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11.07.2016

To:

The Member Secretary,
Goa State Pollution Control Board,
Dempo Towers, EDC Patto Plaza,
Panaji Goa 403 001

Sub: Proposed 30 TPH Fertilizer Blending Unit for Customized
NPK Production . . . at Zuarinagar Goa by Zuari Agro Chemicals (ZACL); Synopsis of
submissions made at public hearing

Submissions under protest as concerned locals informed that they did not get adequate notice
Issues with the existing project: under 100, 204 & 303 of EIA Notification Appendix IV

1. Is the existing Zuari Plant independent of the expansion project being discussed today?

No, therefore cumulative impacts and issues of the existing plant need to be taken into account.

2. Has the existing plant maintained the standards of 25 ppm of phosphate and nitrate content of treated water at all times?

MoEF letter dated 01.09.2009 had found the levels at 250 to 300 PPM

3. Has the existing plant contained the furnace oil storage area to prevent spillage at all times?

MoEF letter dated 01.09.2009 had found that furnace oil was spilled over in the vicinity

4. What is the guarantee provided that the company will adhere to environmental norms in the future?

Issues with Form I for expansion project:

Retained during public hearing
on 11/3/16
D/S/O

1. Has there been any study on water stress in the area or at the source for supplying 2.5 lakh litres per day during operation phase?
2. What are the methods for decontaminating soil and can this return the original quality of the soil (Point 4.9)?
3. What will be the cumulative impact of SO_x, NO_x and PM pollution on the vicinity and Salim Ali Bird Sanctuary? Is there any data to support the same?
4. Spillage of H₂SO₄ is likely (7.1), what is the guarantee that this will be contained?
5. Is there hazardous waste likely to be involved at the plant as indicated at 4.3? Then why is this denied at 8.1?
6. Is the project within 500 m of HTL? Under what law is CRZ clearance exempted for the project?
7. Are there any private forests, wetlands within 10 km of the project site? If yes, why are they not involved in the Environmental Sensitivity section?

Review of Form I of the project indicates incomplete study. In the background of non-compliances of the existing plant and ill effects of chemical fertilizers on soil fertility in the long term, this project would prove detrimental to the public interest and ecology.

Terence Jorge

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EIA Resource and Response Centre. (ERC).