-recording were submitted to MOEF&CC by GPCB vide letter No. GPCB/PH/2015-16/JUN-41/340409 dated 04th Jan 2016, recording all issues raised in the Public Hearing **(Annexure-A3)**.
51. That various issues, concerns and suggestions put forward by the public through oral presentations as well as through written representations are noted and brief summary of the key issues along with the responses is given in the Table in Section 13.3 of the Final EIA Report **(Annexure-A4)**.
52. That during the process of project Appraisal, response to oral representations in tabular form, as asked for by EAC, was also submitted **(Annexure-V)**.
53. Having regard to the facts and circumstances mentioned hereinabove as well as the submissions on behalf of the answering Respondent, it is most respectfully submitted that procedure for public hearing was complied with both in letter and spirit, views of local people were duly respected, documented and accounted for in preparation of the final EIA report as also in project appraisal by EAC.

### **THERMAL POWER PLANT**

54. That in para 16 of the Appeal, the Appellant has referred to a thermal power plant planned by M/s Shapoorji Pallonji Energy Gujarat Limited (SPEGL) at about 9 km from the port site. The EC had been granted for the said Thermal Power Plant by MOEFCC vide letter dated 30<sup>th</sup> Nov 2012 **(Annexure-A5)**. M/s SPEGL could not carry out and set up this project. The work on this project had



not been taken up and the Appellant is fully aware of this fact. However, the Appellant has deliberately concealed the fact that the project was abandoned by M/s SPEGPL in 2015 even before starting construction of the work. This clearly demonstrates that the Appellant is only seeking to mislead this Hon'ble Tribunal by concealing facts and making submissions that are baseless and misconceived.

55. It is, therefore, most respectfully submitted that the present Appeal, which is otherwise not maintainable, is also devoid of any merits and deserves to be rejected by orders of this Hon'ble Tribunal. The answering Respondent prays accordingly.

56. It is most respectfully submitted that the present Response Affidavit is being filed, having regard to the fact that detailed Affidavits have been filed by M/s SPPL and the answering Respondent in Appeal Nos. 30/2019, 31/2019 and 50/2019, on which the answering Respondent places reliance. The answering Respondent craves liberty to file a detailed para-wise Affidavit as and when directed by this Hon'ble Tribunal.



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K. Sreenivasa Rao  
**Respondent No. 2**

HPCL Shapoorji Energy Pvt. Ltd.

Place: Mumbai  
Date: 12.10.2020

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
1.	Manubhai Merubhai Chandra Village – Chhara	Report prepared by Company is totally wrong, misguiding, it has been kept incomplete purposely, details of data during survey is totally incorrect, as per report lions are not present in this area neither there is any movement of them this data is wrong. Actually, lions and other animals are present in this area. Report should include details of attacks of lions on farmer's cattle's.	Section 13.3 - Sr. No. A-1	"Section 3.5.2.2, pg.no: 3.83 & 4.26 of EIA report identifies presence of Asiatic lions in the study area, however, NEERI team has not sighted or observed presence of the same at project site." <i>(Lion Conservation plan was prepared in July 2016 and submitted to GCZMA. Same was reviewed by PCCF and recommended to GCZMA.)</i>
		Here, innumerable small and big plants were present in which animals and birds were present, company has destroyed all these plants. This projects will affect the livelihood of farmers, this is the only source of income for them.		<i>Most of the project land is barren rocky land. Google image of year 2010 is enclosed at Annexure-I</i>
		During the construction and Operation phase of the project there will be huge amount of water requirement, ground water will be extracted, Ground water level will be affected, crops will be destroyed, farmers will be greatly affected.	Executive Summary 5.3.1 Page No. xiii	"Initially, the water requirement of the LNG terminal is estimated to be about 100 m3/d. Once plant starts operation, it will generate large quantity of condensed water. This condensed water will be utilized for Process, make up for firefighting system, sanitation etc. Subsequently, only 10 m3/d water will be required for drinking purposes. <u>Since groundwater abstraction is not proposed for the project, impact on groundwater quality and quantity is not envisaged.</u> "
		Human habitation is present around the project site. Noise pollution will have a bad effect on children, birds and animals.	Section 13.3 – Sr. No. B-1	"As mentioned in the EIA report, increase in ambient noise level at plant boundary, during construction and operation phases, will be insignificant and will not have any impact outside the terminal limits. <u>During construction Phase, adequate measures will be taken to address the same.</u> "
		During the construction phase, due to vehicular movement, loading and unloading	Section 13.3 – Sr. No. B-4	"The numbers of trucks will be 50 per day. As mentioned in the EIA report, in Environment management Plan; adequate measures like

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		operations of goods, emissions from burning of fuel from ships will affect human health.	and Sr. No. B-7	covering of trucks and spray of water will be carried out to control and reduce dust generation. Traffic management plan will be prepared to avoid impact to the locality.” “LNG is a clean fuel with no emission of Sulphur. <u>Impact of NOx, PM10, PM2.5 emission will be minimum.</u> ”
		Establishment of this project will affect the marine life. Dead whales are frequently found in the sea. Turtles lay eggs at the sea shore. Construction of jetty will affect sea turtles	Section 13.3 - Sr. No. A-5 And Executive Summary 5.3.2 Marine Environment	“As per EIA study, the effect to marine life is negligible.” “The proposed waterfront and shore based facilities would cause some adverse effects on marine environments. During construction phase, though coastal hydrodynamics would not get affected, yet water quality and sediment quality would get affected as bed sediment is disturbed and would be brought under suspension. <u>However, this phenomenon is temporary and natural conditions would prevail, once the construction is completed.</u> During the construction phase, the flora and fauna in the nearby areas would be affected due to transient perturbations. The total macrobenthos population and biomass loss due to construction of jetty would be of $10.1 \times 10^5$ and $7.2 \text{ kg}$ respectively. During operational phase, main threat is from the oil spills. Oil spill of 10 t of HSD would increase levels of PHc at the accident site. Spill of HSD at terminal site would move offshore during non-monsoonal season while it would reach the eastern coast of Chhara during monsoon. The coastline affected would be ranging from 1 to 2 km. Since mangroves or eco-sensitive areas are not present in vicinity of the jetty, the effect of spill on them is remote possibility. As per past experience worldwide, the ship collision frequency would be one in 257 years. Ship grounding frequency would be one in 20 years. The adverse impact posed by LNG accident spill would be the reduction in temperature of the surrounding water. With a specific gravity of 0.45, specific heat of 0.5cal/g and 120 kcal/kg of latent heat, $1\text{m}^3$ LNG would

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>Approximately 150-200 cows from our village goes to grazing land and the route passes through your project site. Poor animals will be affected badly.</p>	<p>Executive Summary 1.0 Introduction</p>	<p>need 95625 kcal of heat energy to reach ambient temperature. Gasified LNG would quickly surface due to its buoyancy and tend to spread on the surface as a layer between the water surface and over lying atmosphere. Since the specific heat of the overlying atmosphere would be negligible, bulk of the heat derived from water leading to thermal circulation and the cooled surface water would sink and new water would take its place. Hence, the overall impact on the ecology would be negligible since the temperature of water is unlikely to fall substantially to influence the biota.”</p> <p>“Land for the LNG Terminal is within boundary of port being developed by M/s Simar Port Pvt. Limited (SPPL). Land will be leased to M/s HSEPL by M/s SPPL.”</p> <p>No cow grazing land will be used for the project. Neither there is any access to grazing land through the project site.</p>
		<p>A gas cylinder leak has recently took place in Wanakbara Port in Una district the effect of which was observed upto 2-2.5 Kms, Bhopal Gas tragedy had an effect upto 40 kms on animal plants and human habitation. Please think about our benefit from the upcoming project.</p>	<p>Section 13.3 - Sr. No. D-3 And  Executive Summary 6.3 – LNG Terminal Safety Aspects</p>	<p>“Design and safety measures will be considered to address the risk and hazard. As per Quantitative Risk Assessment, risk of any such accident is negligible.”</p> <p>“The process risk due to accidental release of LNG has been evaluated according to CCPS and NFPA 59A codes. Fire and Explosion Indices have been computed to identify the hazards and categories for various units. Maximum Credible Accident (MCA) analysis has been carried out at 5D atmospheric condition at various heat radiation levels. The damage distances for fire and explosion scenarios fall within the terminal site. The risk has also been quantified in terms of iso-contours and F/N curves for the worst case scenarios. The individual risk and F/N curves are in the acceptable zone. Risk mitigation measures have been recommended to tackle any emergency. Disaster Management Plan (DMP) has been delineated incorporating roles and responsibilities of key personnel.”</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
2	Deepakbhai Dudawada Village – Sarakhadi	This meeting has been kept in the interiors, actually should be kept in between habitation near villages.  In 2009 farmers were misguided, employment was promised, land was purchased at lower rates. I put this serious allegation on company, whosoever was kept on pay-roll, please accept to fulfill the promises.  There are many mistakes in the report and is far away from the actual things. Village Sarakhadi is not even mentioned in the site map, the one which is going to be affected the most is not even mentioned. Most affected agriculture and environment are present in Sarakhadi.	EIA Report Page No. 3.149	As per EIA Notification 2006 Section 7(III) Stage (3) Public consultation sub-section (iii) The public hearing at, or in close proximity to the site shall be conducted by SPCB.  <i>M/s Simar Port Pvt Ltd have issued letters to the khatodars confirming employment when the project starts. M/s SPPL will honor the commitment once construction is started.</i>
		In the executive summary details of noise pollution shows the data but from which village the samples are collected is not mentioned anywhere, did you take permission from local Panchayat of the village in which you went to collect data?	Section 13.3 – Sr. No. B-3  EIA Report Page No. 3.17 and 3.18	“Data collection was carried out by NEERI as per TOR given by MOEFCC.”  “Fig. 3.2.2 – Site Photographs for Monitoring of Noise Levels”  “Table 3.2.1 – Ambient Noise Sampling Locations”
		It is not being proved that meetings have been conducted during survey, why do you forget the effect on local people.	Executive Summary Page x	“Primary survey was carried out in 9 villages and local people were contacted to understand the socio-economic status and the status of basic amenities/facilities available in the region.”  “Photographs of interaction with local people - EIA Report Page No. 3.141, 3.146-348”
		During construction phase around 500	Section 13.3 –	“The number of trucks will be 50 per day. As mentioned in the EIA

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		trucks are going to pass, from where are they going to pass, there is a road from in between Chhara Village, there is a road near school in Sarakhadi Village, is there any alternative for the pollution that will be generated? Why have you shown that there is an approach road from Chhara Village, will it pass through Chhara village. School is coming up in Chhara-Sarakhadi Village. How far will it be so that it will not get affected.	Sr No. B-4	report, in Environment management Plan; adequate measures like covering of trucks and spray of water will be carried out to control and reduce dust generation. Traffic management plan will be prepared to avoid impact to the locality.”
		Nothing is mentioned about precautions that will be taken for the dust that will be generated due to movement of trucks. Crops will stop the process of photosynthesis if dust gets settled on the crops. Who will give the compensation for the crops that will get destroyed, special attention should be given to this.	Executive Summary 7.1.	<p>“7.1 Air Environment</p> <p>Most of the impacts are inherent with any construction project of large scale and cannot be completely eliminated. However, by adopting suitable measures and use of appropriate equipments, their impact can be reduced. Some of the important mitigation measures are given below:</p> <ul style="list-style-type: none"> <li>• Dust suppression arrangements or sprinklers will be regularly used to avoid dust emission</li> <li>• All loose construction material during transportation will be properly covered”</li> </ul> <p>“Table 10.1 – EMP for Transportation of Raw Materials”</p>
		There is a movement of lions in this area. Company also states that there were 21 lions in 2010 so where are they at present? Animal killing by lions is not mentioned in NEERI report.	Section 13.3 – Sr. No. A-1	“Section 3.5.2.2, pg.no: 3.83 & 4.26 of EIA report identifies presence of Asiatic lions in the study area, however, NEERI team has not sighted or observed presence of the same at project site.”
		Lakhs of birds come in Sodham Badhara and Chhara-Sarakhadi forests, Migratory birds come and is also a breeding ground then why this has been given negligible importance.	Section 13.3 – Sr. No. A-2	“LNG is considered as clean fuel and the environmental impact will be insignificant, hence the proposed project will not pollute the surrounding area or pose threat to the agriculture, farming or medicinal plants.”

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
			<p>Executive Summary Page viii - 4.5 - Biological Environment</p> <p>And</p> <p>Page xii</p>	<p>“There are two fresh water bodies within 10 km radius of the proposed site. These are Panchpipalva Bandhara (also known as Kaj-Nanavada wetland) and Sodam Bandhara. The Bombay Natural History Society (BNHS) has listed these wetlands as one of the important wetland and Birds Conservation area. <u>Panchpipalva Bandhara is located at a distance of 9.0 km towards North-East direction, whereas Sodam Bandhara is located at panchpipalava village on Sodam River, approximately 3.0 km from the proposed site.</u>”</p> <p>“The cumulative impact of gas engine electric generators, DG set and flare has been predicted for NOx emissions during summer, post-monsoon and winter season. The 24 hrly maximum incremental GLCs of NOx is predicted to be 7.16 µg/m<sup>3</sup> occurring at a distance of 1.6 km in ESE direction during summer, 5.30µg/m<sup>3</sup> occurring at a distance of 0.7 km in ESE direction during post-monsoon and 6.80 µg/m<sup>3</sup> occurring at a distance of 1.1 km in WSW direction during winter.”</p> <p><i>M/s SPPL have not employed any khatedar on company's payroll. M/s SPPL has issued letters to khatedars confirming employment opportunity once the project starts.</i></p>
		<p>For this Port project for which EC is granted, until the clearance was not granted you had generated greed amongst people and had kept them on Pay-roll but now you have removed them, so what about them now?</p> <p>Secondly the clearance obtained is for Coal Port, if near coal stackyard gas plant also comes both the things will get combined, coal is such a thing which can catch fire anytime, gas can also leak anytime, Company should thus give in written that if they are getting the gas plant they won't bring the coal plant. Local leaders should understand these serious issues. Hence, I am mentioning them.</p>	<p>Section 13.3.- Sr. No. D-3 And</p> <p>Executive Summary 6.3 – LNG Terminal Safety Aspects</p>	<p>“Design and safety measures will be considered to address the risk and hazard. As per Quantitative Risk Assessment, risk of any such accident is negligible.”</p> <p>“The process risk due to accidental release of LNG has been evaluated according to CCPS and NFPA 59A codes. Fire and Explosion Indices have been computed to identify the hazards and categories for various units. Maximum Credible Accident (MCA) analysis has been carried out at 5D atmospheric condition at various heat radiation levels. The damage distances for fire and explosion scenarios fall within the terminal site. The risk has also been quantified in terms of iso-contours and F/N curves for the worst case scenarios. The individual risk and</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		When company bought the land in Rs.5,00,000 it said that when port will start they will give the price as per the current rate, this is injustice with the farmers, farmers have given their good and costly land, you are coming here for business, you will do the business, you are a big group so consider this specially.		F/N curves are in the acceptable zone. Risk mitigation measures have been recommended to tackle any emergency. Disaster Management Plan (DMP) has been delineated incorporating roles and responsibilities of key personnel." <i>Farmers have sold their land through bilateral negotiations on unconditional sale deed. M/s SPPL has not promised any farmer about the future price rise.</i>
3	Dinesh Goswami - Prakruti Nature Club	I welcome the Project  Innumerable animals are present in the near by areas, Gir Forest is present near to the site, this side Arabian sea is present in which whale sharks are also found, till date Prakruti Nature Club has rescued 427 whale sharks, we have a turtle hatchery ground near by. From entire coastland, eggs laid by sea turtles are brought to hatchery and every year innumerable tiny turtles are nurtured and left into the sea. Every year during winter season, lakhs of migratory birds from Australia and Siberia visit Sodam bandhara, Barda Bandhara near Mul Dwarka and Kaj wetland, they nurture their off springs and go back. Coastal forest is also present on both the sides of the project in which Blue-Bull, leopard, deer, Jackal, rabbit, etc. and other reptiles are also	Thanks.	<i>SP Group has been carrying out activities for promotion of environmental awareness through Mr. Dinesh Goswami of PNC since 2011. Summary is enclosed at Annexure – II.  Apparently, his intention seems highlighting PNC activities.</i>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>found. So we request whatever you do, maintain a balance with environment.</p> <p>It's a good thing that the project will lead to development and employment opportunities but first importance must be given to environment and employment to the local people who have given their land. Locals who has given the land are totally dependent on the company. Those who were employed on salaries should be start getting salary. Company should work with people so that they will also support you.</p>	<p>Section 13.3 – Sr. No. C-6</p>	<p>“Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.”</p>
4	<p>Varajangbhai Meghijibhai Chudasama, Village Chhara</p>	<p>In the earlier Public Hearing held in 2010 we were in favour of the project and had stated that we have no objection. We feel that first primarily medical facilities and employment to local people, Lights, water and roads facilities should be provided. There was ambulance facility provided but then stopped.</p>	<p>Section 13.3 – Sr. No. C-3</p>	<p>“HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc.”</p>
		<p>It was advertised in newspaper by Government that the villages in which any industry comes up should give employment to all the villagers. But officers from the company have tried to misguide the illiterate farmers and village leaders. We request you to discuss things with sensible people, leaders, farmers and educated youngsters. Local Villagers should be employed and high schools should be established inside village boundary so that local children get proper education.</p>	<p>Section 13.3 – Sr. No. C-4</p>	<p>“Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.”</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>Proper compensation should be paid for the land taken from illiterate farmers so that their grand children can live a proper life. If company doesn't do all this we would follow Gandhi's Foot path of nonviolence and further action will be taken. Facilities for removing water logging from low lying area should be provided.</p>		<p>M/s Simar Port Pvt Ltd have purchased land following "willing seller – willing buyer" principle.</p>
		<p>Above mentioned requests should be considered and proper steps should be taken.</p>		<p>Noted.</p>
<p>Chair person: Main concern is related to environment, topic related to it only should be put forth, other concerns are also important but main focus is on environment, so please concentrate on it.</p>				
<p>5</p>	<p>Dilipsinh chauhan</p>	<p>If you are talking about environment/pollution, when 5000-7000 trees were cut and burned on 15-12-2015, for which I have submitted objection letter and tried to self immolation by pouring kerosene then why no action has been taken place till date? At that time GPCB officials, Mamlatdaar, were on leave so we have submitted written applications by fax, calls, video shooting, CD to Delhi. Why proper steps are not taken from 15-12-2015 to 18-12-2015? If this is not done this Public Hearing should be called-off. Trunks of the trees were cut/burned and thrown in the wells to destroy all the evidences, and you talk about pollution? You are talking about pressuring farmers. First proper action should be taken on my representation dated 15-12-2015. Take legal action against</p>		<p>HSEPL denies the allegation of cutting 5000-7000 trees.</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>the company and only then this Public Hearing can take place. Regional Officer - Dr. Sharma stated that we have received your complaint and this will be sent to Delhi to further action.</p>		
6	<p>Tapubhai Rajabhai Vaja Village: Sarakhadi</p>	<p>Facilities are not provided in the village. If GPCB can not consider these issues then establishment of such industry is not possible. In the case of water and air polluting industries, permission of GPCB is required for conversion of land for non-agricultural purpose as per Non-agriculture land permission Notification; applicable from dated 12.11.1979. GPCB is required to submit report within 30 days. We are interested in understanding GPCB report in this public hearing.</p>		<p>No response required from HSEPL. (CTE has been obtained from GPCB)</p>
		<p>What was produced in land that will be used for the project and what was the yield? This has not been discussed.</p>		<p>Project site mostly consists of rocky barren land.</p>
		<p>What will be the raw material used and how much quantity of it will be used per month is also not told to public.</p>	<p>EIA Report Page 2.7</p>	<p>"2.8 LNG Terminal Utilities Requirement"</p>
		<p>From where the water requirement will be met and what will be the amount of water required is not shown in the report.</p>	<p>Section 13.3 – Sr. No. D-1</p>	<p>"Water requirement is given in EIA report Section 2.8.2 page no 2.7. " "Executive Summary Section 7.3 – Water Environment"</p>
		<p>Is the wastewater effluent coloured/poisonous is also not given. How waste water will be treated is not explained to people. Habitation, river, ponds, roads etc on map are also not given in advance.</p>	<p>Section 13.3 - Sr. No. B-5</p>	<p>"There will be no effluent discharge from the Regasification Plant."</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		Where will be the disposal point of effluent? If possible please show the disposal point on the map as well.		
		For health benefits, interaction with local people should be carried out.	Section 13.3 – Sr. No. C-3	“HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc” <i>Farmers has sold their land through bilateral negotiations on unconditional sale deed. M/s SPPL has not promised any farmer about the future price rise.</i>
		There has been a dissimilarity in the amount paid while purchasing the land from villages Chhara, Kaj, Nanavada and Sarakhadi. Company had agreed to pay current price for the land. Land deed agreement has also been signed with farmers.		
		Company had promised to give employment to the farmers who have lost their land but the promise has not been kept. More money will be given to the farmers is also not followed.	Section 13.3 – Sr. No. C-4	“Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.”
		Mobile van facility as started for some time, animal welfare camp was also organized, all this was only to misguide people, such facilities were only for very short time and since last three four years such facilities are stopped.		<i>As it was not possible to achieve financial closure, M/s Simar Port were compelled to discontinue pre-construction phase CSR.</i>
		Family being paid Rs.5000 salary is also discontinued since last 4 years. Grandchildren of such farmers are facing extreme hunger situations.		<i>M/s SPPL have not employed any khatedar on company's payroll. M/s SPPL has issued letters to khatedars confirming employment opportunity once the project starts.</i>
		If company comes into existence there will be severe health issues in the 10 km radius from the project site.	Section 13.3 – Sr. No. B-7	“LNG is a clean fuel with no emission of Sulphur. Impact of NOx, PM10, PM2.5 emission will be minimum.”
		Before the Project comes, coastal forests near the sea shore have varieties of flora	Section 13.3 – Sr. No. A-10	“The LNG terminal and it's operation does not adversely impact on the nearby forest and it's animals. Same are addressed by NEERI in EIA

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		and fauna like Blue-Bull, roze, deer, leopard, lion keep roaming here and there, they will also be affected badly.		study.”
		Marine life would be affected due to upcoming project as construction of jetties and Port would take place, marine life would also be affected due to pollution generated from oil and coal. Fisherman will lose his livelihood.	Section 13.3 - Sr. No. B-6	“LNG terminal operation does not pose any threat or adverse impact to the fishing activity in the locality. Similar LNG operation has been running along with major fishing industries in India like LNG terminal in Kochi, Kerala. <u>The impact of LNG ship movement on the fishes and fishing is insignificant. Under EMP, HSEPL will monitor the same.</u> ”
		So if the project has to come all these needs should be considered.		Noted.
7	Dilipbhai Dhirubhai Vala Village: sarakhadi	Till date company has only verbally promised things and not done anything actually. After paying Rs.5,00,000 to farmers for their land promises were made to give the price as per current rates, employment was promised to all the farmers whose land was taken but nothing of that sort has happened, after giving salaries for a short while it has been stopped since last 4-5 years, why has that happened? Company has taken the livelihood from farmers so now what are they suppose to eat, why is company not keeping its promises we want an answer for that, we request you to fulfill all demands of farmers.		<i>Farmers have sold their land through bilateral negotiations on unconditional sale deed. M/s SPPL has not promised any farmer about the future price rise. M/s SPPL will honor the commitment of employment once the project starts.</i>
8	Govindbhai Mangal bhai vaja Village: chhara	Government had put forth the proposal of river linking, so Ambuja cement in our area spent crores of rupees and made canal from Sodham bandhara to goma river at Chhara village in which Govt. was also involved. After this company came into the picture it	Section 13.3 Sr. No. C-5	“The portion of canal falling under HSEPL Plant area will not be disturbed. The canal may be used for discharge of harvested rain water.”

