

**Point No. 1:** It was considered that carrying out the activities just about 8 to 10 meters of the HTL may need a proper handling of Pollutants. The project proponents were advised to give a list of all wastes anticipated, classification of the waste as per their inclusion in various categories under the Pollution Control and Environment protection laws and the mode of disposal.

#### **Response No. 1**

To prevent any spillages of liquid effluents and storm water runoffs carrying solid debris from reaching the sea, a temporary sand bund will be constructed astern of the ship (i.e. between the ship and the sea) by dozers / front-end loaders, immediately after a ship has been hauled up on to recycling area. This berm will be compacted.

<b>Waste</b>	<b>Sources</b>	<b>Expected Generation (t/yr*)</b>	<b>Category</b>	<b>Disposal Option</b>
Asbestos & ACM	Engine room	20	Hazardous	Disposed off in Hazardous Waste Landfill
Glass wool	Galley, Chilling systems	229	Non-Hazardous	Disposed off in Landfills for Non-Hazardous Wastes within TSDF
Sludge Residue and Contaminated Material	Fuel & oil tanks, ballast tanks, bilges	46	Hazardous	Incinerated in TSDF
Plastics and Cables with Paint chips	Entire ship	2.5	Hazardous as may contain PCBs	Disposed off to TSDF
Rubber (Non-contaminated)	Cabin areas	5.5	Non Hazardous	Disposed off to TSDF
Rubber (Contaminated)			Hazardous	Disposed off in Hazardous Waste Landfill or Incinerated
Fibre Glass		4.5	Non Hazardous	Disposed off in Landfills for Non-Hazardous Wastes within TSDF
Rexene		6	Non Hazardous	Disposed off to TSDF
Iron Scales	Entire ship	103	Non Hazardous	Sold off as melting scrap
Chicken Mesh	Engine room	20	Non Hazardous	Sold off as melting scrap

Cardboard & Packing Material	Living & working areas, cargo holds	4	Non Hazardous	Disposed off to TSDF
Glass	Living & working areas	20	Non Hazardous	Disposed off to TSDF
Municipal Solid Wastes	Cabin areas	571.5	Non Hazardous	Disposed off to TSDF
Cement Tiles	Cabin areas, engine room	1143	Non Hazardous	Disposed off to TSDF
<b>TOTAL</b>		<b>2174</b>		

- The wastes as generated will be segregated at the plots itself. They shall be packed in suitable containers (leak proof containers in the case of hazardous wastes, oily sludge and putrescible municipal solid wastes), which shall be labelled accordingly. The quantities of wastes shall be recorded.
- The wastes shall be temporarily stored in dedicated special rooms / enclosures on the plots. There shall be separate rooms for storage of asbestos & asbestos containing material, paint chips, glass wool, rubber & plastics, thermocol & polyurethane foam, fibre glass, glass, ceramic tiles, fabrics, municipal solid wastes, etc. Special storage tanks shall also be set up for temporary storage of oily waste waters, oil sludge, waste oil etc.
- The wastes will be dispatched for final disposal with proper documentation, whose copies shall be submitted to the Regional Office of Gujarat Pollution Control Board.

**Point No. 2: Give proper details of handling Asbestos in the open and within rooms.**

**Response No. 2**

- ❖ Asbestos & Asbestos Containing Materials (ACM) will be identified and their presence demarcated immediately on grounding of ship.
- ❖ Asbestos and ACM will be removed as part of the Decontamination Process, prior to actual breaking of the ship.
- ❖ Asbestos & ACM removal will be carried out by a team of specially trained and certified medically fit workers under the guidance of a trained Asbestos removal supervisor.
- ❖ The workers shall put on full body protective clothing with self-contained breathing apparatus before entering the work area, which shall be cordoned off.
- ❖ The offensive material will be thoroughly wetted before dismantling begins. Only non-abrasive tools will be used. A water sprinkler system shall be installed in area where asbestos work is going on.
- ❖ The removed asbestos & ACM will be categorized into:
  - Salvageable asbestos

