

Proposed Project of: Proposed Development of Fishing Jetty, Multipurpose General Cargo Berths and POL Terminal at Mormugao Port.

Project Proponent: M/s. Mormugao Port Trust, Headland – Sada, Goa.

REPLY TO THE WRITTEN QUERIES SUBMITTED TO GSPCB AS REGARDS TO THE ENVIRONMENTAL PUBLIC HEARING (EPH) HELD ON 05/10/2018, 06/10/2018 AND 08/10/2018 AT SAG, GROUND AT CHICALIM, VASCO-GOA.

ANNEXURE - II
Preliminary Objection Raised by Public in Written Submission

Sr. No.	Objection/Query Raised by Public During EPH	Reply to Query by MPT
1.0	Dr. Albertina de J.P. Almeida	
1.1	Assessing the proposed modernization and expansion of port infrastructure, for fishing, coastal, multipurpose cargo berth and liquid/general cargo at Mormugao Port, Goa, entails assessing not one project but six projects listed in the Report, plus projects entailed as a consequence of the modernization and expansion, including road, rail, waterways infrastructure projects, the supply chain to and from the Port, AND assuming the final approval of earlier projects proposed for which there were public hearings, which the consultancy has deliberately not assessed.	No remarks.
1.2	There is a false assumption that the Project stops within what are described as the limits of the Port's jurisdiction, but it clearly doesn't. For instance, once the cargo is transported to the end of the road proposed in the port's jurisdiction, it obviously does not stop there.	No remarks
1.3	The EIA does not array the environmental and labour laws and specifically state whether the said laws are applicable to this project and whether Mormugao Port Trust (MPT) is compliant or not in that respect and how both in the construction and operational phases. The laws concerned are, among others: Environment Protection Act and regulations made there under Forest Conservation Act, 1980 Wildlife Protection Act, 1972	EIA report is prepared as per EIA Notification, 2006 and in accordance with ToR issued by MoEF & CC.

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	<p>Air (Prevention and Control of Pollution) Act, 1981 Water (Prevention and Control of Pollution) Act, 1974 Noise Pollution Act Ancient Monuments and Archaeological Sites and Remains Act Public Liability and Insurance Act Explosives Act, 1984 Mines, Minerals and Concessions Rules Biological Diversity Act, 2002 National Forest Policy Contract Labour (Regulation and Abolition) Act, 1970 Minimum Wages Act, 1948 Building and Other Construction Workers (Regulation of Employment and Conditions of Services) Act 1996 Scheduled Tribes and Other Traditional Forest Dwellers(Recognition of Forest Rights) Act, 2006. Biological Diversity Act, 2002 Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013</p>	
<p>1.4</p>	<p>Submissions/objections made at the last hearing in April 2017, relating to the study area of the EIA Report have been ignored. For instance, there was a paper referenced in those objections to' reinforce the presence of wildlife Schedule I species, as also to speak of the impact on coral health, titled "Sutaria, Dipani, and Thomas A. Jefferson. "Records of Indo-pacific humpback dolphins (Sousa chinensis, Osbeck' 1765) along the coasts of India and Sri Lanka: An overview"" Aquatic mammals 30.1 (2004): 125-136." (attached), and also further more studies conducted on the coral reef structure at Grande Island, by the National Institute of oceanography cited as Manikandan, B., Ravindran, J., Mohan, H., Periasamy R Murali, R M., & Ingole, B. S. (2016). Community structure and coral health status across the depth gradients of Grande Island Central west coast of India. Regional Studies in Marine Science 7, 150-158 Here, it is also pertinent to note that even though one of the studies cited above is</p>	<p>EIA report is prepared as per EIA Notification, 2006 and in accordance with ToR issued by MoEF & CC.</p>

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	<p>mentioned, it has conveniently ignored the content referred in the objections'</p>	
<p>1.5</p>	<p>For people to be able to access justice in the event of flouting of the project conditions, everything has to be definite and properly defined. Otherwise access to justice remains a mirage and will effectively be denied. But vagueness or contradictions are omnipresent in the EIA Report.</p> <p>a)For instance, the survey numbers of the land on which this project is proposed are not set out. The EIA mentions no survey numbers, leaving it vague and capable of manipulation'</p> <p>b)Even the documents are not definite and authenticated and signed</p> <p>c)Neither~ ownership nor existing land uses have been set out. Jurisdiction cannot be conflated with ownership, Possession and use. The various stakeholders and concerned agencies and authorities in Goa under the laws have not been engaged with or interviewed and their responses/suggestions documented' The stakeholders cannot be brought in the Picture only at a Public hearing, while there has been no engagement with them Prior to the hearing, and any such claims that the consent of the stake holders is being taken through the public hearing is fallacious' That the consent of the stake holders is not there is also reflected visibly in the so-called MoU with the Government of Goa' Old Cross Fishing Canoe Owners Association, referred in the EIA Report, where there is no signature of the Old Cross Fishing Canoe Owners Association.</p> <p>d)The socio economic profile in respect of the study area has been drawn up with only Census data which is broad and sweeping, and no specific data pertaining to the occupations, sources of livelihood of the people. Economic and social importance is a valued ecosystem component. There is no unemployment data to suggest what benefits can be drawn from the data, no data indicating the displacement from livelihoods on account of the Project, no data on the</p>	<p>The project is to be implemented in the area within the Port's jurisdiction. Gazette Notification exists with regard to the notified Port limits. Please refer reply at 1.3 above.</p> <p>Concerned stakeholders including the Government of Goa have been involved in the project.</p> <p>The requirements of the canoe owners also have been taken care of.</p> <p>Latest census data has been used. EIA report is prepared as per EIA Notification, 2006 and in accordance with ToR issued by MoEF & CC.</p>

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	<p>projected employment apart from vague statements about employment benefits'</p> <p>e) Even from the Census data mentioned in respect of the study area, the disaggregated age data is missing, and so also other disaggregated data such as the data on disability, etc.</p> <p>f) The Report says the water requirement will be sourced from PWD Goa (the party from whom it will be sourced), but that does not take away from the responsibility of the Consultancy to set out where will PWD source the water from</p> <p>g) The Report at some places refers already reclaimed land and that therefore no permissions are necessary. At other Places refers to land to be reclaimed? Is the land already reclaimed legally reclaimed? Or is the Consultancy Proposing a structure of illegality on a foundation of illegality?</p> <p>h) Contradiction exist with respect to methodology for drafting socio economic profile. As again statement made on page 167 similarly that land to reclaimed, claimed in TOR</p>	<p>Latest census data has been used.</p> <p>PWD has various sources of water and data regarding the same can be procured from the PWD, GoG.</p> <p>For the purpose of the present project, most of the area has to be reclaimed.</p> <p>Socio economic profile has been narrated as per standard procedure.</p>
1.6	<p>Where is the qualitative and quantitative documentation in the EIA Report of the current uses of the land in the project area and the study area by people and communities? It is only when the current uses of the land, the rivers and the seas are documented that the Potential social, economic and cultural impacts can be visualised' The section on social and cultural impacts is pathetic to say the least. There is no mention of entire cultures that are going to be wiped out by this Project and cumulatively with other Proposed Projects of the same Project proponent or within the jurisdiction of the same Project proponent itself.</p>	<p>Land Use/ Land Cover study was done by using standard techniques which covers the river bodies, land parcels and other vegetative parts of the study area with the help of GIS technology.</p>
1.7	<p>The Proposal mentions about existing road and rail facilities but does not speak of the volume of traffic that the new Project(s) will entail BOTH in the construction phase and the operational Phase. A mere statement that there are existing facilities will not suffice. Will the existing facilities be able to cater to</p>	<p>Please refer the reply to item 6.20 of audio public hearing.</p>

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	the projected volume of traffic via this project/s? If not what more facilities will be required? Those facilities must also come within the purview of the EIA Report and be subject to a public hearing.	
1.8	Whose interests must be prominent? How can you talk of Prominent area being occupied by fish landing platform and the need to shift it? The local people MUST have the possibility to continue to occupy prominent areas/their commons` It has been so for centuries in Goa. Why should the use of Prominent space by the fishing community be lost to Big Traders' and 'Corporates' Interests?	No remarks.
1.9	The trade is expanding and MPT's is intending to expand its projects, but our earth and the land in Goa is not expanding' in fact it is eroding. But there are lies and more lies in the document. For instance, it is an utter lie that the EIA mentions that there will be no shoreline changes on account of the Project`	Please refer the reply to item 2.32 of audio public hearing.
1.10	When the land is not expanding and there are People living on the lands and living off the lands in a sustainable way' which the EIA has not documented, what is the credibility of the Consultancy which prides itself that it "not only gives environmental solutions for sustainable development, but makes sure that they are economically feasible"? Have you looked at how this proposed Project (with all its tentacles) is aligned or not aligned with the 2030 Agenda for Sustainable Development and the SDG Indicators' the National Action plan on Climate Change, the National Mission for Green India and the UN Guidelines on Business and Human Rights? Have you even taken into account that on 2nd October 2016' India has formally ratified the' Paris Agreement and has committed to reduce the emission intensity of its GDP by 20 to 25% by 2020, and in the light of the same, could you not have suggested a no action plan or rejected the feasibility of the proposed project on this account?. There are emissions related to this project when it is a continuum of the other projects and the inadequacy of the existing berths and infrastructure facilities, is the basis of this	No remarks

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	<p>Project. India is a signatory to CEDAW. Where is the compliance with CEDAW and more specifically General Recommendation No.37 on Gender Related dimensions of disaster risk reduction in the context of climate change?</p> <p>The socio economic data has not even been correlated to the proposed Project. Even the minimal data that is included is simply put there just to tick box that requirement. The very precautionary principle and the principles of sustainable development and intergenerational equity, enunciated by the Supreme Court of India as guaranteed under Articles 14 and 21 of the Constitution of India, are thrown to the winds by not correlating the data.</p>	
1.11	<p>The MPT has come forth with this project proposal with unclean hands and on that count alone, this Project should have been recommended for no action or dismissal in limine. What is its track record with regard to cases or complaints of criminal activity? Where is the documentation of the litigation against it? Has the land been reclaimed by MPT with due permissions. If so, why has the so-called reclaimed land, which the EIA Report claims will be used, not been allotted any survey numbers?</p>	No comments
1.12	<p>In sum and substance, the EIA Report is false, misleading and flawed and deserves to be rejected and a new EIA Report called for or alternatively the proposed Project rejected, because a Properly drawn up EIA Report will obviously recognize the environmental, social, economic and cultural infeasibility of the proposed Project.</p>	EIA report is prepared as per EIA Notification 2006, Socio economic study will be revised and incorporated in Final EIA Report.
2.0	Shri Antonio D'Silva	
2.1	<p>This is to submit my strong objections and total rejection of the project cited in the subject above. I am from Arossim village which is directly affected in all possible ways due to the coal expansion project of MPT, which they have cunningly hidden from public scrutiny for many years, and of which this subject project is only a 'tip of the iceberg'.</p>	No remarks. No coal handling at these berths.

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2.2	<p>The subject project cannot be evaluated for environmental or socio-economic impact in isolation, rather the evaluation must be done of the entire Sagarmala project for coal expansion, which impacts the entire state of Goa in a huge and unprecedented manner. Capital dredging, expansion/modification of berths 5a and 6a, expansion/modification of berth 7 and expansion/modification of berths 8 and 9 are all treated as separate projects for the purpose of impact assessment under EIA Notification 2006, though they are a part of the same project As irrefutable evidence, please consider the inclusion in the subject project of "Deepening of Breakwater Berth from -9.5 to -11.5m" under paragraph 1.3, of the ~EIA Report, which is- physically and operationally unrelated to the other parts of the present project. The whole Sagarmala project is therefore irrefutably a single project and the breaking down of the project into numerous fractions is unacceptable under the EIA Notification 2006 as it totally frustrates the objectives of the Notification.</p>	No remarks.
2.3	<p>My village is situated just to the south of the MPT along the Arabian coast The fisher folk farmers and other residents of our village are unanimously against this project for ' we have suffered tremendous losses due to the coal handling and transportation in the past, which has caused us incalculable losses, environmentally, economically and socially.</p>	No remarks
2.4	<p>Our white sandy beach are regularly polluted by black pieces of coal, indicating the levels of pollution caused by the ongoing coal operations in the sea. The losses to our fisheries are incalculable, and because other factors also contribute, the coal pollution becomes the final nail in our coffins. The toxic substances and heavy metals in coal, especially coal dust, is totally poisoning our food chain, with grave ill-effects on the health of fish-eating local populace, and even tourists. The losses to the fisheries and tourism industries, local populations and economies and environment far outweigh the revenue received from the polluting industries</p>	This is not true.

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	of private corporations, whose greed for profit is driving this evil plan.	
2.5	Another serious problem faced by our village and dozens of other villages through which the South Western Railways runs is the double tracking proposal, without our houses and settlements that we are already facing unimaginable problems due to the coal operations, which occupy a large portion of the total train operations. The present single track is quite congested by the present operations, as indicated by MPT itself in its own reports available with MOEF and other authorities and which I can provide on request. The second track is a part of the Sagarmala project and its impact must be studied along with the rest of the project. Unfortunately, the railways has totally violated the law by proceeding with sections of the double tracking without carrying out any EIA studies, unmindful of the fact that the route runs through Western Ghats and thickly populated villages and towns of Goa, like ours.	No comments
2.6	Our village is located on the coast and our fisher folk and other residents have ardently protected our coasts with our traditional knowledge and using the laws in force. It therefore shocks us how the present proposal is being considered without the finalization of the CZMP for Goa under CRZ Notification 2011. Considering the orders of the NGT given in Original Application No. 11 of 2014 and 424 of 2016 on 22nd November 2017 , the present proposal and this Public Hearing being held today on 5th October 2018 are in gross contempt of the orders.	No comments.
2.7	Despite the Constitution of India and our International Commitments for obtaining prior consent of indigenous communities and for public participation in development planning, MPT and the Government have taken great pains to hide the coal expansion plans from the people of Goa, and are dangerously threatening the environment and economies of Goa for the private profits of a few.	This is not true.
2.8	We also bring to your notice the report of the expert body on ports in the 12a Five Year Plan	No remarks.

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	2012-2017 clearly directing MPT to remove dirty and hazardous 'cargoes from the proximity of Vasco City, which directions MPT is contemptuously, fraudulently and illegally flouting. The safety, health and the economic growth of lakhs of people are being adversely affected due to the greed of a few. Indeed, with climate change, it is very difficult to now justify the use of coal for private profits by such corporations, which may be the reason for the secrecy and misrepresentations in the EIA Report, and is another reason for EAC to strike down the EIA Report.	
2.9	I therefore object to the subject project and ask for the Terms of Reference for the subject project to be quashed and the EIA Report also to be rejected with directions to consider the project in its entirety of MPT wishes to continue with these coal plans.	No remarks.
3.0	Baina Ramponkar & Fishing Canoe Owners Society and Desterro Fisherman's Association	
3.1	As per the Regulation 5 of the Coastal Regional Zone Regulation 2011 requires all States to prepare Coastal Zone Management Plans, The Coastal Zone Management Plans are required to contain to provide interalia demarcation of HTL and LTL hazard mapping, classification of CRZ area, demarcation of buffer Zone, hazard line, fishing villages and zones etc. Till date the Coastal Zone Management Authority as directed by the National Green Tribunal by its order passed in OA No: 422/16 and OA No: II/2014 and an extension of time has been sought to prepare the CZMA.	No remarks.
3.2	The Government of Goa has not notified fishing villages in the State of Goa under CRZ Notification 2011.	No remarks.
3.3	In View of the above since the project would affect the fishing village of Khariwada and also would involve construction within the No development Zone of the Zuari estuary and Arabian Sea and also would require capital dredging of the sea bed for laying of the foundation of the jetty. It is absolutely necessary that the Coastal Zone Management	No remarks.

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	Plan is prepared and notified as also the fishing Village are notified.	
3.4	We would like to place on record that as per the minutes of the meeting chaired by then Chief Minister Digambar Kamat in 2011, it was assured to us that certain matters relating to MPT and fisherfolk of Khariwado would be addressed forthwith. The MPT and the GOG has clearly agreed that the khariwado bay will be declared as fishing villages and the same will be notified, the GCZMA was directed to take this forward and said it would be done in 6 months. We have received no official information that this has been completed.	No remarks.
3.5	In adding to the assurance made by MPT and GOG to Traditional fisherfolk of Kharewado dated 16-04-2011,they assured that 356 houses would be regularized on a case to case basis. This too has not been done. It was also agreed that the MPT's jurisdiction would be de-notified, This too has not been done as is clear from the EIA currently in question where the project proponent claims the entire area is under MPT jurisdiction.	No remarks.
3.6	Serious breach of regulation with regards to CRZ mapping in the EIA draft report. The EIA draft report includes Appendix II HTL/LTL Map Prepared by IRS, Anna University Chennai. This map is meant to demarcated the high tide line, low tide line and various CRZ areas as per the CRZ notification of 2011. But it is evident from the legend of the map that the consultant has used the recently proposed, yet to be notified, new proposal for zonation in CRZ areas for eg CRZ - I B, CRZ IV A, CRZ IVB. To propose a project based on a draft notification 2018 is beyond absurd and is definitely legally untenable. We will not accept this mapping as it is not in accordance with CRZ notification of 2011 which is the main CRZ notification which is currently in effect. We reject this map in toto and request you to ensure no public hearing is conducted based on such fraudulent studies. We also place on record that our fisherfolk unions at the national and state levels have place our formal rejection of	Please refer the reply at item 17.38 of audio public hearing.