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Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		stopped the canal for vehicular movements and company establishment, our wells get recharged due to the accumulation of rain water in the canal, farmers gets the benefit of such water, why has company blocked such canal, please give answer.		
		Rs.5,00,000 has been paid for the land taken from Dalit samaj by fooling them, while Rs.35,00,000 has been paid for other land, this company pays Rs. 35,00,000 for 1 bigha i.e. 24 guntha and registers Rs.5,00,000 for 1 acre, while pays Rs.35,00,000 for 14 Gunthas, which is a tax theft. If company is practicing tax evasion on such at this stage what will be the scenario later. Company should answer this.		<i>Farmers have sold their land through bilateral negotiations on unconditional sale deed. M/s SPPL has not promised any farmer about the future price rise.</i>
		We request that 90% of our Dalit OBC Samaj should be employed as laborers immediately and educated people should be given employment accordingly.	Section 13.3 – Sr. No. C-4	“Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.”
9.	Babbhai Chauhan Sauratshtra Ecology Foundation	Development is a necessity but if it destroys the human habitation and nature the questions will definitely be raised. In the conference held in Paris in Dec 2015, 196 countries had made an agreement, as per that document if Indian Government tests this project will it be possible for it to come?	Section 13.3 - Sr. No. B-7	“LNG is considered as clean fuel and the environmental impact from air emissions will be insignificant, hence the proposed project will not pollute the surrounding area or pose threat to the agriculture, farming or medicinal plants.”
		Online Executive summary and presentation made during the public hearing has wide differences, because of such things it is obvious that questions will be raised in the	EIA Report Page No.2.18 And	“Fig. 2.3 LNG Terminal Plan Superimposed on CRZ Map”

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Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>minds of people, there is nothing mentioned about CRZ, aquaculture act, port policy, HT-LT line in executive summary. Raw materials will be transferred in the ships to sea shore, questions will be raised against the applicable acts, like CRZ, aquaculture act HT-LT line.</p>	<p>Page No. 2.28</p>	<p>“Table 2.3 – Activities proposed by HSEPL in CRZ.”</p>
		<p>According to the Executive summary approximately 81 ships with gas will be coming to the Port, this will be regasified, so 7-8 ships will come monthly, World Bank, coastal authority, GMB, etc believe that one ships generated 5-7 kgs of waste get deposited in the sea, here we are talking about 81 ships, if this happens marine life will be badly affected, thus aquaculture act is being broken there.</p>		<p><i>Ships visiting the port will be complying with IMO regulation on sewage, garbage and ballast. No ships are allowed to throw garbage/waste/ballast in the port area. Compared to other busy ports, expected traffic will be much lesser.</i></p>
		<p>Secondly, project site shown in the remote mapping does not show HT and LT lines.</p>	<p>EIA Report Page No. 2.28</p>	<p>“Table 2.3 – Activities proposed by HSEPL in CRZ”</p>
		<p>At lake Sodham bandhara, as per the forest department data, around 3.5 lakhs foreign birds visit every year, and around 250-275 crores has been spent by Government for repairing and reirrigation of rivers linked to sodam bandhara. If that canal is blocked there will be huge loss to environment</p>	<p>Section 13.3 – Sr. No. C-5</p>	<p>“The portion of canal falling under HSEPL Plant area will not be disturbed. The canal may be used for discharge of harvested rain water.”</p>
		<p>Jamwada forest accepts that wild animals are seen in Chhara, sarakhadi and other such three four villages at sea shore. Catties are killed in this region and forest department has paid compensation for the same. Thus questions pertaining to wild life</p>	<p>Section 13.3 – Sr. No. B-11</p>	<p>“The LNG terminal and it’s operation does not adversely impact on the nearby forest and it’s animals. Same are addressed by NEERI in EIA study.”</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		will also be raised. At sodam Bandhara where in huge numbers international birds come for a visit, then questions related to Bird sanctuary act will also be raised. Bird sanctuary act has also been given good importance in NGT act, thus in Sodam bandhara region major questions pertaining to Bird Sanctuary-environment will be raised.	Executive Summary Page ix	"There are no protected areas like National Parks, Wildlife Sanctuary and Biosphere Reserves within 10 km radius of the proposed site."
		Site shown in the remote sensing map shows three buffer zone. It has been explained that this is done because of this and this is done because of this, but as per bird sanctuary act/ forest act/ wildlife act it has been clearly mentioned that no industry is allowed in 10km radius of such area this is also a big question.	Executive Summary Page ix	"There are no protected areas like National Parks, Wildlife Sanctuary and Biosphere Reserves within 10 km radius of the proposed site."
		Every company has its CSR plan, as per CSR guidelines 2% should be spent for public rehabilitation and basic infrastructure nothing of that sort has been mentioned.	Section 13.3 – Sr. No. C-3	"HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc."
		I feel that, considering forest act/bird sanctuary guideline and aquaculture act NGT might not allow this project to come.	Executive Summary Page ix	"There are no protected areas like National Parks, Wildlife Sanctuary and Biosphere Reserves within 10 km radius of the proposed site."
		As per Air-water modification agreement 2015 it is clearly mentioned that in order to reduce the temperature by 2-4 degrees worldwide organic diversity is present, it is clearly mentioned in it to bring change so I feel that if any notification comes from Government, whether it will be applicable to this project or not and if it is applicable	Section 13.3 Sr. No. B-12	"As there will not be significant air emissions from plant operations, no increase in air temperature is expected."

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
10	Jagubhai Babubhai Kamalia Village: Chhara	<p>what will be the impact to the project please clarify.</p> <p>We welcome this project because this village is poor and backward, 80-90% of the village is uneducated.</p> <p>From this village from 1.5, 2.0 and 5.0 bigha land is given by the farmers for the project. What price was paid to the farmers is not known to me, but letters are given to them. Whomsoever the letters are given, it is my appeal from the government that permanent employment shall be given to them. To their family education to be provided, in village, primary, secondary and high school, ITI college, college like facility to be provided by the company. This is our demand that the company shall adopt the village.</p>	Section 13.3 – Sr. No. C-4	<p>Thanks.</p> <p>“Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.”</p>
11	Mayurbhai Parmar Village: Kaj	<p>In this village for child delivery, illness and for other diseases medical facility to be provided. I am not saying that it shall be only for my village, but shall be for all the villages. I am asking for priority for my village is economically backward and they shall get maximum employment, education, vehicles, with this demand I welcome the company.</p> <p>In the name of Public Hearing we have met three times, the company is same but the company has come with different name and different purpose. Today we have met for LNG jetty. The land for coal based power</p>	Section 13.3 – Sr. No. C-3	<p>“HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc.”</p> <p>Agree. No response required.</p>

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Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>plant has fallen short or the jetty is short, that why for the expansion project has been given the name of LNG jetty. This is good the jetty is coming in this area, and have no objection, however the material which will come behind the coal based thermal power plant is coming is not good and we know this and still we are ignoring this.</p> <p>It will be ideal to say that the surrounding are full of various ecologies. The place where jetty will be built, on both the sides forests, patches are existing. This is acknowledged by the company that within the radius of 10 km there are 5 reserved forests and 4 forest patches are there.</p>		<p><i>Agree. No response required.</i></p>
		<p>The company talks about two things in the report, one is regasification of gas and second is coal import, this is like keeping petrol next to fire. If tomorrow something happens this is beyond imagination.</p> <p>The company has taken 400,500, 600 bigha land or will take and permission will be granted then for the expansion how the land will be utilized. For regasification 50-60 acer or hectare land will be used, and rest of the land will be used for coal yard. We all know that the coal is inflammable at high temperature.</p> <p>Tomorrow if coal and LNG which is natural gas get mixed then what kind to accident will take we hear all the time. When in our house one gas cylinder blasts then what is</p>	<p>Section 13.3 - Sr. No. D-3 And</p> <p>Executive Summary 6.3 – LNG Terminal Safety Aspects</p>	<p>“Design and safety measures will be considered to address the risk and hazard. As per Quantitative Risk Assessment, risk of any such accident is negligible.”</p> <p>“The process risk due to accidental release of LNG has been evaluated according to CCPS and NFPA 59A codes. Fire and Explosion Indices have been computed to identify the hazards and categories for various units. Maximum Credible Accident (MCA) analysis has been carried out at 5D atmospheric condition at various heat radiation levels. The damage distances for fire and explosion scenarios fall within the terminal site. The risk has also been quantified in terms of iso-contours and F/N curves for the worst case scenarios. The individual risk and F/N curves are in the acceptable zone. Risk mitigation measures have been recommended to tackle any emergency. Disaster Management Plan (DMP) has been delineated incorporating roles and responsibilities of key personnel. “</p> <p><i>(In its liquid state, LNG is not explosive and can not burn. For LNG</i></p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>the impact then the fresh example is union territory Vanakbara.</p>		<p>to burn, it must first vaporize, then mix with air in the proper proportions (the flammable range is 5 percent to 15 percent))</p>
		<p>The union territory vanakabara is within the radius of 10 KM, however there is no mention of the same in the report. Diu-Vanakbara shall not get polluted as Government wants the tourism industry to flourish.</p>		<p>Diu boundary is at about 20 km aerial distance from project boundary.</p>
		<p>In this area within the radius of 10 km there are 5 reserved forests and 4 patches. Chhara and Sarkhadi village is the area where around 10-15 years back Government had taken initiative to put petroleum project, the Government of that time had dropped the idea as this land gives two crops annually. During monsoon and winter the vegetables are good.</p>		<p>Noted.</p>
		<p>Some time back in this soil the salt content was high, but Government has spend crores of rupees and constructed canal to join Sodambandara and five Pipdhava. During monsoon, the overflow water of Pipdhava bandhara, the water come to sodam bhandara; for this a radial canal was arranged by help of Ambuja Cement. The expenditure of crores was done to reduce the salinity of soil and for the benefits of the farmers. It is the rule of Governmnet that the land that gives two or two crops, then no polluting industry shall be put on this land, same is the guidelines by Supreme Court.</p>		<p>Project site is mostly barren/unfertile land.</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>This area has Hoka trees which is also known as Hifundikotoma and this is included in endangered species by international union for conservation of nature. Here in Saurashtra and Diu, these are seen in numbers. In Diu the cutting of threes trees is punishable. The thing that is valued there has no importance here. If this point is noted at international level then why this is not considered here, why our Government is not paying attention.</p>	<p>Executive Summary Page viii</p>	<p>“Within the Project Site and 5 km aerial radius major portion of the area is occupied by high saline zone of land interspersed with trees, thorny bushes and scrub lands.”</p>
		<p>In Saurashtra region from Sutrapada dhamleg to Pipdava and Chikli there are 4/5 reserve forests and forest patches are there. And in that area Asiatic Lions are found that are internationally known and for the same public and Government is keen to do anything. During summer because of humidity they cannot stay in jungle, so during summer this area is under the migratory route of Lions. On this sea coast they come to live and I can say this as they have killed the domestic animals of this region and the government has paid the compensation. Government for the safety of lions or the lions shall not fall in the wells, the government has fenced the wells. The basis of the same is given.</p>	<p>Section 13.3 - Sr. No. A-1</p>	<p>“Section 3.5.2.2, pg.no: 3.83 &amp; 4.26 of EIA report identifies presence of Asiatic lions in the study area, however, NEERI team has not sighted or observed presence of the same at project site.”</p>
		<p>I do not want to quote on who has blocked the radial canal, as I do not have any proof. This canal joins the two bandara is blocked by someone for personal benefits and the consequence to the five Pipdva village. For</p>	<p>Section 13.3 – Sr. No. C-5</p>	<p>“The portion of canal falling under HSEPL Plant area will not be disturbed. The canal may be used for discharge of harvested rain water.”</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>the last 1/2/3 year water enters in to the village as the canal is being blocked. And what next step shall be taken is to be looked in to by you.</p>		
		<p>Mumbai bird forum has given special status to these two Bandara. In Kanj-nanawada wetland around 70-80 and in Sodam bandara 60-70 species are there; this is mentioned in the reports of forest department and Prakruti Nature Club. These groups keep count of this annually and keep record. Some of these species are migratory and can be considered endangered. Many species are endangered but can be seen here. Even though, if this plant or regasifical project is approved then during regasification various oxides of sulphur dioxide and nitrogen will be released. In report, company has mentioned the types of emission but has not mentioned the impact of various emissions.</p>	<p>Section 13.3 - Sr. No. B-7</p>	<p>“LNG is a clean fuel with no emission of Sulphur. Impact of NOx, PM10, PM2.5 emission will be minimum.”</p>
		<p>if we talk about pollution, the company will pollute in three ways, one Noise pollution during construction phase. Sodam bhandara is near to plant site and in addition Kaj Nanawada is also in the range of 5-7 km radius. The air pollution by the company is going to be on higher side that will harm the human being. Due to higher gaseous form, there will be impact of birds and the same is not shown by the company and what will be the impact of the same on human being is also not shown. The oxides of nitrogen is</p>		<p>Same as above.</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>connected to respiratory system, if oxides of nitrogen is increased in the air then diseases like asthma may cause, sulphur dioxide or various gases or sulphur may lead to lungs or liver cancer.</p>		
		<p>Two species from here are included in the world endangered species; one is whale shark and second is green sea turtle and olive turtle. There two species are observed around Vanakbara to Sutrapada Dhamlej and the basis of the same is given by Government. The fishes are caught in the nets of fishes and with mercy the fisherman cut their nets to free these fishes. The government compensates for the damage of the nets. The sea coast is very favorable for breeding for turtles. The company has shown in the report that the turtles come to the sea coast for breeding and the forest report is sent to you, in the surrounding the presence of mangroves is there.</p>	<p>Section 13.3 – Sr. No. A-5 and A-6</p>	<p>“As per EIA study, the effect to marine life is negligible.”                      “The coast at project site is rocky; whereas, as per NEERI report turtle nesting is found in sand beaches.”</p>
		<p>We have met here for Environment issue, however this is my request that when any project is proposed in any area, then only environment issue is not of concern but the socio-economic environment shall also be heard. When public hearing is for environment then people are restrained from expressing the social problems, then where shall there people take their request. These people shall be provided some forum where they shall take their questions regarding social and land issues. In fact,</p>		<p>Noted.</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>the queries of people are not allowed to reach the authorities. I am fighting with this company from last five years in person as well as in court and I have represented in Green tribunal as well. The petition placed by us in the Green tribunal says and given the remedy that this is a premature matter and the government has not given the approval yet, so we cannot go to the merit of the same. If the government approves then you may approach for reopen of petition. I will take it further.</p>		
		<p>Till date whatever land is purchased by the company, the accounts of the same shall be checked. Similar issue has been raised here that few have been paid 5 lakhs, few 2.5 lakhs and some has received 35 lakhs and there is no proof of the same as the documentation are done for only 5 lakhs. What kind of money if the rest of the money, our country is opposing black money so why this is happening, there is no other way but the accounts of both land owner and purchaser shall be checked then the facts will come out.</p>		<p><i>Farmers have sold their land through bilateral negotiations on unconditional sale deed.</i></p>
		<p>Near the sea cost there are some villages where fisherman communities are there like Dhamleg, Muldwaraka, Chhara, Madhwad, Kotrda and Velna. In all these areas most of the communities are fisherman and here their livelihood is on fishing activity. Here coal port has been approved and we are going to challenge the same. If the LNG jetty</p>		<p><i>There will not be any impact on fishing activity.</i></p>

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		<p>is also approved then marine traffic will increase and for this reason the fishing activity, breeding and multiplication will reduce and because of this impact will be on the livelihood of these people. These people do not have land that they can sell to the company and take care of their generation. The profession of these people is fishing activity, and if the fishing activity stops then they will have to compulsory relocate. I understand that if such project is approved than this will give rise to naxalite in this region, if something is happening against the system then voice will be raised and action will be taken. Else, no one has spare time to interfere in someone else business. If the government approves the company then naxalite will be produced.</p>		
		<p>Due to marine traffic impact will be on endangered species.</p>	Section 13.3 - Sr No 5	<p>“As per EIA study, the effect to marine life is negligible.”</p>
		<p>Whatever the company has mentioned in the report is not true. The company has mentioned that SO2 , NO2, PM10 is among the emission but the impact of the same is not mentioned. People are reading and saying that these are the emissions but 90% of the people are not aware that what actually these emission are. There is only one way for this and that is education. If education is there then we will not have to bend in front on any one, no need to beg in front of anyone. The these will not happen then only the country will develop.</p>		<p><i>Noted.</i></p>

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		<p>This Public hearing is for LNG Jetty and if I put my query for coal then it's irreverent. There will not happen to make request to any authority as they work within in their authority limits and have authorities above them as well. For this I will not raise any technical issue and for all this court is there and court will doing it's work and we have faith in the court.</p>		<p>Noted.</p>
		<p>In the past whatever the land company has purchased and ToR was issued, and following the same the project to be developed, I have Simar Port Pvt Limited report and it is mention in the report that they will purchase land with same rate and company is purchasing land in 5 lacks only, but on paper and off-paper is different, that requires your attention.</p>		<p>Farmers have sold their land through bilateral negotiations on unconditional sale deed.</p>
		<p>During first and second hearing, for favorable atmosphere, Kanj, Nanavada, Sarkhadi and Chhara villages youths have been lured to offer employment. The people who led their life by doing their own business and farming, those people have been given such kind of false offers that the company will give Rs 5000/- salary jobs. As on today who are the families who get Rs 5000/- jobs and would not accept? Such, 300/400 youths have been employed and favorable atmosphere was created and latter after the public hearing was over and land was purchased, nothing was done. After that, the company was not to be</p>		<p>M/s Simar Port Pvt Ltd have issued letters to the khatedars confirming employment when the project starts. M/s SPPL will honor the commitment once construction is started.</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>found. It is the compulsion of the company that they have to come here and this is how company has cheated them.</p>		
		<p>Such social problems should also be considered along with Environment and request should be made to Government that a special platform should be raised for it, such similar thing should be there as the effect will be on local people.</p>		<p><i>Noted.</i></p>
		<p>There is not much recruitment required in LNG port/Coal management projects, when Ambuja cement plant came nearby that time it had promised priority in employment to local people and as per Government rule local people should be given certain percentage of employment, at present all the people in this taluka knows how many senior and permanent positions are with local villagers in Ambuja Cement company. On an average 3 person per village is permanently working with Ambuja cement, so does People/village boys of villages of kodinar taluka are not qualified/educated? They are educated, but the fact is you don't want local people as they raise their voice against you, will stand in front of you if you do anything wrong, if you are legally correct nobody will object, officers from this company should announce in public in front of you that so much of employment will be provided as employment requirement of both these plants is very minimum.</p>	<p>Section 13.3 – Sr. No. C-4</p>	<p>“Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.”</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
Chair person from his seat given to every individual so that other people also gets chance to represent their queries.				
12	Manubha Bhavsinh Rathod Village: Chhara	<p>Many things have been discussed, whether you come or don't come, whether you get the industry or not, loss will be there and profit will be there, there will be a little loss and a little profit, profit will be more but loss will also be there, if I mention about the beginning some sir was giving rs.5,00,000 and thus nobody gave the land, one sir came to me and said please do something about this on which I said at present 1 bigha is equal to 24 Gunthas or otherwise 16 Gunthas equal to 1 bigha, if someone leaves this and goes somewhere else, whether that will be a gain or a loss, if you raise the amount you will get the land, I was requested to become an agent I denied, I would advise you that I have not seen the company's office till date, sir don't even know me neither I know them, I advised one of the sirs, not taking the name, but company comes and company goes has agents in between, I have heard that around 400-500 crores is taken away by agents, so I would suggest to farmers to go to the company directly and why to get agents in between, people like me who are agents will take the money, rather farmers should directly go to company and say that so many lakhs of rupees is remaining, let the Government go and Company comes,</p>		<p><i>Thanks for support.</i></p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
13	Bhupatbhai Sidibhai Dodiya Village: kaj	<p>Chhara is a poor village, whosoever has given the land had only 1.5 bighas of land, give facilities here, arrange for ambulance, hospitals, start a good education centre, here we will give you full support, Land is from Chhara and sarakhadi villages, no one has any right to comment other than this, don't let any other plant come in your village but we will support this project, project will come in Chhara and it will definitely come, whosoever has lost his land has become without any support, they don't have any livelihood at present, pay them salaries and livelihood I have only this much concern.</p> <p>You have come as a chair person/head person, this is your third public hearing, before me a speaker named Mayur stated that we have made a petition, in order to discuss about green tribunal again and again we have gathered here for the third time.</p> <p>Of the total people present here around 80-90% of them don't know who is the representative of the company, first bring him here and ask him to answer, ask him to answer the questions raised here. You say that all the answers will be given at the end of the session, but the position that time never allows that to happen, request you to bring the sir in the front and these people are suppose to get rs.5000 stop such nonsense, if answers are to be given please</p>		<p><i>Responded by the Chair Person.</i></p>

**Response to Oral Representations at Annexure – B (English) of Public Hearing Proceedings Held on Dec. 18, 2015**

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
14	Shaileshbhai Maheshbhai Vaja Village: Chhara	<p>give them why are such hearings being conducted again and again.</p> <p>Chair person said: we have taken your suggestions, hearing is arranged on behalf of Government of Gujarat's Gujarat pollution control Board and District magistrate, we have to follow its rules where in we are not supposed to bring the head of the company on the stage and we are not committed to make them answer your questions. Your question is irrelevant to this hearing and please stop this nonsense.</p>		<p><i>No response required from HSEPL.</i></p>
15	Jethbhai Rajabhai Chudasma	<p>if the company comes here, there is no harm to us.</p>		<p><i>Thanks for support.</i></p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
	Village: Chhara	In our village the company should facilitate water, electricity, high school and medical facilities	Section 13.3 – Sr. No. C- 3	“HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc.”
		For the project, the vehicles hired should be from Chhara village, the vehicles fall short from this village, then only vehicles from outside shall be considered.		<i>Noted.</i>
		Chhara village land belongs to people of Chhara, it shall be investigated if the letter pad given by the company is genuine or fabricated, this is my request.		“M/s SPPL has issued letters to the khatedars confirming employment when the project starts. M/s SPPL will honor the commitment once construction is started.”
16	Parbatbhai Kodiyatar Village: Chhara	My argument is that my birth is from this village and our profession is animal husbandry. We are around 25 people, and we would like to understand that what will be benefit of ours from this project. We request from Collector that he should take decision for our community. My request is to take a note of the point I have raised.	Section 13.3 – Sr. No. C-4	“Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.”
17	Balubhai sidhibhai Chudasama Village: Chhara	Public Hearing for 5 MMTPA has been organized today at Chhara village, being the resident of this village I want to put forth the issues between you and Villagers. This company has decided to establish a 5 MMPTA project, this is for 5MMTPA but I feel this hearing is actually for 10 MMTPA, public hearing arranged for approval, whatever capacity it has, if 10 MMTPA capacity is actually there it would be doubled.		<i>Public hearing was for 5 MMTPA.</i>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>Land will be developed by Simar port Pvt. Ltd. This land will be leased to HSEL, the land given by farmers was for some other use but is given on lease to some other company then such is a cheating with farmers.</p>		<p><i>M/s Simar Port have signed the concession agreement with Gujarat maritime board for development of all-weather mutli cargo green field port. Port will be having multiple customers for handling various cargoes. M/s SPPL will lease the land to the customers which will bring their cargo through ships and store it in port premises. There is no question of cheating.</i></p>
		<p>The length of jetty in Simar Port Pvt. Ltd. Is being requested to be increased to another 2600mts, were a gap of 4300mts is required to be kept but this program has been arranged for 1700 mts, During this phase if sea breakwater is increased marine life will be badly affected, pollution level in sea will increase, livelihood of local fisherman will be affected, this also should be considered.</p>	<p>Section 13.3- Sr No. B-6</p>	<p>“LNG terminal operation does not pose any threat or adverse impact to the fishing activity in the locality. Similar LNG operation has been running along with major fishing industries in India like LNG terminal in Kochi, Kerala. The impact of LNG ship movement on the fishes and fishing is insignificant. Under EMP, HSEPL will monitor the same.”</p>
		<p>In HSEPL LNG terminal, evaporation will occur during unloading, storage and transfer, company has accepted this, the effect of vaporization on atmosphere is unavoidable, for 5MMTPA project there would be movement of around 81 ships, if the capacity is increased to 10 MMTPA there is a possibility that number of ships movement will be doubled. Stored LNG would be refined and sent to end user through Pipeline, there are chances of major accidents during laying of gas pipelines and during re gasification process.</p>	<p>Section 13.3 - Sr. No. D-3 And Executive Summary 6.3 – LNG Terminal Safety Aspects</p>	<p>“Design and safety measures will be considered to address the risk and hazard. As per Quantitative Risk Assessment, risk of any such accident is negligible.”</p> <p>“The process risk due to accidental release of LNG has been evaluated according to CCPS and NFPA 59A codes. Fire and Explosion Indices have been computed to identify the hazards and categories for various units. Maximum Credible Accident (MCA) analysis has been carried out at 5D atmospheric condition at various heat radiation levels. The damage distances for fire and explosion scenarios fall within the terminal site. The risk has also been quantified in terms of iso-contours and F/N curves for the worst case scenarios. The individual risk and F/N curves are in the acceptable zone. Risk mitigation measures have been recommended to tackle any emergency. Disaster Management Plan (DMP) has been delineated incorporating roles and responsibilities of key personnel.”</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
	HSEPL has hired NEERI-Nagpur and NIO-Mumbai and DHI- for ship navigation and prepared this present report. The said study report has all false data, ground realities are not studied in depth, it looks like superficial.	No response required from HSEPL.		
	The noise level mentioned in executive summary is shown to be more than the limit prescribed by CPCB guidelines for residential and commercial areas, this would further increase after the project comes.	Section 13.3 – Sr No. B-1	“As mentioned in the EIA report, increase in ambient noise level at plant boundary, during construction and operation phases, will be insignificant and will not have any impact outside the terminal limits. During construction Phase, adequate measures will be taken to address the same.”	
	Quality check report for drinking water in all seasons states that TDS and Chloride content in ground water samples is higher. Company accepts that Faecal Coliform content is on a higher side as per the summary report if the content is already high the probability of increase in pollution is even higher.	Section 13.3 - Sr No B-5	“There will be no effluent discharge from the Regasification Plant.”	
	Mangroves are present at 7 kms away from the site at the mouth of Madhward Creek, pollution because of upcoming project and movement of big vessles will also affect the mangroves.		<i>Madhward creek is to the east of the project. Ships will come from west direction.</i>	
	Land is considered to be medium-high quality, soil has a good porosity and water holding capacity, if government takes the initiative of improving the farm and soil quality at the sea shore, better harvest can be expected.		<i>Noted.</i>	