- Non-salvageable asbestos and ACM
  - Asbestos & ACM which need to further dismantling
- ❖ The removed Salvageable and Non-Salvageable Material while still wet, will be packed in labeled leak-proof packaging / containers. These will be removed from the ships and stored temporarily in special rooms awaiting final disposal (as applicable).
  - ❖ The sub-assemblies which require further working, will, while still wet, be wrapped in plastic sheets, without leaving any exposed area, carefully lowered to the ground and taken inside special Asbestos & ACM Handling Enclosures on the plots.
  - ❖ The special Asbestos & ACM Handling Enclosures will be completely enclosed. The entry and exit from these enclosures will be through extra chambers. The air pressure inside the enclosures will be maintained at slightly lower than what is prevailing outside. The enclosures will also be provided with air filtration systems routed through High Efficiency Particulate Air (HEPA) filters.
  - ❖ Entry to the Asbestos & ACM Handling Enclosures will be restricted only to trained asbestos workers, wearing full body protective clothing with self-contained breathing apparatus. The collected sub-assemblies will be finally disassembled inside the enclosures and packed in leak-proof labelled containers and sent to the temporary Asbestos & ACM storage room awaiting final disposal.
  - ❖ The special clothing worn by the asbestos removal workers will be taken off inside the enclosures and also packed in labeled leak proof containers before being sent to the cleaners.
  - ❖ **NO ASBESTOS WORK WILL BE DONE IN OPEN AIR.**

**Point No. 3 The committee did discuss the letter from Mr. Debi Goenka and advised the proponents to submit a reply.**

### **Response No. 3**

This e-mail sent by Conservation Action Trust (CAT) contained two attachments

Attachment – 1: Representation with respect to speaking opportunity during Public Hearing (e-mail dated 20.05.2016)

Attachment – 2: Seeking clarification for six points (e-mail dated 02.09.2013)

#### **APSEZ response to attachment – 1:**

As per the EIA notification 2006 and subsequent amendments the Public Consultation shall ordinarily have two components comprising of:-

- (a) a public hearing at the site or in its close proximity- district wise, to be carried out in the manner prescribed in Appendix IV, for ascertaining concerns of local affected persons;
- (b) obtain responses in writing from other concerned persons having a plausible stake in the environmental aspects of the project or activity.

Also,

The District Magistrate / District Collector / Deputy Commissioner or his or her representative not below the rank of an Additional District Magistrate assisted by a

representative of SPCB or UTPCC, shall supervise and preside over the entire public hearing process.

So with respect to the above mentioned provisions of the EIA notification, please note the following:

- Project proponent are liable to introduce the project to the audience and answer their questions raised / written representations submitted
- During the public hearing, all the questions raised by public were answered which are minitized by GPCB in the form of public hearing proceedings.
- Reply to all written representations received is also included in the minutes of public hearing
- Representations received from CAT are annexed as C13; C14 and C21. Reply of APSEZ to the same are annexed as D13; D14 and D21 of the minutes of the public hearing.

## **APSEZ response to attachment – 2:**

### **Comment No. 1**

Out first comment was "The exact status of the land required for the project may please be clarified – how much of it is within the intertidal zone, and how much of it is submerged. As per figure 2.1, it seems the entire site is in the intertidal zone." The reply is incomplete except for providing the information that the project area is located on the eastern side of the west port which is part of Waterfront Development Project for which MoEF has granted approval in 2009 and that it includes creating port back up areas (reclamation) using dredged material. It further says that the project area is partly in the intertidal area and mostly submerged area which is to be reclaimed as per Environmental and CRZ clearance granted by MoEF as mentioned above. It is pertinent to point out here that a report of the Committee for inspection of M/s. Adani Port and SEZ Ltd., Mundra, Gujarat, April 2013, headed by Sunita Narain under mentions that "the Adani Waterfront and Power Plant project, which has been granted clearance in different phases beginning 1995, has led to massive ecological changes with adverse impacts." Also, no clarification was given in terms of the area as acquired in the intertidal and how much is submerged area which has been reclaimed.