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	CRZ draft notification of 2018 on record and submitted our objections to the GCZMA and MoEF & CC respectively.	
3.7	The National Green Tribunal, vide its order on 01-09-2016 on Appeal no.10.2016 (WZ), quashed the EC given to MPT for dredging of the navigation channel to the port stating that it was arbitrary and illegal. MPT was found to have illegally commenced dredging in Jan 2016 even before the fraudulent EC was issued. We were appellants in this case and this has shown us the immense lack of respect that MPT has for due this has shown us the immense lack of respect that MPT has for due process and rule of law. Despite this fact, MPT has again included 2 dredging components in this current proposal. Any more dredging to deepen the coast so close to the beach will only lead to further erosion and will lower the resistance of this beach to extreme climate events.	No remarks.
3.8	EIA Report not as per the Terms of Reference (ToR), the EIA Report November, 2017, Page no 15, Section 1.6: Says that "Baseline monitoring program during March - May 2017 to establish marine water qualities, marine sediment quality, soil quality, air quality, ground water and surface water quality and noise level in the study area. This same time period is mentioned for data collection regarding ambient air quality and other data points. The Terms of Reference (ToR) was granted on May 08, 2017 in vide reference number: F.N. 10/82017-IA-III. As per the EIA report submitted by the project proponent it clearly says the baseline data was collected during March - May 2017 and which much before the granting of TOR. Anywhere in the EIA report there is no mention of data collecting after the date of ToR granted. It is evidently established that EIA report was prepared on data collected much before the ToR was granted. Para, 7 (i) II (i) of the EIA Notification says "Scoping": refers to the process by which the Expert Appraisal Committee in the case of Category_ 'A' projects or activities, and State level Expert Appraisal Committee in the case of Category	MoEF & CC has issued an Office Memorandum (OM) regarding the validity of the TOR and the same will be attached with Final EIA Report.

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	<p>_B I' projects or activities, including applications for expansion and/or modernization and/or change in product mix of existing projects or activities, determine detailed and comprehensive Terms Of Reference (ToR) addressing all relevant environmental concerns for the preparation of an Environment Impact Assessment (EIA) Report in respect of the project or activity for which prior environmental clearance is sought. As per the requirement of EIA Notification, 2006 (Section 7(i) II Stage 2 (i)) the EIA report has to be prepared by the project proponent strictly on basis of Terms of Reference (ToR) issued by the Ministry of Forest, Environment and Climate Change. In this case conducting the survey prior to granting of TOR is a clear violation of EIA Notification 2006. The EIA Report is required to be placed before public prior conducting public hearing. The purpose is defeated if same is not in consonance with Terms of Reference. Further, it is unfortunate that data collected before ToR for the preparation of EIA report may not address all the issues arising out of EAC meetings and ToR granted after that. It is also questionable that whether the EIA is in compliance with all the terms and conditions mentioned in the TOR granted in May 2017.</p>	
<p>3.9</p>	<p>Without prejudice to the foregoing, and while on the issue of public notice/publicity for the public hearing, we wish to point out that you have failed to comply with mandatory requirements in this regard as prescribed by law. You must be aware that Hon'ble Delhi High Court, in its judgment in Utkarsh Manda[v.Union of Indial, held (at para 43) as follows: "It is a matter of concern that the requirement of public hearing under the EIA notification has been taken so lightly by the MoEF. This needs immediate correction. If the hearing has to have adequate publicity then the notices would have to be repeated and spread over a period of ten days so that as many people as possible are made aware of such public `hearing' (Emphasis supplied). Kindly note that the aforesaid case has a</p>	<p>Adequate publicity has been given. Also please see the reply at item 10.30 of audio public hearing.</p>

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	<p>direct nexus with State of Goa; the procedural propriety of the grant of an environmental clearance to the Borga Mines in Quepem Taluka to M/s Panduranga Timblo Industries being the issue in the petition. The Hon'ble Delhi High Court has clearly laid down that the notices of the public hearing envisaged under the EIA Notification would have to be repeated every ten days. We are unaware of the public notice in local/national newspapers having been repeated in the last 20 days. If so, we submit that holding the public hearing on 5th October 2018 would be illegal and irregular on this count alone, besides being in contempt of orders of the Hon'ble High Court above.</p>	
3.10	<p>You may be aware that the last round of public hearings on MPT expansion projects was held over eight days in April/May 2017 at Tilak Maidan, Vasco. Tilak Maidan was the chosen venue for the very same public hearing that was scheduled to be held in April 2017 but was cancelled by your office. However, the venue selected for the hearing on 5th October i.e. Chicalim Ground, is most inconvenient and unsuitable, being 4 - 5kms from Vasco town/project site. Why was MPT Ground Raina - located within 12 km of the project site - not considered? It belongs Page 2 of 4 to the project proponent itself. Is the idea to ensure minimum attendance at the hearing. Hon'ble Gujarat High Court in Centre For Social Justice v. Union Of India & Ors AIR 2001 Gujarat 71, held (at para 6.3) that it would be convenient to hold environmental public hearings at taluka headquarters. Without prejudice to the foregoing, the description of the venue as "Chicalim Ground" has puzzled us, and is bound to confuse many. To our knowledge, there is no venue known as "Chicalim Ground"; we know of a Chicalim Sports Complex that is located along Airport Road, and of a Chicalim Panchayat Ground located next to the Chicalim Panchayat office. At which of the two venues is the public hearing proposed to be held; or is there some other?</p>	<p>Arrangements for the Public Hearing Proceedings including the selection of venue have been done by the GSPCB.</p>

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	Is this confusion being caused deliberately to ensure minimum attendance at the hearing?	
3.11	NO NEED OR NECESSITY. EXCEPT FOR COAL EXPANSION: The subject proposal is only for expansion of coal handling at MPT, since the existing POL at Berth 8 is obstructing Vedanta's coal handling plans.	This is not true.
3.12	DISPLACEMENT OF FISHER FOLK: The subject project is only to displace the fisher folk of Kharewado and the trawlers at the fishing jetty next to Berth 11 to make way for the expansion of coal handling planned at MPT	This is not true.
3.13	DISPLACEMENT OF FISHING VILLAGE AT KHAREWADO: The subject project will completely displace over 2,000 families of fisher folk and others living in the fishing village at Kharewado, This fact is clear from the contents of the EIA Report, since the roads and the back office spaces will require the lands on which this village exists. The EIA Report cunningly conceals all these facts related to displacement of the fisher folk.	Please refer the reply at item 15.36 of audio public hearing and item 3.12 above.
3.14	DESTRUCTION OF FISH STOCKS AND MARINE ENVIRONMENT: This project will completely destroy the fish stocks of Goa, which are already under very fast decline. Vasco Bay used to see thousands of dolphins and abundance of fish of all kinds only a few years ago, but MPT and coal handling have badly destroyed our fisheries	Please refer the reply at item 17.21 of audio public hearing.
3.15	CONCEALMENT OF MARINE ENVIRONMENT DEGRADATION BYMPT: The EIA Report totally conceals the degradation of the marine environment due to MPT's past activities. There is no study or data regarding the declining fish stocks or the pollution of the Vasco Bay and Arabian Sea due to coal pollution and MPT's activities. There is no study or reference to the destruction of the corals at Grande Islands and the populations of dolphins, porpoises, turtles and whales due to the big ships and MPT's activities.	This is not true. Also please refer the reply at item 2.31 of audio public hearing.
3.16	CONCEALMENT OF MASSIVE EROSION AND DESTRUCTION OF BEACHES AND COAST - The Vasco Beach has suffered serious erosion and its width has already reduced drastically	Please refer the reply at item 2.32 of audio public hearing.

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	<p>due to past dredging and other activities by MPT. Similarly, the beaches around Vasco are also affected due to the past dredging. The massive dredging envisaged under Sagarmala project, including the part included in the subject proposal, will cause unprecedented erosion with severe implications to the fishing communities and other local residents who use the beaches and the coast. It is highly probable that the catastrophic destruction faced by Pondicherry coast in the past will be repeated at Goa if this project is allowed without proper studies.</p>	
3.17	<p>WRONG TOR AND SCOPE OF STUDY - ENTIRE SAGARMALA_PROJECT MUST HAVE ONE EIA STUDY - The EIA Report clearly states that the scope of the subject proposal is a part of the Sagarmala Project, which includes many activities that are essential or inter-related to the subject proposal. It is therefore essential that an EIA study of the entire Sagarmala project at MPT, including all the berths, dredging and connectivity of roads and railways be carried out together, otherwise the objectives of the EIA Notification 2006 will be defeated and it will be an empty exercise.</p>	<p>EIA is based on the approved ToR issued by the EAC of the MOEF & CC.</p>
3.18	<p>GRAVE- SAFETY ISSUES-The POL is a grave danger for the residents of the Vasco, especially the fisher folk living in the vicinity of MPT. The POL must be moved away from Vasco City to a Port without dense populations in its neighborhoods, as stated in 12th Five Year Plan 2012-2017. The present project attempts to bring the POL terminal right in the midst of heavily populated fishing area which is totally unacceptable and against all norms and recommendations.</p>	<p>Project shall comply with all safety standards laid down in health Rules & regulations.</p>
3.19	<p>The proposed Modernization and Expansion of Port Infrastructure for Fishing, Coastal, Multipurpose Cargo Berth and Liquid /General Cargo will approximately dredge quantity 1 crore Cubic meter of silty clay and clayey silt which will in turn destroy the entire Khariwado beach. The proposed project will dredge around 1 crore Cubic meter of silty clay and clayey silt. This will result in degradation of the ecosystem and will</p>	<p>Dredging is estimated to be about 1.5 million cum only. No erosion of beaches is anticipated as per the conclusions drawn by studies conducted by CWPRS, (Pune), NIO, (GOA) and National Centre for Sustainable Coastal Management (NCSCM) Chennai.</p>

<p>destroy the ecology of the region, the soil deposit in any water body have a certain pre disposed composition thus through dredging this composition will be altered because the said alteration the existing habitat of creatures and organisms that depend on the original composition of the soil will die out due to non favorableness of the changes caused. The said alteration the turbidity of the soil under the water also changes this causes problems by way of creation of newer and harmful organisms, transferring of unwanted organisms to other parts in the water-body leading to wider spread of contamination and organic processes by way of release of extra and unwanted nutrients. The removing gravel (founded stones) from river /sea beds by dredging leads to the loss of spawning (eggs depositing spaces) grounds for fish, and can cause loss of some species, the removal river/sea bank soils disturbs the habitat of river/sea bank fauna such as otters (mammals) and water voles and this will lead to change chemical composition of water. This will affect the fish and other aquatic organisms and lead to a depletion in the fish/shell fish catch and inturn deprive the fishermen from Caranzalem, DonaPaula, Miramar, Siridao, Bambolim, Nauxim, Cacra, Khariwado, Issorcim, Desterro, Raina, Bogmalo, Hollant, Santarem, Velsao of their livelihood. The Capital dredging will lead to erosion of the seabed and beach at the Caranzalem, Dona Paula, Miramar, Siridao, Bambolim, Nauxim, Cacra, Khariwado, Issorcim, Desterro, Raina, Bogmalo, Hollant, Santarem, Velsao beach and will lead to collapsing of river beds in the nearby villages of Sancoale, Cortalim, Quelossim and Chicalim as the River Zuari flows past these villages at a stretch of around 10 kms and meets the Arabian Sea at Dabolim. About 20% of the 105 km of Goa's coastline has already been affected by erosion, the Colvale area in North Goa and River Talpona in South Goa is already affected by erosion in the last` monsoon. If such large scale of</p>	
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	<p>Capital dredging is done then their will cause floods in the neighbouring villages and it will also cause destruction of Corals and coral reefs, Turtle nesting grounds, Horse shoe crabs habitats, Sea grass beds, Mudflats and also Nesting grounds of birds etc. the dredging will lead to collapse of the river beds thereby leading to water logging of all low lying areas surrounding the rivers and will further aggravate the already fast eroding coast of Caranzalem, Dona Paula, Miramar, Siridao, Bambolim, Nauxim, Cakra, Khariwado, Issorcim, Desterro, Raina, Bogmalo, Hollant, Santarem, Velsao.</p>	
3.20	<p>Out of the 7,516.6 k.m. coastline in the country, 42% of the coast has already been washed away and the main cause is the unplanned ports / harbours which are also documented by National Institute of Port Management. An example of such a situation is the Pondicherry harbour which build a new deep-water port due to this the town's beautiful sand beach disappeared and the fishing villages got destroyed. All this was due to unplanned expansion of port and dredging. In the EIA, total 1 crore Cubic meter of sediment is expected to be removed. This material will be dumped in the deep sea, and hence lost forever. It would be worthwhile to examine if this dredged sediment which is essentially sandy could be used for (a) beach nourishment considering that some of our beaches are losing sand, and (b) inland building projects considering that river sand is in short supply. The Capital dredging of such large volume will affect the rocky shoreline. As a result, the stability of the sea cliff / headland Sada may be at stake, due to the fact that the sea-facing laterite sea cliffs are highly vulnerable to collapse. In view of the above, it is demanded and objections in the 'EIA Report and the TOR be rejected and the subject project stopped completely in Public Interest.</p>	The remarks are not correct.
4.0	Bharat Mukti Morcha	

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4.1	The Board was informed that in case of the mining unit of Late M/s AmaIia R G. Figueiredo-Polo Dongor iron and manganese ore mine (T.C no. 65/5I) to which-although the environmental clearance (EC) was granted under the provisions of the EIA Notification 2006, the MoEF & CC has not yet lifted the EC abeyance since 2012. Accordingly, the Board decided to defer the application pending relevant/ suitable communication for the MoEF & CC, New Delhi.	This has no relevance to the proposed project.
4.2	The board was informed that there are 06 mining units in the Sonshi cluster (Annexure-2) which have been granted environmental clearances as per provisions under the EIA notification 2006. It was also informed that this cluster has reported exceedance in ambient air quality parameter with specific reference to particulate matter (PM10) prior to June 2017. The Board after discussion/ deliberation approved to consider grant of renewal of Consent to the mining units referred as Annexure-2 subject to submission of Bank Guarantee (B.G) as well as compliance to Plan of Action submitted to the board in the consultation with the Iism-iit, Dhanbad which are to be incorporated as Specific Conditions in the Consent to be issued. In addition establishing vis-à-vis monitoring of ambient air quality monitoring mechanism along the ore transportation route at a locations where settlements area located. Further the board agreed that till such time the board sets up such monitoring stations the mining firms concerned have to set up the same at the locations determined by the board.	This has no relevance to the proposed project.
5.0	Conservation Action Trust	
5.1	Please furnish copies of the environmental, forest and CRZ clearances received for the existing Port.	This has no relevance to the proposed project.
5.2	Please also submit copies of all the compliance and monitoring reports for same.	This has no relevance to the proposed project.
5.3	Please furnish copies of complaints and action taken, if any regarding same.	This has no relevance to the proposed project.

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5.4	Please furnish data on the present status of the number of ships/cargo/containers operating daily in MPT? Please furnish data of the increase in the number of ship/cargo after completion of the proposed project.	Necessary data will be provided in the Final EIA Report.
5.5	Have the ToRs been fully complied with?	Yes
5.6	Does EIA has been made in line with MoEF&CC guidelines for ports and harbours?	Yes. EIA has been conducted as per the EIA Notification, 2006.
5.7	How much area of the proposed project falls within CRZ? Please describe in details the area under each CRZ category along with maps and google images.	Please refer Appendix II of EIA report.
5.8	Please give details about the mangroves, mudflats, corals, salt marshes, sand, rocky area falling under the project area and under the study area.	Please refer to the reply at item 15.47 of audio public hearing.
5.9	Has the project proponent carried out mapping of the CRZ area and the HTL - LTL line, buffer area, as well as mudflats, sand dunes, and corals on 1:4000 scale on the CZMP approved by MoEF&CC? If yes, kindly furnish.	Yes.
5.10	What is the expected increase in the marine traffic in the area? What will be the increase in the pollution due to marine traffic	Please refer Table 2.4 of EIA report.
5.11	Please provide the details on the expected deterioration of water quality.	Please refer Chapter 4.4 of EIA report.
5.12	Are there any turtle nesting grounds present in the area.? Please furnish the full details	No turtle nesting grounds have been documented during baseline study.
5.13	Are there any other endangered marine mammals present in the study area?	This information will be covered in the NIO Biodiversity Report to be attached to the Final EIA Report.
5.14	What will be the impact of the movement of ships and barges on the marine ecology of the area?	Impacts on marine environment during construction as well as operation phase have been studied along with mitigation measures and the same have been incorporated in Chapter 4 of EIA Report.
5.15	How will this impact the marine life and bird life and the livelihoods of local fisher folk communities?	The present project will have no significant effect on marine life, bird life and on the local fishermen community. This has been elaborated in Chapter 4 of EIA Report.