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		Executive summary states that Wild animals from Gir national park are found to be roaming around the sea shore, forest department has paid compensation for the loss of cattles in this area. This topic should be seriously considered.		<i>Noted (Lion Conservation plan was prepared in July 2016 and submitted to GCZMA. Same was reviewed by PCCF and recommended to GCZMA.)</i>
		During the winter season local and migratory birds are frequently seen in this area, pollution due to this project will affect the birds.	Section 13.3 - Sr. No. B-7	"LNG is a clean fuel with no emission of Sulphur. Impact of NOx, PM10, PM2.5 emission will be minimum."
		Kodinar taluka's coast is known as nesting ground for two species of turtles, they are extinct species and found frequently at sandy beaches, existence of such species will be in doubt.	Sr No A-6	The coast at project site is rocky; whereas, as per NEERI report turtle nesting is found in sand beaches.
		Local people carry out fishing activities with big mechanized boats, most of the local people are associated with the profession of fishing, by such frequent upcoming projects there is at risk on the livelihood of such fishermen.	Sr No A-5	As per EIA study, the effect to marine life is negligible.
		It is given in the summary report that there is no combustion of anthropogenic fuel during re gasification process. Fact of gas vaporization shows that there is a risk to livelihood. In order to keep the plant in operation engine generator with 18 MW capacity power plant and 1000 KVA DG set will be used.	Sr No B-7	LNG is a clean fuel with no emission of Sulphur, Impact of NOx, PM10, PM2.5 emission will be minimum.
		Chair person said that please submit the written representation.		No response required from HSEPL.
		Balubhai said that there will be movement	Section 13.3 –	"The numbers of trucks will be 50 per day. As mentioned in the EIA

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>of 500 trucks for this 5 MMTPA plant, but for 10 MMTPA plant this would be doubled, thus instead of 500, 1000 trucks will come and increase the pollution level.</p>	<p>Sr. No. B-4</p>	<p>report, in Environment management Plan; adequate measures like covering of trucks and spray of water will be carried out to control and reduce dust generation. Traffic management plan will be prepared to avoid impact to the locality.”</p>
		<p>Probability of vessel accident is not relative to the time, it has been accepted that there is major loss of life due possible accidents of vessels.</p>		<p><i>Noted.</i></p>
		<p>Temporary employment for educated and uneducated people will be created during construction phase but there is no mention about permanent employment. It is shown in the presentation that employment will be given to 2500 people during construction phase and 100 people during operation phase. Sir I want to say that land taken from farmers are given letter pad with 1-5 number, employment has been promised to 5 person per family, so that number comes to around 1000-2000 person, but now The company has said that they will employ 100 people, it shall be checked if the letter given to those people is genuine or false.</p>		<p><i>M/s SPPL will honor the commitment of job employment once project starts.</i></p>
		<p>In view of atmosphere and upper limits, there will be danger to the human life, thus this project is not welcomed. It is understood that LNG storage, cold condition and because of heat, there is risk. On the other hand, whatever safety measures are said are not followed.</p>	<p>Section 13.3 – Sr No B-12</p>	<p>“As there will not be significant air emissions from plant operations, no increase in air temperature is expected”</p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>For the project whatever land price the company has paid is not uniform. If the land is purchased for 35 lacks per bigha, the registration is done only for 5 lacks. The company has said that in future whatever the increase in price would be will be paid. It is our request that whatever was said shall be followed so that farmers are benefitted.</p>		<p>Farmers have sold their land through bilateral negotiations on unconditional sale deed. M/s SPPL has not promised any farmer about the future price rise.</p>
		<p>It was committed that the farmers who have sold their land will be given permanent employment but the same has not been done.</p>		<p>M/s SPPL will honor the commitment of job employment once project starts.</p>
		<p>For project development for healthcare mobile dispensary was started that is stopped now. In this area the people are poor and for treatment of illness permanent healthcare facility shall be provided.</p>	<p>Section 13.3 - Sr No C-3</p>	<p>“HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc.”</p>
		<p>The company has removed trees for the lands purchased for project, but have not planted new trees.</p>		<p>100 m wide green belt will be developed around the port boundary by M/s Simar Port through Forest department.</p>
		<p>For illegal purchase of land for the project, the company has used middle man. On the other hand, I want to remind that Ambhuja Cement Pvt Ltd, in Rampara mine have carried out firing through corruption, which people are not able to forget. In that area firing was done on the local people and farmers and in the same one boy had died. In future, the same shall not happen in this area specific step shall be taken.</p>		<p>Farmers have sold their land through bilateral negotiations on unconditional sale deed</p>

**Response to Oral Representations at Annexure – B (English) of Public Hearing Proceedings Held on Dec. 18, 2015**

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		On behalf of village, I request that if the government gives permission to this project, then the basic requirement in the village is water and along with the same infrastructure facilities like light, roads, and water shall be felicitated.	Section 13.3 - Sr No C-3	"HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc."
18	Hirabhai chinabhai Village: Chhara	Balubhai has helped us in selling the land in Rs.5,00,000, and had also promised to pay the differential rate. All brokers ran away.		<i>Farmers have sold their land through bilateral negotiations on unconditional sale deed</i>
19	Bhikabhai Balubhai Chandera	I just want to say that many have taken money from the company and many have not, if the company comes its good or else other people would take disadvantage, other thing that I want to add is that company has not done anything to us so if it comes we would welcome the same or else we are any way dying hungry.		<i>Thanks for support.</i>
20	Keshubhai Jethabhai Mori: Lion Nature Gir foundation	People should support the company and company should support people, if this company comes in our area employment will be generated. If we support, the company would come and all the questions will be solved.		<i>Thanks for support.</i>
		All the questions should be solved, the question that you have raised with respect to Gir forest that Rs.13 crores has been spent for GIR Environment on which collector sir said that this question should not be answered then how will we get the answers to our questions. No break up is given for rs.13crore that what amount is budgeted for turtles, what for lions, for	EIA Report Page No. 10.27	"Table 10.5 – Budget for Environment Management Plan"

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>cowranch (Gaushala) and so much for health facilities, I need an answer to all this, this should be answered by authorized person.</p>		
		<p>Secondly according to the advertisement given by Gujarat Government in newspaper that any farmer before giving his land can get partnership, be a part of shares is there any such provision in your company, and I want an answer as to what steps are being taken for the children, health and education of the farmers whose land has been taken.</p>		<p><i>Farmers have sold their land through bilateral negotiations on unconditional sale deed. All CSR activities will be carried out by the once project starts.</i></p>
		<p>My last question is the answer for which I want in public. In this area if cattle are attacked, it is surveyed by forest officer, we have 3000-4000 such cases. I am an RTI Activist, so aren't lions found in this area, leopard doesn't stay, 120 turtles do not lay eggs here, so what arrangements are being made for it sanctuary how much extra land is given should be answered in public, I finish my comments.</p>	<p>Section 13.3 - Sr No A-10</p>	<p><i>"The LNG terminal and its operation does not adversely impact on the nearby forest and its animals. Same are addressed by NEERI in EIA study."</i></p>
		<p>Do you have the rights to allow an authorized person to answer in public/or written?</p>		<p><i>No response required from HSEPL.</i></p>
		<p>Chair person: replied to keshubhai jethabhai that I am not bound to give you any answer I am conducting the hearing, you are attending the hearing, we are not here to put one on one allegations on each other and this is not the forum were answer</p>		<p><i>No response required from HSEPL.</i></p>

**Response to Oral Representations at Annexure – B (English) of Public Hearing Proceedings Held on Dec. 18, 2015**

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>should be given, with such request.</p> <p>Keshubhai said that I request you all not to ask superficial questions but such questions should be asked which shakes the chair of officers. Even if there are internal issues amongst you all but this is for betterment of your future, your children, and environment.</p>		<p><i>No response required from HSEPL.</i></p>
21	<p>Najabhai lakhabbhai Chudasama Village: Chhara</p>	<p>Chhara is a small village, we haven't seen money, while we got the money we bought tractors, now where are we supposed to run those tractors, Village sarpanch should write on the letter pad and submit to us that only our 200/500 tractors will be used everyday and outside tractors should not be allowed.</p>		<p><i>Noted.</i></p>
22	<p>Principal-Chhara Girls High School</p>	<p>Whichever Industries wants to come up in the village, should adopt the entire village and try to solve questions on Health issues and Education, I and my villagers have given their lands to Industry, their 1200 poor children are studying in both the schools, ground water there is saline and sweet, considering the population water is not sufficient, thus we are forced to buy and provide water to children coming in school, so if the company wants to establish, we thus represent with request to put up a water pipeline till the school using which we can make hygienic food and provide the same to children, such pipeline should be put up, RO facilities should be provided, along with the infrastructure facilities</p>	<p>Section 13.3 - Sr No C-3</p>	<p>"HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc."</p>

**Response to Oral Representations at Annexure – B (English) of Public Hearing Proceedings Held on Dec. 18, 2015**

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
23	Sursinh Mori Village: Sarakhadi Jilla Panchayat, Ex-Chairman	<p>provided by Government things like school bags, water bags etc should also be provided, People awareness program should be arranged, Liquor drinking habits in our village is on a high rate so we request you to arrange for health check-up camps like the ones arranged by Government for children and multi specialty hospital should also be constructed. As a principal and a responsible citizen, I request you to provide financial help to poor children.</p> <p>People of this region are concerned irrespective of the upcoming project, employment is the main concern, For that Our Prime Minister Mr. Narendra Bhai Modi is travelling in the entire world and working very hard to create a new and better image of our country. People say that industries are the requirement and necessities, considering no one suffers from any big/small problem such industries should come.</p> <p>When local industries come, they talk about local employment, world famous Ambuja Cement factory is situated in Kodinar, When Ambuja cement came, it had said to give to give 80% of its total employment to local people. So I want to ask all officers that as this industry has come up how many people are given employment the one who has lost his land are also freed, so to the new company that is coming up, I would like to tell you that both the villages Sarakhadi and</p>		<p><i>No response required from HSEPL.</i></p>
				<p><i>No response required from HSEPL.</i></p>

Sr. No.	Name and Address of Representative	Issue	Reference to Response in EIA Report	Actual Text of Response
		<p>Chhara which will be affected has many farmers staying in there, families are also staying with them, who has taken away the money that was for our benefit, I don't want to mention about it.</p>		
		<p>Other than that water is the main concern for villages Sarakhadi and Chhara, these villages are near coast line, people work very hard throughout the day and return home at night, ladies of these villages are forced to fetch water even at night 12:00 Clock, so I want to tell these officers that the first thing that should be done in this region is to make arrangements for most important drinking water, if drinking water cannot be supplied to the villagers other things are way far away, the most important thing is to make water schemes, make water available in all houses, adjacent village is sarakhadi were farmers community stays.</p>	<p>Section 13.3 - Sr No C-3</p>	<p>"HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc."</p>
		<p>Sarakhadi village is our Taluka's revolutionary village, daughters of this village has made our country proud with the game of volleyball and has earned fame for India and Gujarat. Varjang bhai Vala is doing a very great job by coaching these girls, I on behalf of entire village would like to thank him in public.</p>		<p><i>No response required from HSEPL.</i></p>



GOVERNMENT OF GUJARAT  
FORESTS & ENVIRONMENT DEPARTMENT  
BLOCK NO. 14, 8<sup>TH</sup> FLOOR, SACHIVALAYA  
GANDHINAGAR - 382 010.

K.C. MISTRY  
DIRECTOR (ENVIRONMENT) &  
ADDITIONAL SECRETARY

Ph : (079) 23251062

Fax : (079) 23252156

E-mail [direnv@gujarat.gov.in](mailto:direnv@gujarat.gov.in)

*Ref. No.ENV-10-2016-50-E (T cell)*

*February 2, 2017*

To,  
**Shri S.K. Srivastava**  
Additional Director(IA-III)  
Ministry of Environment, Forests & Climate Change  
Indira Paryavaran Bhavan, Jor Bugh,  
Aliganj Road New Delhi - 110 003

***Sub: CRZ clearance for proposed development of LNG Terminal and Re-gasification Terminal at Village: Chhara, Taluka: Kodinar, Dist: Gir-Somnath by M/S HPCL Shapoorji Energy Pvt Ltd –regarding***

Dear Sir,  
M/s HPCL Shapoorji Energy Pvt Ltd (HPCLSEPL), vide letter dated 12-02-2016 has approached this Department seeking recommendations from Gujarat Coastal Zone Management Authority for obtaining CRZ clearance under CRZ Notification 2011 from the Ministry of Environment, Forests and Climate Change, Government of India for their proposed project development of LNG Terminal and Re-gasification Terminal at Village: Chhara, Taluka: Kodinar, Dist: Gir- Somnath.  
It is submitted that they have proposed to develop LNG- regasification terminals for 5 MMTPA capacities within boundary of port being developed by M/S Simar Port Pvt Ltd. The Land would be leased to them by the SSPL.

M/s HPCLSEPL has submitted the following documents alongwith application:

1. A copy of the principal approval issued by the Gujarat Maritime Board vide its letter dated 26-02-2016
2. Form-1 as per the CRZ Notification , 2011
3. The CRZ maps indicating the High Tide Line, Low Tide Line, CRZ Boundary, etc. prepared by Institute of Remote Sensing, Anna University, Chennai
4. An acknowledgement copy of the application made to GPCB for CTE.
5. Various undertakings as per guidelines of this Department.
6. Comprehensive Environmental Impact Assessment report prepared by the National Environmental Engineering Research Institute(NEERI), Nagpur

7. Lion Conservation Plan based on rapid Assessment of Movement of Asiatic Lion prepared by the Gren Support Service during July, 2012

The National Environmental Engineering Research Institute (NEERI), Nagpur in its Comprehensive EIA report has included Project Description (Chapter 2), Description of Environment (Chapter 3), Anticipated Environmental Impacts and Mitigation measures Chapter 4), Analysis of Alternatives (Chapter 5), Environmental Monitoring Program(chapter 6 ), Additional Studies ( Chapter 7), Project benefits(Chapter 8), Environmental Cost Benefit Analysis( Chapter 9), Environmental Management Plan(chapter 10). The NEERI has also included one chapter as Summary and Conclusion(Chapter 11)

The main findings of the Comprehensive EIA report prepared by the National Environmental Engineering Research Institute, (NEERI), Nagpur are summarized as follows:

- I. Construction of the LNG terminal involves civil, electrical and mechanical work involving different types of machinery and is labour intensive. Environmental impacts related to construction works are mostly temporary in nature and last only during the period of construction. However, appropriate environmental protection measures should be planned and implemented during construction period to minimize these impacts.
- II. The major pollutant in the construction phase will be PM10 produced mainly from various construction activities. The vehicular movement generates pollutants such as NOX, CO and HC. But, the vehicular pollution is not expected to lead to any major impacts except near the roadside. The soil in the project area is sandy in texture, and is likely to generate substantial quantities of dust. However, the fugitive emissions generated due to vehicular movement are not expected to travel beyond a distance of 200 to 300 m. Since, there is no habitation or ecologically sensitive areas in the vicinity of the site; the impact on air environment during the construction phase is not expected to be significant.
- III. The combustion of diesel in various construction equipments could also be one of the sources of air pollution during the construction phase. However, the increase in SO2 levels due to operation of these equipments will be insignificant to cause any adverse impact on air environment. Thus the impacts are temporary and may last only during the construction phase. The

particulate matter pollution may be reduced by covering the trucks with tarpaulin sheets or by using water sprays. The fugitive dust emissions and dust generation from concrete mixing, cement handling, operation of construction machinery may be reduced by water sprinkling.

- IV. The LNG storage and re-gasification does not involve combustion of any anthropogenic fuel, in normal conditions. Thus, the ambient air quality is not likely to be affected due to the proposed project. In case of plant upset, cold vapour would be flared. A low pressure cryogenic collection and flare system will be provided. The system shall include liquid knock-out drums, elevated flare and pilot burner. The flare design will consider the maximum heat radiation to surrounding. Emissions during LNG flaring are not expected to be significant. CO<sub>2</sub> and NO<sub>x</sub> in small quantities will be released to atmosphere during flaring, however, their ground level concentrations (GLCs) will be insignificant. Possibility of LNG coming out as fugitive emission is ruled out based on the system design.
- V. LNG is a clean and environmentally friendly fuel, which will be used by the existing industries in the region. The baseline quality status in the region reveals that areas close to the coast of Chhara show low levels of NO<sub>x</sub>. The ground level concentration of NO<sub>x</sub> from the proposed LNG terminal during both construction and operation phases will not exceed 30 µg/m<sup>3</sup>. Dispersion in post-monsoon and winter seasons will be in SW direction away from the coast. Impact due to NO<sub>x</sub> emissions on habitation is therefore not envisaged. As per isopleths post monsoon direction is ESE. As natural gas free of sulphur will be used as fuel in the terminal, emissions of SO<sub>2</sub> are not envisaged. Ambient quality of HC will also not change as these emissions are very low. LNG is stored in cryogenic tanks and gasification will be in a closed system, fugitive emissions of hydrocarbons in normal operational conditions will also be negligible.
- VI. Most of the impacts listed above are inherent with any construction project of large scale and cannot be completely eliminated. However by adopting suitable measures and use of appropriate equipments, their impact can be reduced
- VII. It is HSEPL intention to stipulate in the EPC contract the maximum allowable noise levels. This means that the terminal will be designed such that the sound

pressure level in any situation (including emergencies such as blowing of safety/relief valves) shall not exceed 85-90 dB(A). The impulse noise level shall not exceed 135 dB(A). The design of the terminal will be such that the sound pressure level in the work area will not exceed 85 dB(A). The work area is defined as any position not less than 1 m from equipment surfaces accessible to personnel, or any position where a worker's ear may be exposed in the normal course of duty. Restricted areas will be those locations where it is not reasonably practicable to reduce the noise level below the work area limit. Where practicable, attempts shall be made to reduce the noise level below 80 dB(A).

- VIII. Incremental increase in baseline noise levels due to maximum 50 trucks/hour is predicted using the above model. It is predicted that the maximum contribution at 10 m and 20 m from the center of the road will be 70 dB(A) and 66 dB(A) respectively. Considering the background noise levels of 74 dB(A) and 68 dB(A) the incremental increase in noise level will be at 10 m and 20 m respectively, only). There will be an increase in noise levels in residential areas situated close to the road due to movement of trucks. However, the impact of truck movements on noise level in residential areas situated at 50 meter and beyond from the road will be insignificant considering the excess attenuation and will be below the stipulated standard of CPCB, i.e. 55 dB(A) during day time. Though the computations are carried out for 50 trucks per hour the actual number of trucks during the construction phase may be around 25 trucks per hour. This will not be a continuous operations but it may last up to six months.
- IX. In the construction phase the service water requirement of the LNG terminal is estimated to be approximately 100m<sup>3</sup>/day. The water requirement will be met from water tankers supplied by local supplies. Impact of water quality during this phase may be due to sewage generated from the construction workforce stationed at the site. Temporary sanitation facilities like Septic tank and soak pits will be setup for disposal of sanitary sewage generated by workplace. Further, the construction will be more related to mechanical fabrication, assembly and erection hence the water requirement would be marginal. The construction water required will be also met from water tankers.

- X. Though ground water abstraction is not envisaged in the proposed activity, ground water extraction in coastal area may lead to saline water ingress and hence ground water extraction shall not be practiced at any point of time for the proposed project. The overall impact on water environment during construction phase due to proposed LNG terminal is likely to be short term and insignificant.
- XI. Once the plant starts its operations it will generate large quantity of condensed water and the quantity will depend upon the atmospheric humidity. This condensed water can be utilized for process, make up for fire-fighting system etc. Around 3 m<sup>3</sup>/h, water will be required for drinking purposes. Since groundwater abstraction is not proposed for the project, impact on groundwater quality and quantity is not envisaged.
- XII. The sediment deposition rates were continuously recorded at different observation points set up around the proposed developments in the model run. It was observed that the change or variation in the deposition rates is limited to the vicinity of the jetty and near break waters and no significant change was observed in the rest of the domain. The rates of instantaneous erosion showed an increase near edges of breakwater and shallow waters in upstream direction of the jetty head. Based on modeling studies it was concluded that the impact predicted on flow/sediment dynamics after proposed development is not very significant and also it is limited to localize areas only. From the study, it is concluded that the bed level changes are confined to the breakwater and jetty head. Hence the impact of construction of jetty and breakwaters is not expected on the shoreline changes.
- XIII. The most likely impact during construction phase would be on the subtidal and the intertidal habitats which could be temporarily destroyed marine structures during to driving of piles, dredging, trenching, rock pumping. Moreover, if the dredge spoil spreads over nearby areas under the prevailing high tidal excursion the biota there would also suffer accordingly. Overall damage in the region however would be localised, temporary and reversible and recovery would be fast once the construction phase is completed. Moreover, the region sustains low density of biotic communities and hence damage to marine biota would be small.

- XIV. The proposed construction activities related to LNG terminal consisting of jetty and trestle would have both negative and positive impacts on benthic habitats and marine benthos at the construction site. Total number of piles in approach trestle: - 240X2, Berthing Dolphins: - 16X4, Mooring Dolphins: - 16X6, Unloading Platform: - 39. Each pile dia. would be 1.5 m. Hence area that affected by the construction would be 963 m<sup>2</sup>
- XV. The major loss of macrobenthos would be due to breakwater construction activities. The intertidal zone affected due to jetty construction is very small. The loss of macrobenthos at the foot print of the piled structures would be permanent. However, these marine structures would provide additional surface area for selected benthic organisms, like barnacles, to habitat the affected segment. In this way, the available area for settlement of benthos would be 3 ha. The area available for the macrobenthos to grow in the new pile area would be 30 times more as compared to the loss of macrobenthos in the footprint of the piles. The damage to benthos along the pipeline corridor would be temporary and benthos would re-habitate at the affected segment in about 2-3 years after the construction phase. Hence the permanent lose of the benthic habitat due to the project implementation would be minor and would not have any measurable impact on macrobenthic productivity of the region.
- XVI. In well managed ports the leakages during normal operations of pumping are nearly eliminated. However, under certain rare abnormal unloading situations or due to defective components LNG under transport may be spilled. The spilled LNG would quickly evaporate and the impact on marine ecology would be insignificant. However, the major fear of such a leakage would be fire/explosion. The leakage of LNG during transit through specially designed tanks are used for running ships machinery and releases to the atmosphere are negligible. The LNG is not carried in the ship hold as conventional oil tankers do with liquid cargo. The double walled spheres are mounted on the ship with adequate distance from the hull. In case of a collision the chances of the impact reaching the spheres are rare. Hence, the LNG transport is relatively safer than any other petroleum product. At the LNG terminal, LNG would be unloaded in liquid form and pumped through pipelines to the cryogenic storage tanks. Since regasification of LNG would be done by utilizing heat of industrial water, no cold water discharge to the sea is envisaged.

- XVII. Accidents due to ship collision and grounding are rare but damage caused can often be serious. Only HSD is considered for assessment since as LNG is unlikely to adversely influence the marine ecology. Major concern during the operational phase of the LNG terminal would be the large releases of LNG and spillages of HSD from the ships fuel holds in case of an accident, that might occur and contaminate the marine environment. Severity of Impacts on the marine ecology due to HSD would depend on the quantity spilled and the location of spill. The study on oil spill modelling indicates that the spill of HSD at terminal site would move offshore during non-monsoonal season while it would reach the eastern coast of Chhara during monsoon. The coastline affected would be ranging from 1 to 2 km.
- XVIII. Frequency of ship collision is governed by the frequency of ship encounter and the probability of a collision, given an encounter. From the records of accidents maintained at several major ports worldwide it has been considered that collision frequency is proportional to the square of the traffic density and is directly proportional to the number of encounters. Causality statistics maintained at UK ports indicate that collisions involving ships account for 7% of all accidents and represent 0.024 for every 1000 ship movements. Assuming that this statistic is applicable to the region and taking movements of 162 in phase I and 290 in phase II of deep-sea vessels the probability of an accident works out to be one in every 257 y for phase I and 142 y for phase II.
- XIX. From grounding incidents at several ports it has been considered that the channel length to width ratio gives a good indication of probability of encountering a grounding obstruction. The grounding frequency increases with increasing length of the channel and decreases with increasing width for a given length. The channel between the 30 m contour to the LNG terminal would have a length of about 16 km and an average width of 0.5 km. Hence, probability of a deep-sea ship grounding at the present traffic level is one in 20 y in phase I and 11 y in phase II.
- XX. LNG which has a boiling point of  $-160^{\circ}\text{C}$  at atmospheric pressure is a liquefied gas stored at low temperature. As the ambient temperature of water is relatively high, LNG would evaporate as soon as it spills out. LNG is very buoyant having a density of 0.45 gm/cc and hence in case a leak occurs under the water, it tends to surface very quickly. The ambient seawater temperature

is very high compared to boiling point of LNG and hence it expands. The pressure exerted by 20 m column of seawater is far less than the pressure under which it has to be kept in liquid state. Hence, the buoyancy would steadily increase as it reaches the surface within a fraction of minute and would spread over a larger area and quickly evaporate. Hence, the impact of LNG spill is negligible in the water column as it would be dispersed over a larger area.