### **APSEZ response:**

The proposed ship recycling facility will be developed over an area of 40.7432 ha. It is located on the eastern side of west port which is being developed as part of Water Front Development Plan and granted Environmental Clearance vide MoEF order dated 12.1.2009 & addendum dated. 19.1.2009 (copy enclosed as **Annexure – 1**) and validity is further extended up to 11.01.2019 vide MoEF order dated 07.10.2015 (copy enclosed as **Annexure – 2**). The reclamation of the west port area (920 ha) is permissible activity as part of approval under the EC for WFDP to facilitate the backup infrastructure activities. . The status of project area as per CRZ map was submitted along with EIA at relevant time during the process of obtaining Environment & CRZ clearance. Presently land is reclaimed. Refer following Google Earth Image of Mundra West Port area with the project site marked.

As evident from the report of committee appointed by MoEF, there are no adverse comments with respect to proposed project location.



Location map on Google Image

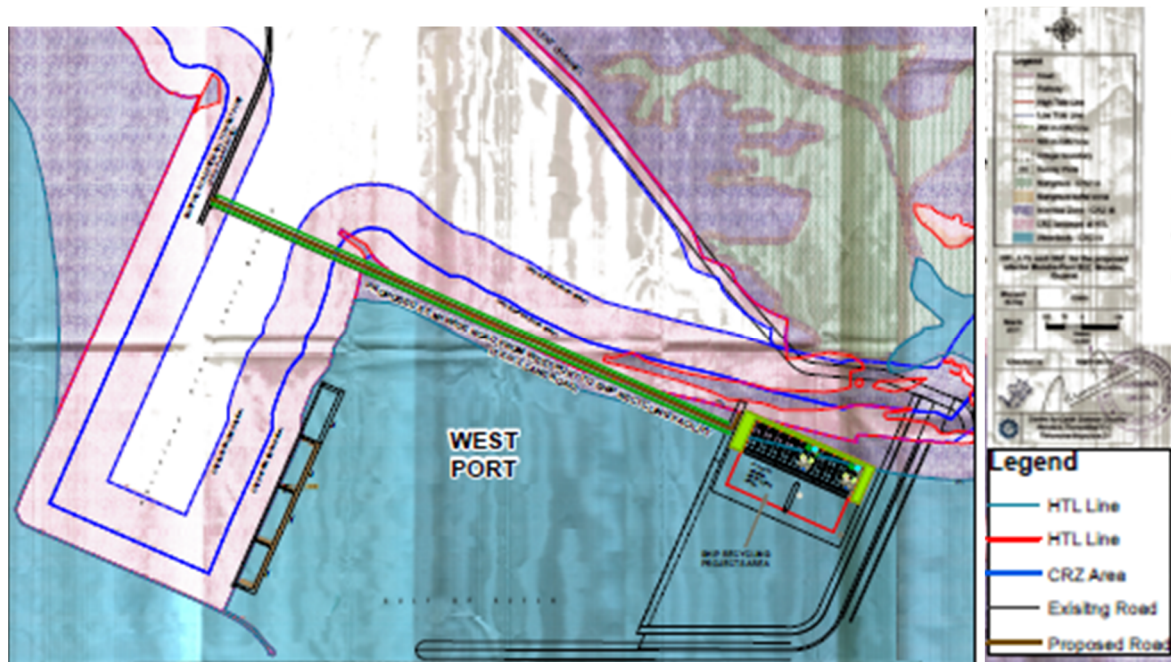
#### Comment No. 2

Our second comment was "What is the status of this area under the CZMP approved by the MoEF in September 1996?" APSEZL to this has replied that "at present the project is at public consultation stage and that after this process is over, final EIA with necessary documents as per CRZ Notification, 2011 will be submitted for CRZ recommendation from Gujarat CZMA. The project proponents should know that the Land use status of the land being acquired is known before hand by the Project Proponents and same is to be mentioned in the EIA report. Whereas, the Executive Summary under its land use information clearly mentions that mangroves and mudflat form part of study area, their reply clearly shows that that the project proponent is unwilling to divulge correct and adequate information as presence of mangroves and mudflats naturally categorizes the area under CRZ I.

#### APSEZ response:

The proposed project area is part of west port development. At the time of making application and as per authorized CRZ map, the proposed project area falls partly within CRZ IV and partly within CRZ I(B). The area is reclaimed as per EC & CRZ clearance for WFDP for setting up of west port and is a permissible activity as per CRZ notification 2011.