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5.16	The proposed project would adversely impact the fish catch and livelihood of the fisherfolk. What steps are being proposed to minimize the adverse impact and to compensate the fisher folk for their financial losses?	The present project will have no significant impact on fish catch as it is located within the active MPT Port basin where no fishing is allowed. On the contrary once the project is operational it will improve the fish catch due to the modern fishing jetty and allied facilities made available to the local fishing community.
5.17	What are the mitigation measures proposed for the same?	Please refer the above answer.
5.18	What quantity of material will be dredged?	The dredged material is estimated at 1.5 million cum.
5.19	Where will it be dumped?	The dredged spoils will be disposed off in the designated spoil grounds identified by CWPRS, Pune as a result of a detailed scientific study.
5.20	Please furnish the land use details of the proposed project along with a land use map and greenbelt plan	Please refer item 3.5.2 of EIA report, for layout of green belt please refers annexure VII of EIA report.
5.21	What will be the impact of the additional transport of materials on the road and rail infrastructure?	Please refer Chapter 4.6 for relevant information.
5.22	Please furnish copies of the transportation studies conducted.	Except for the adverse temporary pollution impacts of traffic during the construction phase the project will not cause any adverse impacts related to traffic during its operational phase. The information will be elaborated in the Final EIA Report.
5.23	Please give full details of new roads and railway lines to be constructed for the proposed project and roads to be widened including details of forest lands, CRZ areas, ESZs, etc impacted by the new roads and rail lines or by road widening.	The present project does not involve any construction of new Rail lines or Roads except for the small approach road which will connect the project area to the main road. The entire project is located within the MPT limits and as such does not involve any forest land, ESZ and the like.
5.24	Mangroves are found in the study area. The increase in the ship, barge and road traffic will impact these mangrove areas tremendously.	Mangrove patches are located in Zuari Estuary at a distance about 5km east of the project site and as such there will be no

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		adverse impacts whatsoever on the same
5.25	In the event of oil spill or any other chemical spill, including the coal dust, the mangroves would be impacted. What steps are proposed to protect the mangroves from this contingency?	Please refer the above reply.
5.26	The proposed project will alter the shoreline which would in turn impact the mangroves of the area and the fisheries in the area. What steps are proposed to minimize this damage?	The project will not impact the mangroves nor cause any shoreline changes. Please refer studies of shoreline conducted by NIO.
5.27	Please furnish complete list of mangroves found in the study area along with the photographs.	The complete list of mangroves varieties found in the study area has been incorporated in Chapter 3 of EIA Report.
5.28	How many fisher folks are dependent on traditional fishing around the proposed project area? And how ill compensated for the loss of livelihoods?	Please refer item 15.36 of audio public hearing.
5.29	Please furnish a copy of the Social Impact assessment study report for the project.	Please refer Chapter 3.13 of the EIA report
5.30	Is there any compensation/reimbursement plan for the people whose livelihood will be impacted? Please furnish full details	No negative impacts are envisaged from the proposed project.
5.31	What is source of water during construction and operation? How will the sewage and the effluents be treated?	Water will be sourced from the PWD, GOG. For information with respect to sewage please refer Chapter 4.3.1 of the EIA Report.
5.32	Please furnish full details of the field visits conducted to undertake the ecological study including copies of the field notes. Please mention full details of the team members, their qualifications, and the number of man-days spent on the ecological data collection	This query is not relevant for the purpose of the PH. Field visits were conducted to study the Eco-Biodiversity of the 10 km study area and the study was conducted by NABET approved Field Area Experts (FAE's). The names and qualification & signatures of the team members and the consultant engaged have already been incorporated in the EIA Report.
5.33	Please furnish full details of the field visits conducted by Consultants to undertake the marine ecological and hydrology studies including copies of the field notes. Please mention full details of the team members, their qualifications, and the number of man-days spent on the ecology and hydrology data collection.	Field visits were conducted to study the Eco-Biodiversity of the 10 km study area and the study was conducted by NABET approved FAE's. The name and qualification & signatures of the team members and the consultant engaged has

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		already been incorporated in the EIA.
5.34	How much of forest land is involved in the proposed project area? Please mention in detail. Has this area been transferred from the forest department?	No forest land is involved in the proposed project.
5.35	How much area will be reclaimed for the proposed project? Please furnish with the land cover and land use details of same along with maps and google earth images.	Please refer items 2.7 and 5.33 of audio public hearing.
5.36	What will be the impact of reclamation on tidal and current patterns? What areas will face erosion due to this reclamation?	As per studies conducted at CWPRS shows that there is no impact of reclamation on tidal and current patterns at proposed project site.
5.37	What type of method will be used for dredging? How much area will be dredged?	Dredging techniques such as THSD, CSD will be deployed for the dredging work. A total marine reclamation work of about 70,000 m ² is involved. The area to be dredged is about 3 lakh m ² .
5.38	Please give details of the capital dredging and the maintenance dredging.	A total dredged quantity of about 15,05,660m ³ and maintenance dredging quantity estimated at 0.34 million cum.
5.39	What is the impact of ballast water on marine biodiversity? What provision is being made in this Project to handle ballast water, bilge water etc?	Ballasting and deballasting is regulated as per IMO norms. As such the deballasting of foreign water is not allowed inside the port area
5.40	Please also give full information about the biodiversity and the currents and tidal Patterns at spoil ground locations.	Please refer Appendix III of the EIA Report.
5.41	Given the current patterns and the tidal patterns, what would be the best time to dump the dredged material at these locations?	Please refer above reply 5.40.
5.42	How much time-will be required to complete the proposed project?	Proposed project will be completed within 24 months of commencements of construction.
5.43	Will the proposed dredging, blasting be undertaken at night time?	Dredging operation will be conducted 24x7 and no blasting is involved.
5.44	What safeguards are proposed to track the barges that will be carrying the dredged material to ensure that they dump the dredged materials at the approved sites and at the approved time?	The movement of all vessels within the Port area is tracked through VTMS.

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5.45	What is the maximum quantity of explosives that will be used for blasting at any one time? What kind of explosives will be used? Where will they be stored? How will they be transported?	No explosives are involved in the project construction phase (also refer reply at 5.43 above)
5.46	What will be the effects of dredging, blasting activities on the Dr. Salim Ali Bird Sanctuary and on Aguada Fort?	No impacts on Salim Ali bird Sanctuary and Aguada fort are envisaged due to the proposed project activity.
5.47	What attempts will be made to minimize the noise and vibrations caused by the blasting? Will measuring placed on Aguada Fort?	No blasting is involved.
5.48	How will the dredging activities impact the dolphins that are found in this area?	No such impacts are envisaged.
5.49	Please provide details of the siltation in the area at present, during the operation and after the completion of the project	Siltation and de-siltation is a continuous natural phenomena regardless of human activity. For details with respect to possible siltation during the project work please refer Appendix III of EIA Report.
5.50	What are the other different options available for dredging that will help reduce the siltation? Why have these not been adopted?	The process of siltation does not change with the mode of dredging. Please refer to reply at 5.49 above.
5.51	The project is proposed in phases. A full picture is required to understand the impacts of the projects in its entirety. Piece-mealing the project does not reveal the full impact, and it is essential that all components of the project should be assessed in their entirety.	The entire project will be executed within 24 months from the commencement of project construction work.
5.52	How will the coal be stored and transported?	No coal handling is involved in the proposed project.
5.53	What steps are being proposed to reduce the existing and proposed pollution?	Please refer Table 8.2 of EIA report.
5.54	What are the existing facilities for the parking, washing, repairs and maintenance of trucks and other heavy equipment's	The management maintenance and repair of trucks and other heavy equipment's used for construction is the responsibility of the contractors who will be involved in project construction. As such except for parking of the same during the ongoing works. The maintenance and repairs of the equipment and vehicles will take place outside the Port limits.

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5.55	What facilities will be provided for the drivers and cleaners?	This will also be the responsibility of the contractors who will be accredited by competent authorities and as such will have all such facilities outside the Port area in their own existing facilities.
5.56	Acquisition of land for roads, rail, canals, pipelines, transmission lines, etc. will also lead to fragmentation of the land and will lead to change in the land use and land cover of the area. What steps are proposed to minimize this impact?	The present project does not involve any change in the land use. The land cover of the area will be enhanced by the planned greenbelt.
5.57	Please furnish full details and show on a map the area allotted for parking of trucks and storage of containers both inside and outside the port based on the assessment of maximum number of trucks and containers that will be handled any given point of time.	Please refer the reply 5.55 above.
5.58	Please furnish details of facilities being provided to customs, GSPCB, and other agencies involved in port related activities within and outside the port.	This is not relevant to the present project.
5.59	How many continuous air monitoring stations are installed in and around the project site? What are the minimum and maximum readings of SO ₂ , NO _x , CO, Ozone and PM ₁₀ recorded by your monitoring systems? Please also give details of the maintenance carried out on the air monitoring stations, and the costs incurred on the maintenance and repairs of the equipment.	There are three continuous air monitoring stations installed in and around the project site. For observations on minimum and maximum readings of Air Pollution parameters please refer Chapter 3 of EIA report. The maintenance of these Air Monitoring Stations is done through annual maintenance contracts executed with the suppliers of the Air monitoring equipment.
5.60	Please also furnish details of the staff employed for carrying out air pollution monitoring and their technical qualifications.	One Junior Engineer aided with subordinate staff is employed for this work.
5.61	Why is the air monitoring data not available online to the public?	Air monitoring data is available on GSPCB website.
5.62	Please furnish a copy of the Cumulative EIA Report.	Draft EIA report is already presented to GSPCB, online portals and district officials.
5.63	Were any measures undertaken presently to safeguard the diversity? Please provide details for the same.	Site specific EMP is proposed which is discussed in Chapter 8 of the EIA report. Additional information will be provided in the NIO Biodiversity

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		report attached to the Final EIA Report.
5.64	Please give details of existing and proposed mitigation measures to protect the flora and fauna of the area	Please refer Chapter 4 of EIA report.
5.65	Are there any near threatened, vulnerable, endangered, critically endangered species of flora and fauna found in the area? Please furnish with details of same.	Please refer Chapter 3 of EIA report.
5.66	Are there any species under schedule I and II of the wildlife protection act (1972) observed in the area? Please furnish with the details of same.	Please refer the reply at 5.65 above.
5.67	Please provide details on the change in noise levels during the operation phase of the proposed project. Please furnish with mitigation measures of same.	Please refer Chapter 4 and Chapter 8 of EIA Report.
5.68	Please furnish with the safety measures for the additional storage of material due to proposed expansion project.	Adequate storage facilities will be provided for the material required for the construction work, in the backup area within the jurisdiction of the Port.
5.69	The area falls in seismic zone III. A tremor in this region would affect Goa. What measures have been undertaken in such event.	The construction design will incorporate the necessary earthquake resistant technology required for this seismic zone
5.70	Please furnish copy of DMP and the maximum credible accident scenario	The MPT has an approved DMP which will be extended to the proposed project and put in operation whenever the need arises
6.0	Captain Viriato Fernandes- The queries raised in the written submission are repeated with respect to the queries raised during EPH hence there is no separate reply here under.	
6.1	The Sagarmala project is stated in the EIA report as a single project is stark contraction to the impression created by the title and contents of the EIA report that this is a stand alone project.	No remarks.
6.2	MPT is misrepresenting facts and misleading the expert appraisal committee in order to conceal the tremendous adverse impact of the coal expansion envisaged under Sagarmala project on Goa's environment and economy. All the projects related to expansion/modernization of berthing and	This is not true.

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	<p>storage facilities, dredging, road and rail connectivities must be evaluated as a single project in order to properly evaluate the impact. Any attempt to study the impact of a part of the Sagarmala project in isolation is completely in contempt of the EIA Notification 2006, since this will set a dangerous precedent for all project proponents to fragment the scope of works of large projects so that EIA Notification 2006 is rendered completely ineffective and useless.</p>	
6.3	<p>I wish to point out that the subject project is totally misleading the MOEF, since project actually displaces the fisher folk, but is falsely claiming to helping them. The 351 meters long berthing area to the east of berth 11, which is currently occupied and used by fishing trawlers, will be usurped through this project by MPT. The fishing community will not only lose this area, but will also lose the entire area where the proposed jetties and the related channel channels for cargo ships are to be located, which area is presently fully occupied and used by the traditional fisherfolk of Vasco Bay. The proposed fishing jetty within the proposed new construction is no justification for the loss of such large areas and the fisher folk, who actually need more berthing and other spaces, are only losing more space instead of gaining space.</p>	<p>This is not true.</p>
6.4	<p>My village is situated just to the east of the MPT along the banks of River Zuari. The fisher folk, farmers and other residents of our village are unanimously against this project for we have suffered tremendous losses due to the coal handling and transportation in the past, which has caused us incalculable losses, environmentally, economically and socially. The famous mudflats that provide large quantities of mussels, shell fish, crabs, fish and the famed and extremely rare window pane oysters and support the livelihoods of thousand will be lost forever, if the subject project is allowed. The toxic substances and heavy metals in coal, especially coal dust, is totally poisoning our food chain, with grave ill-effects on the health of fish-eating local</p>	<p>Please refer the item at 10.18 of audio public hearing.</p>

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	populace, and even tourists. The losses to the fisheries and tourism industries, local populations and economies and environment far outweigh the revenue received from the polluting industries of private corporations, whose greed for profit is driving this evil plan.	
6.5	I also wish to highlight that there are three important defence units/installation including a major naval hospital within 200 metres of aerial distance from the proposed project site. The same has been cleverly omitted. One needs to include the impact on these defence installations including the hospitals, the patients admitted therein and also the sophisticated medical equipment installed inside.	Please refer the item at 10.19 of audio public hearing.
6.6	Moreover, the mention of the two defence installations viz. Goa Shipyard Limited and INS Hansa which houses the international civil as well as a defence airport have been so indicated so as to intentionally show as located far away from the proposed site. Where reality, Goa Shipyard Limited is located just about 200- 250 meters of aerial distance from the proposed site and INS Hansa is located just about 300 metres of aerial distance from the proposed site. This misrepresentation clearly indicates the malafide intension of the project proponent.	Please refer the item at 10.20 of audio public hearing.
6.7	To further highlight the immense danger to the entire city as well as the areas falling within a radius 2 km of aerial distance there is a major defence ammunition depot located within 300 m of aerial distance from the proposed project site. Any impact on this depot can reduce the city of Vasco and nearby villages of Vaddem, New Vaddem, Mangoor, Baina, Destero, Chicalim, Bogmollo, Sancoale, Cortalim, etc. to ashes and rubble within minutes.	Please refer the item at 10.21 of audio public hearing.
6.8	Another aspect that I would like to bring to the notice of the committee is about the at least six schools within a radius of about 300-400m of aerial distance. The safety and health of the children is paramount importance and needs to be considered prior considering any such disastrous proposals.	Please refer the item at 10.22 of audio public hearing.

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6.9	Further, the South Western Railways is preceding with the double tracking of the Vasco-Londa route without any EIA study, without which the coal expansion cannot take place. The existing single track is so close to Goan houses and settlements that we are already facing unimaginable problems due to the coal operations, which occupy a large portion of the total train operations. The present single track is quite congested by the present operations, as indicated by MPT itself in its own reports available with MOEF and other authorities. The second track Is a part of the Sagarmala project and its impact must be studied along with the rest of the project. Unfortunately, the railways has totally violated the law by proceeding with sections of the double tracking without carrying out any EIA studies, unmindful of the fact that the route runs through Western Ghats and thickly populated villages and towns of Goa	Please refer the item at 10.23 of audio public hearing.
6.10	Further it shocks us to see that the present is being considered without the finalization of the CZMP for the Goa under CRZ notification 2011. Considering the orders of the NGT given in original application no.11 of 2014 and 424 of 2016 on 22 nd November 2017. The present proposal and this public hearing being held on 5 th October 2018 are in gross contempt of the orders.	Please refer the item at 10.24 of audio public hearing.
6.11	Despite the constitution of India and our international commitments for obtaining prior consent of indigenous communities and for public participation in development planning MPT and the Government have taken great pains to hide the coal expansion plans from the people of Goa and are dangerously threatening the environment and economies of Goa for the private profits of a few.	Please refer the item at 10.25 of audio public hearing.
6.12	I also bring to your notice the report of the expert body on ports in 12 th five year plan 2012-2017 clearly directing MPT to remove dirty and hazardous cargoes from the proximity of Vasco city. Which directions MPT is contemptuously fraudulent and illegally flouting. The safety health and the economic growth of lakhs of people are being adversely affected due to greed of a few indeed with	Please refer the item at 10.8 of audio public hearing.

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	climate change it is very difficult to now justify the use coal for private profits by such cooperation's which may be the reason for the secrecy and misrepresentations in the EIA report and is another reason for EAC to strike down the EIA report.	
6.13	I therefore object to the subject project and ask for the terms of reference for the subject project to be quashed and the EIA report also to be rejected with the directions to consider their project in its entirety of MPT wishes to continues with these coal plans.	No remarks.
7.0	Custodio Dsouza others	
7.1	As per the project affected area of 10km radius, several thousands fishermen from Caranzalem, Dona Paula, cacra, Khariwado, Issorcim, Desterro, Baina, Bogmalo, Hollant, Santarem, Velsao are likely to be displaced because consistent misleading facts produced by the Mormugao Port Trust in the draft EIA and the above areas are fishing villages and are not yet notified under CRZ notification 2011.	Please refer the item at 15.9 of audio public hearing.
7.2	We are writing to you on behalf of all affected fishermen with reference to public hearing notice issued by the Goa Pollution Control Board on 04-09-2018 for the proposed development of fishing jetty, passenger jetty, multipurpose general cargo berth and POL terminal at Mormugao port by MPT. Kindly view detailed objection in below attachment	No remarks.
8.0	Desterro Fisherman's Association:	
8.1	As per the project affected area of 10 km radius, several thousands fishermen and around 15 beaches from Caranzalem, Dona Paula, Miramar, Siridao, Bambolim, Nauxim, Cacra, Khariwado, Issorcim, <i>Desterro</i> , Baina, Bogmalo, Hollant, Santarem, Velsao are likely to be displaced and eroded because consistent misleading facts produced by the Mormugao Port Trust (MPT) in the draft EIA and the above areas are fishing villages and are not yet notified under the CRZ notification 2011.The Draft Environmental Impact Assessment Report of Proposed	This is not true.