- XXI. The adverse impact posed by LNG spill would be the reduction of temperature of the surrounding water. With a specific gravity of 0.45, specific heat of 0.5 cal/g and 120 kcal/kg of latent heat, 1m<sup>3</sup> LNG would need 95625 kcal of heat energy to reach ambient temperature. Whereas, 1m<sup>3</sup> of seawater at 30°C can supply 4733.7 kcal with reduction in its temperature by 5°C. Hence 20 m<sup>3</sup> of water would be required to increase the temperature to the 250C level. Since gasified LNG only will be transported through pipelines latent heat need not be considered. In which case about 10 m<sup>3</sup> of seawater would be required for 450 kg of LNG to attain a temperature about 50 less than ambient temperature.
- XXII. Gasified LNG would quickly surface due to its buoyancy and tend to spread on the surface as a layer between the water surface and over lying atmosphere. Since the specific heat of the overlying atmosphere would be negligible, bulk of the heat be derived from water leading to thermal circulation and the cooled surface water would sink and new water would take its place. Hence, the overall impact on the ecology would be negligible since the temperature of water is unlikely to fall substantially to influence the biota.
- XXIII. Most of the impacts of LNG terminal are restricted to construction phase which will be stabilize during operational phase. The impacts on the top soil will be confined to proposed LNG terminal facilities. Further development of green belt will have positive impacts on soil quality. The impact of project activity accounts for changes in soil quality and soil erosion from project area. Considering that LNG terminal activity will be implemented at proposed site. Hence the changes in soil quality are not envisaged and impact will be less than significant.
- XXIV. The Marine area of Arabian Sea facing Chhara village in Kodinar taluka does not have any fragile ecosystem such as Coral reef or major Mangrove forests. However, small sparsely distributed mangroves shrubs are present in the

creek, near, Velan and Wanakbara etc. which are 10 Km away from the periphery of the upcoming proposed LNG Terminal. The mangrove cover in this area is very small, sparse and mostly of single species *Avicennia marina*. These mangroves are likely to have been established naturally which came in along the tides however, their size and numbers does not seem to make it significant mangrove ecosystem in this region.. However as the development activities like LNG terminal and associated activities are far away from the mangrove patches.

- XXV. Marine environment of Kodinar coast does have a great significance for several endangered marine fauna and also for fishermen as it provides one of the best fishing grounds for the local fisher folks. However there will be no impact on Fishing Activity due to the upcoming Project. The deep sea area of Kodinar Coast particularly starting from Muldwarka to Chharra is important egg laying ground for sea turtle during September to December. However all the construction activities will be taking place within the port boundary on the rocky enclave, not suited for laying egg by turtle, and will not have any development activities in the western side of the proposed port where the nesting ground of the turtle was located at stretch of approx. 1.5 - 4 km.
- XXVI. It is also informed that project proponent will not utilize the groundwater, therefore, no impact is envisaged on groundwater, etc. Due to poor condition of ground water availability and area falling in semi-critical category as per CGWB, groundwater withdrawal in and around the proposed LNG terminal may not be feasible.

The Technical Committee scrutinized the proposal of SPPL in its 22nd meeting, which was held on 23-03-2016, wherein, the representative of HPCLSEPL made a presentation about various activities to be carried out in the CRZ area, Comprehensive EIA report prepared by M/S National Environmental Engineering Research Institute (NEERI), Nagpur and CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai. Based on presentation made by the representative of the HPCLSEPL, the technical committee asked the company to submit various details. The company has submitted the details vide its letter dated 22/04/2016.

The proposal was also discussed in the 29th meeting of Gujarat Coastal Zone Management Authority, which was held on 24-05-2016., wherein following decision was taken:

***“After detailed discussion and deliberation, it was decided by the GCZMA to ask the HPCLSEPL to prepare the Lion Conservation Plan considering the latest census data, including details about wild life population, distribution and movement especially for lion in the project area and its vicinity. It was also suggested to explore the possibility for alternative site, if possible”.***

Accordingly, details were called from the HPCLSEPL vide this office letter dated 05-07-2016. The HPCLSEPL submitted the details vide its letter dated 29th July, 2016 alongwith Lion Conservation Plan prepared in July 2016.

The proposal was again discussed in the 31st meeting of the Gujarat Coastal Zone Management Authority, which was held on 15-10-2016, wherein the representative of the HPCLSEPL made a presentation before the Authority and submitted that they have proposes to develop LNG re-gasification terminal at village Chhara, Taluka Kodinar, District Gir Somnath, Gujarat.

On-shore LNG storage and re-gasification facilities for 5 MMTPA capacity (expandable to 10 MMTPA) will have following components:

- HSEPL LNG Terminal will have LNG ship unloading Jetty( 1 jetty with 3 nos. unloading arms, approach Trestle with pipelines-1225m, Dolphins-6mooring and 4 berthing), LNG storage(2 nos. of each of 200,000cum) LNG transfer(from jetty to storage tanks), Regasification facilities and vaporization return line(from tankages to jetty), Gas send out and metering, boil-off gas handling facility, utilities and infrastructure facilities, fire, gas, spill detection systems and fire-fighting facilities.

The terminal will be provided with latest state of art instruments and controls for safe handling of LNG and LNG terminal operation. The proposed facilities would be located within the Simar Port boundary and therefore no additional land required. The LNG jetty will be protected by breakwater. There would be use of modern plant, machinery and vehicles. Further to this Dusty suppression with water would be carried and trucks would be covered with tarpaulin to minimize or eliminate the impact on air quality during construction phase. The LNG will be stored in cryogenic tanks and gasification will be in closed system, so no fugitive emission would be there. Natural gas will be used as fuel in the terminal , so emission will be less.

Nearest major fish landing centers are at Madhwad and Mul-Dwarka. Major fishes are catfishes, small sciaenids and other clupeids. Corals were not present at the proposed location. There are no mangroves near the project site. Nearest mangroves are at the mouth of Madhwad creek which is at about 7 km from the proposed project site. Reptiles and mammals such as dolphins and whales were not sighted during the period of field studies. Turtle breeding ground present in the vicinity of the project site.

It was submitted that the Risk Assessment studies has been carried out and all suggestions/recommendations of the study report would be adopted to avoid any Risk due to the proposed project. They have carried out additional studies like Littoral Drift Assessment study, Cyclone Risk Assessment Study and Tsunami Risk Assessment Study by DHI.

It was further submitted by the representative of the HPCLSEPL that Asiatic lion numbers in coastal area is not growing in proportion to the overall numbers of total satellite population. Their percentage contribution to total satellite population has been decreasing over the years, suggesting limitations related to habitat and food. Coastal thorn forests do not offer adequate wild prey for lions. Lions dispersing/straying in coastal areas are likely to undergo numerous challenges which include habitat constraint, prey and social factors. Such marginal habitat are termed as "Population sinks" for the species, where dispersing populations from source (Gir PA) could not establish territories and eventually die due to various unnatural reasons. It is evident that the lions are not breeding in coastal areas and particularly near the proposed site due to limited resources availability. Several census records suggests that there is no presence of lions cubs near coastal area and around project site.

The representative of the HPCLSEPL submitted that proposed lion conservation plan during construction phase include preparation of comprehensive Traffic Management Plan in consultation with local traffic Department and Forests Department, Construction of boundary wall before actual construction, ban on entering of vehicles or person into the coastal forests, labour camps shall be outside coastal forests, no dumping of any waste in coastal forests, construction of wider under passages (@10 mtrs) over drainages with proper designed for safe passages for lion, construction of elevated road facilitates, at least 200m portion of proposed road in two section of 100m each from port boundary to NH-8E, development of green belt development to be handed over to Forests Department etc.,

It was further submitted that the proposed lion conservation plan during operational phase include provision of 100m green belt( non thorny and leafy vegetation plantation merging with local vegetation ) development outside the boundary wall of the port, installation of sign board all along the roads, for public to avoid accidents , training to be given to port staff and workers to avoid any human-lion confrontation in the area, provide support to local NGO for conservation of Lion etc.,

***The Authority deliberate the issues and Lion Conservation plan submitted by the project proponent and after detail deliberation, it was decided that PCCF(WL) in consultation with project proponent would study the Lion Conservation Plan submitted and submit his comments/suggestion within 30 days and the proposal would be discussed in the next GCZMA meeting.***

As decided in the 31st GCZMA meeting, the PCCF(WL) submitted report vide his letter dated 02-12-2016.

The proposal of SPPL was again discussed in the 32<sup>nd</sup> meeting of GCZMA, which was held on 14-12-2016, wherein the Authority was apprised that the PCCF(WL) vide its letter dated 02-12-2016 has submitted comments/suggestions.

Accordingly, the PCCF(WL) has examined the Lion Conservation Plan in consultation with the project proponent and after detailed examination submitted his letter dated 02-12-2016 alongwith comments/suggestions.

The PCCF (WL ) further apprised the Authority that the DCF Gir(West) Junagadh visited the site on 21-22 October, 2016 and discussed the proposal with user agency. The CCF(WL) Junagadh has submitted the findings of the DCF Gir(West) Junagadh with his recommendation, as per letter dated 02-12-2016.

***The Authority deliberated the proposal of M/s HPCL Shapoorji Energy Pvt Ltd and after detailed discussion, it is decided to recommend to the Ministry of Environment, Forests and Climate Change, Government of India to grant CRZ Clearance for Development of LNG Storage and Regasification Terminal at Village Chhara, Taluka: Kodinar, Dist: Gir-Somnath by M/S HPCL Shapoorji Energy Pvt Ltd with some specific conditions***

In view of the above, the State Government hereby recommends to the Ministry of Environment and Forests, Government of India to grant CRZ Clearance for Development of LNG Storage and Regasification Terminal at Village Chhara, Taluka: Kodinar, Dist: Gir-Somnath by M/S HPCL Shapoorji Energy Pvt Ltd with strict compliance of the following conditions:

**Specific Conditions:**

1. The provisions of the CRZ Notification of 2011 shall be strictly adhered to by M/s SPL. No activity in contradiction to the provisions of the CRZ Notification shall be carried out by M/s HPCLSEPL
2. *The HPCLSEPL shall ensure that adequate numbers of underpasses are provided in road construction to minimize the wildlife conflict and also traffic management plan shall be implemented as per report, in consultation with PCCF(WL) and allocate adequate fund for the same.*
3. *The HPCLSEPL shall ensure that the over bridge is provided with adequate height with ground level, wherever, it is not possible to provide underpasses to minimize the Wildlife conflict, in consultation with PCCF(WL) and allocate adequate fund for the same.*
4. *A Marine Conservation center may be developed at Chhara with objective of educating the people and creating awareness amongst the people for Wildlife conservation.*
5. *The HPCLSEPL shall earmark appropriate fund for the cause of conservation of lion and conflict management with "Lion Conservation Society" on annual basis.*
6. *100 m green belt shall be developed by the HPCLSEPL outside the hard boundary. i.e after the footprint of layout of the plant, in consultation with Forests Department and maintenance will be done by HPCLSEPL.*
7. *The HPCLSEPL shall have to comply with all other conditions/recommendations made by the PCCF(WL) vide his letter No: WLP/32/A/1501-1504/2016-17 dated 02-12-2016.*
8. The HPCLSEPL shall not start any construction activity without obtaining Environmental Clearance and CRZ clearance from the MoEF&CC, GOI.
9. All necessary permissions from different Government Departments / agencies shall be obtained by M/s HPCLSEPL before commencing any enabling activities.
10. Dredging disposal site may be examined to ensure that it does not adversely affect the region west to the proposed port, which is known for whale shark presence and it shall be based on the modeling study done by the an agency of National repute.
11. All the recommendations and suggestions given by NEERI Nagpur .in their Comprehensive Environment Impact Assessment reports for conservation /

protection and betterment of environment shall be implemented strictly by M/s HPCLSEPL

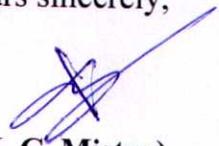
12. The construction and operational activities shall be carried out in such a way that there is no negative impact on mangroves, if any, and other important coastal / marine habitats. The construction activities shall be carried out only under the guidance / supervision of the reputed institute / organization.
13. M/s HPCLSEPL shall strictly ensure that no creeks or rivers are blocked due to any activity at the site.
14. The construction debris and /or any other type of waste shall not be disposed of into the sea, creek or in the CRZ areas. The debris shall be removed from the construction site immediately after the construction is over.
15. The construction camps shall be located outside the CRZ area and the construction labour shall be provided with the necessary amenities, including sanitation, water supply and fuel and it shall be ensured that the environmental conditions are not deteriorated by the construction labours.
16. M/s SPL shall prepare and regularly update their Local Oil Spill Contingency and Disaster Management Plan in consonance with the National Oil Spill and Disaster Contingency Plan and shall submit the same to this Department after having it vetted through the Indian Coast Guard.
17. M/s HPCLSEPL shall bear the cost of the external agency that may be appointed by this Department for supervision / monitoring of proposed activities and the environmental impacts of the proposed activities.
18. The groundwater shall not be tapped within the CRZ areas by the SPL to meet with the water requirements in any case.
19. Massive greenbelt development program including the mangrove plantation in 50 ha. shall be carried out in consultation with the Gujarat Ecology Commission/ Forest Department by M/s HPCLSEPL
20. M/s HPCLSEPL shall have to contribute financially for taking up the socio-economic upliftment activities in this region in consultation with the Forests and Environment Department and the District Collector / District Development Officer.
21. A separate budget shall be earmarked for environmental management and socio-economic activities including the greenbelt / mangrove plantation and details thereof shall be furnished to this Department as well as the MoEF& CC, GOI. The

details with respect to the expenditure from this budget head shall also be furnished alongwith the compliance report.

22. A separate Environmental Management Cell with qualified personnel shall be created for environmental monitoring and management during construction and operational phases of the project.
23. Environmental Audit report indicating the changes, if any, with respect to the baseline environmental quality in the coastal and marine environment shall be submitted every year by M/s HPCLSEPL to this Department as well as to the MoEF&CC, GOI.
24. A six monthly report on compliance of the conditions mentioned in this letter shall have to be furnished by M/s HPCLSEPL on a regular basis to this Department as well as to the Ministry of Environment, Forests and Climate Change, Government of India
25. Any other condition that may be stipulated by this Department/ Ministry of Environment Forests and Climate Change, Government of India from time to time for environmental protection / management purpose shall also have to be complied with by M/s HPCLSEPL.

Thanking you

Yours sincerely,



(K. C. Mistry)

**Encl: As above**

**Copy to:**

✓ Mr. Vinod Kumar  
Senior Manager  
M/S HPCL Shapoorji Energy Pvt Ltd,  
Venus Amadeus, 301-305,  
3<sup>rd</sup> Floor, Jodhpur Cross Road ,  
Satellite , Ahmedabad- 380015 - For information please

**Minutes of the 32<sup>nd</sup> meeting of the Gujarat Coastal Zone Management Authority held on 14-12-2016 at 03:00 PM in the Committee Room, Gujarat Pollution Control Board, Gandhinagar**

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The 32<sup>nd</sup> meeting of the Gujarat Coastal Zone Management Authority (GCZMA) was held on 15-10-2016 under chairmanship of Shri Arvind Agarwal, IAS, Additional Chief Secretary, Forests & Environment Department and Chairman, GCZMA in the Committee Room, Gujarat Pollution Control Board, Gandhinagar. A list of the members and other participants, who attended the meeting, appears at **Annexure A**. Also a list of the representative of various project proponents, who have made presentation before the Authority appears at **Annexure-B**.

Initiating the meeting, with the permission of the Additional Chief Secretary, Forests & Environment Department, and Chairman of GCZMA, the Member Secretary, GCZMA, welcomed all the members of the GCZMA and other participants.

He briefed the Members of the GCZMA about the agenda items for the meeting and the agenda wise discussion and decisions taken thereafter is as under:

**32.1 CRZ Clearance for Development of LNG Storage and Regasification Terminal at Village Chhara, Taluka: Kodinar, Dist: Gir-Somnath by M/S HPCL Shapoorji Energy Pvt Ltd**

M/S HPCL Shapoorji Energy Pvt LTD (HPCLSEPL), vide its application dated 12-02-2016 has approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from the Ministry of Environment, Forests and Climate Change, Government of India for their proposed project for Development of LNG Storage and Regasification Terminal at Village: Chhara, Taluka: Kodinar, Dist: Gir- Somnath

The Authority was apprised that the proposal was discussed in the 29<sup>th</sup> meeting of the Authority, which was held on 24-05-2016, wherein the Authority was apprised that the Technical Committee scrutinized this proposal in its 22<sup>nd</sup> meeting, which was held on 28-03-2016, wherein the representative of HPCLSEPL made a presentation about various

activities to be carried out in the CRZ area, Comprehensive EIA report prepared by the National Environmental Engineering Research Institute (NEERI), Nagpur, and CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai. Based on the presentation made by the representative of the HPCLSEPL, it was decided by the Technical Committee to furnish various details. The HPCLSEPL. The same has been furnished.

Representative of the HPCLSEPL made a presentation before the Authority and submitted that they have proposed to develop LNG re-gasification terminal at village Chhara, Taluka Kodinar, District Gir Somnath, Gujarat.

On-shore LNG storage and re-gasification facilities for 5 MMTPA capacity (expandable to 10 MMTPA) will have following components:

- HSEPL LNG Terminal will have LNG ship unloading Jetty (1 jetty with 3 nos. unloading arms, approach Trestle with pipelines-1225m, Dolphins-6 mooring and 4 berthing), LNG storage (2 nos. of each of 200,000 cum) LNG transfer (from jetty to storage tanks), Regasification facilities and vaporization return line (from tankages to jetty), Gas send out and metering, boil-off gas handling facility, utilities and infrastructure facilities, fire, gas, spill detection systems and fire-fighting facilities.

The terminal will be provided with latest state of art instruments and controls for safe handling of LNG and LNG terminal operation. The proposed facilities would be located within the Simar Port boundary and therefore no additional land required. The LNG jetty will be protected by breakwater. There would be use of modern plant, machinery and vehicles. Further to this Dusty suppression with water would be carried and trucks would be covered with tarpaulin to minimize or eliminate the impact on air quality during construction phase. The LNG will be stored in cryogenic tanks and gasification will be in closed system, so no fugitive emission would be there. Natural gas will be used as fuel in the terminal, so emission will be less.

Nearest major fish landing centers are at Madhwad and Mul-Dwarka. Major fishes are catfishes, small sciaenids and other clupeids. Corals were not present at the proposed location. There are no mangroves near the project site. Nearest mangroves are at the mouth of Madhwad creek which is at about 7 km from the proposed project site. Reptiles and mammals such as dolphins and whales were not sighted during the period of field studies. Turtle breeding ground present in the vicinity of the project site.

It was submitted that the Risk Assessment studies has been carried out and all suggestions/recommendations of the study report would be adopted to avoid any Risk due to the proposed project. They have carried out additional studies like Littoral Drift Assessment study, Cyclone Risk Assessment Study and Tsunami Risk Assessment Study by DHI.

It was further submitted by the representative of the HPCLSEPL that Asiatic lion numbers in coastal area is not growing in proportion to the overall numbers of total satellite population. Their percentage contribution to total satellite population has been decreasing over the years, suggesting limitations related to habitat and food. Coastal thorn forests do not offer adequate wild prey for lions. Lions dispersing/straying in coastal areas are likely to undergo numerous challenges which include habitat constraint, prey and social factors. Such marginal habitat is termed as "Population sinks" for the species, where dispersing populations from source (Gir PA) could not establish territories and eventually die due to various unnatural reasons. It is evident that the lions are not breeding in coastal areas and particularly near the proposed site due to limited resources availability. Several census records suggest that there is no presence of lions cubs near coastal area and around project site.

The representative of the HPCLSEPL submitted that proposed lion conservation plan during construction phase include preparation of comprehensive Traffic Management Plan in consultation with local traffic Department and Forests Department, Construction of boundary wall before actual construction, ban on entering of vehicles or person into the coastal forests, labour camps shall be outside coastal forests, no

dumping of any waste in coastal forests, construction of wider under passages(@10 mtrs) over drainages with proper designed for safe passages for lion, construction of elevated road facilitates , at least 200m portion of proposed road in two section of 100m each from port boundary to NH-8E, development of green belt development to be handed over to Forests Department etc.,

It was further submitted that the proposed lion conservation plan during operational phase include provision of 100m green belt( non thorny and leafy vegetation plantation merging with local vegetation ) development outside the boundary wall of the port, installation of sign board all along the roads, for public to avoid accidents , training to be given to port staff and workers to avoid any human-lion confrontation in the area, provide support to local NGO for conservation of Lion etc.,

The Authority felt that the data used for preparation of lion conservation plan is of census 2010. Since the new census data has been published for 2015, the conservation plan should have been prepared on this basis only. The HPCLSEPL submitted details along with Lion Conservation Plan.

The Authority was apprised that proposal was again discussed in the 31st meeting of the Authority, The Authority deliberate the issues and Lion Conservation plan submitted by the project proponent and after detail deliberation, it was decided that PCCF(WL) in consultation with project proponent would study the Lion Conservation Plan submitted and submit his comments/suggestion within 30 days and the proposal would be discussed in the next GCZMA meeting.

Accordingly, the PCCF(WL) has examined the Lion Conservation Plan in consultation with the project proponent and after detailed examination submitted his letter dated 02-12-2016 alongwith comments/suggestions.

The PCCF (WL ) further apprised the Authority that the DCF Gir(West) Junagadh visited the site on 21-22 October, 2016 and discussed the proposal with user agency. The CCF(WL) Junagadh has submitted the findings of the DCF Gir(West) Junagadh with his recommendation, as per letter dated 02-12-2016.

**The Authority deliberated the proposal of M/s HPCL Shapoorji Energy Pvt Ltd and after detailed discussion, it is decided to recommend to the Ministry of Environment, Forests and Climate Change, Government of India to grant CRZ Clearance for CRZ Clearance for Development of LNG Storage and Regasification Terminal at Village Chhara, Taluka: Kodinar, Dist: Gir-Somnath by M/S HPCL Shapoorji Energy Pvt Ltd with following specific conditions:**

1. The HPCLSEPL shall ensure that adequate numbers of underpasses are provided in road construction to minimize the wildlife conflict and also traffic management plan shall be implemented as per report, in consultation with PCCF(WL) and allocate adequate fund for the same.
2. The HPCLSEPL shall ensure that the over bridge is provided with adequate height with ground level, wherever, it is not possible to provide underpasses to minimize the Wildlife conflict, in consultation with PCCF(WL) and allocate adequate fund for the same.
3. A Marine Conservation center may be developed at Chhara with objective of educating the people and creating awareness amongst the people for Wildlife conservation.
4. The HPCLSEPL shall earmark appropriate fund for the cause of conservation of lion and conflict management with “Lion Conservation Society” on annual basis.
5. 100 m green belt shall be developed by the HPCLSEPL outside the hard boundary. i.e after the footprint of layout of the plant, in consultation with Forests Department and maintenance will be done by HPCLSEPL.
6. The HPCLSEPL shall have to comply with all other conditions/recommendations made by the PCCF(WL) vide his letter No: WLP/32/A/1501-1504/2016-17 dated 02-12-2016.

### 32.2

**CRZ Clearance for proposed extension of Break water at Port to be developed by M/s Simar Port Pvt. Ltd at Village Chhara-sarkhadi, Ta-Kodinar, Dist: Gir-Somnath by M/S Simar Port Pvt Ltd**

M/S Simar Port Pvt Ltd(SPPL), vide its application dated 29-04-2016 has approached this Department has seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from Ministry of Environment, Forests and Climate Change, Government of India for their proposed project for extension of break water at Port to be developed by M/S Simar Port Limited at Village: Chhara- Sarakhadi, Taluka: Kodinar, Dist: Gir-Somnath.

The Authority was apprised that the proposal was discussed in the 29th meeting of GCZMA, which was held on 24-05-2016, wherein the Authority was apprised that the Technical Committee scrutinized the proposal of SPPL in its 23rd meeting, which was held on 19-05-2016, wherein, the representative of Simar Port Pvt Ltd made a presentation about various activities to be carried out in the CRZ area, Comprehensive EIA report prepared by M/S National Environmental Engineering Research Institute(NEERI), Nagpur and CRZ map prepared by the Institute of Remote Sensing , Anna University, Chennai. Based on presentation made by the representative of the SSPL, the technical committee asked the company to take all necessary measures to ensure that coast stability is maintained and also to come out with a sound conservation plan for wildlife ensuring their free movement in the area and adopt suitable measures to eliminate the pollution problems during transportation of construction material during construction period and handling of the cargo during operation phase.

After detailed discussion and deliberation, since the proposed proposal for extension of breakwater is associated with LNG Terminal, it was decided by the Authority to ask the Simar Port Private Limited to prepare the Lion Conservation Plan considering the latest census data, including details about wild life population, distribution and movement especially for lion in the project area and its vicinity. The HPCLSEPL has now submitted details alongwith Lion Conservation Plan

The representative of the SPPL made a presentation before the Authority and submitted that M/s Simar Port Private Limited is developing all weather , multi cargo , multipurpose, deep draft green field port near Village: Chhara, Taluka: Kodinar, Dist: Gir- Somnath. They have planned

port development in Phase-I consists of coal terminal to handle coal up to 8 MMTPA and allied facilities. In order to achieve the tranquility required for operating the coal berth, a 1700m long breakwater will be constructed on the shoal bank. Ministry of Environment, Forests and Climate Change, Government of India granted environmental clearance for Phase-I development in January, 2014.

