

SEALAND PORTS PRIVATE LIMITED

08/08/2018

To,
The Member Secretary, Infra-1,
Expert Appraisal Committee,
Ministry of Environment, Forest and Climate Change (MoEF&CC),
Indira Paryavaran Bhawan, Room No. 503, 5th Floor,
Vayu Wing, JorBagh Road, Aliganj,
New Delhi- 110 003

Sub: Environmental/CRZ Clearance for Development of Multi-Product SEZ/FTWZ and DTA at Layja Mota, Kutch District, Gujarat by M/s. Sea Land Ports Private Limited and M/s. Avash Logistic Park Private Limited. [F.No.21-68/2011-IA-III] – Submission of response & Request for Environmental & CRZ Clearance– reg.

Reference:

1. Minutes of 185th Meeting of Expert Appraisal Committee for projects related to Infrastructure Development, Industrial Estate and Miscellaneous projects held on 26th March, 2018 [item No: 3.4]
2. MoEF & CC issued ToR Letter dated March 5, 2013 and validity extension letter dated July 13, 2016

Respected Sir,

The EAC while considering the subject proposal for EC & CRZ clearance in their 185th meeting held on March 26, 2018, has sought response from the Proponent

Accordingly, we are herewith enclosing the document containing point wise response to EAC observations (Reference 1)

We request you to consider the project in upcoming Expert Appraisal Committee meeting for the issue of Environmental & CRZ clearance for Development of Multi-Product SEZ/FTWZ and DTA at Layja Mota, Kutch District, Gujarat

Thanking you,

For M/s. Sealand Ports Private Limited and M/s. Avash Logistic park Private Limited.



Sumathy Sivaramakishnan
Director (SPPL & ALPL)
Encl: As above

Clarifications to observations raised during 185th meeting of Expert Appraisal Committee for projects related to Infrastructure Development, Industrial Estate/ Parks/ Complexes/ Areas etc held on 26th March, 2018 at Ministry of Environment, Forest and Climate Change (MoEF&CC)

S.No.	EAC Observations	Proponent reply
1	The SEZ area is being utilized for agriculture purpose due to good ground water resources with water level 2.84 m to 7.19 m and it need to be protected from over exploitation or its contamination by the effluents such as pharma, polymer and basic & allied chemical industries due to potential to contaminate ground water.	Groundwater will not be used in any stage of project. Pharma (135 acres) and chemical (45 acres) sector proposed in an area of 185 acres will not be developed as desired by EAC. Therefore in lieu, Proponent will consider allocating 185 acres for various industries permitted by MOEF including herbal medicines, allied plastics and for installing solar panels.
2	The intake/outfall of sea water for power plants (2000 MW gas based) and (4000 MW coal based) may be considered with appropriate location of intake point as well as outfall point with diffusers at adequate depth. Sea water intake for desalination plant as well as its reject along with discharge of cooling water bleed of power plants may be considered. It needs to be ensured that there should not be any discharge of chemical constituents and heavy metals.	The location of sea water intake and outfall was identified through detailed model studies and accordingly outfall will be located at (-) 10.3 m water depth. The outfall system will contain pipeline with diffusers and risers with ports. All CETPs will be developed as ZLD system with reuse of treated wastewater. The marine outfall will be used only for discharge of return cooling water and reject brine.
3	The industry categories that could be considered are plastic industry with Zero Liquid Discharge (ZLD), textile industry comprising spinning and weaving operations and apparel making with ZLD, Free Trade and warehousing zone activity, focus engineering goods, shipping ancillary, handicrafts, non-metallic and mineral products with ZLD and desalination plant with intake and outfall as mentioned above.	All CETPs will be developed as ZLD system with reuse of treated wastewater. The seawater intake and marine outfall will be used for power plants and desalination plant.
4	The utility corridor will pass through stabilized sand dunes which is proposed to be utilized for conveyor belt for coal	Sand dunes will not disturbed and flattened. As recommended by GCZMA, trestle of the utility corridor shall be kept 1.0 m highest height of sand dunes

	transportation, intake and outfall pipelines to sea as well as LNG pipeline, and road, all of which will pass above sand dunes. Hence, the sand dunes should not be disturbed with structures and corridor should be built on stilts with minimum structural intervention. A proper management plan for protection of sand dunes should be prepared, as entire foreshore area was proposed to be reclaimed and utilised for hinterland facilities of port/ shipyard.	
5	Considering the sea coast adjoining proposed project site is known for breeding ground of Olive Ridley and Green Sea Turtle and quality of sea water is pristine as well as used for fishing activity by locals, no effluent discharge be allowed from drugs and pharmaceuticals, polymer and basic and allied chemical industries including dyeing operation in textile industry. As such these chemical industries categories cannot be considered to ensure that no chemical constituents find a way even through a storm water drain during rainy season.	Pharma (135 acres) and chemical (45 acres) sector proposed in an area of 185 acres will not be developed as desired by EAC. In lieu, Proponent will consider allocating 185 acres for various industries permitted by MOEF including herbal medicines, allied plastics and for installing solar panels. All CETPs will be developed as ZLD system with reuse of treated wastewater. No discharge is envisaged from CETPs.
6	It is to be ensured that ship building activity should not result in any deterioration of sea water quality and suitable measures to be devised, as Olive Ridley and Green Sea Turtle are noticed in this area.	Effluents generated in shipbuilding activity will be treated in ETP (ZLD system) and treated wastewater will be reused within the system, there will be no discharge into the harbour area.
7	The construction of shipyard and port requires reclamation and raising of ground level at beach front with dredged material. During construction, sea water turbidity will increase and hence it will temporarily affect the fishing activity, which should be compensated with CSR activity.	As a part of CSR activities of SEZ and Shipyard development, an amount Rs. 3570 lakhs was earmarked for fishermen welfare activities.
8	The LNG jetty, shipping jetty and ship yard are proposed in beach portion with reclamation of adjoining sand dunes and it was reviewed by Infra 2 committee. The CRZ provisions should be met to minimize the impact of port facilities and utility corridor.	CRZ provisions and EAC recommendations shall be followed.

9	2% project cost should be earmarked for sea turtle and other marine biodiversity conservation of the region. Conservation work must be carried out by nationally and internationally reputed organization. It also involves monitoring of sea turtle nesting activity annually and monitor change in habitat is any. A third party audit of the funds and the conservation measures must be undertaken annually.	A detailed study for existence of sea turtle nesting ground at proposed location was carried out by Zoological Survey of India (ZSI). The project proponent is committed for protection of sea turtles and proposed Conservation Measures for Turtle Nesting around the Project Site. The budget earmarked for Sea turtle and other marine biodiversity conservation was considered under various activities such as CSR, EMP implementation etc.,is Rs. 15.75 crores for a period of 30 years
10	Illumination at all installations must be sea turtle friendly.	Illumination near sea coast areas in shipyard cum captive jetties will be developed as sea turtle friendly.
11	Effluent discharge from Engineering Goods, Shipping, Textiles and FTWZ should not be mixed together for sending to CETP as proposed by the proponent	As suggested by EAC, treatment plant (CETP) will be developed separately for Engineering Goods, Shipping, Textiles and FTWZ.