	<p>Modernization and Expansion of Port Infrastructure for Fishing, Coastal, Multipurpose Cargo Berth and Liquid /General Cargo at Mormugao Port, Goa is in complete violation of Environmental Impact Assessment (EIA) notification and as per the Terms of Reference (ToR).The following objections are raised due to non compliance of TOR in totality:</p> <p>1. Reasons for selecting the site with details of alternate sites examined /rejected /selected on merit with comparative statement. The proposed project development is within existing Mormugao Port area. Hence, alternative sites are not considered. Statement is false as this site is a bay called khariwado and is the beach stretches along the bays of chicalim and this shall be surveyed and mapped and khariwado is one of the bay which is protected under the CRZ 2011 and the Goa Coastal Zone Management Plan (CZMP) has not been finalized till date as per NGT order of Nov 22nd 2017.So this site is in violation of CRZ notification 2011.Under the CRZ2011 The Government of Goa shall notify the fishing villages and khariwado is a fishing village and you have acknowledge in assurance made by MPT and GOG to Traditional fisherfolk of Kharewado dated 16-04-2011 the khariwado bay will be declared as fishing village. Beside that the impact of the site will have the following impact: Impacts on water quality.</p>	<p>Please refer the item at 10.5 of audio public hearing.</p>
<p>8.2</p>	<p>Breakwaters and landfills will change current patterns and cause stagnation of water behind the structures. If municipal or industrial effluent flows into a port, stagnant port water may deteriorate through a dramatic increase of phytoplankton and a decrease of dissolved oxygen, resulting from eutrophication of water, caused by effluents containing nutrient salts (chemical compounds including N and P). Anaerobic water leads to the generation of hydrogen sulphide (H₂S) and can be identified by its odour. It has serious effects on marine organisms. Impacts on coastal hydrology.</p>	<p>Study on hydrodynamics and assessment of siltation carried out by CWPRS is enclosed in the Final EIA report. All other points are covered in the EIA report.</p>

<p>The location of this site will cause changes in current patterns and littoral drifts due to alteration of wave refraction, diffraction and reflection. The change of littoral drift may lead to erosion or accretion in shore zones. Altered currents or reflected waves may endanger small ships maneuvering near structures. The creation of this project may cause changes in river flow and waterfront drainage.</p> <p>' Impacts on bottom contamination. The location of the site will accelerate sediment deposition in stagnant water behind structures and cause contamination of the sea bottom. Sediment deposition covers bottom biota and physical habitat. Pile structures shade the bottom and affect habitat. Eutrophication of water induces sedimentation of dead plankton and changes chemical characteristics of bottom sediments, resulting in an increase of organic matter, hydrogen sulphide, and mobilization of harmful substances.</p> <p>" impacts on marine/coastal ecology</p> <p>The location of the site will affects aquatic fauna and flora through changes of water quality, coastal hydrology and bottom contamination. Land reclamation from the sea destroys bottom habitat and displaces fishery resources. Terrestrial fauna and flora will also be altered by the location of a port. Diminution of bottom biota is usually linked to a reduction of fishery resources, and occasionally to an increase of undesirable species. Deterioration of water quality usually gives rise to changes in aquatic biota: a decrease in the number of species; and an increase in the quantity of one or two specific species. Further deterioration will lead to the destruction of all kinds of aquatic biota. Diminution of plants in a shore zone within enclosed water will degrade its aeration capability and worsen water pollution. Mangroves in wetlands play an important role in providing habitat for terrestrial and aquatic biota and indirectly recovering water quality.</p>	
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	clear that the land use and approach road will be build too.	
8.3	Submit the present land use and permissions required such as forest agriculture, land acquisition etc. All construction activities proposed are under the jurisdiction of MPT. Hence, there is no land acquisition. Answer false as MPT will acquire area for approach road and office area so clearly TCP, MMC, CRZ, PWD permission is required to be obtained .	Please refer the item at 2.7 of audio public hearing.
8.4	Examine and submit the water bodies. The project site is located at the mouth of Zuari River System and Arabian Sea. Further details presented in Chapter 3.6. Answer is false as Vasco da Gama, Goa Velha, Maimollem Lake, Vaddem Lake, Baina Lake are only mentioned and what about other lakes in around 10km radius. sancoale lake, kesarval spring, Bogmallo springs, velsao lake, Bondava Lake, sanjiv lake, sulabhat lake, Batim lake, Mala lake, Goa Velha lake and what about seasonal lake and non seasonal lake.	Please refer the item at 15.14 of audio public hearing.
8.5	Submit a copy of layout superimposed on the HTL/LTL map demarcated by an authorized agency on 1:4000 scale, with recommendations of SCZMA. HTL/LTL map in 1:4000 scale superimposing the project layouts have been prepared and is attached as Appendix II. This appendix is falsely prepared as Serious breach of regulation with regards to CRZ mapping in the EIA draft report. As per the Regulation 5 of the Coastal Regional Zone Regulation 2011 requires all States to prepare Coastal Zone Management Plans, The Coastal Zone Management Plans are required to contain to provide interalia demarcation of HTL and LTL hazard mapping, classification of CRZ area, demarcation of buffer Zone, hazard line, fishing villages and zones etc. Till date the Coastal Zone Management Authority as directed by the National Green Tribunal by its order passed in OA No: 422/16 and OA No: II/2014 and an extension of time has been sought to prepare the CZMA. The EIA draft report	Please refer the item at 3.3(g) of audio public hearing.

	<p>includes Appendix II HTL/LTL Map Prepared by IRS, Anna University Chennai. This map is meant to demarcated the high tide line, low tide line and various CRZ areas as per the CRZ notification of 2011. But it is evident from the legend of the map that the consultant has used the recently proposed, yet to be notified, new proposal for zonation in CRZ areas for eg CRZ - IB, CRZ IV A, CRZ IVB. To propose a project based on a draft notification 2018 is beyond absurd and is definitely legally untenable. We will not accept this mapping as it is not in accordance with CRZ notification of 2011 which is the main CRZ notification which is currently in effect. We reject this map in toto and request you to ensure no public hearing is conducted based on such fraudulent studies. We also place on record that our fisherfolk unions at the national and state levels have place our formal rejection of CRZ draft notification of 2018 on record and submitted our objections to the GCZMA and MoEF&CC respectively.</p>	
<p>8.6</p>	<p>6. Submit the status of shore line change at the project site. National Center for Sustainable Coastal Management has carried out shoreline changes of Goa. Mormugao region is stable coast. Detailed map is attached as Appendix VII. The above statement is false and fabricated as Historical shoreline change analysis for the coast of Goa has been analyzed for the period from 1972 to 2010 (38 years). Multiple shorelines extracted from satellite images were used to calculate shoreline change rates using Digital Shoreline Analysis System (DSAS) model developed by United States Geological Survey (USGS) in an ArcGIS environment. Overall for a coastal stretch of about 105 km, 35% of the coast is rocky terrain, 20% of the coast is stable, 27% is under erosion (i.e. 24% of erosion and 3% of artificial coast) and 17% of the coasts experiences accretion. River mouths and port areas experience significant erosion characteristics under the report of Prof Ramesh Ramachandran of NCSCM Carrying Capacity of Beaches of Goa for Providing</p>	<p>Shoreline change study report is conducted by NCSCM and the imagery of the project site is attached as appendix VII.</p>

	<p>Shacks & Other Temporary Seasonal Structures in Private Areas. The 7,516.6 k.m. coastline in the country, 42% of the coast has already been washed away and the main cause is the unplanned ports / harbours which are also documented by National Institute of Port Management. An example of such a situation is the Pondicherry harbour which build a new deep-water port due to this the town's beautiful sand beach disappeared and the fishing villages got destroyed. All this was due to unplanned expansion of port and dredging. Union Minister of State (Independent Charge) for Science and Technology and Earth~ Sciences Jitendra Singh" The study conducted by the Pune-based Central Water and Power Research Station found out that over the years the problem of coastal erosion has accelerated, and presently about 25 km is affected,</p>	
<p>8.7</p>	<p>Details of the layout plan including details of channel, breakwaters, dredging, disposal and reclamation. Layout of project presented in Chapter 2.3.No sufficient data is available. The Fisheries harbour area, the dredge level of (-) 4.0m.The dredging quantity is about 1,00,000 m³. Passenger Jetty the dredge, level of (-) 5.10 m The approximate dredging quantity is 20,000 m³. The Dredge depth of (-) 13.10 the dredging quantity is about 4 lakhs cu m for Costal cargo berth and 1.40lakhs m³ for general cargo berth. Deepening of Breakwater Berth from a depth of (-) 9.00 m to a founding level of (-) 20m.No specific details so as too how much length and breath of the channel to the berth will be dredge.??So the total dredge quantity o 15,05,660m³ is false but exceeds more then 15,05,660m³ Deepening of Breakwater Berth their is no total amount of dredge quantity mentioned.</p>	<p>A total dredged quantity of about 15,05,660 m³ and maintenance dredging 0.34 million cum is involved. Dredging quantity will be reviewed and if found necessary same will be utilised for reclamation. Necessary correction in this regards will be incorporated in Final EIA Report.</p>
<p>8.8</p>	<p>8. Details of handling of each cargo, storage, spillage control measures. The details cargo handling, storage are given in Chapter 2.1 Chapter 2.2.4. Storage Facilities says that The Storage facilities at Mormugao Port comprise of covered storage area in the</p>	<p>Information will be reviewed and if found necessary same will be incorporated in the Final EIA Report.</p>

	<p>form of transit sheds, warehouses and open storage area and tanks for liquid cargo area. No details like location, area, place, dimension etc is mentioned and not a single word of spillage control measures mentioned in the Chapter 2.1 or in the entire EIA.</p>	
<p>8.9</p>	<p>9.Submit the details of fishing activity and likely impacts on the fishing activity due to the project. Specific study on impacts of construction and piling on marine life. Details are presented in Chapter 2.3. Proposed project involves development for local fishermen development. The chapter 2.3 doesn't mentioned a single word of and likely impacts on the fishing activity due to the project. Specific study on impacts of construction and piling on marine life at khariwado bay.</p> <p>10.The fishing jetty is exclusively build for fishing trawlers and motorized fishing vessels that is only for The Goa Boat Owner's Association only. But chapter 2.3 doesn't speak threat to 2000 traditional fishermen families i.e canoe owners, as five canoe owners association that is Old Cross Canoe Association Owners Co-operative, Society Ltd , Baina Ramponkar, Fishing Canoe Owners Society, Desterro Fisherman's Association ,St Andrew fisherman association uses the bay of landing site and fish in the khariwado bay. The impacts of construction and piling on marine life is that impacts of construction and piling on marine life is that Depletion of nutrients and organic matter along with reduced mud and silt deposition affect benthic life on the continental shelf. Impacts of construction and piling on marine life are as follows: "Impacts on water quality. Pile driving, deposition of rubble, dredging, sand compaction and other construction work in water cause resuspension of sediments and turbid water.\ Resuspension of sediments in water leads to an increase in the level of suspended solids (88) and in the concentration of organic matter, possibly to toxic or harmful levels. It also reduces</p>	<p>Please refer the item at 15.33,15.36 and 15.37 of audio public hearing.</p>

	<p>sunlight penetration. Work vessels are a cause of oil spills, garbage discharge, and leakage of other substances into water. Diffusion from concrete work in water and overflows from landfills be sources of water pollution.</p> <p>"Impacts on coastal hydrology The potential impacts of construction on coastal hydrology are nearly the same as the potential impacts of the location of a port .Dredging cause changes in current patterns and flows as well as salt wedge intrusion into a river mouth or littoral drifts in the shore zone. Changes in littoral drifts lead to beach erosion or accretion. Disposal of dredged material may possibly cause leakage of harmful substances into ground water or changes in waterfront drainage.</p> <p>" Impacts on bottom contamination Construction work and dredging disturb bottom sediments and induce resuspension, dispersal and settlement of such sediments. Dumping of dredged material directly alters bottom configuration and biota and disperse toxic or harmful chemicals around the disposal site. Dredging removes bottom habitat and lead to a loss of fishery resources.</p> <p>'Impacts on marine/coastal ecology Disturbance from construction activities cause displacement of fishery resources and other mobile bottom biota. Dredging removes bottom biota and dumping of dredged material covers bottom habitat, both of which may reduce fishery resources. Settlement of resuspended sediments on fragile marine fauna and flora damages the ecosystem particularly coral reefs, which are formed by the extracellular product of symbiotic plants. The great number of coral polyps attached need dissolved oxygen for respiration and the plants need sunlight for photosynthesis. Piles, concrete surfaces, rubble mounds and other similar structures in water could form new habitats, which will introduce undesirable species. If toxic substances and other contaminants are resuspended through</p>	
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	<p>dredging or dumping, will led to contamination of fishery and shellfishery resources.</p>	
<p>8.10</p>	<p>Details of oil spill contingency plan. MPT has Oil Spill Contingency Response Plan. Detailed Plan attached as Appendix V. Contingency plans only In total, the HAZOP study identified 38 recommendations for reducing the likelihood of a hazardous event occurring or reducing the severity of the consequence, should such an event occur, but does not speak about impact of oil spillage on water quality, air quality, Waste management ,socio-cultural Impacts. Therefore the impacts of oil spillage are: Impacts on water quality. Discharges from ships that could be sources of water pollution are bilge water, ballast water, oily wastes, sewage, garbage and other residues in a ship. Spills of oils, lubricants, fuels and other oily liquids may be other sources of water pollution. Once an oil or oily compound is discharged into water, it is spread on the surface by winds and currents, forming a thin layer. On the surface of seas in tropical or temperate zones, oils can be polymerized gradually by biodegradation and eventually form dense particles which sink. Concentration of oily compounds in water is an important indicator of water quality, particularly in recreational water areas. Repair docks may be a possible source of toxic or harmful materials such as antifoulants, paints, or heavy metals. impacts on marine and coastal ecology. Leakage of oils, oily wastes and mixtures may directly cause damage to fishery resources, aquatic biota and coastal habitat. Biodegradation of oil also generates polymerized oil particles and toxic aromatic fractions using dissolved oxygen in the water, which indirectly cause damages to bottom biota and habitat. Both effects may seriously damage marine and coastal ecology. Fishery resources, including shellfish, may be spoiled by oil and toxic substances generated by biodegradation. Some oils contain carcinogens and their contamination is reported in fishery</p>	<p>Please refer the item at 15.43 of audio public hearing.</p>

	<p>resources. impact on air quality Ships are a possible source of airborne emissions such as gasses, smoke, soot and fumes. N02 and SO2 are typical pollutants generated by ships while both manoeuvring and berthing and may affect air pollution in the hinterland.</p> <p>Waste management Ships generate: (a) oily wastes such as bilge water, ballast water, washing water, lubricant oil and other residues in machinery space; (b) sewage and garbage; and</p> <p>(c) cargo residues such as wood bark. Discharges and spills of these wastes cause problems of oil pollution, floating garbage, unsanitary conditions, odour and other degradation of water quality. Socio-cultural Impacts Oil and oily wastes discharged from ships may reach nearby beaches and spoil recreational activities which cause serious damage to tourism. Ship traffic may disturb pleasure boat cruising and fishery boat operations. The possibility of accidents in the ship traffic becomes a worry to local people. Ship calls create many related jobs including pilotage, tug services, stevedoring, bunker and crew services, however, they may bring considerable changes in the life style of local people.</p>	
<p>8.11</p>	<p>Details of litigation pending against the project. There is no litigation pending against the project. This statement is false as two litigation pending on BEFORE THENATIONAL GREEN TRIBUNAL, WESTERN ZONE BENCH,PUNE M.A. No.210/2017 (WZ),M.A. No.211/2017(WZ) In Appeal No.10/20 16 (WZ) In the matter of Old Cross Fishing Canoe Owners Co-operative Society V/s Mormugao Port Trust regarding dredging matter and in IN THE HIGH COURT OF BOMBAY, AT GOA</p>	<p>Please refer the item at 15.44 of audio public hearing.</p>
<p>8.12</p>	<p>12.Study the impact of dredging on the shore line. Impacts due to dredging are presented in Chapter 4.4 and 4.5. The above study is false. Grande Island archipelago at Coral Reefs ,the world wide fund (wwf) for nature and national institute of oceanography (NIO)</p>	<p>Please refer the item at 15.45 to 15.62 of audio public hearing.</p>

are studying coral reefs. Grande Island archipelago is approximately 3km from Vasco coast ,the WWF Study have funded by the international Union for Conservation of Nature - Mangrove for the future the coral reef growth at depth of 4-5mts and are home to 18species of fish life ,including parrotfish, butterfly fish, damselfish and fauna such as sea urchins and sea cucumbers. Coral Reefs serve as a protective barrier around coasts, they create and support living biomass and serve as an important food source for marine species. The most common coral reef are table top corals said Baban Ingole fisheries scientist at NIO.

Sancoale constitutes a back water complex with a network of creeks and lagoons influenced by the tide, twice daily. Dense fringing mangroves adorn the river bank and the lagoon system, as can be observed from the Zuari bridge. The Survey of India (Sol) Toposheets of 1964 and Naval Hydrographic Office (NHO) charts drawn subsequently can be used to study the morphology and the areal extent of these mud flats, Presently, the river bank of Sancoale is marked by a prominent mud flat that gets fully exposed during the low tide. This geological feature in fact extends from Zuari bridge up to Chicalim bay, a distance of about 6 kilometres. Visual megascopic observations indicate that the sediment is composed of sand near the bank where as silty clay dominates the deeper strip. This marine deposit forms the second largest tidal flat within the estuarine systems of Goa.

Similarly. along the opposite bank, the stretch from Agassaim to Siridao is again characterized by another tidal flat which gets sub-aerially exposed at low tide. This feature also extends up to around I .6 kilometres into the Zuari River.The Sancoale and the Siridao mud flats make this part of the river extremely shallow.

A comparison of Sol and NHO maps indicate that both the tidal flats formed over the last 60 years at least. The Siridao flat has extended considerably in space and time, the Sancoale - Chicalim linear deposit has remained unchanged. Generally, tidal flats are located in estuaries and low energy marine environments and at places where fine-grain sediments accumulate. The Sancoale mud flat could be termed as inter-tidal, as a maximum of around 1 kilometre (from the bank into the river) gets exposed during low tides owing to the shallow nature of such habitats.

The functions of riverine tidal flats are documented globally. These accreted sediments perform the functions of a buffer zone between the land and the deeper sea thereby protecting inter-tidal habitats by dissipating wave energy. More importantly, such habitats reduce and even eliminate erosion.

Under the CRZ 201 I notification, mud flats are classified under CRZ I since they are biologically active and hence ecologically sensitive; no interference is permitted in such environments. Being a tidally influenced water body and a mangrove marsh setting adjacent to a saline river, the entire area also falls within the No Development Zone (NDZ) according to the CRZ 2011 notification. Therefore, the Sancoale mud flat is one such sensitive ecosystem that cannot be tampered with.