The Phase-II of the port development consists of LNG terminal with storage and regasification facilities. These will be developed by HPCL Shapporji Energy Private Limited, a joint venture between Shapporji Pallonji and Hindustan Petroleum Corporation Limited. In order to achieve the tranquility condition required for operating the LNG carriers, additional breakwaters of 2800 m will be constructed on the shoal bank. Thus total length will be 4500m.

It was further submitted by the representative of the HPCLSEPL that Asiatic lion numbers in coastal area is not growing in proportion to the overall numbers of total satellite population. Their percentage contribution to total satellite population has been decreasing over the years, suggesting limitations related to habitat and food. Coastal thorn forests do not offer adequate wild prey for lions. Lions dispersing/straying in coastal areas are likely to undergo numerous challenges which include habitat constraint, prey and social factors. Such marginal habitat are termed as "Population sinks" for the species, where dispersing populations from source( Gir PA) could not establish territories and eventually die due to various unnatural reasons. It is evident that the lions are not breeding in coastal areas and particularly near the proposed site due to limited resources availability. Several census records suggest that there is no presence of lion cubs near coastal area and around project site.

The representative of the HPCLSEPL submitted that proposed lion conservation plan during construction phase include preparation of comprehensive Traffic Management Plan in consultation with local traffic Department and Forests Department, Construction of boundary wall before actual construction, ban on entering of vehicles or person into the coastal forests, labour camps shall be outside coastal forests, no

dumping of any waste in coastal forests, construction of wider under passages(@10 mtrs) over drainages with proper designed for safe passages for lion, construction of elevated road facilitates , at least 200m portion of proposed road in two section of 100m each from port boundary to NH-8E, development of green belt development to be handed over to Forests Department etc.,

It was further submitted that the proposed lion conservation plan during operational phase include provision of 100m green belt( non-thorny and leafy vegetation plantation merging with local vegetation ) development outside the boundary wall of the port, installation of sign board all along the roads, for public to avoid accidents , training to be given to port staff and workers to avoid any human-lion confrontation in the area, provide support to local NGO for conservation of Lion etc.,

The Authority felt that the data used for preparation of lion conservation plan is of census 2010. Since the new census data has been published for 2015, the conservation plan should have been prepared on this basis only. The HPCLSEPL submitted details along with Lion Conservation Plan.

The Authority was apprised that proposal was again discussed in the 31st meeting of the Authority, The Authority deliberate the issues and Lion Conservation plan submitted by the project proponent and after detail deliberation, it was decided that PCCF(WL) in consultation with project proponent would study the Lion Conservation Plan submitted and submit his comments/suggestion within 30 days and the proposal would be discussed in the next GCZMA meeting.

The PCCF(WL) vide its letter dated 02-12-2016 has submitted comments/suggestions.

The PCCF (WL) apprised the Authority that the DCF Gir(West) Junagadh visited the site on 21-22 October, 2016 and discussed the proposal with user agency. The CCF(WL) Junagadh has submitted the findings of the DCF Gir(West) Junagadh with his recommendation, as per letter dated 02-12-2016.

**The Authority deliberated the proposal of M/s Simar Port Limited and after detailed discussion, it is decided to recommend to the**

**Ministry of Environment, Forests and Climate Change, Government of India to grant CRZ Clearance for proposed extension of Break water at Port to be developed by M/s Simar Port Pvt. Ltd at Village Chhara-Sarkhadi, Ta- Kodinar, Dist: Gir-Somnath by M/S Simar Port Pvt Ltd**

1. The SPPL shall ensure that adequate numbers of underpasses are provided in road construction to minimize the wildlife conflict and also traffic management plan shall be implemented as per report, in consultation with PCCF(WL) and allocate adequate fund for the same.
2. The SPPL shall ensure that the over bridge is provided with adequate height with ground level, wherever, it is not possible to provide underpasses to minimize the Wildlife conflict, in consultation with PCCF(WL) and allocate adequate fund for the same.
3. A Marine Conservation center may be developed at Chhara with objective of educating the people and creating awareness amongst the people for Wildlife conservation.
4. The SPPL shall earmark appropriate fund for the cause of conservation of lion and conflict management with “Lion Conservation Society” on annual basis.
5. 100 m green belt shall be developed by the SPPL outside the hard boundary. i.e after the footprint of layout of the plant, in consultation with Forests Department and maintenance will be done by SPPL.
6. The SPPL shall have shall have to comply with all other conditions/recommendations made by the PCCF(WL) vide his letter No: WLP/32/A/1501-1504/2016-17 dated 02-12-2016.

**32.3 CRZ Clearance for Proposed Salt Works in 100 acres of land at Plot no- 2,10 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Neelkanth Coal Mfg. Pvt Ltd**

M/S Neelkanth Coal Mfg.Pvt Ltd (NCMPL), vide its application dated 07-07-2015 has approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from State Level Environmental Impact Assessment Authority (SEIAA) for their proposed project for Salt Works in 100 acres of land at Plot no- 2&10 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch

The Authority was apprised that the proposal was scrutinized by the Technical Committee in its 19th meeting, which was held on 08-10-2015, wherein the representative of Neelkanth Coal Mfg.Pvt Ltd made a presentation about various activities to be carried out in the CRZ area, EIA report prepared by the Envisafe Environment Consultant, Ahmedabad and CRZ map prepared by the Institute of Environmental Studies and Wetland Management, Kolkata, West Bengal.

After detailed discussion and deliberation on the presentation made by the representative of the NCMPL, it was decided by the Technical Committee to ask various details from the NCMPL. The unit has submitted Details. Further to this the project proponent changed their consultant and therefore it was asked to appoint new consultant and submit the vetted report from them. The project proponent has submitted the same.

The representative of the NCMPL made a presentation before Authority and submitted that they have proposed to set up a new salt works in total 100 acres located (**Latitude: 23° 7'9.58" N. Longitude: 70° 14'5.55" E**) along the Bank of the Sanu creek between Village: Padana and Village: Mithirohar, Gandhidham. This salt pans are located at a comparatively higher elevation and the Seawater does not flow into it naturally. The land has been granted on lease by Kandla Port Trust for Salt production for period of 30 years(30/12/2010 to 29/12/2040). There are also operational salt pans in this area, which are connected with each other.

It was further submitted that the production capacity @5000 MT/Annum based on 10 months production cycle. There would be mixed salt

production @ 1250 MT/Annum based on 10 months production cycle. The tidal water from the Gulf of Kutch would be drawn through natural flow during high tide period reaches to Sannu creek and the water from Sannu Creek would be pumped by using centrifugal pumps in intake wells for salt harvesting. The Sea water intake would be 850M<sup>3</sup>/day having salinity 35.4-37.0ppt. The source of power supply would be from PGVCL.

The intake well will be circular in shape with 3.00m diameter, made of RCC located within the salt pan boundary itself with an inlet pipe passing through the boundary wall. When the seawater level increase in the height during high tide period and reaches up to boundary wall, seawater will reach the intake well, through intake pipe. The depth of intake well will be 4.5 m. The seawater then shall be pumped and diverted through channels to the required ponds. The nearest mangrove patch is located at @ 323.19 M from the salt pan boundary.

The representative of the NCMPL further submitted that in this salt farm, it has been proposed to route the remaining mixed salt bittern after production of NaCl salt in the crystallizer to the mixed salt settler pond, located to allow natural evaporation to produce mixed salt containing salt of KCl, MgCl<sub>2</sub>, MgSO<sub>4</sub>, etc. This can be sold in market separately and has good market value. There would not be any discharge of concentrated bittern back to the sea at any stage of NaCl salt production process, thus making entire cycle, a zero discharge of concentrated bittern into sea.

It was further submitted that the proposed location of salt pan is on the landward side of the elevated North West bank of Sanu creek. Being at an elevation more than the water level influx in the creek during the maximum high tide period, this portion remains dry and without vegetation except few salt tolerant species. The mud flat along the South East side of the creek (opposite side of the proposed salt pans area) is covered with thick patches of mangroves. The proposed site is devoid of mangroves. The construction of embankment and road is required. The construction will be carried out using locally available mud or brining lateritic form from distant place if required. No mangroves are growing in

these region. The construction required for proposed project will not have any consequences on scattered mangroves growing along the fringes of Sanu creek. There will not be any impact on air environment , if locally available mud is used for construction of embankment. Water pollution from salt pan operation generally occurs mainly through the discharge of mother liquor into creeks, thus impacting negatively on marine life such as juvenile fishes, fish eggs and mangrove saplings. But in the proposed salt farm zero discharge option shall be adopted with no discharge of mother liquor/bittern. When pumping is used for intake of seawater to salt pans, it can lead to impingement and entrainment of marine organism. This can be avoided/minimized by using proper wedge wire screens around the pumping location. Their effects on entrainment may be small, but such screens have potential to eliminate impingement of juvenile and adult fishes, if properly designed and located.

It was further submitted that salt pans, when exploited, can function as artificial wetlands, nevertheless be of a very high ecological value. Salt pans are excellent feeding ground because of the availability of planktons. Salt production leads in practice to the creation of large, undisturbed areas where human presence is limited hence they can therefore function as an important habitat for water birds. Managing salt pans as water birds habitat can provide alternative forging ground for shorebirds and wading birds. Waders and shorebirds are attracted to the pan of lower salinity where benthic macro fauna resembled that of intertidal mudflats in the estuary

As per the CRZ maps prepared by the Institute of Environmental Studies and Wetland Management, Department of Environment, Government of West Bengal, Kolkata, the proposed project falls in the CRZ-I(B) category.

**The Authority deliberated the proposal of M/s Neelkanth Coal Mfg. Pvt Ltd and after detailed discussion, it is decided to recommend to the State Level Environment Impact Assessment Authority to grant CRZ Clearance for Proposed Salt Works in 100 acres of land at Plot no- 2,10 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana**

**and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Neelkanth Coal Mfg. Pvt Ltd with following specific conditions:**

1. Necessary permissions from different departments/ agencies under different laws/ acts shall be obtained before commencing any enabling activity for the proposed salt work
2. The NCMPL shall ensure that existing mangrove patches are protected and conserved.
3. There shall be no destruction of any mangrove due to proposed project.
4. The NCMPL shall ensure that there shall be no discharge of any effluent/bittern into marine environment and unit shall observe Zero Discharge.
5. The NCMPL shall carry out mangrove plantation in 25 ha of land in consultation with Gujarat Ecology Commission/Forests Department.

**32.4 CRZ Clearance for Proposed Salt Works in 300 acres of land at Plot no- 6,7,8 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Neelkanth Enterprises.**

M/S Neelkanth Enterprises (NE), vide its application dated 07-07-2015 has approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from State Level Environmental Impact Assessment Authority (SEIAA) for their proposed project for Salt Works in 300 acres of land at Plot no- 6,7 and 8 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch

The Authority was apprised that the proposal was scrutinized by the Technical Committee in its 19th meeting, which was held on 19-10-2015, wherein the representative of Neelkanth Enterprises(NE) made a presentation about various activities to be carried out in the CRZ area, EIA report prepared by the Envisafe Environment Consultant,

Ahmedabad and CRZ map prepared by the Institute of Environmental Studies and Wetland Management, Kolkata, West Bengal.

After detailed discussion and deliberation on the presentation made by the representative of the NCMPL, it was decided by the Technical Committee to ask various details from the NCMPL. The unit has submitted Details. Further to this the project proponent changed their consultant and therefore it was asked to appoint new consultant and submit the vetted report from them. The project proponent has submitted the same.

The representative of the NE made a presentation before the Authority and submitted that they have proposed to set up a new salt works in total 100 acres located (**Latitude: 23° 6' 51.55" N, Longitude: 70° 13' 39.19" E**) along the Bank of the Sanu creek between Village: Padana and Village: Mithirohar, Gandhidham. This salt pans are located at a comparatively higher elevation and the Seawater does not flow into it naturally. The land has been granted on lease by Kandla Port Trust for Salt production for period of 30 years (30/12/2010 to 29/12/2040). There are also operational salt pans in this area, which are connected with each other.

It was further submitted that the production capacity @15,000 MT/Annum based on 10 months production cycle. There would be mixed salt production @ 3750 MT/Annum based on 10 months production cycle. The tidal water from the Gulf of Kutch would be drawn through natural flow during high tide period reaches to Sannu creek and the water from Sannu Creek would be pumped by using centrifugal pumps in intake wells for salt harvesting. The Sea water intake would be 2500 M<sup>3</sup>/day having salinity 35.4-37.0ppt. The source of power supply would be from PGVCL.

The intake well will be circular in shape with 3.00m diameter, made of RCC located within the salt pan boundary itself with an inlet pipe passing through the boundary wall. When the seawater level increase in the height during high tide period and reaches up to boundary wall, seawater will reach the intake well, through intake pipe. The depth of intake well will be 4.5 m. The seawater then shall be pumped and

diverted through channels to the required ponds. The nearest mangrove patch is located at @ 32.86 M from the salt pan boundary.

The representative of the NE further submitted that in this salt farm, it has been proposed to route the remaining mixed salt bittern after production of NaCL salt in the crystallizer to the mixed salt settler pond, located to allow natural evaporation to produce mixed salt containing salt of KCL, MgCL, MgSO<sub>4</sub>, etc. This can be sold in market separately and has good market value. There would not be any discharge of concentrated bittern back to the sea at any stage of NaCL salt production process, thus making entire cycle, a zero discharge of concentrated bittern into sea.

It was further submitted that the proposed location of salt pan is on the landward side of the elevated North West bank of Sanu creek. Being at an elevation more than the water level influx in the creek during the maximum high tide period, this portion remains dry and without vegetation except few salt tolerant spices. The mud flat along the South East side of the creek (opposite side of the proposed saltpans area) is covered with thick patches of mangroves. The proposed site is devoid of mangroves. The construction of embankment and road is required. The construction will be carried out using locally available mud or brining lateritic form from distant place if required.. The construction required for proposed project will not have any consequences on scattered mangroves growing along the fringes of Sanu creek. There will not be any impact on air environment, if locally available mud is used for construction of embankment. Water pollution from salt pan operation generally occurs mainly through the discharge of mother liquor into creeks, thus impacting negatively on marine life such as juvenile fishes, fish eggs and mangrove saplings. But in the proposed salt farm zero discharge option shall be adopted with no discharge of mother liquor/bittern. When pumping is used for intake of seawater to saltpans, it can lead to impingement and entrainment of marine organism. This can be avoided/minimized by using proper wedge wire screens around the pumping location. Their effects on entrainment may be small, but such screens have potential to eliminate impingement of juvenile and adult fishes, if properly designed and located.

It was further submitted that saltpans, when exploited, can function as artificial wetlands, nevertheless be of a very high ecological value. Salt pans are excellent feeding ground because of the availability of planktons. Salt production leads in practice to the creation of large, undisturbed areas where human presence is limited hence they can therefore function as an important habitat for water birds. Managing salt pans as water birds habitat can provide alternative foraging ground for shorebirds and wading birds. Waders and shorebirds are attracted to the pan of lower salinity where benthic macro fauna resembled that of intertidal mudflats in the estuary

As per the CRZ maps prepared by the Institute of Environmental Studies and Wetland Management, Department of Environment, Government of West Bengal, Kolkata, the proposed project fall in the CRZ-I(B) category.

**The Authority deliberated the proposal of M/s Neelkanth Enterprises and after detailed discussion, it is decided to recommend to the State Level Environment Impact Assessment Authority to grant CRZ Clearance for Proposed Salt Works in 100 acres of land at Plot no- 6,7&8 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Neelkanth Enterprises with following specific conditions:**

1. Necessary permissions from different departments/ agencies under different laws/ acts shall be obtained before commencing any enabling activity for the proposed salt work
2. The NCMPL shall ensure that existing mangrove patches are protected and conserved.
3. There shall be no destruction of any mangrove due to proposed project
4. The NE shall carry out mangrove plantation in 50 ha of land in consultation with Gujarat Ecology Commission/Forests Department.
5. The NE shall ensure that there shall be no discharge of any effluent/bittern into marine environment and unit shall observe Zero Discharge.

**32.5 CRZ Clearance for proposed salt works in 100 acres of land at Plot no- 9, Kandla Port Trust located along the North Western bank of Sanu creek along the coast of Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Rankers Salt Works**

M/S Rankers Salt Works (RSW), vide its application dated 14-07-2015 has approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from State Level Environmental Impact Assessment Authority (SEIAA) for their proposed project for Salt Works in 100 acres of land at Plot no- 9 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch

The Authority was apprised that the proposal was scrutinized by the Technical Committee in its 19th meeting, which was held on 19-10-2015, wherein the representative of Rankers Salt Works(RSW) made a presentation about various activities to be carried out in the CRZ area, EIA report prepared by the Envisafe Environment Consultant, Ahmedabad and CRZ map prepared by the Institute of Environmental Studies and Wetland Management, Kolkata, West Bengal.

After detailed discussion and deliberation on the presentation made by the representative of the RSW, it was decided by the Technical Committee to ask various details from the RSW. The unit has submitted reply. Further to this the project proponent changed their consultant and therefore it was asked to appoint new consultant and submit the vetted report from them. The project proponent has submitted the same.

The representative of the RSW made a presentation before the Authority and submitted that they have proposed to set up a new salt works in total 100 acres located(**Latitude: 23° 7' 7.36" N, Longitude: 70° 13' 22.84" E**) along the Bank of the Sanu creek between Village: Padana and Village: Mithirohar, Gandhidham. This salt pans are located at a comparatively higher elevation and the Seawater does not flow into it naturally. The land has been granted on lease by Kandla Port Trust for Salt production for period of 30 years(30/12/2010 to 29/12/2040).

There are also operational salt pans in this area, which are connected with each other.

The intake well will be circular in shape with 3.00m diameter, made of RCC located within the salt pan boundary itself with an inlet pipe passing through the boundary wall. When the seawater level increases in the height during high tide period and reaches up to boundary wall, seawater will reach the intake well, through intake pipe. The depth of intake well will be 4.5 m. The seawater then shall be pumped and diverted through channels to the required ponds.

It was further submitted that the production capacity @5,000 MT/Annum based on 10 months production cycle. There would be mixed salt production @ 1250 MT/Annum based on 10 months production cycle. The tidal water from the Gulf of Kutch would be drawn through natural flow during high tide period reaches to Sannu creek and the water from Sannu Creek would be pumped by using centrifugal pumps in intake wells for salt harvesting. The Sea water intake would be 850 M<sup>3</sup>/day having salinity 35.4-37.0ppt. The source of power supply would be from PGVCL.

The representative of the RSW further submitted that in this salt farm, it has been proposed to route the remaining mixed salt bittern after production of NaCl salt in the crystallizer to the mixed salt settler pond, located to allow natural evaporation to produce mixed salt containing salt of KCL, MgCL, MgSO<sub>4</sub>, etc. This can be sold in market separately and has good market value. There would not be any discharge of concentrated bittern back to the sea at any stage of NaCl salt production process, thus making entire cycle, a zero discharge of concentrated bittern into sea.

It was further submitted that the proposed location of salt pan is on the landward side of the elevated North West bank of Sanu creek. Being at an elevation more than the water level influx in the creek during the maximum high tide period, this portion remains dry and without vegetation except few salt tolerant species. The mud flat along the South East side of the creek (opposite side of the proposed saltpans area) is covered with thick patches of mangroves. The proposed site is devoid of mangroves. The construction of embankment and road is required. The

construction will be carried out using locally available mud or brining lateritic form from distant place if required. No mangroves are growing in these region. The construction required for proposed project will not have any consequences on scattered mangroves growing along the fringes of Sanu creek. There will not be any impact on air environment , if locally available mud is used for construction of embankment. Water pollution from salt pan operation generally occurs mainly through the discharge of mother liquor into creeks, thus impacting negatively on marine life such as juvenile fishes, fish eggs and mangrove saplings. But in the proposed salt farm zero discharge option shall be adopted with no discharge of mother liquor/bittern. When pumping is used for intake of seawater to saltpans, it can lead to impingement and entrainment of marine organism. This can be avoided/minimized by using proper wedge wire screens around the pumping location. Their effects on entrainment may be small, but such screens have potential to eliminate impingement of juvenile and adult fishes, if properly designed and located.

It was further submitted that saltpans, when exploited, can function as artificial wetlands, nevertheless be of a very high ecological value. Salt pans are excellent feeding ground because of the availability of planktons. Salt production leads in practice to the creation of large, undisturbed areas where human presence is limited hence they can therefore function as an important habitat for water birds. Managing salt pans as water birds habitat can provide alternative forging ground for shorebirds and wading birds. Waders and shorebirds are attracted to the pan of lower salinity where benthic macro fauna resembled that of intertidal mudflats in the estuary

As per the CRZ maps prepared by the Institute of Environmental Studies and Wetland Management, Department of Environment, Government of West Bengal, Kolkata, the proposed project falls in the CRZ-I(B) category.

**The Authority deliberated the proposal of M/s Rankers Salt Works and after detailed discussion, it is decided to recommend to the State Level Environment Impact Assessment Authority to grant CRZ Clearance for Proposed Salt Works in 100 acres of land at Plot no- 9 of Kandla Port Trust located landwards along the North**

**Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Rankers Salt Works with following specific conditions:**

1. Necessary permissions from different departments/ agencies under different laws/ acts shall be obtained before commencing any enabling activity for the proposed salt work
2. The NCMPL shall ensure that existing mangrove patches are protected and conserved.
3. There shall be no destruction of any mangrove due to proposed project.
4. The RSW shall ensure that there shall be no discharge of any effluent/bittern into marine environment and unit shall observe Zero Discharge.
5. The RSW shall carry out mangrove plantation in 25 ha of land in consultation with Gujarat Ecology Commission/Forests Department.

**32.6 CRZ Clearance for Proposed Salt Works in 100 acres of land at Plot no- 3& 4 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Neelkanth Coal Mfg. Pvt Ltd (Table Agenda)**

M/S Neelkanth Coal Mfg. Pvt Ltd, vide its letter dated 29th June, 2015 has approached this Department seeking recommendations from the GCZMA for obtaining CRZ Clearance from State Level Environment Impact Assessment Authority the for proposed Salt works in 100 acres of land comprising of Plot no-3 &4 of Kandla Port Trust located landward side along the North Western Bank of Sanu Creek, an inlet of Gulf of Kutch, along the coast of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist:Kutch.

The Authority was apprised the proposal was scrutinized by the Technical Committee in its 18<sup>th</sup> meeting, which was held 29-07-2015, wherein the representative of Neelkanth Coal Mfg. Pvt Ltd(NCMPL) made a presentation about various activities to be carried out in the CRZ

area, EIA report prepared by the Envisafe Environment Consultant, Ahmedabad, and CRZ map prepared by Institute of Environmental Studies and Wetland Management, Department of Environment, Government of West Bengal, Kolkata (one of the authorized agencies )

After detailed discussion and deliberation on the presentation made by the representative of the NCMPL it was decided by the Technical Committee to ask various details from the NCMPL. The unit has submitted reply. Further to this the project proponent changed their consultant and therefore it was asked to appoint new consultant and submit the vetted report from them. The project proponent has submitted the same.

The representative of the NCMPL made a presentation before the Authority and submitted that this proposed salt works in 100 acres is located along the bank of the Sannu Creek between Village Padana and Village Mithirohar, Taluka: Gandhidham, Dist: Kutch and at a comparatively higher elevation and the sea water does not flow into in naturally. The Land has been granted on lease by Kandla Port Trust(KPT) for Salt production for period of 30 years. The possession has been handed over to them on 01-04-2011 by the KPT. The salt production capacity would be 5000 MT/Annum based on 10 months production cycle. There would be mixed salt production @ 1250 MT/Annum based on 10 months production cycle. The tidal water from the Gulf of Kutch would be drawn through natural flow during high tide period reaches to Sannu creek and the water from Sannu Creek would be pumped by using centrifugal pumps in intake wells for salt harvesting. The Sea water intake would be 850M<sup>3</sup>/day having salinity 35.4-37.0ppt. The source of power supply would be from PGVCL.

The intake well will be circular in shape with 3.00m diameter , made of RCC located within the salt pan boundary it self with an inlet pipe passing through the boundary wall. When the seawater level increase in the height during high tide period and reaches up to boundary wall, seawater will reach the intake well , through intake pipe. The depth of intake well will be 4.5 m. The seawater then shall be pumped and

diverted through channels to the required ponds. The nearest mangrove patch is located at @ 10.45 M from the salt pan boundary.

The representative of the NCMPL further submitted that in this salt farm, it has been proposed to route the remaining mixed salt bittern after production of NaCL salt in the crystallizer to the mixed salt settler pond, located in approximately 1 acre land, sub divided in 3 ponds to allow natural evaporation to produce mixed salt containing salt of KCL, MgCL, MgSO<sub>4</sub>, etc. This can be sold I market separately and has good market value. There would not be any discharge of concentrated bittern back to the sea at any stage of NaCL salt production process, thus making entire cycle, a zero discharge of concentrated bittern into sea.