For proposed Ship Recycling facility, CRZ recommendations have been already obtained from Gujarat Coastal Zone Management Authority (GCZMA) vide their letter no. ENV-10-2013-106-E dated January 18, 2014. Copy of the same is enclosed as **Annexure – 3**. The study area covers area within 10 Km radius from the project boundary and accordingly land use map is prepared which includes presence of mangrove and mudflats within the study area. Mangrove areas are also demarcated in the authorized CRZ map and accordingly project area does not fall within CRZ I(A).



Project area superimposed on authorized CRZ map

### Comment No. 3

Our third comment was "What is the CRZ category of the project area under the existing CZMP?" APSEZL has replied to this that as per demarcation by CESS in June 2011 the project area falls mainly in CRZ IV and partly in intertidal area and therefore CRZ 1(B) and that the reclamation of the said area is approved as per Environment and CRZ clearance granted for Water Front Development project in January 2009". The intertidal area here is largely mudflats and hence it falls under CRZ 1(A) as per the CRZ notification 2011. And as far as the reclamation goes as per the approved Environment and CRZ clearance granted, the committee report on M/s. Adani Port and SEZ Ltd., Mundra, Gujarat, April 2013, headed by Sunita Narain clearly states that Baradi Mata creek has witnessed a distinct change at its mouth where the creek meets the sea which is clearly because of construction for the Water Front Development Project, whereas the specific conditions of the MoEF's Environmental Clearance dated 12.01.2009 clearly states that "there should be no filling up of creeks and reclamation of creeks". Further the same report shows that there is discrepancy in marking the HTL line and that they are mapped by various agencies with no common opinion on the HTL. This leads to important question on whether this area is CRZ IV or CRZ I or any other category. Also, the maps prepared by CESS does not confirm with the guidelines by MoEF for demarcating the HTL and LWL and has submitted the CRZ map of the scale 1:8000 and 1:5000 rather than the specified 1:4000 scale by the MoEF.

### APSEZ response:

The classification of project area as per authorized CRZ map is already described in our response against comment no. 2

The reference of Baradimata creek has no relation with proposed project facility. Project is developed as part of west port and there are no concern related to creek. As per CRZ notification 2011, CRZ demarcation is carried out by MoEF approved agencies only and

CESS (now NCESS) is one of the authorized agencies. CRZ maps have been submitted to GCZMA for obtaining CRZ recommendations and same is granted as mentioned in our response against comment no. 3.

#### **Comment No. 4**

Our next query was on "How much land has already been reclaimed by dumping of dredged materials?" APSEZL to this has replied saying that the reclamation activity is being carried out as per development plan of west port which is permitted under Environment and CRZ clearance of WFDP granted in January 2009. Again this information is absolutely irrelevant since there is no mention of how much area has been reclaimed so far.

#### **APSEZ response:**

Information related to land for proposed project and status of reclamation is already described in our response against comment no. 1

#### **Comment No. 5**

Our next query was on "How much area of mangroves and mudflats already been destroyed?" to which APSEZL has responded that they have not destroyed any mangroves or mudflats. Our response to this is that the Report of the Committee set up by the MoEF under the chairmanship of Ms. Sunita Narain clearly records the destruction of mangroves, reclamation of land and CRZ violations by the Adanis at Mundra. Further this report states that creeks are showing signs of damage because of soil deposition blocking access of seawater into the area and that over without adequate mitigation efforts this would block the creek and lead to eventual death of mangroves.

#### **APSEZ response:**

The proposed project is part of west port development for which EC has been granted and land is reclaimed as per said approval. There are no mangroves or mudflats at the project site. There are no concerns related to creek for the proposed project area. As evident from the report of committee appointed by MoEF, there are no adverse comments with respect to proposed project location.

#### **Comment No. 6**

For our next query on "How much area of mangroves and mudflats will be destroyed", APSEZL has replied that the nearest mangrove area is 1.4 km away from the proposed project location and that the proposed project will be developed on the approved area as per WFDP. Therefore there will be no damage to the mangrove and mudflats due to proposed work. It is relevant to note here that the observation from Google Earth imagery shows mangroves within 700 meters.

#### **APSEZ response:**

At the project site there are no mangroves or mudflats. The nearest mangroves are 1.4 km to the north-east of the project site. There will be no impacts on mangroves due to project activities.