Therefore, any unwarranted interference in the mud flat system can have a drastic long term ramification - sediment deficit, consequent deepening, rapid erosion of an erstwhile stable river bank, and invasion of river water into the hinterland. It is precisely due to the fragile nature and ecological sensitivity of mud flats that these habitats are protected by law.

Based on the data of Goa State Biodiversity Board, the Sancoale – Chicalim strip is a confirmed site for Window Pane Oyster and a

habitat for diverse marine organisms such as shrimps, clams and crabs. Independent research by NIO scientists had also confirmed the richness of benthic population as this bay is not only the habitat but also a breeding site for the Window Pane Oysterspecies, listed as endangered by the Wildlife Protection Act 1972. Therefore, the impact of dredging on the habitat, bathymetry and evolution of the fragile mud flats of Sancoale bay is manifold. Remobilization of sediment will endanger the stability of the bank and the population dynamics of diversebivalves in the bay as well as the pennanently~established clam bed in the vicinity. Scouring of an established and productive mud flat can be frightening and can be the worst environmental impact that one can expect. (Dr Antonio Mascarenhas is a former Scientist, NIO, Goa.

Dredge quantity 16 lakhs Cubic meter of silty clay and clayey silt which will inturn destroy the entire khariwado beach andalso Caranzalem, Dona Paula, Miramar ,Siridao, Bambolim, Nauxim, Cacara, Khariwado, Issorcim *Desterro*, Baina, Bogmalo, Hollant, Santarem, Velsao. The proposed project will dredge around 16 lakhs Cubic meter of silty clay and clayey silt. This will result in degradation of the ecosystem and will destroy the ecology of the region, the soil deposit in any water body have a certain pre disposed composition thus through dredging this composition will be altered because the said alteration the existing habitat of creatures and organisms that depend on the original composition of the soil will die out due to non favorableness of the changes caused. The said alteration the turbidity of the soil under the water also changes this causes problems by way of creation of newer and harmful organisms, transferring o fun wanted organisms to other parts in the water-body leading to wider spread of contamination and organic processes by way of release of extra and unwanted nutrients. The removing gravel (founded stones) from river /sea beds by dredging leads to the loss of spawning (eggs depositing spaces)

grounds for fish, and can cause loss of some species, the removal river / sea bank soils disturbs the habitat of river / sea bank fauna such as otters (mammals) and water voles and this will lead to change chemical composition of water. This will affect the fish and other aquatic organisms and lead to a depletion in the fish / shell fish catch and in turn deprive the fishermen from Caranzalem, Dona Paula, Miramar, Siridao, Bambolim, Nauxim, Cakra, Khariwado, Issorcim, Desterro, Baina, Bogmalo, Hollant, Santarem, Velsao of their livelihood.

The Capital dredging will lead to erosion of the seabed and beach at the Caranzalem, Dona Paula, Miramar, Siridao, Bambolim, Nauxim, Cakra, Khariwado, Issorcim, Desterro, Baina, Bogmalo, Hollant, Santarem, Velsao beach and will lead to collapsing of river beds in the nearby villages of Sancoale, Cortalim, Quelossim and Chicalim as the River Zuari flows past these villages at a stretch of around 10 kms and meets the Arabian Sea at Dabolim. About 20% of the 105 km of Goa's coastline has already been affected by erosion, the Colvale area in North Goa and River Talpona in South Goa is already affected by erosion in the last monsoon. If such large scale of Capital dredging is done then they will cause floods in the neighboring villages and it will also cause destruction of Corals and coral reefs, Turtle nesting grounds, Horse shoe crabs habitats, Sea grass beds, Mudflats and also Nesting grounds of birds etc. the dredging will lead to collapse of the river beds thereby leading to water logging of all low lying areas surrounding the rivers and will further aggravate the already fast eroding coast of Caranzalem, Dona Paula, Miramar, Siridao, Bambolim, Nauxim, Cakra, Khariwado, Issorcim, Desterro, Baina, Bogmalo, Hollant, Santarem, Velsao.

The Capital dredging of such large volume will affect the rocky shoreline. As a result, the stability of the sea cliff / headland Sada may be at stake due to the fact that the sea-facing

	laterite sea cliffs are highly vulnerable to collapse.	
8.13	<p>Action plan for disposal of dredged soil and rocks.</p> <p>Dredged material will be disposed off in the existing marine spoil grounds identified and demarcated by CWPRS, Pune. The above documentation false and fabricated as it is a cut copy paste of "Proposed deepening of Approach Channel and Inner Basin for Capsize Vessels at Mormugao Port" by M/s. Mormugao Port Trust, Headland Sada-Goa" and not of Proposed Modernization and Expansion of Port Infrastructure for Fishing, Coastal, Multipurpose Cargo Berth and Liquid /General Cargo at Mormugao Port, Goa. There is no whatsoever details of Dredged material will be disposed. No details of location and impact on marine life. Dredge material should be use for beach nourishment and not dumped any other place. Hoping that you consider the above objections and scrape the project in totality and do the needful at the earliest as the above proposed project is in violation of law and therefore will be threat to our livelihoods.</p>	For dredging spoil ground locations please refer Appendix III of EIA report and for usability of dredge material for reclamation Please refer the item at 36.11 of audio public hearing.
9.0	Desterro Fisherman's Association: This is the repetition what has to referred serial no 3 of the same document	
9.1	As per the Regulation 5 of the Coastal Regional 'Zone Regulation 2011requires all States to prepare Coastal Zone Management Plans, The Coastal Zone Management Plans are required to contain to provide inter laid demarcation of HTL and LTL` hazard maping, classification of CRZ area, demarcation of buffer Zone, hazard line, fishing villages and zones etc. Till date the Coastal Zone Management Authority as directed by the National Green Tribunal by its order passed in OA No: 422/16 and OA No: II/2014and an extension of time has been sought to prepare the CZMA.	Please refer the item at 3.1 of this document.
9.2	The Government of Goa has not notified fishing villages in the State of Goa under CRZ Notification 2011.	Please refer the item at 3.2 of this document.

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9.3	In View of the above since the project would affect the fishing village of Khariwada and also would involve construction within the No development Zone of the Zuari estuary and Arabian Sea and also would require capital dredging of the sea bed for laying of the foundation of the jetty. It is absolutely necessary that the Coastal Zone Management Plan is prepared and notified as also the fishing Village are notified.	Please refer the item at 3.3 of this document.
9.4	We would like to place on record that as per the minutes of the meeting chaired by then Chief Minister Digambar Kamat in 2011, it was assured to us that certain matters relating to MPT and fisherfolk of Khariwado would be addressed forthwith. The MPT and the GOG has clearly agreed that the khariwado bay will be declared as fishing villages and the same will benotified, the GCZMA was directed to take this forward and said it would be done in 6 months. We have received no official information that this has been completed.	No remarks.
9.5	In adding to the assurance made by MPT and GOG to Traditional fisherfolk of Kharewado dated 16-04-2011,they assured that 356 houses would be regularized on a case to case basis. This too has not been done. It was also agreed that the MPT's jurisdiction would be de-notified, This too has not been done as is clear from the EIA currently in question where the project proponent claims the entire area is under MPT jurisdiction.	Please refer the item at 3.5 of this document.
9.6	Serious breach of regulation with regards to CRZ mapping in the EIA draft report. The EIA draft report includes Appendix II HTL/LTL Map Prepared by IRS, Anna University Chennai. This map is meant to demarcated the high tide line, low tide line and various CRZ areas as per the CRZ notification of 2011. But it is evident from the legend of the map that the consultant has used the recently proposed, yet to be notified, new proposal for zonation in CRZ areas for eg CRZ - IB, CRZ IV A, CRZ IVB. To propose a project based on a draft notification 2018 is beyond absurd and is definitely legally untenable. We will not accept this mapping as it is not in accordance	Please refer the item at 3.6 of this document.

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	<p>with CRZ notification of 2011 which is the main CRZ notification which is currently in effect. We reject this map in toto and request you to ensure no public hearing is conducted based on such fraudulent studies. We also place on record that our fisherfolk unions at the national and state levels have placed our formal rejection of CRZ draft notification of 2018 on record and submitted our objections to the GCZMA and MoEF&CC respectively.</p>	
9.7	<p>The National Green Tribunal, vide its order on 01-09-2016 on Appeal no.10.2016 (WZ), quashed the EC given to MPT for dredging of the navigation channel to the port stating that it was arbitrary and illegal. MPT was found to have illegally commenced dredging in Jan 2016 even before the fraudulent EC was issued. We were appellants in this case and this has shown us the immense lack of respect that MPT has for due process and rule of law. Despite this fact MPT has again included 2 dredging components in this current proposal. Any more dredging to deepen the coast so close to the beach will only lead to further erosion and will lower the resistance of this beach to extreme climate events.</p>	<p>Please refer the item at 3.7 of this document.</p>
9.8	<p>EIA Report not as per the Terms of Reference (ToR), the EIA Report November, 2017, Page no 15, Section 1.6: Says that " Baseline monitoring program during March - May 2017 to establish marine water qualities, marine sediment quality, soil quality, air quality, ground water and surface water quality and noise level in the study area. This same time period is mentioned for data collection regarding ambient air quality and other data points. The Terms of Reference (ToR) was granted on May 08, 2017 in vide reference number: F.N. 10/82017-IA-IfI. As per the EIA report submitted by the project proponent it clearly says the baseline data was collected during March - May 2017 and which much before the granting of TOR. Anywhere in the EIA report there is no mention of data collecting after the date of TOR granted. It is evidently established that EIA report was prepared on data collected</p>	<p>Please refer the item at 3.8 of this document.</p>

	<p>much before the TOR was granted. Para, 7 (i) II (i) of the EIA Notification says "Scoping": refers , to the process by which the Expert Appraisal Committee in the case of Category _A' projects or activities, and State level Expert Appraisal Committee in the case of Category _B 1 ' projects or activities, including applications for expansion and/or modernization and/or change in' product mix of existing projects or activities, determine detailed and comprehensive Terms Of Reference (TOR) addressing all relevant environmental concerns for the preparation of an Environment Impact `Assessment (EIA) Report in respect of the project or activity for which prior environmental clearance is sought. As per the requirement of EIA Notification, '2006 (Section 7(i) II Stage 2 (i)) the EIA report has to be prepared by the project proponent strictly on basis of Terms of Reference (TOR) issued by the Ministry of Forest, Environment and Climate Change. In this case conducting the survey prior to granting of TOR is a clear violation of EIA Notification 2006. The EIA Report is required to be placed before public prior conducting public hearing. The purpose is defeated if same is not in consonance with Terms of Reference. Further, it is unfortunate that data collected before TOR for the preparation of EIA report may not address all the issues arising out of EAC meetings and TOR granted after that. It is also questionable that whether the EIA is in compliance with all the terms and conditions mentioned in the TOR granted in May 2017.</p>	
<p>9.9</p>	<p>Without prejudice to the foregoing, and while on the issue of public notice/publicity for the public hearing, we wish to point out that you have failed to comply with mandatory requirements in this regard as prescribed by law. You must be aware that Hon'ble. Delhi. High Court, in its judgment in Utkarsh Mandal v.Union of India} , held (at para 43) as follows: "It is a matter of concern that the requirement of public hearing under the EIA notification has been taken so lightly by the MoEF. This needs immediate correction. If</p>	<p>Please refer the item at 3.9 of this document.</p>

	<p>the hearing has to have adequate publicity then the notices would have to be repeated and spread over a period of ten days so that as many people as possible are made aware of such public hearing." (Emphasis supplied). We therefore request you to defer the public hearing schedule for 5/10/2018 and not to proceed for grant of approvals of the project until and Coastal Zone Management Plan for Goa is finalized and the fishing Village in the State of Goa are notified in compliance with the CRZ regulation 2011 and until the project proponent comply with EIA Notification, 2006,As the above propose project will be threat to almost 10,000 fishermen livelihoods ,thus breaching the Article 21 of the Constitution.</p>	
<p>10.0 Desterro Fisherman's Association</p>		
<p>10.1</p>	<p>EIA Report not as per the Terms of Reference (ToR), the EIA Report November, 2017, Page no 15, Section 1.6: Says that " Baseline monitoring program during March - May 2017 to establish marine water qualities, marine sediment quality, soil quality, air quality, ground water and surface water quality and noise level _in the study area. This same time period is mentioned for data collection regarding ambient air quality and other data points. The Terms of Reference (ToR) was granted on May 08, 2017 in vide reference number: F.N. 10/82017-IA-IfI. As per the EIA report submitted by the project proponent it clearly says the baseline data was collected during March - May 2017 and which much before the granting of TOR. Anywhere in the EIA report there is no mention of data collecting after the date of TOR granted. It is evidently established that EIA report was prepared on data collected much before the TOR was granted. Para, 7 (i) II (i) of the EIA Notification says "Scoping": refers , to the process by which the Expert Appraisal Committee in the case of Category _A' projects or activities, and State level Expert Appraisal Committee in the case of Category _B 1 ' projects or activities, including applications for expansion and/or</p>	<p>Please refer the item at 9.8 of this document.</p>

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	<p>modernization and/or change in' product mix of existing projects or activities, determine detailed and comprehensive Terms Of Reference (TOR) addressing all relevant environmental concerns for the preparation of an Environment Impact `Assessment (EIA) Report in respect of the project or activity for which prior environmental clearance is sought. As per the requirement of EIA Notification, '2006 (Section 7(i) II Stage 2 (i)the EIA report has to be prepared by the project proponent strictly on basis of Terms of Reference (TOR) issued by the Ministry of Forest, Environment and Climate Change. In this case conducting the survey prior to granting of TOR is a clear violation of EIA Notification 2006. The EIA Report is required to be placed before public prior conducting public hearing. The purpose is defeated if same is not in consonance with Terms of Reference. Further, it is unfortunate that data collected before TOR for the preparation of EIA report may not address all the issues arising out of EAC meetings and TOR granted after that. It is also questionable that whether the EIA is in compliance with all the terms and conditions mentioned in the TOR granted in May 2017</p>	
<p>10.2</p>	<p>Serious breach of regulation with regards to CRZ mapping in the EIA draft report. The EIA draft report includes Appendix II HTL/LTL Map Prepared by IRS, Anna University Chennai. This map is meant to demarcated the hightide line, low tide line and various CRZ areas as per the CRZ notification of 2011. But it is evident from the legend of the map that the consultant has used the recently proposed, yet to be notified, new proposal for zonation in CRZ areas for eg CRZ - IB, CRZ IV A, CRZ IVB. To propose a project based on a draft notification 2018 is beyond absurd and is definitely legally untenable. We will not accept this mapping as it is not in accordance with CRZ notification of 2011 which is the main CRZ notification which is currently in effect. We reject this map in toto and 'request you to ensure no public hearing is conducted based on such fraudulent studies. We also</p>	<p>Please refer the item at 9.6 of this document.</p>

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	place on record that our fisherfolk unions at the national and state levels have place our formal. rejection of CRZ draft notification. of 2018 on record and submitted our objections to the GCZMA and MoEFCC respectively.	
10.3	The National Green Tribunal, vide its order on 01-09-2016 on Appeal no.10.2016 (WZ), quashed the EC given- to MPT for dredging of the navigation channel to the port stating that it- was arbitrary and illegal. MPT was found to have illegally commenced dredging in Jan 2016 even before the fraudulent EC was issued. We were appellants in this case and -this has shown us the immense lack of respect that MPT has for due- process and rule of law. Despite this fact MPT has again included 2 dredging components in this current proposal. Any more- dredging to deepen the coast so close to the beach will only `lead to further. erosion .and will lower the resistance of this beach to extreme climate events.	The statements on dredging effects are not true.
10.4	Pending issue against MPT in NGT regarding ecological damages caused to Vasco bay & Kharewado beach: As an extension to the mentioned above, it must be noted that the NGT is currently charged with examining the matter of ecological damage caused to Vasco Bay and Kharewado beach due to the criminal and negligent behavior of MPT. In light of these facts, we find it impossible to accept the proposal of another project in this very same area which also includes dredging until the matter of restoration and restitution of environmental degradation done due to capital dredging at navigational channel is heard and disposed of by the NGT as per law. We urge you not to allow this fresh proposal by MPT to be appraised/ implemented until such time.	Please refer the item at 2.31 of this document.
10.5	Non compliance of terms of understanding between MPT authorities, State of Goa and Traditional fisherfolk of kharewado dated 16-04-2011: We would like to place on record that as per the minutes of meeting chaired by then Chief Minister Digambar Kamat in 2011, it was assured to us that certain matters relating to MPT and fisherfolk of Kharewado	Not agreed to.