It was further submitted that the proposed location of salt pan is on the landward side of the elevated North West bank of Sanu creek. Being at an elevation more than the water level influx in the creek during the maximum high tide period, this portion remains dry and without vegetation except few salt tolerant spices. The mud flat along the South East side of the creek (opposite side of the proposed saltpans area) is covered with thick patches of mangroves. The proposed site is devoid of mangroves. The construction of embankment and road is required. The construction will be carried out using locally available mud or brining lateritic form from distant place if required. No mangroves are growing in these region. The construction required for proposed project will not have any consequences on scattered mangroves growing along the fringes of Sanu creek. There will not be any impact on air environment , if locally available mud is used for construction of embankment. Water pollution from salt pan operation generally occurs mainly through the discharge of mother liquor into creeks ,thus impacting negatively on marine life such as juvenile fishes, fish eggs and mangrove saplings. But in the proposed salt farm zero discharge option shall be adopted with no discharge of mother liquor/bittern. When pumping is used for intake of seawater to saltpans, it can lead to impingement and entrainment of marine organism. This can be avoided/minimized by using proper wedge wire screens around the pumping location. Their effects on entrainment may

be small, but such screens have potential to eliminate impingement of juvenile and adult fishes, if properly designed and located.

It was further submitted that saltpans, when exploited, can function as artificial wetlands, nevertheless be of a very high ecological value. Salt pans are excellent feeding ground because of the availability of planktons. Salt production leads in practice to the creation of large, undisturbed areas where human presence is limited hence they can therefore function as an important habitat for water birds. Managing salt pans as water birds habitat can provide alternative forging ground for shorebirds and wading birds. Waders and shorebirds are attracted to the pan of lower salinity where benthic macro fauna resembled that of intertidal mudflats in the estuary

As per the CRZ maps prepared by the Institute of Environmental Studies and Wetland Management, Department of Environment, Government of West Bengal, Kolkata, the proposed project falls in the CRZ-I(B) category.

**The Authority deliberated the proposal of M/s Neelkanth Coal Mfg.Pvt Ltd and after detailed discussion, it is decided to recommend to the State Level Environment Impact Assessment Authority to grant CRZ Clearance for Proposed Salt Works in 100 acres of land at Plot no- 3&4 of Kandla Port Trust located landwards along the North Western Bank of Sanu creek along the coast line of Village: Padana and Mithirohar, Taluka: Gandhidham, Dist: Kutch by M/S Neelkanth Coal Mfg. Pvt Ltd with following specific conditions:**

1. Necessary permissions from different departments/ agencies under different laws/ acts shall be obtained before commencing any enabling activity for the proposed salt work
2. The NCMPL shall ensure that existing mangrove patches are protected and conserved.
3. There shall be no destruction of any mangrove due to proposed project
4. The NCMPL shall maintain adequate buffer zone around the existing mangrove patches

5. The NCMPL shall ensure that there shall be no discharge of any effluent/bittern into marine environment and unit shall observe Zero Discharge.
6. The NCMPL shall carry out mangrove plantation in 25 ha of land in consultation with Gujarat Ecology Commission/Forests Department.

**32.7 CRZ Clearance for Saltpan on 6000 acres land at Jakhau, Dist"Kutch by M/S Jakhu Salt Company Pvt. Ltd**

M/S Jakhau Salt Company Pvt Ltd(JSCPL), vide its application dated 06-08-2016 approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from the State Level Environment Impact Assessment Authority for their proposed project for salt works on 6000acres of land at Jakhau, Dist: Kutch.

The Authority was apprised that the project proponent has submitted the proposal alongwith Form-1 and requisite fees, CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai. EIA report is prepared by M/S Kadam Environmental Consultant, Vadodara.

The project proponent was not remained present.

**The Authority decided to defer the proposal. However, considering the huge area for salt manufacturing, it was decided to carry out site visit by the Committee of GCZMA, as constituted for Kandla Port Trust The Committee would carry pout and submit its report to the Authority.**

**32.8 CRZ Clearance for Revival of Existing Jetty with Liquid Storage Terminal, Pipeline Road Connectivity by M/S Ahir Salt & Allied Product Pvt. Ltd**

M/S Ahir Salt & Allied Product Pvt. Ltd (ASAPL), vide its application dated 04-10-2016 approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from the State Level Environment Impact Assessment Authority for their proposed project for revival of existing

jetty with liquid Storage Terminal, pipeline, Road connectivity, Railway line etc, at Mithirohar, near Kandla, Taluka: Gandhidham, Dist: Kutch.

The Authority was apprised that the proposal is submitted alongwith Form-1 and requisite fees CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai. EIA report is prepared by M/S Kadam Environmental Consultant, Vadodara.

The representative of the ASAPPL made a presentation before the Authority and submitted that the proposed project is for revival of existing jetty to handle 0.30 MMTPA liquid cargo and 0.60 MMTPA solid cargo with liquid storage terminal, pipeline, road connectivity, railway line and sliding covering total area of **3,82,670 M<sup>2</sup>**. The proposed project is located at Village: Mithirohar, Taluka: Gandhidham, Dist: Kutch(**Latitude: 23° 02' 57.38" N, Longitude: 70° 13' 6.11" E**).

It was submitted that following activities would be carried out in CRZ areas:

- Jetty with Berthing
- Liquid Storage Terminal (Edible Oil)
- Pipeline
- Road
- Parking
- Railway line

It was further submitted that total project area is 3,82,670 M<sup>2</sup>. The berthing and jetty construction would be in 14,355 M<sup>2</sup>. Backup area would be developed in 3,68,315 M<sup>2</sup>. The reclamation quantity require, would be 5,52,472M<sup>3</sup>. The Capital dredging will be 28,788 M<sup>3</sup>, and this will be used for reclamation work. The remaining quantity of reclamation work would be purchased from Village: Rampur, Taluka: Anjar, Dist: Kutch, which is 20 Km away from the project site. Maintenance dredging will be 2000 M<sup>3</sup>/three year. The maintenance dredging will be disposed at south of Guoyu No.5 and influence will be minimal as amount is less and it will not come up to Kandla Creek through back pressure.

Existing sea traffic at Kandla Port was 1661 (Nos. Vessels) during 2013-2014 and 1558 (Nos. Vessels) were handled during 2014-2015. Likely 45 vessels will be increased due to proposed project. Only 3% of total vessel traffic will increase due to proposed project which will be very negligible.

It was further submitted that the turbidity induced during the dredging would be minimized using controlled dredging techniques using appropriate bucket/cutter suction dredgers. The net enclosures (silt screens) with booms shall be placed around the dredging area in order to control the spread of the turbid plume. Regular monitoring of the turbidity and sediment concentration may be carried by water sampling and OCM satellite imageries. Oil spill contingency plan would be evaluated to handle accidental spill and contingency equipment like boom, skimmer and dispersant chemicals should be stored. Oil Contingency Team headed by a trained expert should be established at port and all arrangements should form as an integral part of the specialized team. They should establish coordination with National Oil Spill Committee headed by the Indian Navy.

Advanced 21/3 modeling techniques were used to simulate the water hydrodynamics and oil weathering and transport in the Kandla region. Calibration and verification of this module is done with hydrodynamics and sediment transport studies carried out separately. The study has indicated the movement of oil spill towards Phang and Sara creek system beyond the port area. Since, Phang and Sara creeks are shallow and no major aquatic life and mangroves prevail around these creeks, spillage if at all occur may not have any adverse impact in the region due to heavy wind and prevailing hydraulic conditions all along.

As per the CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai proposed activities fall in the CRZ-I(B), CRZ-III and category.

**The Authority deliberated the proposal of M/s Ahir Salt & Allied Products Pvt Ltd and after detailed discussion, it is decided to recommend to the State Level Environment Impact Assessment Authority to grant CRZ Clearance for Revival of Existing Jetty with**

**Liquid Storage Terminal, Pipeline Road Connectivity by M/S Ahir Salt & Allied Product Pvt. Ltd with following specific conditions:**

1. The ASAPPL shall ensure that there shall be no damage to the existing mangrove patches, if any, near the site and also ensure the free flow of water to avoid damage to the mangrove.
2. The ASAPPL shall ensure there shall not be blockage of any creek and free flow of water shall be maintained.
3. The ASAPPL shall not construct any storage facilities for material / chemicals in the CRZ area except for those permissible as per Annexure- II of the CRZ Notification, 2011. Also for other Hazardous chemicals, outside CRZ areas, the ASAPPL shall have to consult SDMA for Disaster Management Plan.
4. All necessary permissions from different Government Departments / agencies shall be obtained by M/s ASAPPL before commencing the activities.
5. No dredging, reclamation or any other project related activities shall be carried out in the CRZ area categorized as CRZ I (A) and it shall have to be ensured that the mangrove habitats and other ecologically important and significant areas, if any, in the region are not affected due to any of the project activities.

**32.9 Transfer of CRZ Clearance of M/S GSPC LNG Limited to M/S Gujarat State Petronet Ltd-Gandhinagar for component of laying off Send out Gas pipeline from LNG Terminal at Mundra, Kutch connecting GSPL Gas Grid Network covering approx. length of 16 km with Dia.36” by M/S Gujarat State Petronet Ltd**

The Gujarat State Petronet Ltd(GSPL), vide its letter dated 15th October, 2016 has approached this Department for obtaining approval from GCZMA for Transfer of CRZ Clearance of M/S GSPC LNG Limited to M/S Gujarat State Petronet Ltd-Gandhinagar for component of laying of Send out Gas pipeline from LNG Terminal at Mundra, Kutch connecting GSPL Gas Grid Network covering approx. length of 16 km with Dia.36” By M/S Gujarat State Petronet Ltd.

It is submitted that the necessary EC/CRZ Clearance from MOEF&CC, GOI has been obtained on 6th March, 2014. Now they have applied for change of name, for which the Ministry of Environment, Forest and Climate Change, Government of India has asked to submit recommendations from the GCZMA.

The representative of the GSPL made a presentation before the Authority and submitted that GSPC LNG Limited(GLL) is setting up Green field LNG Terminal at Mundra within APSEZ area in the State of Gujarat, which is third LNG Terminal in Gujarat for Import of Natural Gas. Environment and CRZ Clearance from Ministry of Environment, Forests and Climate Change, Government of India have already been obtained by GSPC LNG Ltd vide F.NO.10-2/2009-IA-III dated 6th March, 2014. This Clearance includes the send out pipeline.

GSPL being gas transportation company in Gujarat, is proposed to lay the send out Gas pipeline which is approximately 16 Kms within APSEZ area/CRZ area and further connects to the existing GSPL gas pipeline network at Anjar. It was submitted that proposed pipeline will be laid 1.0 to 1.2m underground as per PNGRB Technical and safety regulations, ASME B 31.8 and other applicable statutory standards. It does not pass through National Park/Sanctuary/coral reefs etc. There is no buster station in the entire route. There is no perennial river, however, any water body crossing job will be carried out by HDD/Augur Boring method without and disturbance in the flow of water.

**The Authority deliberated the proposal of M/s Gujarat State Petronet Ltd and after detailed discussion, it is decided to recommend to the Ministry of Environment, Forest and Climate Change, Government of India to transfer of CRZ Clearance of M/S GSPC LNG Limited to M/S Gujarat State Petronet Ltd-Gandhinagar for component of laying off Send out Gas pipeline from LNG Terminal at Mundra, Kutch connecting GSPL Gas Grid Network covering approx. length of 16 km with Dia.36” by M/S Gujarat State Petronet Ltd with following specific conditions**

- All terms and conditions of the Environment Clearance and CRZ Clearance issued by the Ministry of Environment, Forest and

Climate Change, Government of India Vide F.NO vide F.NO.10-2/2009-IA-III dated 6th March, 2014 shall remain unchanged, and shall have to be complied with by M/S GSPL, Gandhinagar

- All conditions related to send out pipeline as prescribed by the MOEF&CC, GOI shall be abide by M/S GSPL, Gandhinagar

**32.10 CRZ Clearance for Residential (Subplot Type) purpose project ‘Suncity’ at Barbodhan Village, Olpad Taluka, Surat by M/S Pramukh Organisers LLP.**

M/S Pramukh Organizers LLP(POLLP), vide its application dated 24-10-2016 has approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from the State Level Environment Impact Assessment Authority for their proposed project for development of Residential Project-“Suncity” at Village: Barbodhan, Taluka: Olpad, Dist: Surat

The Authority was apprised that the proposal has been received along with Form-1, EIA report prepared by M/S Kadam Environmental Consultant, Vadodara, and CRZ map prepared by National Centre for Sustainable Coastal Management(NCSCM), Chennai (An agency authorized by the Ministry of Environment, Forest and Climate Change, Government of India). As per the CRZ map prepared by the NCSCM, Chennai, there is no mangrove in the proposed project site and also out of it is out of its buffer zone.

The representative of POLLP made a presentation before the Authority and submitted that as per the CRZ map prepared by the Anna University, Chennai, out of total 170 acres of land, portion of West portion of Block No. 1052/B/2 and South portion of Block No. 1056/B/2, totaling to 1.93 ha of the proposed project fall within CRZ area.

It was submitted that, as per EIA report, there is no notified /protected ecologically sensitive area including National Park, Sanctuary, Elephant/Tiger reserve existed in the study area. On inquiring about the existence of mangrove in study area, the representative of the POPPL and their Consultant submitted that there is no mangrove in the proposed project site. Thick mangroves patches were observed in western side from

the project site and also the proposed project site is outside the buffer area of mangroves. As per the CRZ map prepared by the NCSCM, Chennai, there is no mangrove in the proposed project site and also proposed project site is out of mangrove area and its buffer zone.

The representative of POLLP submitted that PIL has been filed against this project, before the Hon'ble High Court of Gujarat. It was submitted that there was no stay order for obtaining Environment Clearance or CRZ Clearance from concerned Authority.

**The Authority deliberate the proposal of the POLLP and after detailed discussion and deliberation, it was decided to recommend the proposal to State Level Environment Impact Assessment Authority with following conditions:**

1. The developers would not carry out any construction activity within CRZ area on West portion and south portion as demarcated on CRZ map submitted by the POLLP, left out that portion and submit the revised map for the same.
2. The plot fall within CRZ area shall be kept open and it shall not be sale to any other user for any construction.
3. There shall be no discharge of any sewage into the Creek and treated sewage shall be utilized within premises for gardening and plantation.
4. The developers shall strictly abide by the outcome/ decision of Hon'ble High Court of the Gujarat in PIL No: 16 of 2016 with Writ Petition 52 of of 2016.

**32.11 CRZ Clearance for proposed Expansion of LPG & Propane, import & storage terminal at Porbandar by M/s SHV Energy Private Limited (Super Gas)**

M/S SHV Energy Private Limited(SHVEPL), vide its application dated 04-10-2016 has approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from the State Level Environment Impact Assessment Authority for their proposed project for expansion of LPG & Propene , import and storage terminal at Porbandar, Dist: Porbandar

The Authority was apprised that the proposal has been received alongwith Form-1 and requisite fees, CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai. EIA report is prepared by M/S Kadam Environmental Consultant, Vadodara.

The representative of the SHVEPL made a presentation before the Authority and submitted that the project is located at Plot No. 74, Village Javar- 360 757, Tal. Porbandar, Dist.: Porbandar, Gujarat. The proposed proposal in CRZ area is expansion of the existing facility, and accordingly, the storage capacity of LPG would be expanded from 4000MT to 8500 MT, Storage capacity for Propene would be expanded from 4000MT to 8500MT. New storage facility for Ethyl Mercaptan will be 2 MT. New LPG/Propene storage spheres and associated facility will be constructed in CRZ area. There would be additional pipeline in CRZ area. Existing pipeline would be used for expansion.

It is submitted that as the expansion will be done in existing facilities, there will no requirement of clearance of vegetation and building. However relevant modification will be done in existing premises. There is no generation of industrial effluent. Domestic effluent generated is being disposed of in soak pit through septic tank. Same practice will be continued for proposed expansion.

It was further submitted that due to the movement of vehicles for transportation of construction material, there will be temporary and localized increase in the levels of dust particles. Sprinkling of water will be carried out to contain dust, speed limits would be observed, construction site would be barricaded, dust masks will be provided, only PUC compliant vehicles will be allowed during construction phase and vehicles should operate on the paved roads. Vehicle movement for transportation of materials and work force to the site will cause minor noise emission as the frequency of vehicular movement is few times in a week. The wastewater generated during hydro testing is stored in fire water storage tank for further use

As per the CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai, the proposed activities fall within CRZ-III category.

**The Authority deliberated the proposal of M/s SHV Energy Private Limited and after detailed discussion, it is decided to recommend to the State Level Environment Impact Assessment Authority to grant CRZ Clearance for proposed Expansion of LPG & Propane, import & storage terminal at Porbandar by M/s SHV Energy Private Limited (Super Gas) with following specific conditions:**

1. The SHV Energy Private Limited shall ensure there shall be no blockage of creek, if any.
2. All safety measures shall be adopted by the unit as suggested by in EIA report and the pipeline shall be monitored regularly by the company and it shall be ensured that there is no leak from the pipeline. In case of any such eventualities, the company shall immediately stop disposal through the said pipeline and take the corrective measures in consultation with the GPCB and the District Collector

**32.12 CRZ Clearance for wind power (wind mills) project at Mundra, Kutchh Adani Green Energy Ltd**

M/S Adani Green Energy Limited (AGEL), vide its application dated 23-04-2016 approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from the Ministry of Environment, Forest and Climate Change, Government of India for their proposed project for shore Wind Power (Wind mills) at Mundra, Taluka: Mindra, Dist: Kutch.

The Authority was apprised that the AGEL was asked to furnish the details, as the application was incomplete. The AGEL has now submitted details vide its letter dated 16-09-2016. The proposal is received alongwith Form-1 and requisite fees, CRZ map is prepared by the National Institute of Oceanography, Goa, The proposed activities superimposed on old map prepared by the CESS, Thiruvanthapuram. The Marine EIA studt has been prepared by the Indomer Coastal Hydraulics Pvt Ltd, Chennai.

As per the details submitted total 74 wind mills will be constructed along the periphery of harbor boundary of Adani South and West Port in Adani Port and SEZ Limited .

The project proponent was not remained present during meeting

**The Authority decided to defer the proposal and to consider proposal in next meeting of GCZMA.**

**32.13 CRZ Clearance for development of Fishery Harbour at Mangrol-Phase-III at Mangrol, Dist: Junagadh by Commisionerate of Fisheries, Government of Gujarat.**

The Commisionerate of Fisheries, Government of Gujarat vide its application dated 30-11-2016 has approached this Department seeking recommendations from the Gujarat Coastal Zone Management Authority for obtaining CRZ Clearance from the State Level Environment Impact Assessment Authority for their proposed project for development of Fishery Harbour, Phase-III at Village: Mangrol, Dist: Junagadh.

The Authority was apprised that the proposal is received alongwith Form-1 CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai. The EIA report has been prepared by the WAPCOS Limited, Gurgaon.

The representative of the Commissionerate of Fisheries made a presentation before the Authority and submitted that the proposed site is located at Latitude: 21° 06'51.50" N, Longitude: 70° 05'31.2" E. Following activities would be carried out in CRZ area:

- Landing Quay – 01- 237 m x 10 m
- Berthing Quay ( 01 Jetty ) 204 m x 7 m
- Berthing Quay( 01 Wharf) 211 m x 10 m
- Outfitting Quay - 01 60 m x 10 m
- Repair Quay – 01 60 m x 10 m
- Beach Landing -113 m
- Eastern Break water -737.30 m
- Western Break water -532.00 m
- Road Above Eastern Break water- 737.30 x 6 m
- Road Above Western Break water -532.00 x 6 m
- All other associated facilities

It was submitted that there is no compound wall around the existing harbor which allows unrestricted entry in harbor premises. Department of Fisheries, Government of Gujarat proposes to develop Margrol Harbor

as per Food and Agriculture Organisation norms. Keeping all problems in view, shore area upto 1 km to the west of existing Mangrol Fishery harbor was proposed by the CICEF officers for development of Mangrol Phase-III Fishery harbor.

There was no Mangroves found in & around project site. No Sea Turtles observed during the survey. No Corals recorded from Mangrol Coast. No Sand Dunes found in project area. There will be no impact on land environment as there is no private/ forest land acquisition is involved, no displacement of population or tree cutting and construction material will be sourced from local market

It was submitted that the total land requirement for the project is 36.2 ha, out of which Government waste land is -12.5 ha and sea side area is - 24.52 ha. No Private or forest land acquisition.

For the proposed project 43910 m<sup>2</sup> area is proposed to be reclaimed and total requirement of reclamation material would be - 2 Lakh m<sup>3</sup>. The quantity of dredged material will be - 0.68 Lakh m<sup>3</sup> and quantity of material from earth cutting will be - 1.0 Lakh m<sup>3</sup>. The remaining quantity of material required from quarry will be - 0.32 Lakh m<sup>3</sup>. Reclamation will be done in barren area, hence no adverse impact is anticipated due to reclamation

Boundary wall will be constructed to prevent the soil erosion from reclamation area.

To minimize/eliminate the impact on water environment, there is a provision of 10 community toilets with septic tanks, treated water will be connected to existing sewage network of Mangrol. The sewage generation from labour camps will be 7.2 m<sup>3</sup>/day, and sewage generation from fish handling and auction hall will be 0.31 MLD. The Effluent Treatment Plant (ETP) with 0.56 MLD capacity is proposed, treated water will be disposed of in the sea

For the proposed project, construction activities and dredging, etc will be carried out in a confined manner to reduce the impacts on marine environment. Dredging shall not be carried out during the fish breeding season. Dredging will be carried out using Cutter Suction Dredger to avoid spillage of dredged material during dredging. Dredged material will be

used in reclamation. Vessels operating during construction phase such as dredger shall be equipped with spill response kits. There is provision for shore-based reception facilities for oily wastes (bilge water and spent oil) from boats and spent engine oil shall be collected and sold to registered re-cyclers. There is no impact on terrestrial ecology is anticipated as project site is located in a barren area. Green belt is proposed around the periphery of proposed Mangrol –III fishery harbor. Plantation will be done in an area of 1.5 ha.

As per the CRZ map prepared by the Institute of Remote Sensing, Anna University, Chennai proposed facilities fall in CRZ- IB, CRZ III and CRZ-IVA Category.

**The Authority deliberated the proposal of Commissionerate of Fisheries, Government of Gujarat and after detailed discussion, it is decided to recommend to the State Level Environment Impact Assessment Authority to grant CRZ Clearance for development of Fishery Harbour at Mangrol-Phase-III at Mangrol, Dist: Junagadh by Commissionerate of Fisheries, Government of Gujarat with following specific conditions:**

1. The Commissionerate of Fisheries shall ensure there shall be no blockage of creek, if any.
2. All necessary permissions from different Government Departments / agencies shall be obtained by the Commissionerate of Fisheries . before commencing the activities.
3. The Commissionerate of Fisheries shall ensure that construction activities like dredging etc shall be carried out in confined manner to reduce the impact on marine environment.
4. The Commissionerate of Fisheries shall ensure that the dredging shall not be carried out during the fishing breeding season.
5. Construction waste including debris shall be disposed safely in the designed areas and in no case it shall be disposed in the marine environment.

**32.14 Any other item with the approval of the Chair.**

**Preparation of Master Plan for Lion Corridor Areas.**

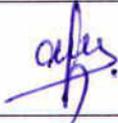
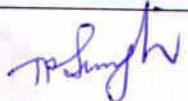
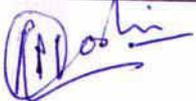
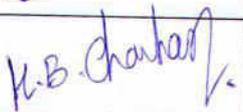
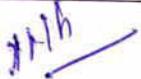
During the course of meeting, the issues regarding preparation of master plan for conservation of Lion in lion corridor area was came up

for discussion. After detailed discussion and deliberation, it was decided that ACS, FED will take up the matter with PCF(WL) and request to constitute a State Level Committee under Chairmanship of PCCF(WL) including all concerned Department like Road and Building, Industries and Mines Department, Port and Transport Department, Gujarat Maritime Board, Highway Authority, Railway , for identification of critical area for Lion Conservation and to prepare a master plan with Do's and Don'ts guidelines

The meeting ended with a vote of thanks to the Chair

32<sup>nd</sup> GCZMA Meeting

List of participant who attended the meeting of the. Gujarat Coastal Zone Management Authority (GCZMA) held on **14-12-2016 at 15:00** hours under the Chairmanship of **Shri Arvind Agarwal, IAS**, Additional Chief Secretary, Forests & Environment Department in the Committee Room, Gujarat Pollution Control Board(GPCB), Paryavaran Bhavan, Sector-10 /A, Gandhinagar.

Sr. No	Name	Designation	Signature
1	<b>Shri Ajay Bhadoo, IAS</b> Vice Chairman & Chief Executive Officer, Gujarat Maritime Board,	VC & CEO GMB	
2	<b>Smt. Anuradha Mall, IAS</b> Chief Executive Officer, Gujarat State Disaster Management Authority(GSDMA), Gandhinagar		
3	<b>Smt. Mamta Verma, IAS</b> <i>Representative</i> Industries Commissioner, Udhyog Bhavan, Gandhinagar	<i>D.R. Parnal</i> <i>Deputy Commissioner</i> <i>of Industries</i>	
4	<b>Shri Mohammad Sahid, IAS</b> Commissioner of Fisheries, Gujarat State, Gandhinagar		
5	<b>Shri Kuldeep Goel, IFS</b> Principal Chief Conservator of Forests(WL), Aranya Bhavan, Sector- 10A , Gandhinagar		
6	<b>Shri S.K.Charurvedi, IFS</b> Member Secretary, Gujarat Ecology Commission, Gandhinagar		
7	<b>Shri Rajesh .I. Shah</b> Managing Trustee, VIKAS Centre for Development, Ahmedabad		
8	<b>Shri Paresh. L. Sharma</b> Chief Town Planner, Gujarat State, Gandhinagar		
9	<b>Shri T. P. Singh</b> Director, BISAG, Gandhinagar		
10	<b>Shri Rajesh Pravin Chandra Doshi</b> Marine Engineer, Vadodara -390007.		
11	<b>Shri H.B.Chauhan,</b> Senior Scientists SF, Space Application Centre, Ahmedabad		
12	<b>Shri H.S.Singh</b> Retired APCCF, Plot- 44, Sector-8, Gandhinagar		
13	<b>The Member Secretary</b> Gujarat Pollution Control Board, Gandhinagar		
14	<b>Shri Hardik Shah, IAS</b> Director ( Env.) & AS F &ED, Sachivalaya, Gandhinagar.		