	<p>would be addressed for with, Some of them are listed below:</p> <ol style="list-style-type: none"> 1. Our fishing villages would be notified as traditional fishing villages. DCZMA we directed to take this forward and said it would be done in 6 months. We have received no official information that this has been completed. 2. Our homes would be regularized on a case basis. This too has not been done. 3. MPT's jurisdiction would be reviewed and our claims settled. This too has not been done as is clear from the EIA currently in question where the project proponent claims the entire area in question is under MPT jurisdiction. 4. While a new jetty is being proposed and presented as being in our benefit, no mention is made of whose jurisdiction this jetty and kharewado beach will fall under. As the minute of the meeting indicate, we had placed a clear demand that the beach be handed over to traditional fisherfolk as "commons". <p>It is now 7 years since our last agitation and negotiation with MPT and we are still to see the fruit of the discussion that we had in good faith, This leaves us with no option but to state that we will not allow for this new proposal to be taken forward unless it is in accordance with assurance made to us and accepted by MPT in the presence of the then Chief Minister. We urge you to consider this as a breach of trust and therefore put on hold any further action on the current proposal and EIA in question.</p>	
10.6	<p>Goa Coastal Zone Management CZMP has not been finalized as per NGT order of Nov 22nd 2017:</p> <p>We are shocked that the project proponent has conducted this EIA in the absence of the new Goa State Coastal Management Plan that needs to be finalized by the State Government The CZMP is meant to delineate various development /development free zones in coastal areas, hazard line, demarcate 'fishing villages and the commons being utilized by communities in the area.</p>	<p>As regards to CZMP no remarks. Anticipated impact and mitigation study is described in Chapter 4 of EIA Report.</p>

	<p>The NGT in its order on Original Application Nos. II/2014 and 424 of 2016 issued on 22nd November 2017 stated unequivocally: "As the entire development activity out of prohibited area, regulated area and area permitted to development in accordance with the CZMP would be dependent upon finalization of the above. It is suggested .by Ministry of Environment, Forest & Climate Change that the States should not grant Environmental. Clearance for development activity which falls within the permissible area/regulated area as that may result in defeating the entire exercise. As per the statement of Ministry of Environment, Forest & Climate Change we direct accordingly. "Accurate information on delineation of zones is absolutely central to the appraisal of the project and understanding its impacts on the specific Proposed location. Thus, it can be concluded that the EIA presented by the project proponent cannot be technically sound on the environmental and social impacts since it is not based on Government approved and mandated CZMP. In view of above, to uphold the spirit of public hearing and EIA Process, we request you to kindly abstain from any further proceedings related to Public hearing for this project until such time that these issues are adequately addressed as per the process laid down in the EIA notification of 2006 by concerned authorities at EAC and MoEFCC whom we have informed of the same. Please also ensure that any further action is only taken after the Goa Coastal Management Zone Plan is drafted and finalized in consultation with traditional fishing communities in the state and commitments made to us as during the meeting on 16/4/2017 are complied with.</p>	
11.0	EIA Resource and Response Centre	
11.1	TOR compliance regarding point 8 under general Guidelines requires that the draft EIA has to include the certificate of accreditation with QCI/NABET and status of approval of Organization providing data	NABET certificate will be attached in the Final EIA Report.

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11.2	Presence of White-bellied Sea Eagle (<i>Haliaeetus leucogaster</i>) which is a Schedule I (Part II) species has to be considered and impacts of the project on the same to be clarified (Refer 3.12.4. Fauna, Avifauna of Draft EIA Report)	Information will be reviewed and if found relevant will be included in the Final EIA Report. For impact study, please refer to Chapter 4.5 of EIA Report.
11.3	Form A, 1.28 for details of people in the area either temporarily or permanently contains only temporary details. The long-term influx of population details is not provided.	There is no Form –A hence the query raised is baseless.
11.4	Form A, 3.1 for use of substances, which are hazardous as per MSIHC Rules, does not disclose LPG, which is to be dealt with at the port. LPG is a prescribed item under Part II of the list of hazardous and toxic chemicals of Schedule I of the Manufacture, Storage, and Import of Hazardous Chemicals (MSIHC) Rules 2000	There is no Form –A hence the query raised is baseless.
11.5	Form A, 3.3 regarding affecting the welfare of people by changing living conditions does not provide details of Petroleum products and multipurpose cargo.	There is no Form –A hence the query raised is baseless.
11.6	Form A, 5.3 Emissions from materials handling including storage and transport does not mention details of multipurpose cargo.	There is no Form –A hence the query raised is baseless.
11.7	Impacts and mitigation measures on windowpane oysters, mangroves and corals on Grande Island during construction and operation need to be specified.	Impacts and Mitigation measures are suggested in Chapter 4 of EIA Report.
11.8	Details of the cumulative impact of existing port facilities need to be clearly mentioned in point 9.4 of Form A. It only states that the efficiency and profitability of the port will be increased.	There is no Form –A hence the query raised is baseless.
11.9	The CEA in Draft National Electricity Plan 2016 says no coal based addition is required in 2017-22. You must be aware of various judicial pronouncement on giving reasoned responses to the issues at public consultation. We are asking for consultation of the project due to inadequate data in Form 1 of EIA and impacts of flora, fauna & coastal environment.	No remarks.
12.0	12 Federation of Rainbow warriors, 16 Goencho Awaaz and 22 United Goa Foundations	

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12.1	Part of larger project for coal handling: MPT has clearly stated that the present project is a part of the sagarmala project. The EIA report states in paragraph 2.3, Description of the proposed modernization and expansion. Sagarmala project is a strategic and customer oriented initiative of the government of India to modernize India's ports. It looks towards "transforming the existing ports into modern world class Ports and integrate the development of the ports, the industrial clusters and hinterland and efficient evacuation system through road, rail, inland and coastal waterways resulting in ports becoming the drivers of economic activity in coastal areas. Under Sagarmala Programme, 415 projects, at an estimated investment of approximately INR 7,98,500 lakh crore have been identified across port modernization and new port development., port connectivity enhancement, port linked industrialization and coastal community development for phase wise implementation over the period 2015 to 2035. The proposed modernization and expansion at Mormugao port comes under the sagarmala project.	No remarks.
12.2	The growth projections for MPT based on the sagarmala project area given in table 2.4 of EIA report. From the table it is clear that the only significant growth of MPT from now to 2030 planned under sagarmala project is the increase in handling of coal from 1.94+10.8=12.74 MTPA to 14.37+36.7=51.07MTPA, growth of over 38 MTPA , over 2/3 rd of the entire growth of MPT.	Please refer the reply at item 1.2 of audio public hearing.
12.3	In order to achieve the coal expansion, MPT is simultaneously pursuing environmental clearances and other clearances for multiple projects including capital dredging, expansion of	Please refer the reply at item 1.2 of audio public hearing.
12.4	berths 5a, 6a 7, 8 and 9. Further, the South Western Railways from MPT to Londa is being double tracked and the highways across Goa, namely NH 17, NH 17 A, NH 17 B, NH 4 and NH 4A are all being widened for the transportation of the coal. The subject project is also for the coal expansion and its	Please refer the reply at item 1.2 of audio public hearing.

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	<p>primary objective is the relocation of the POL terminal from its present location at berths 8 and 9 so that these berths are vacated for handing over to Vedanta for coal handling It is seen that all of these projects are not only for the Sagarmala project, but are also inter-dependent and inter-related so closely that each of these projects would be meaningless on their own.</p>	
12.5	<p>It is clear that each of the above mentioned projects is a part of the coal expansion project Therefore it is clear that the scope of the present environment impact assessment study is totally inadequate, for the impact assessment study must be of the entire coal expansion project, including berth expansions, dredging and the rail and road connectivity's. The Sagarmala project for MPT is a single project for coal expansion and therefore must be studied for its environmental and socio-economic impact as a single project The breaking down into separate projects has the following drawbacks: Objectives of the project have been concealed as follows: i. The project proponent (MPT) has misled the entire process by falsely submitting Benefit of the project ' to the MOEF, as recorded in paragraph 3, (ix) of the letter from MOEF dated 8th May 2017 granting TOR for the EIA Study, as, <i>"The modern fishing jetty will make all fishing operations easy and efficient and hence give boost to the economic welfare of local fishermen "</i>.</p>	<p>Please refer the reply at item 1.2 of audio public hearing. Benefits of the project are discussed in Chapter 7 of EIA Report.</p>
12.6	<p>ii. However, the EIA report contradicts the above submission in paragraphs 1.3, which states, <i>"The Proposed Modernization and Expansion Mormugao Port has a total operational area of 250 acres which is inadequate to cater to ever increasing trade demands. Temporary fishlanding platform occupies prominent waterfront area close to BerthNo.11 making development of Port infrastructure difficult."</i> iii.Paragraph 2.3.1 states <i>"Construction of Fishing Jetty</i></p>	<p>No remarks.</p>

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	<p><i>Fishing activities within Vasco Bay is one of the major limitations for expansion of the Mormugao Port. It is therefore, proposed to construct fishing jetty along with allied facilities. Existing facility is a temporary fish landing platform which is inadequate considering the number of trawlers operating from Vasco Bay. The Goa Boat Owner Association has been demanding a fully fledged Jetty for landing of their catch, Besides, the fishing jetty being close to MPT berths, trawlers venture very close to the merchant ships which are a serious safety as well as security hazard. As Mormugao Port Is ISPS compliant it is difficult to maintain such situation in long terms. It is therefore proposed to shift existing fish landing platform to another location."</i></p>	
12.7	<p>Paragraph 2.3.3 states Construction of Liquid Cargo Berth Need of dedicated Liquid Cargo is handled at berth 8,10 and 11, berth 8 handles various liquid cargo viz. caustic soda, furnace oil, HSD, Liquid Ammonia, Motor spirit, palm oil etc. these products are received in smaller tankers with loq parcels sizes. The unloading is done with ships pumps and hence the average productivity at this berth is very low i.e about 9000 TPD only. The capacity of berth is stated to be 2.2 MTPA with about 70% occupancy. The berth occupancy of the berth in 2014-2015 and 2015-16 is only 26%. Berth 10 & 11 handle liquid cargoes like ammonia oil, HSD, furnace oil, LSHF kerosene and phosphoric acid etc. The above cargo is besides the general cargo which is predominantly handled at these berths. The total cargo handled at these berths in 2015-16 is 2.64 MMTs. The berth occupancy of these berths in 2014-15 is 81% & 79% & IN 2015-16 it is 67% & 68%. Going by the norms, these berths are over utilized in 2014-15 and utilized optimally in 2015-16, By withdrawing the Liquid cargo handling from these berths the utilization/ occupancy can be at optimal and can be utilized for handling other general cargo.</p>	No remarks.

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	<i>Berth 8 and 9 are being handed over to a I'PP operator tor redeveloping and cargo handling due to which the POL cargo being handled at Berth 8 has to be shifted to other berths which is Berth 10 and 11 only As is stated above, Berth 10 and 11 are being over utilized and hence there is no other alternative left for the port to develop a POL/ Liquid cargo berth to handle the Liquid cargo)</i>	
12.8	<p>Planning of POL berth</p> <p>It is proposed to have a POL jetty of capacity 2 MTPA in the vasco Bay</p> <p>From the contents of the paragraphs 1.3, 2,3.1 and 2.3.3 replicated above, the descriptions of the present operations, future projections and the layout plans provided, it is clear that the real objectives of this project are:</p> <ul style="list-style-type: none"> i. Relocation of POL berth to enable Vedanta to handle coal/other dirty or hazardous cargoes at Berths 8 and 9 ii. Displacement of the large fleet of fishing trawlers and the massive traditional fishing community as Vasco Bay iii. Enable increase in coal handling at MPT from present 12.7 MTPA to 51 MTPA Only if the entire Sagarmala project is seen together, it becomes evident that the subject relocation of POL handling facilities and fishing trawlers is to increase coal handling at MPT. 	The subject project is an independent project.
12.9	The coal is for private corporations for their profit making industries and the MPT is being progressively privatized and handed over to private corporations for coal handling These facts are not stated in the EIA Report.	No remarks.
12.10	The present proposal and the permissions/decisions to continue/increase handling coal, ammonia, naphtha, petroleum, LPG and other dirty and hazardous cargoes are completely against the Policy of the Government stated in the "Report of the Expert Group on Ports-" under the 12th Five Year Plan 2012-17.	No remarks.
12.11	DISPLACEMENT OF FISHER FOLK, SNATCHING COMMONS OF VASCO CITY	Please refer the reply at item 10.11 of audio public hearing.

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	<p>a. The Report states in para 1,3 reproduced herein above that this proposal is required because the fishing trawlers are obstructing the growth of MPT. It is therefore clear that displacement of the fishing trawlers is a primary goal of this proposal.</p> <p>b. The Report reveals that the present fishing Trawlers jetty is of 351 m length. The Report states under para 2.3.1 that the relocation of the fishing berth from its present location next to berth 11 is the objective of the proposal. The proposal aim to take away this entire land from the fishing community and use it for general cargo expansion</p> <p>c The entire proposal under consideration is located on the Vasco Beach and on lands and waters used by traditional fisher folk of Vasco Bay and people of Vasco City. The project will displace the fisher folk and take away the commons of the residents of Vasco. But conceals this displacement of fishing community and usurping of commons</p>	<p>Most of the fishermen will not be displaced from their present locations. Only about 8 dwellings will be relocated for road construction and will be re-accommodated within the same area.</p>
12.12	<p>No marine Life/Environment study- The EIA study is totally inadequate Since the impact on the marine life and the marine environment of Vasco, Zuari River and the Arabian Sea is totally concealed and Ignored</p>	<p>As per EIA Notification 2006, the study area is well defined and accordingly the study is conducted and incorporated in the EIA Report.</p>
12.13	<p>Para 4.5.1 speak about the risk of marine mammal fatalities due to dredger and other vessel movement. But it fails to offer any mitigation for the same. It is important to note that there is a recorded presence of many marine mammals and cetaceans in the waters of Vasco and Baina bay which include turtles, killer whales, whale sharks, humpback dolphins and finless porpoise In fact in the last year alone, in impact radius of this proposed project there have been a number of turtle and humpback dolphin carcasses and live stranding recorded in the 10km radius of this proposal, as documented by Ms Puja Mitra and others of 'Terra Conscious' Case in point: gravid humpback dolphin carcass with near term foetus recorded on Baina beach, Goa's humpback dolphins are a Scheduled I species. Olive Ridley turtles are endangered and very little</p>	<p>Anticipated Impacts and Mitigation measures of dredging on ecology are discussed in Chapter 4.5 of EIA Report.</p>

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	is know about the finless porpoise. Merely because the data collection team did not encounter them on these 2 day marine sample collection does not mean they do not frequent these waters.	
12.14	No Fisheries study The EIA study is totally inadequate since the impact on the fisheries and the fisher folk of Vasco, villages along Zuari River and villages along the coast of Goa has been totally concealed and ignored.	Please refer the item at 12.12 of this document.
12.15	Para 4.4.1 clearly states that there will be impact on fishing activities during the construction phase as construction activities "may". displace fisheries resources. Since the habitat itself will be irreversibly changed, this will have long term impacts, But there is no mention of any study to show scale of impact on marine Item and its impact on growth of fisheries. There is no mitigation plan for these impacts expect for the usual defining when dredging can and cannot be done which in fact don't mitigate these specific impacts at all. Hydrodynamic modelling done by CWPRS is based on 1977 data!	Please refer the item at 12.12 of this document.
12.16	Para 4.4.2 impacts on marine area during operation phase can be many like harmful discharge from ships, oil spills etc but the EIA seems to portray that the most polluting activity will in fact be at the harbour! A list of possible mitigation measures are mentioned but none are committed too nor are any details of schedules etc available in the EIA.	Anticipated impacts are envisaged and adequate mitigations measures are suggested in Chapter 4 of EIA report.
12.17	The mitigation measures suggested are all very vague and says what can and should be done but nowhere commits to actually what will be definitely done.	Please refer the item at 12.16 of this document.
12.18	Para 4.5.2 speaks of possibility of oil spills at liquid cargo berth as being the main risk. It states that not only can oil spills be disastrous for birds and fish in the short term , it can also cause long term damage to fish stock by causing reduction in growth, enlarged livers and adversely impacts eggs and larval survival. Has the PP done any study to show how a possible oil spill will impact	There is an approved Oil Spill Contingency Plan which is attached as Appendix IV of EIA report.

	the Lives of fish consuming Goans as well as the livelihood of boat and canoe owners in the long and short term?	
12.19	<p>TOR point 14 states : Submit the details of fishing activity and likely impacts on the fishing activity due to the project. Specific study on impacts of construction and piling on marine life. Corresponding response provided in the TOR compliance table: Details are presented in Chapter 2.3. Proposed project involves development for local fishermen development. Chapter 2.3 states: Description of Proposed Modernization and expansion. No sub section of this chapter address the impact of fishing and fishing communities. Rather it lists out in detail the construction, dredging and other works needed to be done for each portion of the project. There is no projection for fisheries growth, as well no current trends of catch landing. Plus, it is proposed that all 250 trawlers will be alongside on a 315-meter jetty resulting in a loss of jetty space, as the existing 351m long jetty next to berth 11 presently used by fishing trawlers is being usurped by MPT. This is significant because it implies that the fishing activities will be reduced due to this project, if it is allowed.</p>	Please refer the item at 12.12 of this document.
12.20	<p>FREE, PRIOR, INFORMED CONSENT: The EIA study and the project are both unlawful in view of the UN declaration requiring Free, Prior and informed Consent of the indigenous communities before approving the project. The UN declaration on the rights of indigenous peoples requires states to consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them (article 19). States must have consent as the objective of consultation before any of the following actions are taken: . The adoption of legislation or administrative policies that affect indigenous peoples (article 19) ' The undertaking of projects that affect indigenous</p>	Please refer the item at 2.10 of audio public hearing.