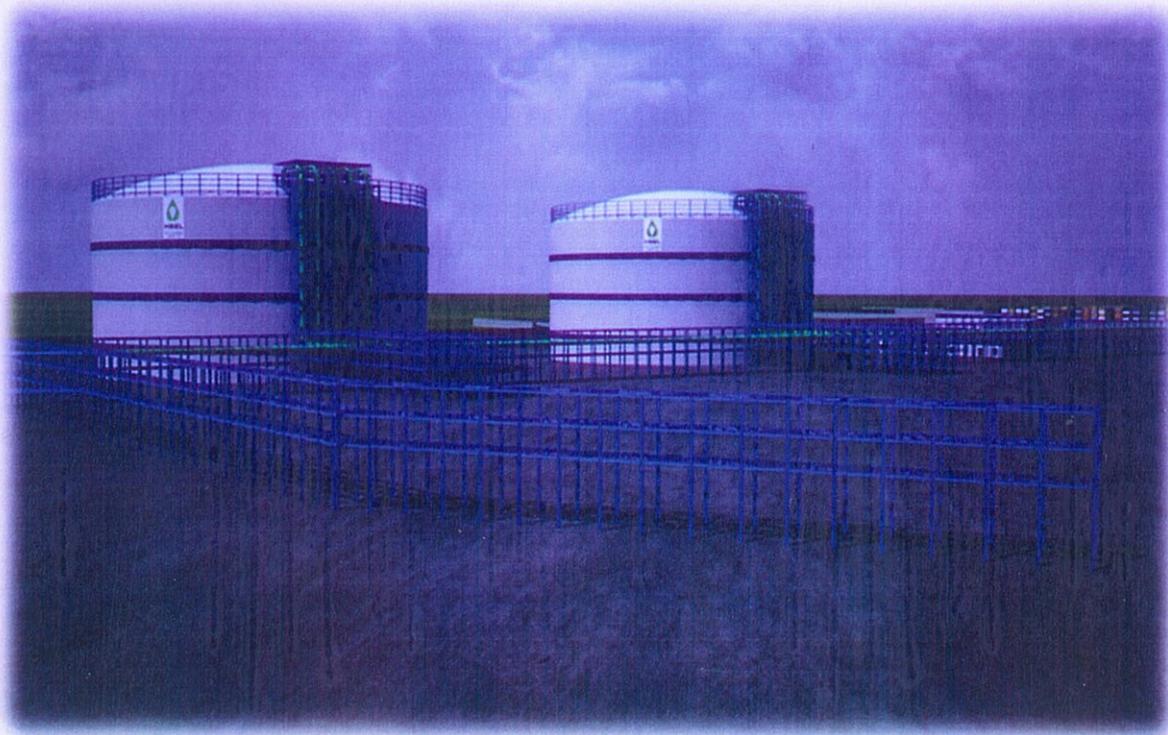
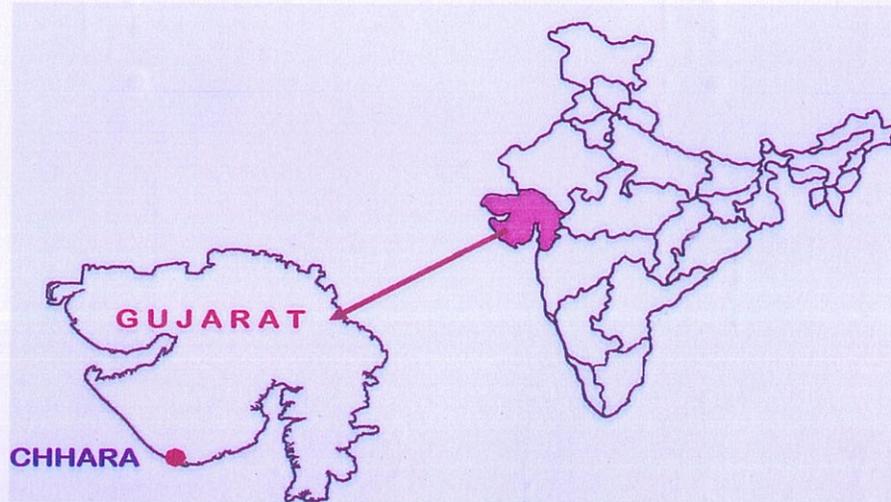
**ANNEXURE - B**

List of the representative who attended the 32<sup>nd</sup> Gujarat Coastal Zone Management Authority meeting which was held on 14/12/2016 at 15:00 hrs in the Committee Room, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector 10/A, Gandhinagar.

1. Representative M/S HPCL Shapoorji Energy Pvt Ltd
2. Representative M/S Simar Port Pvt Ltd
3. Representative M/S Neelkanth Coal Mfg. Pvt Ltd
4. Representative M/S Neelkanth Enterprises.
5. Representative M/S Rankers Salt Works
6. Representative M/S Neelkanth Coal Mfg. Pvt Ltd
7. Representative M/S Jakhu Salt Company Pvt. Ltd
8. Representative M/S Ahir Salt & Allied Product Pvt. Ltd
9. Representative M/S Gujarat State Petronet Ltd
10. Representative M/S Pramukh Organisers LLP.
11. Representative M/s SHV Energy Private Limited (Super GAS)

HPCL Shapoorji Energy Pvt. Ltd.  
(HSEPL)

Public Hearing - Minutes of Meeting



18th Dec 2015



No. GPCB/PH/2015-16/JUN-41/

340409

24 JAN 2016

Time Limit  
By RPAD/H.D.

To,  
The Director (IA.III-Section),  
Government of India,  
Ministry of Environment and Forests,  
Room No: 143, Parivesh Bhavan,  
CGO Complex, Lodhi road,  
New Delhi 110003.

**Sub:** To furnish a copy of the Public Hearing proceeding.

**Ref:** [1] Notification no. S.O. 1533 dated September 14, 2006 published by the Ministry of Environment, Forests & Climate Change, Government of India, New Delhi.  
[2] MoEF&CC's Notification no. S.O.948 dated 12.6.2007 and the Forest and Environment Department, Government of Gujarat's GR no. ENV/10.2006/176/P, dated 25.7.2007  
[3] Request Application of from M/S HPCL Shapoorji Energy Limited., to organize Public Hearing.

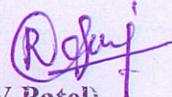
**Sir,**

Based on request received for public hearing from M/S HPCL Shapoorji Energy Limited for Development of LNG storage and regasification terminal, At Village: Chhara, Taluka: Kodinar, Dist: Gir-Somnath, hearing was organized on 18/12/2015 at 11:00 hrs.

The Public Hearing proceeding along with CD and VCD is enclosed herewith for your information and necessary action please.

Yours faithfully,

**Encl:** As above.(Original copy)

  
(R.V.Patel)

Senior Environmental Engineer

**Copy to:**

1. District Collector, Collector Office,  
District : Junagadh.. for information Please.
2. The Unit Head, Junagadh . Unit  
GPCB, Gandhinagar ... along with the original case file of aforesaid applicant for further suitable action.
3. The Unit Head, Unit 31 [Computer]  
GPCB, Gandhinagar along with CD of aforesaid Public Hearing to up-load on website immediately.
4. The Regional Officer, GPCB, Junagadh..... for further suitable action, if any.
5. M/S HPCL Shapoorji Energy Limited.,  
At Village: Chhara, Taluka: Kodinar, Dist: Gir-Somnath,..... Along with a copy of Public Hearing proceeding for necessary further action please.
6. File Copy.

Public Hearing Proceedings

It is hereby informed that as per the Ministry of Environment and Forests, Government of India, New Delhi vide its Notification no. S.O. 1533 dated September 14, 2006. Public Hearing was fixed for the following project covered under Category A, **M/s. HPCL Shapoorji Energy Limited for development of 5.0 MMTPA LNG Storage and re-gasification terminal at Village: Chhara, Taluka: Kodinar, Dist. Gir-Somnath** as mentioned in their request application.

A copy of the draft Environment Impact Assessment report and the Summary of Environment Impact Assessment Report was sent to the following authorities or offices to make available the draft EIA Report for the inspection to the public during normal office hours, till the Public Hearing is over.

1. The District Collector Office, Gir-Somnath
2. District Development Office, Gir-Somnath
3. District Industry Centre, Gir-Somnath
4. Taluka Development Office, Tal. Kodinar, Dist. Gir-Somnath
5. The Chief Conservator of Forests, Ministry of Environment Forests & Climate Change, Government of India, Regional Office (West Zone), Kendriya Paryavaran Bhavan, E- 5, Arera Colony, Link Road 3, Ravisankar Nagar, Bhopal 462 016
6. Regional Office, GPCB, Opp. Saint Anne's Church, Pankaj Bunglow, Station road, Junagadh-362 001

Other concerned persons having plausible stake in the environmental aspects were requested to send their response in writing to the concerned regulatory authorities. They were requested to send their comments to the regulatory authorities as under:

Central Government in MoEF (Ministry of Environment and Forests, GOI, CGO Complex, Lodi Road, New Delhi 110003) for the matter falling under **Category A** of schedule of the aforesaid Notification.

The Public Hearing was scheduled on 18/12/2015 at 11.00 hrs. at Survey no. 845/paiki 2, Village: Chhara, Tal. Kodinar, Dist. Gir-Somnath.

An advertisement in English was published in "The Times of India" dated 16/11/2015 and in Gujarati "Sandesh" dated 16/11/2015.

Shree K. S. Nayak, I/C Additional Collector & Additional District Magistrate, Gir-Somnath has supervised and presided over the entire public hearing process.

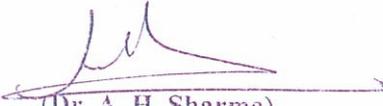
A statement showing participants present during the public hearing is enclosed herewith as Annexure -A.

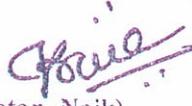
A statement showing salient points highlighting issues raised by the participants and responded by the representative of applicant during the public hearing in English & Gujarati languages are enclosed herewith as annexure B & B1.

The copies of responses received in writing from persons having plausible stake in environmental aspects before & during the public hearing and the replies by the applicant to the same are enclosed herewith as annexure C-1 to C-26 & D-1 to D-26.

Three hundred nine written representations received welcoming the project & same are enclosed herewith as Annexure-1 to 309.

Signature:  
Place: Chhara  
Date: 18/12/2015

  
(Dr. A. H. Sharma)  
Regional Officer, GPCB,  
Junagadh as representative of the  
Member Secretary, GPCB.

  
(Ketan. Naik)  
I/C Additional Collector  
&  
Additional District Magistrate  
Dist.: Gir-Somnath

જાહેર સુનાવણીની કાર્યવાહી

આથી જણાવવામાં આવે છે કે ભારત સરકારના વન અને પર્યાવરણ મંત્રાલય, નવી દિલ્હીના નોટીફિકેશન ક્રમાંક એસ.ઓ. ૧૫૩૩ તા. ૧૪/૦૯/૨૦૦૬ અનુસાર મે. એચ.પી.સી.એલ શાપૂરજી એનર્જી લીમિટેડ, ગામ: છારા, તા. કોડીનાર, જીલ્લો: ગીર-સોમનાથના પ.૦ એમએમટીપીએ એલ.એન.જી. સ્ટોરેજ અને રીગેસીફિકેશન ટર્મીનલ ના વિકાસ કરવા માટેની પરિયોજના (પ્રોજેક્ટ) ની કેટેગરી "એ" પ્રકારના પ્રોજેક્ટ માટેની જાહેર સુનાવણી તેઓની વિનંતીના આધારે રાખવામાં આવેલ.

પ્રસ્તાવિત પર્યાવરણની અસરોના આંકલન અહેવાલ, પર્યાવરણ વ્યવસ્થાપન પ્લાન સહીતની નકલ, તેની સુધારાનોંધની નકલ, પુનઃસ્થાપના અંગેનો પ્લાન અને પર્યાવરણની અસરોના આંકલન અહેવાલના સાર રુપ નકલ નીચેના અધિકારીઓને અથવા તેઓની કચેરીએ મોકલી આપવામાં આવેલ જેથી તે અહેવાલ જાહેર જનતા માટે કચેરીના સમય દરમિયાન અવલોકન-નિરીક્ષણ અર્થે ઉપલબ્ધ કરાવી શકાય.

૧. જીલ્લા કલેક્ટરશ્રીની કચેરી, ગીર સોમનાથ

૨. જીલ્લા વિકાસ અધિકારીની કચેરી, ગીર સોમનાથ

૩. જીલ્લા ઉદ્યોગ કેન્દ્ર, જુનાગઢ.

૪. તાલુકા વિકાસ અધિકારીની કચેરી, તા. કોડેનાર, જી. ગીર-સોમનાથ

૫. મુખ્ય વન સંરક્ષકશ્રી, પર્યાવરણ વન અને જળ વાયુ પરિવર્તન મંત્રાલય, ભારત સરકારની ક્ષેત્રીય કચેરી (પશ્ચિમ ઝોન), કેન્દ્રીય પર્યાવરણ ભવન, ઇ - ૫, અરેરા કોલોની, ડી.સી. રોડ - ૩, રવિશંકરનગર, ભોપાલ - ૪૬૨ ૦૧૬.

૬. પ્રાદેશિક કચેરી, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, સેન્ટ આન્સ ચર્ચની સામે, સ્ટેશન રોડ, જુનાગઢ - ૩૬૨ ૦૦૧

અન્ય સંબંધિત વ્યક્તિઓ કે જેઓ પર્યાવરણની દ્રષ્ટીએ સંબંધિત છે તેઓને પણ તેમના પ્રતિભાવો લેખીત સ્વરુપે સંબંધિત અધિકારીશ્રીને પહોંચાડવા વિનંતી કરાયેલ. તેઓને તેમના મંતવ્યો સંબંધિત નિયંત્રણ કચેરીને પહોંચાડવા માટે પણ જણાવવાયેલ.

કેન્દ્ર સરકારના વન અને પર્યાવરણ મંત્રાલય, ભારત સરકાર, સી.જી.ઓ. કોમ્પ્લેક્સ, લોધી રોડ, નવી દિલ્હી - ૧૧૦૦૦૩ ના નોટીફિકેશન અનુસાર સદર બાબત ઉપરોક્ત નોટીફિકેશનના શીડ્યુલના કેટેગરી - એ માં આવે છે, તેથી જાહેર સુનાવણીનું આયોજન તા. ૧૮/૧૨/૨૦૧૫ ના રોજ સવારના ૧૧-૦૦ કલાકે, સર્વે નંબર ૮૪૫/પૈકી ૨, ગામ: છારા, તાલુકો: કોડીનાર, જી. ગીર-સોમનાથ મુકામે કરાયેલ.

ઉપરોક્ત બાબતની જાહેરાત અંગેજીમાં "ધ ટાઇમ્સ ઓફ ઇન્ડિયા" માં તા. ૧૬/૧૧/૨૦૧૫ ના રોજ તથા ગુજરાતીમાં "સંદેશ" માં તા. ૧૬/૧૧/૨૦૧૫ ના રોજ પ્રકાશિત કરાયેલ.

શ્રી કે. એસ. નાયક, ઈનચાર્જ અધિક કલેક્ટર અને અધિક જીલ્લા મેજિસ્ટ્રેટશ્રી ગીર-સોમનાથ દ્વારા જાહેર લોક સુનાવણીનું અધ્યક્ષ સ્થાન સંભાળવામાં આવેલ તથા તેનું નિરીક્ષણ કરવામાં આવેલ.

જાહેર લોક સુનાવણીમાં ભાગ લેનારની હાજરી દર્શાવતી વિગતોનું પત્રક બિડાણ - એ આ સાથે સામેલ છે.

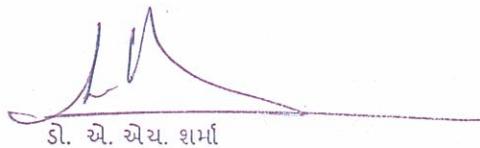
ભાગ લેનાર વ્યક્તિઓ દ્વારા ઉપસ્થિત કરાયેલ મહત્વના મુદ્દાઓ તથા પ્રશ્નોનો નો સારાંશ તથા પ્રોજેક્ટના પ્રતિનિધિ દ્વારા અપાયેલ ઉત્તરોનું પત્રક અંગેજી તથા ગુજરાતી ભાષામાં બિડાણ - બી અને બિડાણ - બી ૧ આ સાથે સાથે સામેલ છે.

હિત ધરાવતા વ્યક્તિઓ દ્વારા લેખીતમાં લોકસુનવણી પહેલાં અને લોકસુનવણી સમયે મળેલ રજુઆતો બિડાણ - સી ૧ થી સી-૨૬ તથા રજુઆતોના અરજદાર દ્વારા આપવામાં આવેલ પ્રત્યુત્તરો આ સાથે બિડાણ - ડી ૧ થી ડી-૨૬ તરીકે સામેલ છે.

એકમ ને આવકારતી ૩૦૯ લેખીત રજુઆતો મળેલ છે જે બિડાણ - ૧ થી ૩૦૯ તરીકે સામેલ છે.

સ્થળ: છારા

તારીખ: ૧૮/૧૨/૧૫



ડૉ. એ. એચ. શર્મા

પ્રાદેશિક અધિકારી, ગુ.પ્ર.નિ.બોર્ડ, જુનાગઢ  
અને સભ્ય સચિવશ્રી, ગુ.પ્ર.નિ.બોર્ડના  
પ્રતિનિધિ તરીકે



કેતન નાયક

ઈનચાર્જ અધિક કલેક્ટરશ્રી અને  
અધિક જીલ્લા મેજિસ્ટ્રેટશ્રી,  
જી.: ગીર-સોમનાથ

## Chapter 13

# Public Hearing

### 13.1 General

As per Ministry of Environment, Forest and Climate Change MoEFCC, Government of India, New Delhi notification no.S.O.1533 dated.14th September 2006 and subsequent amendment S.O 3067(E) dated 1st December 2009, Public Hearing is mandatory for this project.

Public Hearing was conducted on 18<sup>th</sup> Dec 2015 at Venue: Survey no. 845/paiki 2, Village: Chhara, Tal. Kodinar, Dist. Gir-Somnath.

Public Notice in English language was published in “**The Times of India**” dated 16-11-2015 informing the stakeholders about the time and venue of the Public Hearing as well as places/offices where the Draft EIA report was made available for public review. The same notice was published in Gujarati language on 16-11-2015 in the Rajkot edition of “**Sandesh**”, a leading Gujarati newspaper, which is widely circulated in the area.

The notice also requested the concerned stakeholders to submit their comments/views regarding the project in writing to the regulatory authorities. The offices where the draft EIA report was made available for public review are as follows:

1. The District Collector Office, Gir-Somnath
2. District Development Office, Gir-Somnath
3. District Industry Centre, Gir-Somnath
4. Taluka Development Office, Tal. Kodinar, Dist. Gir-Somnath
5. The Chief Conservator of Forests, Ministry of Environment, Forests & Climate Change, Government of India, Regional Office (West Zone), Kendriya Paryavaran Bhavan, E- 5, Arera Colony, Link Road 3, Ravisankar Nagar, Bhopal 462 016
6. Regional Office, GPCB, Opp. Saint Anne's Church, Pankaj Bungalow, Station road, Junagadh.



Public Hearing was Chaired by Additional District Magistrate Shri K.S Nayak. Around 1500 persons participated in the public hearing.

### 13.2 Meeting Proceedings

Dr. A. H. Sharma, Regional Officer, GPCB, Junagadh & representative of Member Secretary, GPCB welcomed all present in the Public Hearing. He outlined the project details and added that it was as per the advertisement of public notice in “The Times of India” dated 16/11/2015 in English and in “Sandesh” dated 16/11/2015 in Gujarati. He also mentioned that the documents related to the project were displayed at the various places mentioned in the advertisement. He added that after the presentation is over, the forum would be opened to the concern of the local affecting people of the area.

Ms. Jitixa Updhyaya representative for HSEPL gave a brief Introduction of the Company and Environmental Management Plan. She also explained technical details for the proposed project.

After the presentation, Dr. A. H. Sharma, Regional Officer, GPCB, Junagadh opened the Public hearing after due permission from Mr. K. S. Nayak, Chairman of the Public hearing & I/C Additional Collector, Gir-Somnath.

### 13.3 Summary of key issues/Concerns and Responses

Various issues, concerns and suggestions put forward by the public through oral presentations as well as through written representations are noted and brief summary of the key issues along with the responses is given in the Table below.

Sr. No.	Key Issue/Concern	Response
<b>A. Site related issues</b>		
1	Presence of lions is not shown in the region.	<ul style="list-style-type: none"> <li>Section 3.5.2.2, pg.no: 3.83 &amp; 4.26 of EIA report identifies presence of Asiatic lions in the study area, however, NEERI team has not sighted or observed presence of the same at project site.</li> </ul>
2	Plants will be badly affected and so are animals and birds staying inside them.	<ul style="list-style-type: none"> <li>LNG is considered as clean fuel and the environmental impact will be insignificant, hence the proposed project will not pollute the surrounding area or pose threat to the agriculture, farming or medicinal plants.</li> </ul>

3	What is the land use Plan, what will be the production from it? What will be the raw material used and how much quantity of it will be used per month?	<ul style="list-style-type: none"> <li>This will be a regasification plant, in which LNG will be converted from Liquid to gaseous form and no other raw material will be required. Land use details are given in Chapter No. 2 and No. 3 section 3.4.1.7 of EIA Report.</li> </ul>
4	Land was given to PORT which will now be leased to HSEPL, this is cheating on farmers.	<ul style="list-style-type: none"> <li>Land will be leased from Simar Port under sub-concession agreement. HSEPL will carry out due diligence before entering in to lease agreement.</li> </ul>
5	Whales and other marine life will be affected.	<ul style="list-style-type: none"> <li>As per EIA study, the effect to marine life is negligible.</li> </ul>
6	Chhara port is known as egg laying ground for sea turtles, they will also be affected.	<ul style="list-style-type: none"> <li>The coast at project site is rocky; whereas, as per NEERI report turtle nesting is found in sand beaches.</li> </ul>
7	Mangroves, dense forest and other plantation near the site will be damaged.	<ul style="list-style-type: none"> <li>As per EIA report by NEERI, there are no mangroves at project site. As per EIA, environmental impact due.</li> </ul>
8	Villages within 15 km radius from the project site may be affected biologically and chemically.	<ul style="list-style-type: none"> <li>There is no discharge of chemicals from LNG Plant. As per NEERI report there will not be adverse impact</li> </ul>
9	In proposed project area there are Mythical temples like Gangnath, Baalnath etc. Proposed project will hurt religious belief of people.	<ul style="list-style-type: none"> <li>The proposed LNG terminal will not affect the religious faith of people.</li> </ul>
10	Wild animals like lions, leopard, Nilgay, Porcupine, hyaena etc. are present in this area do consider this.	<ul style="list-style-type: none"> <li>The LNG terminal and it's operation does not adversely impact on the nearby forest and it's animals. Same are addressed by NEERI in EIA study.</li> </ul>
11	Proposed project would obstruct migratory route for lions.	<ul style="list-style-type: none"> <li>As it is well known that lions do not follow a fixed route/path, so LNG terminal cannot be considered as obstruction to migratory route of lions. The LNG terminal will not pose threat to animals, like Asiatic lions.</li> </ul>