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	<p>peoples rights to land, territory and resources, including mining and other utilization ore xploitation of resources (article 32). In certain circumstances, there is an obligation to obtain the consent of the indigenous peoples concerned, beyond the general obligation to have consent as the objective of consultations. For example, the Declaration explicitly requires States to obtain consent of indigenous peoples in cases of, The relocation of indigenous peoples from their lands or territories (article 10) The storage or disposal of hazardous materials on indigenous peoples' lands or territories (article 29) The EIA study has not made any attempt to verify if the indigenous fishing communities within the study area, and the Vasco Bay in particular, were informed and their free consent obtained prior to approving the proposal, and therefore the EIA study is premature, inadequate and fit to be rejected The fulfillment of the mandatory requirement for Free, Prior and Informed Consent is essential for the EIA study to be successful since most of the social, economic and environmental data, which is available only with the indigenous community, can be procured only through this process. The EIA study must be carried out only after the mandatory requirement for Free, Prior and Informed Consent is fulfilled</p>	
12.21	<p>The Constitutional mandate also requires the participation of people in the determination of their development plans, which has not taken place in the present case, wherein the displacement of the local communities is planned and proposed while keeping the citizens in the dark.</p>	<p>Please refer the item at 2.10 of audio public hearing.</p>
12.22	<p>PROJECT MEANT ONLY FOR COAL – a.The proposed development under the subject proposal is to enable expansion of coal handling. Based on port cargo handling data presented in table 2.1, 2.2, 2.3 and forecasted handling data in 2.4, it is evident that the only significant increase in handling quantities is that of coking coal.</p>	<p>No coal/coke is proposed to be handled at the proposed project Berths.</p>
12.23	<p>Forecasted increase POL handling from 2018 to 2030 is of merely 0.09 million tons per</p>	<p>No remarks.</p>

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	annum to 1.55 mtpa , which is an increase of 0.58 MTPA	
12.24	On the other hand, the handling of thermal coal forecasted from 2018 to 2030 is of 7.21 MTPA to 14. 34 MTPA That's an increase of 7.13 MTPA, double of 2018 quantities.	No remarks.
12.25	Coking coal 2018 to 2030 = 13.2MTPA to 36.7 MTPA i.e. an increase of 23.5MTPA - almost 3.5 times more that quantities to be handled in 2018! In this scenario, the argument of the PP that the modernization and expansion of the POL Berth and General Cargo Berths is essential for the growth of trade at the Port is baseless - it is only for the growth of coal handling by private players for their profits.	No coal/coke is planned to be handled in this project.
12.26	FOR VEDANTA COAL BERTHS 8 AND 9 – The proposed jetty is for Vedanta's proposed coal terminal at berths 8 and 9, where the POL facilities currently exist. This analysis also makes it very clear that the reason for shifting the POL berth is to accommodate the expansion and redevelopment of Berths 8 and 9 for increasing the ports coal handling capacity. It is public knowledge that an agreement has already been signed between MPT and Vedanta for the use of Berth 9 for coal handling operations. In addition, It is important to note that a proposal for redevelopment of Berth 8 and 9 has also been submitted by MPT and is yet to receive any EC from the MoEF & CC, With this in mind, it begs the question as to how and why MPT is pushing this new proposal to shift the POL berth and move the existing jetty when it has no real reason to do.	This is an independent Project.
12.27	ONE PROJECT WITH DREDGING , BERTHS 5a, 6a, 8 AND 9, NEEDS COMMON EIA STUDY : It also highlights the fact that the current proposal is intrinsically linked to the redevelopment of` Berth SA, 6A , 8, 9 and dredging of the navigation channels - all of which have been pitched as individual projects completely separate from each other - in complete defiance of the MoEF & CC OM No, J-11013/41 / 2006-IA, II(I) dated 24/	This is not related to the proposed project

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	12/2010. These project need to be presented as interlinked and interconnected projects and their impact as cumulative impact has to be studied. The same issue was pointed out at the last hearing, but considering the ramifications of the joint EIA report, it is clear that the projects have been not linked and are kept individual.	
12.28	FALSE STATEMENT ON DREDGING Para 1.4 "Further, deepening of the channel to - 19.80 m for Capesize vessels is in Process." This is blatant lie as there is no disclosure that this has in fact been stayed by NGT orders, as it was done illegally. No new EC has been given for the Capital Dredging proposal till date.	This is not related to proposed project.
12.29	RAIL AND ROAD CONNECTIVITIES NOT STUDIED -Para 2.3 states exactly how the current proposal is linked to all the other proposal for "redevelopment and expansion" that MPT has put in and also reveals its direct linkage to rail expansion works and road expansion works currently underway in Mormugao and other parts of Goa. None of these projects have been appraised for their cumulative impact on the state's environment, ecology or society.	This is an independent project.
12.30	CUMULATIVE IMPACT OF 1.5 MCM DREDGING :The same para 2.3 goes on to state "The proposed modernization and expansion at Mormugao Port comes under the Sagarmala project. A total marine reclamation work of about 851 95m2 is involved. A total dredged quantity of about 15,05,660m3 is involved." The project proponent has failed to provide any data or analyses on the comprehensive / cumulative impact of such a massive undertaking on Vasco Bay, Zuari estuary and beaches of Kharewado, Baina and others, making the entire EIA study a failure. A fresh EIA study must be done incorporating these studies. Data analyses.	Anticipated impacts are discussed in Chapter 4 of the EIA report.
12.31	HEAVY METALS POLLUTION : Para 3.7.5 of the EIA states "High concentrations of heavy metals in sediment are attributed to extensive maritime and marine industrial	Please refer to item 2.28 of audio public hearing.

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	<p>activities in Mormugao Harbour region. Disturbance to sediment due to dredging will lead to further deterioration of water column due to suspension of polluted sediment." Given the observation in para 3.7.5, MPT should have studied and submitted what will the impact on the stability of the water column in this region and how that will in turn impact the livelihood of fisher communities living along Vasco and Baina bay and Zuari, but no such studies are provided, making the EIA study incomplete and ineffective. A fresh EIA study must be done incorporating these studies, data and analyses</p>	
12.32	<p>5,05,660 m³ OF DREDGING NOT IDENTIFIED OR CONSIDERED –</p> <p>a. This observation is in context of the dredging to be done as per the current proposal in question only, i.e. for fisheries harbour - from 2.5 to 4 mts 1,00,000m³ (pg 31); for passenger jetty - 2.5 to 5.10 mts 20,000 m³ (page 34); for POL berth - from 2.5 mts to 13.10 mts - 4,00,000 m³ (page 38); for General and Cargo berth from 2.5 to (initially) 13.10 mts and eventually 15mts- 3,40,000 m³ and 1,40,000 m³ respectively (page 41) that is a total of 10,00,000 m³ of dredging for this proposal which in effect is made up of 6 proposals. If we subtract this from the total amount of dredging envisaged in this EIA i.e. 15,05,660m³ (Para 2.3, page 25), it shows us that apart from this current proposal as explained in Chapter 2.3, MPT proposes to dredge a further 505,660 m³ which is not explained in this EIA!!! The Project Proponent has failed to explain this discrepancy between the total quantity of dredging mentioned and the sum of the dredging quantities mentioned in chapter 2.3, Where and why is the 505,660m³ going to be dredged and why is not mentioned in the EIA clearly ? An EIA with such a serious flaw cannot be accepted and this EIA should be declared void immediately. Its also important to note that chapter 2.3 makes no mention of any other dredging details, Deepening of Berths 10 and 11 is conspicuously absent from this chapter and</p>	Please refer to item 17.9 and 17.11 of audio public hearing.

	reappears in Chapter 2.4, Table 2.7 and speaks only of reclamation of 14800 m2 of land.	
12.33	<p>WHERE WILL THE LAND REQUIRED COME FROM? : From a total of 10,00,000 m3 that will dredged as per Chapter 2,3, only 25% will be useable for reclamation works i.e. 240,000m³. This amount of useable dredging material will result in reclamation of 6305m² of land. The PP states in many parts of the EIA (as cited before) that majority or in some cases "all" of the construction activities will take place on reclaimed land. When the reclamation possible from the said dredging is only 6305m² which is less than 10% of the 2 varying figures for Total land requirements as per Table 2.4 (Page 44, EIA) and Chapter 2.3 respectively, it raises a crucial question of where the balance 90% land for the development of these proposal will come from. It is shocking to see that this EIA intentionally tries to confound the reader by playing with numbers and docs not offer any insight into the question. Raised about. Through investigation needs to be done into this aspect of the report and communicated back to all communities who stand to be affected by this project.</p>	The balance material required for reclamation will be obtained from licensed quarries and will be transported through roads/barges.
12.34	<p>On page 30 total dredging of 1,00,000 m3 for the fishing jetty along out of which 25% can be said for reclamation i.e. 25,000 m3 This will create approx. 3968.5m² of land mass. The EIA further states on page 30 that the proposed area for development of fisheries harbour is 33,744 m². Since the PP has stated in Pt 2 of the 'TOR compliance table that " all constructions are proposed on the reclaimed marine area" the PP needs to clarified where the balance land area i.e 29,775.5m² of land is going to come from ? Neither the project layout maps nor the text of the EIA is clear on this. By verifying the ground location, it is clear that the homes of the local community exist along this area and maybe at risk of eviction.</p>	Please refer to item 17.9 and 17.11 of audio public hearing.

12.35	<p>Page 32 & 33 states the proposed Passenger Jetty is supposed to have on its landward side a parking area, toilets, charging area, office, approach road etc. these facilities are not clearly marked on any of the layout maps provided. Page 34 also states that the proposed development area of 3307m² It further states that of the proposed dredging quantity of 20000 m³, 25% is suitable for reclamation i.e 5000m³ Simple calculation shows that with this amount of dredged material it is possible to create 292.4m² of reclaimed land.</p> <p>The EIA does not explain where the balance 3014.6 m² will be sourced from the landward side activities of the passenger jetty. What are the R&R implication of this, since these lands are belonging to the fishing communities. The EIA report has totally ignored this important data making the study incomplete and fit to be rejected.</p>	<p>The parking facilities are provided on the jetty during the transit period. For R&R, Please refer to item 33.2 of audio public hearing.</p>
12.36	<p>The proposed development areas for the POL berth is around 25,934m² The proposed dredging for this berth is 4,00,000m³ of which 25% i.e. 1,00,000 m³ could be used for reclamation. This 25% could lead to creation of 2154.4m² Since the EIA repeated claims that most of the construction activities will be on marine zone / reclaimed land, MPT has failed to clarify how it plans to source/create the balance area required for development of this berth i.e. 23,780 m² of the land. Such gross failure to provide basic data makes the EIA report useless for readers and affected persons, as it is impossible to know the impact of the project in the absence of the scope of the works and the displacement involved.</p>	<p>Please refer to item 33.2 of audio public hearing.</p>
12.37	<p>Conceals Displacement of fisher folk, no R & R-Berth requirement (h) (page 30) states "the proposed development area falls for the fisheries harbour is around 33,744m². This area comprises of jetty area, backup area the utilizes such as security cabin, office & ratio communication , auction hall, canteen, rest</p>	<p>Please refer to item 12.35 of same document.</p>

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	<p>shed, net mending shed, gear shed, ice plant, equipment and operating rooms, petrol pumps and toilets. A separate road of 12m width along with gate complex has been proposed for the fisheries harbour with exclusive approach to the commercial area through the rehabilitation area " Since the PP has maintained that there is no land acquisition and no scope for evictions and/or R & R (Pt p in TOR compitable table) Who are they rehabilitating and from what? The EIA offers no clarity on the same. The suppression of the essential facts regarding displacement of fisher folk of Kharewado renders the EIA report grossly incomplete and fit to be rejected.</p>	
12.38	<p>INSUFFICIENT DATA ON GENERAL CARGO AND COASTAL BERTHS: This section describing the development of General Cargo and Coastal Berths does not specify the size of proposed area of development. Page 41 merely states that 4,80,000 m3 dredging will be done for both berths of which 25% is suitable for reclamation i.e 1,20,000 m3. From 1,20,000 m3 of dredged material only 2432.9 m2 of land can be reclaimed land is insufficient for development of both general cargo berth and the coastal berth or where will it be sourced/ created from. Obviously this will displace the fisher folk and will have R & R impacts of the communities living along Kharewado beach but the EIA has failed to mention these details. This is a fatal in the EIA study and the EIA report must be rejected and a fresh study must be asked to be done including these essential aspects that are missing presently.</p>	Please refer to item 12.33 of same document.
12.39	<p>SECURITY/PROTECTION WALL Berth requirements (h) (page 30) states "A security wall has been proposed to be executed by Mormugao port between the proposed fisheries harbour and the proposed port developmental area on the west side of the fisheries harbour" (page 30) "In this process of development in Vasco Bay, it is proposed to build a compound wall around the residential area of fishermen on Southern shore of the proposed developments as a</p>	Please refer to item 17.13 of audio public hearing.

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	<p>security measures." (page 31). This is a direct assault on the fishing community of Kharewado and amounts to displacement of the fisher folk, but is concealed in the EIA Report under the guise of security.</p>	
12.40	<p>Security/Protection Wall - The EIA is not at all clear on what impact all of this construction and reclamation work will have on the thousands of families currently living along Kharewado beach. It is clear that the construction and operation of these berths and dredging cannot be done without causing significant harm and interference with the lives of thousands of fisher folk of Kharewado. MPT has not stated where it plans to construct compound walls around existing residential areas and how that will impact residents access to that section of Kharewado beach where canoes are currently parked. It is important to note that none of the layouts shown in Figures 2.1 to 2.9 are clearly decipherable, especially in the hard copy. The figures also lack a complete legend for a reader to be able to understand which areas are going to be used and which areas are being left untouched. This is especially true when it comes to existing homes along Kharewado beach, particularly towards the proposed coastal berth and POL berths.</p>	<p>There is no relocation of existing dwellings in Kharewado except for a few dwellings required for road construction and will be relocated as per understanding between GFBOA and GoG. Please refer to reply at item 2.27 of audio public hearing.</p>
12.41	<p>Para 2.5 states that the existing road along Kharewado beach is sufficient to transport materials and personnel to the site during construction and operational phases. Anyone who has visited Kharewado road knows that the entire length of the road from the existing fishing jetty to the Hindu crematorium is used for allied fisheries activities. The area is also densely packed with houses of fisher folk. MPT has failed to clarify what impact the transport of goods and personnel will have on the livelihood-related activities and general living conditions of the communities who live in this area. These gross failings make the EIA study fatally deficient and the affected communities must be provided all the missing details for their review, for which a fresh EIA study is necessary, after which the Public Hearing can be held.</p>	<p>Site-specific EMP for construction and operation phase of the proposed project is incorporated in Chapter 9 of the EIA report.</p>

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12.42	<p>Para 2.5 also states that a new 8m road will be built to connect project area to main city. MPT has however not stated or shown the alignment of this road and what exists in the location proposed for this new road. The EIA Report fails to identify the impact these construction activities related to this road will have on the live of communities living in adjoining areas and on the livelihood activities of fisher folk along this road. The EIA Report must be rejected and a fresh study be done incorporating these missing data for the review of the affected fisher folk, before the Public Hearing can be held.</p> <p>Sec 2.3.4 describing the development plans of General and Coastal Berths states on Page 40, states "An effective back up area of 0.79ha (7,930 m²) is proposed due to space constraint, for handling and movement of the coastal cargo as discussed with MPT officials, without customs formalities. However, the Indian Standard 4651 prescribes a backup areas of 2.5 to 3 hectare for a general cargo berth" This in effect means that the PP has proposed construction of these two cargo berths with a combined backup area which is less than 1/3rd of the area prescribed by India's own standards for one, single general cargo berth. This plan of MPT is in contravention of applicable standards and must therefore be rejected completely. MPT cannot explain how this drastic lack of backup area for these 2 berths was accepted It is clear that MPT has cunningly planned to displace the fisher folk at a later stage in order to enable the handling activities at these berths. MPT will forcibly evict the fisher folk to meet the requirement of more space for backup area. The fishing communities who live of the landward side of the proposed development will have to be displaced, but this is concealed in a criminal manner by MPT, for which this EIA Report must be rejected</p>	Please refer to reply at item 17.15 of audio public hearing.
12.43	<p>THIS PROJECT IS NOT NECESSARY, EXCEPT FOR COAL –</p> <p>Sec 2.3.3 clearly states that Berth 8 is handling liquid cargo and has low occupancy</p>	No remarks.

	<p>because of the fact that obsolete methods of handling are being used- ships pumps for unloading, small tanks with low parcel size for storage. Sec 2.3.3 also states that Berth 10 and 11 have been over utilized since they have handled liquid cargo in addition to the general cargo. Sec 2.3.3 also states that "Berth 8 & 9 have been handed over to a PPP operator for redeveloping and cargo handling due to which the POL cargo berth has to be shifted to other berths which is berth 10 and 11 only." "Berth 10 and 11 are being over utilized and hence there is no other alternative left for the port to develop a POL/ Liquid cargo berth to handle liquid cargo. This section of the EIA tries to make one believe that MPT's hands are tied in this matter when it is in fact by MPT's own design of large scale expansion including the redevelopment and modernization of berth 5a 6a, and Berths 8 and 9 along with the dredging envisaged all across Vasco and Baina bay that have led to this situation MPT can easily rectify the low handling capacity of the Berth 8 - the current liquid cargo berth by modernizing the handling mechanisms at this berth. given that the proposal for redevelopment of Berth 8 and 9 is very much in its nascent stages and has received no Environmental Clearance as yet The failure of the EIA Report to consider this easy, cheap and environment friendly solution makes the EIA Report a failure and fit to be rejected.</p>	
12.44	<p>MPT has failed to justify why is it in the greater public good to allow massive redevelopment of entire Vasco bay just to entertain the corporate need of a private entity to use Berth 8 & 9 for cargo handling, instead of simply modernizing the liquid handling capabilities of Berth 8 to address the issue regarding its capacity. MPT has falsely stated in the EIA Report that there is no other alternative left for the port but to develop a POL/Liquid cargo berth. The alternative to modernize the liquid handling capabilities at Berth 8 is a win-win solution that must be adopted, but is being ignored</p>	No remarks.