B.	Pollution related issues	
1	Noise pollution will have a bad effect on children, birds and animals.	<ul style="list-style-type: none"> <li>As mentioned in the EIA report, increase in ambient noise level at plant boundary, during construction and operation phases, will be insignificant and will not have any impact outside the terminal limits. During construction Phase, adequate measures will be taken to address the same.</li> </ul>
2	Agriculture and Environment will be badly affected in Sarakhadi.	<ul style="list-style-type: none"> <li>As there won't be any discharge of hazardous waste, chemical and effluent from the proposed terminal and also the environmental impact from air emissions will be insignificant, the proposed project will not pollute the surrounding area or pose threat to the agriculture, farming or medicinal plants.</li> </ul>
3	In details of noise pollution name of villages from where samples were collected is not given and not clarified whether permission from local Panchayat was taken or not.	<ul style="list-style-type: none"> <li>Data collection is carried out by NEERI as per TOR given by MOEFCC.</li> </ul>
4	What is the route of 500 trucks during construction phase, what is the alternative for the pollution caused by the same?	<ul style="list-style-type: none"> <li>The numbers of trucks will be 50 per day. As mentioned in the EIA report, in Environment management Plan; adequate measures like covering of trucks and spray of water will be carried out to control and reduce dust generation. Traffic management plan will be prepared to avoid impact to the locality.</li> </ul>
5	Give the details of effluents How will it be treated? Where will it be disposed? show the disposal point on the map as well.	<ul style="list-style-type: none"> <li>There will be no effluent discharge from the Regasification Plant.</li> </ul>
6	Increase in length of breakwater will badly affect the marine life; increase pollution in sea, livelihood of local fisherman will also be affected.	<ul style="list-style-type: none"> <li>LNG terminal operation does not pose any threat or adverse impact to the fishing activity in the locality. Similar LNG operation has been running along with major fishing industries in India like LNG</li> </ul>

		terminal in Kochi, Kerala. The impact of LNG ship movement on the fishes and fishing is insignificant. Under EMP, HSEPL will monitor the same.
7	Report shows there will be no emissions of PM10, PM2.5, SO2, which is not possible. Bad effect on Human life will increase.	<ul style="list-style-type: none"> <li>LNG is a clean fuel with no emission of Sulphur, impact of NOx, PM10, PM2.5 emission will be minimum.</li> </ul>
8	Due to the increase in noise level, smoke and increase in temperature flora and fauna, marine ecosystem, etc. will be affected	<ul style="list-style-type: none"> <li>The terminal will be designed for noise level as per CPCB guidelines. Impact outside plant limit is insignificant, no increase in air temperature is expected.</li> </ul>
9	If GPCB gives permission to the Upcoming Project it will cause adverse effect on marine life.	<ul style="list-style-type: none"> <li>LNG is a clean fuel and the emissions from the gas (LNG) based power plant are minimum and as per EIA report the impact of the same on marine ecology and ecosystem is insignificant.</li> </ul>
10	Herbal medicinal plants will be destroyed.	<ul style="list-style-type: none"> <li>LNG is considered as clean fuel and the environmental impact from air emissions will be insignificant, hence the proposed project will not pollute the surrounding area or pose threat to the agriculture, farming or medicinal plants.</li> </ul>
11	Wild animals like lions, leopard, Nilgay, Porcupine, hyaena etc are present in this area do consider this	<ul style="list-style-type: none"> <li>The LNG terminal and its operation does not adversely impact on the nearby forest and its animals. Same are addressed by NEERI in EIA study</li> </ul>
12	Because of the project the temperature of the surrounding environment will increase and variations in season will be there.	<ul style="list-style-type: none"> <li>As there will not be significant air emissions from plant operations, no increase in air temperature is expected.</li> </ul>
13	What are the precautionary measures taken to avoid negative impact that will be created due to oil spills during construction phase.	<ul style="list-style-type: none"> <li>Routine maintenance of the equipment will be carried out and storage of oils will be provided with spill collection trays/spill collection provision to minimize the adverse effect of oil spillage. Any spillage will be</li> </ul>



		collected by absorbent medium and disposed through approved agencies.
<b>C</b>	<b>Socio-Economic/Developmental issues</b>	
1	Extraction of Ground Water, will affect crops and farmers.	<ul style="list-style-type: none"> <li>• Ground water extraction will not be there.</li> </ul>
2	Environmental balance should be maintained in whatever activity Company does.	<ul style="list-style-type: none"> <li>• CSR will be implemented with participation of locals.</li> </ul>
3	Medical facilities and employment to local people, Lights, water and roads facilities should be provided.	<ul style="list-style-type: none"> <li>• HSEPL will carry out its CSR activities which would cover sectors like Health, education, drinking water facilities, roads, drainage, electricity etc.</li> </ul>
4	Local Villagers should be employed and high schools should be established inside village boundary so that local children get proper education. Land losers should get employment.	<ul style="list-style-type: none"> <li>• Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.</li> </ul>
5	Blocking of canals will affect recharging of our wells which would then affect farmers.	<ul style="list-style-type: none"> <li>• The portion of canal falling under HSEPL Plant area will not be disturbed. The canal may be used for discharge of harvested rain water.</li> </ul>
6	90% of our Dalit OBC Samaj should be employed as laborers and educated people should be given employment accordingly.	<ul style="list-style-type: none"> <li>• Employment will be provided based on qualification experience and skills. However, preference will always be given to local people.</li> </ul>
7	How many people are going to get employment?	<ul style="list-style-type: none"> <li>• For the operation of LNG terminal around 100 people will be employed.</li> </ul>
<b>D</b>	<b>Miscellaneous.</b>	
1	What will be the source and amount of water required?	<ul style="list-style-type: none"> <li>• Water requirement is given in EIA report Section 2.8.2 page no 2.7.</li> </ul>
2	Please clarify whether this hearing is for 5 MMTPA or 10 MMTPA.	<ul style="list-style-type: none"> <li>• This hearing is for 5MMTPA.</li> </ul>
3	Regasification process can prove to be fatal. Major accidents can take place during laying of pipelines.	<ul style="list-style-type: none"> <li>• Design and safety measures will be considered to address the risk and hazard. As per Quantitative Risk Assessment,</li> </ul>



Chapter 13: Public Hearing

		risk of any such accident is negligible.
4	Status of application of CRZ Clearance.	<ul style="list-style-type: none"> <li>HSEPL will apply to GCZMA for CRZ Clearance.</li> </ul>

Out of the total 304 oral/written representations, as many as 280 representations were in favour of the project and 24 representation sought clarification regarding the project. Most of the representation (oral/ written) received from the local public were related to local employment, education facility for local student, medical facilities, cattle grazing & livelihood of fishermen etc.

Complete proceedings of the Public Hearing along with the Video-recording was submitted to MOEF&CC by GPCB vide letter No. GPCB/PH/2015-16/JUN-41/340409 Dated 04<sup>th</sup> Jan 2016.





Select photographs of Public Hearing.

SPEED POST

J-13012/100/2009-IA.II (T)

Government of India  
Ministry of Environment & Forests



Ph: 011-2436 4067

Paryavaran Bhawan

CGO Complex, Lodi Road

New Delhi-110 003

Dated: November 30, 2012

To

M/s Shapoorji Pallonji Energy (Gujarat) Pvt. Ltd.  
SP Centre, 41/44 Minoo Desai Marg,  
Colaba, Mumbai- 400 005.

**Sub: 2x660 MW Imported Coal Based Thermal Power Plant at village Kaj/Nanawada, in Kodinar Taluk, in Junagadh Distt., in Gujarat - reg. Environmental Clearance.**

Sir,

The undersigned is directed to refer to your letters dated 15.07.2011, 28.07.2011, 07.10.2011 and 28.12.2011 on the subject mentioned above. The Ministry of Environment & Forests has examined the application.

2. The proposal is for setting up of 2x660 MW Imported Coal Based Thermal Power Plant at village Kaj/Nanawada, in Kodinar Taluk, in Junagadh Distt., in Gujarat. Imported coal from Indonesia will be used for the proposed plant. Land requirement has been now reduced to 400 acres excluding corridor area. The co-ordinates of the site are located in between Latitude 20°44'27.49"N to 20°45'35.57"N and Longitude 70°48'34.27" E to 70°50'02.38" E. The Ash Pond (52 acres) has been relocated North West wards. No grazing land and no double crop agricultural land will be acquired for the proposed plant. Area requirement for ash pond/dyke will be 30.03 ha. Coal requirement will be 4.5 MTPA. Sulphur and ash contents in coal will be about 0.7% and 10% respectively. About 0.36 MTPA fly ash and 0.09 MTPA of bottom ash respectively will be generated. HCSD system will be adopted. Fly ash will be supplied to M/s SP Cement Gujarat Pvt. Ltd. and M/s Gujarat Sidhee Cement Ltd. Stack height will be 275 m. Water requirement will be 316.6 MLD and will be sourced from the Sea. Desalination Plant Capacity will be 1885 cum/hr. CRZ clearance for sea water intake and outfall is yet to be obtained. Marine EIA study has been carried out by NIO. There are no National Parks, Wildlife Sanctuaries, Heritage sites, tiger/Biosphere Reserves etc. within 10 km of the site. Public hearing was held on 15.06.2011. Cost of the project will be Rs 7335.0 Crores.

3. The project has been considered in accordance with the provisions of the EIA notification issued by the Ministry of Environment & Forests vide S.O. 1533 (E), dated September 14, 2006.

4. Based on the information submitted by you, as at Para 2 above and others and presentation made before the Expert Appraisal Committee (Thermal Power) in its 40<sup>th</sup> Meeting held during January 09-10, 2011, by you and your consultant viz. M/s EMTRC Consultants Pvt. Ltd., Delhi, the Ministry of Environment and Forests hereby accords environmental clearance to the above project under the provisions of EIA notification dated September 14, 2006, subject to the compliance of the following Specific and General conditions:

**A. Specific Conditions:**

- (i) In case source of fuel supply is to be changed at any stage for the proposed 2x660 MW units to be run on the imported coal, the proponent shall intimate the Ministry well in advance along with necessary documents for its concurrence to allow the change. In such case, the necessity for re-conducting public hearing may be decided in consultation with Expert Appraisal Committee.
- (ii) Vision document specifying prospective plan for the site shall be formulated and submitted to the Regional Office of the Ministry within **six months**.
- (iii) CRZ clearance for permissible activities in CRZ area under the CRZ Notification, 2011 shall be obtained before starting construction activity.
- (iv) The project proponent shall ensure that the thermal power plant is developed as a model plant, wherein ecosystem and development can co-exists in a balanced harmony.
- (v) In case clearance of the proposed Port site, intake and outfall points by the State and National Coastal Zone Management Authority or any concerned agency is denied, alternate environmentally suitable site for the power plant shall be identified.
- (vi) The proposed Thermal Power site shall be shifted further northwest in a manner that its impacts are bare minimum on the ecology of water bodies in the vicinity. The land shall be optimised to the bare minimum by shifting north-eastern boundary of the proposed plant site to cart road which is at an elevation of more than 4.5 meters above MSL. Further eastern side boundary of the proposed site shall be shifted to a minimum of 100 m from CRZ line.
- (vii) The quantum of land shall be restricted to 400 acres for the power plant excluding corridor area. In the Thermal Power Plant layout, it shall be ensured that separate coal storages for uncrushed and crushed coal totaling to 30 days storage may only be kept and accordingly land shall be optimised.

- (viii) The provision for ash pond for 2x660 MW shall be located at some alternative site in the vicinity.
- (ix) Harnessing solar power within the premises of the plant particularly at available roof tops shall be undertaken and status of implementation shall be submitted periodically to the Regional Office of the Ministry.
- (x) Transportation of coal shall be strictly by tube conveyor system from the Port to the plant site.
- (xi) Sulphur and ash contents in the coal to be used in the project shall not exceed 0.5 % and 10 % respectively at any given time. In case of variation of coal quality at any point of time, fresh reference shall be made to the Ministry for suitable amendments to environmental clearance condition wherever necessary.
- (xii) Provision for installation of FGD shall be provided for future use.
- (xiii) A stack of 275 m height shall be provided with continuous online monitoring equipments for SO<sub>x</sub>, NO<sub>x</sub> and Particulate Matter (PM<sub>2.5</sub> & PM<sub>10</sub>). Exit velocity of flue gases shall not be less than 22 m/sec. Mercury emissions from stack shall also be monitored on periodic basis.
- (xiv) No water bodies including natural drainage system in the area shall be disturbed due to activities associated with the setting up / operation of the power plant.
- (xv) COC of atleast 1.25 shall be adopted and report submitted within 3 months of operation of the plant. Waste water generated from the plant shall be treated before discharge to comply limits prescribed by the SPCB.
- (xvi) Intake shall be designed to ensure aggregation of fish and other marine creatures.
- (xvii) Continuous monitoring of marine biology shall be undertaken by an institute of repute. The marshy areas in the vicinity (if any) which may hold large quantities of water shall not be disturbed.
- (xviii) Degenerated mangrove located in the study area shall be adopted and regenerated in consultation with the concerned Department.
- (xix) Transit storage (guard pond) shall be developed to ensure that cooling water discharge is done near ambient temperature. Details shall be submitted to the Regional Office of the Ministry.

- (xx) A well designed rain water harvesting system shall be put in place which shall comprise of rain water collection from the built up and open area in the plant premises. Action plan and road map for implementation shall be submitted to the Ministry **within four months**.
- (xxi) There shall not be any contamination of soil, ground and surface waters (canals & village pond) with sea water in and around the project sites. In other words necessary preventive measures for spillage from pipelines, such as lining of guard pond used for the treatment of outfall before discharging in to the sea and surface RCC channels along the pipelines of outfall and intake should be adopted. This is just because in the areas around the projects boundaries there may be fertile agricultural land used for paddy or other crop cultivation.
- (xxii) Waste water generated from the plant shall be treated before discharge to comply limits prescribed by the SPCB/CPCB and no effluent, under any circumstances whatsoever, should be discharged into low lying area or into estuary.
- (xxiii) The leveling in plant area should be minimum with no or minimal disturbance to the natural drainage of the area. If the minor canals (if any) have to be diverted, the design for diversion should be such that the diverted canals not only drains the plant area but also collect the volume of flood water from the surrounding areas and discharge into marshy areas/major canals that enter into creek/nallah etc. Major canals should not be altered but their bunds should be strengthened and desilted.
- (xxiv) Additional soil for leveling of the proposed site shall be generated within the sites (to the extent possible) so that natural drainage system of the area is protected and improved.
- (xxv) High Efficiency Electrostatic Precipitators (ESPs) shall be installed to ensure that particulate emission from the proposed plant does not exceed 50 ug/Nm<sup>3</sup>.
- (xxvi) Adequate dust extraction system such as cyclones/ bag filters and water spray system in dusty areas such as in coal handling and ash handling points, transfer areas and other vulnerable dusty areas shall be provided.
- (xxvii) 100 % fly ash disposal shall be ensured from **day one** of operation of the plant and action plan in this regard including the utilization of fly ash in the cement and brick manufacturing shall be submitted to the Ministry within **four months**.

- (xxviii) Fly ash shall not be used for mine void filling or for agricultural purpose.
- (xxix) A detailed study on chemical composition of coal used particularly heavy metal and radio activity contents shall be carried out through a reputed institute and report shall be submitted to Regional Office of the Ministry. Only after ascertaining its radioactive level shall fly ash be supplied to end user.
- (xxx) Fly ash shall be collected in dry form and storage facility (silos) shall be provided. Unutilized fly ash shall be disposed off in the ash pond in the form of slurry form. Mercury and other heavy metals (As, Hg, Cr, Pb etc.) will be monitored in the bottom ash as also in the effluents emanating from the existing ash pond. No ash shall be disposed off in low lying area.
- (xxxi) Ash pond shall be lined with HDPE/LDPE lining or any other suitable impermeable media such that no leachate takes place at any point of time. Adequate safety measures shall also be implemented to protect the ash dyke from getting breached.
- (xxxii) Fugitive emission of fly ash (dry or wet) shall be controlled such that no agricultural or non-agricultural land is affected. Damage to any land shall be mitigated and suitable compensation provided in consultation with the local Panchayat.
- (xxxiii) Well designed acoustic enclosures for the DG sets and noise emitting equipments to achieve the desirable insertion loss viz. 25 dB(A) should be provided.
- (xxxiv) Hydrogeology of the area shall be reviewed annually from an institute/ organization of repute to assess impact of surface water and ground regime (especially around ash dyke). In case any deterioration is observed specific mitigation measures shall be undertaken and reports/ data of water quality monitored regularly and maintained shall be submitted to the Regional Office of the Ministry.
- (xxxv) Regular monitoring of ground water level shall be carried out by establishing a network of existing wells and constructing new piezometers. Monitoring around the ash pond area shall be carried out particularly for heavy metals (Hg, Cr, As, Pb) and records maintained and submitted to the Regional Office of this Ministry. The data so obtained should be compared with the baseline data so as to ensure that the ground water quality is not adversely affected due to the project.
- (xxxvi) Monitoring surface water quality in the area shall also be regularly conducted and records maintained. The monitored data shall be

- submitted to the Ministry regularly. Further, monitoring points shall be located between the plant and drainage in the direction of flow of ground water and records maintained. Monitoring for heavy metals in ground water shall be undertaken.
- (xxxvii) The project proponent shall not hamper the vocation of the fishing community in the area (if any) and it shall be ensured that local fishing community shall be allowed to carry out their vocation. Fish landing platforms shall be constructed out of CSR funds.
- (xxxviii) A Model Green Belt consisting of atleast 3 tiers (preferably 5 tiers) of plantations of native species all around plant site and 100 m width shall be raised. Also it shall be ensured that wherever the plant boundary is close to water bodies and mud flats, the width of greenbelt should be more than 200-300m wide. The density of trees shall not less than 2500 per ha with survival rate not less than 80 %.
- (xxxix) Coastal forests shall be regenerated in consultation with the Forests Department.
- (xl) All conservation measures suggested by GUIDE and Dr. Jethva and Gadhvi and also conservation plan submitted by the project proponent should be adopted. In addition Wildlife Conservation plan shall be prepared in consultation with the office of the Chief Wildlife Warden concern for implementation right from the development of the project itself.
- (xli) A common **Green Endowment Fund** shall be created and the interest earned out of it shall be used for the development and management of green cover of the area.
- (xlii) A **Fishermen Endowment Welfare Fund** of Rs. One Crore should also be created not only to enhance the quality of life of fishermen community through creation of facilities for fish landing platforms / fishing harbour / cold storage, but also to provide relief in case of emergency situations such as missing of fishermen on duty due to rough seas, tropical cyclones and storms etc.
- (xliii) The project proponent shall also adequately contribute in the development of the neighbouring villages. Special package with implementation schedule for free potable drinking water supply in the nearby villages and schools shall be undertaken in a time bound manner. As part of CSR measures, the project proponent shall construct small check dams (locally known as Bandharas) to help local people in the vicinity in storing fresh water.
- (xliv) CSR activities shall be implemented in a time bound manner and status of implementation shall be submitted to the Ministry from time to time. It shall be ensured that an in-built monitoring mechanism for the CSR schemes identified and R&R are in place

and annual social audit shall be got done from the nearest government institute of repute in the region. The project proponent shall also submit the status of implementation of the scheme from time to time.

- (xlv) An amount of Rs 31.60 Crores shall be earmarked as one time capital cost for CSR programme. Subsequently a recurring expenditure of Rs 6.30 Crores per annum till the life of the plant shall be earmarked as recurring expenditure for CSR activities. Details of the activities to be undertaken shall be submitted within one month along with road map for implementation.
- (xlvi) CSR scheme shall be identified based on need based assessment in and around the villages within 5.0 km of the site and in constant consultation with the village Panchayat and the District Administration. As part of CSR prior identification of local employable youth and eventual employment in the project after imparting relevant training may also undertaken
- (xlvii) An Environmental Cell comprising of atleast one expert in Ecologist, Marine Biologist, Fishery Specialist, Environmental Science / Engineering, occupational health and social scientist, shall be created at the project site itself and shall be headed by an officer of appropriate superiority and qualification. It shall be ensured that the Head of the Cell shall directly report to the Head of the organization and not to the head of the power plant at site. The Head of the Cell shall be accountable for implementation of environmental regulations and social impact improvement/mitigation measures.

**B. General Conditions:**

- (i) The treated effluents conforming to the prescribed standards only shall be re-circulated and reused within the plant. Arrangements shall be made that effluents and storm water do not get mixed.
- (ii) A sewage treatment plant shall be provided (as applicable) and the treated sewage shall be used for raising greenbelt/plantation.
- (iii) Adequate safety measures shall be provided in the plant area to check/minimize spontaneous fires in coal yard, especially during summer season. Copy of these measures with full details along with location plant layout shall be submitted to the Ministry as well as to the Regional Office of the Ministry.
- (iv) Storage facilities for auxiliary liquid fuel such as LDO/ HFO/LSHS shall be made in the plant area in consultation with Department of Explosives, Nagpur. Sulphur content in the liquid fuel will not exceed 0.5%. Disaster Management Plan shall be prepared to meet any eventuality in case of an accident taking place due to storage of oil.

- (v) First Aid and sanitation arrangements shall be made for the drivers and other contract workers during construction phase.
- (vi) Noise levels emanating from turbines shall be so controlled such that the noise in the work zone shall be limited to 85 dB(A) from source. For people working in the high noise area, requisite personal protective equipment like earplugs/ear muffs etc. shall be provided. Workers engaged in noisy areas such as turbine area, air compressors etc shall be periodically examined to maintain audiometric record and for treatment for any hearing loss including shifting to non noisy/less noisy areas.
- (vii) Regular monitoring of ambient air ground level concentration of SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>2.5</sub> & PM<sub>10</sub> and Hg shall be carried out in the impact zone and records maintained. If at any stage these levels are found to exceed the prescribed limits, necessary control measures shall be provided immediately. The location of the monitoring stations and frequency of monitoring shall be decided in consultation with SPCB. Periodic reports shall be submitted to the Regional Office of this Ministry. The data shall also be put on the website of the company.
- (viii) Provision shall be made for the housing of construction labour (as applicable) within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.
- (ix) The project proponent shall advertise in at least two local newspapers widely circulated in the region around the project, one of which shall be in the vernacular language of the locality concerned within seven days from the date of this clearance letter, informing that the project has been accorded environmental clearance and copies of clearance letter are available with the State Pollution Control Board/Committee and may also be seen at Website of the Ministry of Environment and Forests at <http://envfor.nic.in>.
- (x) A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parisad / Municipal Corporation, urban local Body and the Local NGO, if any, from whom suggestions/representations, if any, received while processing the proposal. The clearance letter shall also be put on the website of the Company by the proponent.
- (xi) The proponent shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MOEF, the respective

Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; SPM, RSPM (PM<sub>2.5</sub> & PM<sub>10</sub>), SO<sub>2</sub>, NO<sub>x</sub> (ambient levels as well as stack emissions) shall be displayed at a convenient location near the main gate of the company in the public domain.

- (xii) The environment statement for each financial year ending 31<sup>st</sup> March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of the Ministry by e-mail.
- (xiii) **The project proponent shall submit six monthly reports on the status of the implementation of the stipulated environmental safeguards to the Ministry of Environment and Forests, its Regional Office, Central Pollution Control Board and State Pollution Control Board. The project proponent shall upload the status of compliance of the environment of the environmental clearance conditions on their website and update the same periodically and simultaneously send the same by e-mail to the Regional Office, Ministry of Environment and Forests.**
- (xiv) Regional Office of the Ministry of Environment & Forests will monitor the implementation of the stipulated conditions. A complete set of documents including Environmental Impact Assessment Report and Environment Management Plan along with the additional information submitted from time to time shall be forwarded to the Regional Office for their use during monitoring. Project proponent will up-load the compliance status in their website and up-date the same from time to time at least six monthly basis. **Criteria pollutants levels including NO<sub>x</sub> (from stack & ambient air) shall be displayed at the main gate of the power plant.**
- (xv) Separate funds shall be allocated for implementation of environmental protection measures along with item-wise break-up. These cost shall be included as part of the project cost. The funds earmarked for the environment protection measures shall not be diverted for other purposes and year-wise expenditure should be reported to the Ministry.
- (xvi) The project authorities shall inform the Regional Office as well as the Ministry regarding the date of financial closure and final approval of the project by the concerned authorities and the dates of start of land development work and commissioning of plant.

(xvii) Full cooperation shall be extended to the Scientists/Officers from the Ministry / Regional Office of the Ministry / CPCB/ SPCB who would be monitoring the compliance of environmental status.

5. The Ministry of Environment and Forests reserves the right to revoke the clearance if conditions stipulated are not implemented to the satisfaction of the Ministry. The Ministry may also impose additional environmental conditions or modify the existing ones, if necessary.

6. The environmental clearance accorded **shall be valid for a period of 5 years** to start operations by the power plant.

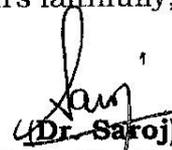
7. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.

8. In case of any deviation or alteration in the project proposed including coal transportation system from those submitted to this Ministry for clearance, a fresh reference should be made to the Ministry to assess the adequacy of the condition(s) imposed and to add additional environmental protection measures required, if any.

9. The above stipulations would be enforced among others under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and rules there under, Hazardous Wastes (Management, Handling & Transboundary Movement) Rules, 2008 and its amendments, the Public Liability Insurance Act, 1991 and its amendments.

10. Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

Yours faithfully,

  
(Dr. Saroj)  
Scientist 'F'

Copy to:

1. The Secretary, Ministry of Power, Shram Shakti Bhawan, Rafi Marg, New Delhi 110001.
2. The Secretary (Environment), Forests and Environment Department Government of Gujarat.
3. The Chairman, Central Electricity Authority, Sewa Bhawan, R.K. Puram, New Delhi-110066.

4. The Chairman, Gujarat State Pollution Control Board, Paryavaran Bhawan, Sector 10-A, Gandhi Nagar- 382010- with a request to display a copy of the clearance letter at the Regional Office, District Industries Centre and Collector's office within 30 days.
5. The Chairman, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi- 110032.
6. The Chief Conservator of Forests, Regional Office (WZ), E-5, Kendriya Paryavaran Bhawan, Arera Colony, Ravishankar Nagar, Bhopal - 462016.
7. The District Collector, Junagadh District, Govt. of Gujarat.
8. The Director (EI), MOEF.
9. Guard file.

  
(Dr. Saroj)  
Scientist 'F'