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	<p>by MPT only to forcibly displace the fisher folk and to appease the greed of Vedanta for profits. Any concession or PPP agreement signed for Redevelopment of Berth 8 & 9 is obviously illegal and intentionally done without carrying out studies of alternatives only to forcibly displace the fisher folk of Vasco.</p>	
12.45	<p>UNCLEAR ON VESSEL SIZE, MOORING DOLPHINS – Page 37 also states that "When the jetty is to be designed for higher DWT vessels, the jetty configuration may be provided with additional mooring dolphins with suitable dredged depth in front with regards to this point, the use of language is very vague and does not clearly indicate whether or not new mooring dolphins are being proposed. It does not indicate how many mooring dolphins are proposed, if any, It does not indicate what the "suitable dredged depth" for the same are. The vessel size being considered for this berth is 85,000 DWT (page 36). but the statement above on Page 37 suggests that in the future if vessels of higher capacity are to be serviced then these mooring dolphins will be needed Further on Page 38 under the title of "Berth facilities" the EIA now speaks in the affirmative stating "berthing dolphins and mooring dolphins will have the follows" while still not providing details of how many will be built etc, In light of this extremely contradictory and seemingly intentionally confusing text, where MPT has failed to clearly state whether or not any mooring dolphins are being proposed as part of this POL Berth, or to provide essential details such as the numbers, the specifications, the suitable dredged height, etc for the same, the EIA Report has failed to identifying the scope of the works and therefore fails to assess the impact of the project, The EIA Report must therefore be rejected on this ground.</p>	<p>Please refer to reply at Item 2.29 of audio public hearing.</p>
12.46	<p>MPT has failed to clarify if it envisages have vessels larger than 85000 DWT. If it does so envisage, there is no explanation why the whole POL berth proposal is based on 85000DWT, as it will become insufficient if</p>	<p>The vessel size is restricted to less than 85,000 DWT for which berth is designed.</p>

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	larger size vessels are planned to use this berth in the future. MPT has not stated the additional dredging that will be required if larger vessels are to use this proposed berth.	
12.47	<p>No EIA STUDY FOR USE OF RETURN WHARF FOR GENERAL CARGO/CRUISE VESSELS</p> <p>Page 41 states that the "Return Wharf between Berth 11 and proposed Coastal berth could be used for handling general cargo/ Cruise vessels. This EIA is meant to let the appraising authorities and the public know what will specifically and definitely be done during project construction and operation works. MPT has failed to specify whether or not the Returning Wharf will be used for Cargo Handling MPT has failed to state the infrastructure to be provided for the same at the Returning Wharf. Though the returning Wharf is envisaged to be used as a berth, there no proposal from MPT for the said Dell berth specifying what quantities will be handled here and applying for an EC for the proposed activities The EIA Study and the Report are completely inadequate in the light of this gross inadequate and must be rejected outright deepening of breakwater, why?</p> <p>The EIA report does not clarify why the proposal for deepening of breakwater is included for consideration with the other proposals listed? The EIA Report fails to clarify how this is integral to the development of the POL berth, the fisheries harbour and berths 8 & 9 specifically. This is in fact clear and irrefutable evidence that the subject project is a part of the entire coal expansion project and reinforces the argument that the EIA study for the entire project must be done as a single entity. The inclusion of the deepening of breakwater in this EIA study reveals that MPT is trying to break up a single project into numerous parts in order to conceal the impact on the environment, economy and society.</p>	Please refer to reply at item 2.1 and 17.18 of audio public hearing.
12.48	<p>EMPLOYMENT GENERATION OR LOSS?</p> <p>One of the main benefits of the project as listed in Para 2.5 as well as detailed in Chapter 7, the employment generation during construction phase is 70 individuals</p>	Please refer to reply at item 1.7 (a) and 10.12 of audio public hearing.

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	<p>only. The PP has failed to provided any estimate for employment generation during operational phase. The entire Chapter 7 on project benefits is built on the basis extremely vague and generalized statements like " if the order is more the employment opportunity is also more and vice versa-" It is laughable for such statements to be included what is meant to be rigorous, fact based study. MPT has failed to clarify how much employment will be generated at each berth proposed in this proposal, Even more importantly, MPT has concealed the displacement of fisher folk and the grave impact of the project on the fishing industry and loss of employment that will result It is submitted that the loss of employment in the fisheries sector will be in hundreds or thousands of jobs and MPT has intentionally concealed this fact by refusing to do any studies on the same.</p>	
<p>12.49</p>	<p>NOT NECESSARY IF EXISTING JETTIES ARE MODERNIZED, OR BERTHS 10 & 11 ARE REASSIGNED- MPT has failed to clarify why it cannot modernize the existing fishing jetty as is the demand of both the boat owners as well as traditional fisher folk of the area. This obvious alternative is intentionally ignored and the fishing community is proposed to be discretely displaced without even mentioning the displacement in the EIA Report, revealing the ill intentions of MPT" The proposal must be rejected outright in view of this fundamental failure to consider a more viable and less destructive alternative</p>	<p>No remarks.</p>
<p>12.50</p>	<p>NO STUDY OF SOCIAL IMPACT - Sec 4.9 covering socio cultural impacts is the most insignificant section in chapter 4. It is portrayed in the report that there will be hardly any social impacts. The EIA report rules out any R &R being involved in this project in stark contradiction with the other facts stated in the report. The report fails to clarify the extent of land parcel required for the development of backup areas for general cargo and coastal cargo berth. The report fails to clarify where the proposed 8m road is</p>	<p>Please refer to reply at item 2.4 and 17.34 of audio public hearing.</p>

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	<p>to be constructed and what exists in that location presently. Pre feasibility report for this project site in sec. 1.3 and para 4.6 of sec 6.4. The total development of Vasco bay not be possible unless the existing fishing jetty is shifted. The fishermen were strongly resisting all attempts of MPT to develop vasco bay. Keeping in view of the fishermen community who depends on fishing for their livelihood, the development plan has been proposed in such a way that it would not restrict movement of their boats in and out of sea. It will not be desirable for the port operation to co-exist with fishing activities as there are security concerns. MPT being an ISPS compliant port, have to necessarily address the security problems posed by the movement of fishing trawlers close to its operational water areas. There is a demand from fishermen community to the Govt. of Goa for providing a separate fisheries harbour in the vasco bay. And Sec 4.4 categorically states existing encroachments and slums along vasco bay will have to be <i>"relocated to another area to facilitate optimum development of further port facilities"</i> So from the onset it is evident that the clearing of any civilian activity form Vasco Bay is of top priority, As MPT keeps claiming its jurisdiction over all of these beaches and adjoining areas, it repeatedly states no land acquisition will be involved in these projects and hence there will be no R&R In an absence of any clear layout plans and specific mitigation plans, where does this leave the people of Kharewado? This raises serious questions of the competence of the consultant who has made this EIA Report and the intentions of MPT. The EIA Study and Report have intentionally concealed the massive displacement of the fishing communities and therefore must be rejected outright,</p>	
12.51	<p>VIOLATION OF EC TERMS AT BERTHS 10 & 11 - Para 6.1 - Appendix I, the appended Compliance Report shows that the iron and woodchips being handled at the current</p>	<p>Port is following EC conditions as well as conditions laid down in CTO.</p>

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	<p>cargo berths 10&11 are violating their EC terms as the cargo is not covered with tarpaulin and hence results in spillage and air and noise pollution and that Mechanized ore handling has not been given priority till date.</p>	
12.52	<p>ILLEGAL MISUSE OF REGRESSIVE DRAFT CRZ NOTIFICATION 18 -While Para 6.2 Appendix II, states that the HTL/LTL studies done by NCSCM are meant to be in compliance with CRZ Notification 2011, NCSCM has used the zonation as specified in a yet to be notified, Draft CRZ Notification of 2018!! This is a grave fraud not expected from a premier scientific institute and immediate investigations must be carried out into this criminal act of the institute on which we intend to rely in the future for scientific studies, It is incredible that a draft that has no legal status and has received severe push back from coastal communities and environmentalists as well is been used to as the basis of such an important study. Therefore there is no legal basis for this EIA and its CRZ mapping and the EIA study must be summarily rejected immediately.</p>	No remarks.
12.53	<p>USE OF 40 YEAR OLD HYDRODYNAMIC STUDY - Para 6.3 says that as per the Hydrodynamic Modelling studies conducted by Central Water and Power Research Station (CWPRS) done to understand the changes in hydrodynamics and impacts of dredging - no significant changes or risks occur as the tidal movement will not be strong enough to lift up the dredged. dumped materials. But what the PP fails to disclose is that CWPRS` s study is based primarily on field observation of tidal activity in MPT area collected in 1977!! How can a study of hydrodynamic and possible impacts of dredging be considered valid when it is based on 40yrs old field observations? MPT area has seen massive maintenance and capital dredging many time in those 40 yrs and this has left Vasco Bay floor completely changed The field reading~ taken 40 yrs ago cannot be presumed to be accurate or be used to form the basis of the hydrodynamic study. The presentation of such fraudulent</p>	Please refer to reply at item 3.3 (m) of audio public hearing.

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	data must be considered a violation of the spirit of the EIA notification of 2006 and the EIA report must be summarily rejected on this ground.	
12.54	<p>FAULTY QUALITATIVE RISK ASSESSMENT - The Quantitative Risk Assessment of liquid cargo berth referred to in Chapter 6 and details in Appendix VI clearly show that the main areas exposed to risk are the Passenger Jetty and its associated areas, the Fisheries harbour and the population that live close to the berth areas. Everything that is upwind from the POL berth faces risk not just in terms of immediate damage from leaks, oil spills, explosions etc but also from radiation and overpressure. The QRA states that "since relocation of these activities is not feasible a positive barricade/ protection shall be provided against the impact. A wall of 3 mts height is proposed between the POL berth and fishing harbour." There is no mention of any specifications of the this 3mt high wall i.e. what material is it to be made of, how do these act as protection etc~ The Report does not state how this 3mt wall will protect visiting tourists at the passenger ferry and allied areas, fishermen, their staff and their equipment, especially from explosions or fires.</p>	Please refer to reply at item 6.30, 6.31, 6.32 of audio public hearing.
12.55	The QRA also says that human movement must be minimized during unloading at the POL berth, This raises the question whether the activities of the fisheries harbour will be affected by this provision. The EIA Report fails to explain the implications of these recommendation on the functioning of the fisheries.	Please refer to reply at item 17.37 of audio public hearing
12.56	<p>NGT MATTER ON ECOLOGICAL DAMAGE ~NOT CONSIDERED - Pending court matter against MPT in NGT regarding ecological damages caused to Vasco bay and Kharewado beach - As an extension to the matter mentioned above, it must be noted that the NGT is currently charged with examining the matter of ecological damage caused to Vasco Bay and Kharewado beach due to the criminal and negligent behavior of MPT In light of these facts, it is impossible to</p>	Please refer to reply at item 2.31 of audio public hearing.

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	<p>accept the proposal of another project in this very same area which also includes dredging until the matter of restoration and restitution of environmental degradation done due to capital dredging at navigational channel is heard and disposed of by the NGT as per law. We urge you not to allow this fresh proposal by MPT to be appraised implemented until such time. The EIA study can be reviewed by the public only after receiving the verdict of the NGT and in the light of its findings. Therefore, this EIA Report cannot be considered at this stage</p>	
<p>12.57</p>	<p>CZMP NOT FINALIZED – Goa Coastal Zone Management Plan (CZMP) has not been finalized as per NGT order of Nov 22nd 2017 - it is shocking that the project proponent has conducted this EIA in the absence of the new Goa State Coastal Management Plan that needs to be finalized by the State Government The CZMP is meant to delineate various development / development free zones in coastal areas, hazard)z-ne demarcate fishing villages and the commons being utilized by communities in the area. The NGT in its order on Original Application Nos. 11/2014 and 424 of 2016 issued on 22nd November 2017 stated unequivocally: "As the entire development activity out of prohibited area, regulated area and area permitted to development in accordance with the CZMP would be dependent upon finalization of the above, It is suggested by Ministry of Environment, Forest & Climate Change that the States should not grant Environmental Clearance for development activity which falls within the permissible area! regulated area as that may result in defeating the entire exercise. As per the statement of Ministry of Environment, Forest & Climate Change we direct accordingly " Accurate information on delineation of zones is absolutely central to the appraisal of the project and understanding its Impacts on tilt- specific proposed location Thus it can be concluded that the ETA presented by the project proponent cannot be technically sound on the</p>	<p>Please refer to reply at item 2.8 and 10.24 of audio public hearing.</p>

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	environmental and social impacts since it is not based on the new mandated CZMP.	
12.58	PUBLICATION OF EIA REPORT - EIA Report is not provided to all the affected people, but has been provided to only a few of the local bodies. The Report should have been made available to all the local bodies in the study area, which are CCP, Panjim, VP St Cruz, VP Siridao-Pale, VP St Lawrence, VP St Andre, VP Curca-Bambolim-Talaulim, VP Batim and VP Mercedes in Tiswadi, Vasco Municipal Council, VP Chicalim, VP Sancoale, VP Issorcim, VP Chicolna, VP Pale- Velsao, VP Cansaulim-Arossim-Cuelim, VP Cortalim and VP Quelossim in Mormugao and VP Candolim, VP Nerul and VP Reis Magos in Bardez.	Please refer to reply at item 10.30 of audio public hearing.
12.59	EIA DATA COLLECTION WITHOUT TOR - TOR was issued on MAY 2017 whereas the EIA agency started conducted data collection in March 2017 till MAY 2017 so we cannot be sure all the conditions stipulated in then TOR are sufficiently addressed or if the data collected has been manipulated to suit the TOR	Please refer to reply at item 3.3 (o) of audio public hearing.
12.60	<p>ERRORS IN THE REPORT - Some of the errors in the Report are listed below. The illegibility of layouts and maps is a fatal error, since the scope of the project, the displacement of the fishing communities and the veracity of the statements made in the Report cannot be checked in the absence of these maps and drawings.</p> <p>a. Contents table point 9.6 b. page 44, para 2.4.1 c. All layouts and maps are unreadable, The legends are unclear in hard copy. d. EMP table is in landscape mode and half of it is cut off, so really cannot tell what the Actual EMP is. e. Appendix VII shoreline change maps are completely illegible</p> <p>It is therefore necessary that the maps and drawings be provided to the people before holding the Public Hearing.</p>	<p>a & b - Information will be reviewed and incorporated in the Final EIA Report.</p> <p>c. Legible Layout plans will be incorporated in the Final EIA Report.</p> <p>d. EMP table will be reviewed</p> <p>e. Legible map will be incorporated in the Final EIA Report.</p>
12.61	<p>SAFETY ISSUES</p> <p>The new location proposed for the POL facility is closer to larger populations,</p>	Please refer to reply at item 6.30, 6.31, 6.32 of audio public hearing.

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	including thousands of fishermen on the narrow finger jetty right next to it. The new location proposed for the POL facility has limited width of access for a long length, restricting evacuations and firefighting/rescue operations. as compared with the present location	
12.62	<p>GROSS VIOLATION OF 12TH FIVE YEAR PLAN 2012-2017</p> <p>The report of the expert group on ports for the 12th five year plan 2012-2017 clearly states that MPT has among the most critically hazardous and dangerous operations among the port cities of india and recommended that the dirty and hazardous cargoes be phased out and moved away from vasco city. However, MPT has completely Ignored the recommendations and is in fact going totally against the recommendations be trying to increase the handling of dirty and hazardous cargoes at MPI, thus endangering the lives of lakhs of residents of the surrounding areas~</p>	No remarks.
12.63	<p>SUSTAINABLE GREEN ALTERNATIVE DEVELOPMENT PLAN</p> <p>Attached are three plans, the first marked as 'Present Scenario' showing the existing layout of MPT and fishing operations at Vasco Bay, the second marked as 'Proposed Changes' showing the layout of MPT operations and fishing operations as per the subject proposal, and the third marked as 'Sustainable Alternative' showing the development of Mormugao Port in accordance with the recommendations of the 12th Five Year Plan and which will bring real sustainable development to Vasco City, Goa and India.</p>	No remarks.
12.64	As shown on the third plan, the removal of the dirty and hazardous cargoes from MPT will allow the development of the Port as a Cruise Tourism destination as recommended by the 12th Five Year Plan, while restoring the Vasco beach, bringing a massive impetus to economic development and prosperity for Vasco City through Cruise Tourism, taking care of the needs and aspirations of fisher folk and residents of Vasco and removing the sources of air pollution, water pollution and	No remarks.

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	safety and fire hazards from the vicinity of the dense settlements around the Port	
12.65	The EIA Report has completely failed to consider the alternative mentioned above, or any other alternative that is sustainable, and is instead pushing for the interests of private corporations at huge costs to the fisheries, fishing communities, health of residents of Vasco City, neighbouring areas and those living along the transportation routes for coal.	No remarks
12.66	In View of above submissions we demand that the TOR, the EIA study and the EIA Report are rejected outright and MPT is asked to prepare a fresh proposal and form I for the sustainable development of the Mormugao port that will take care of the aspirations of the people, fishing communities and future generations based on proper scientific studies and the economic growth and wellbeing of Vasco city and its residents.	No remarks
13.0	Goa Fishing Boat Owners Association	
13.1	<p>In terms of the minutes 1.4 in the Proceedings of the Board of Trustees' 2nd Meeting held on Thursday 30th August 2018 page No 1 Item no. 1 under the Subject Heading: Quarterly Action- Taken Report on the decisions taken during the last and previous meetings of the Board of Trustees for the quarter ending 30TH OF June 2018 it was specifically mentioned that the POL Berth shall be at Berth No 8 and that the Mormugao Port Trust may not take up the construction of the POL Berth at Vasco Bay and that instead a Cruise cum Multipurpose cargo Berth will be constructed with funding from Ministry of Tourism in future. The said minutes at 1.4 are reproduced herein below in its entirety:</p> <p>To a query raised by Shri Satardekar regarding handing over the area (Berth 8, 9 & Barge berths) to M/s Goa Sea Port Pvt. Ltd (VEDANTA), Chairman informed that existing POL berth (Berth No. 8) will be retained and balance areas will be handed over to M/s Goa Sea Port Pvt./ Ltd, which the party has informally agreed. Due to the present</p>	Please refer to reply at item 18.6 of audio public hearing.

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	<p>financial position, the Port may not take up the construction of the POL Berth at Vasco Bay. Instead, a Cruise cum Multipurpose Cargo Berth will be constructed with funding from Ministry of Tourism in future. The detailed Board note on the subject will be submitted later.</p>	
13.2	<p>In view of the aforementioned minutes it is clear that the Mormugao Port Trust has categorically set out that the POL Berth will be at Berth No. 8 and that the Mormugao Port Trust may not take up the construction of the POL Berth at Vasco Bay (i.e. Berth No. 14) and that the Vasco Bay (i.e. Berth No. 14) will be used for Cruise cum Multipurpose Cargo Berth. The POL Berth therefore should be maintained at Berth No. 8 in terms of its minutes above mentioned</p>	<p>Please refer to reply at item 18.6 of audio public hearing.</p>
13.3	<p>That in the event, Berth No, 14 as mentioned in the minutes aforesaid be used for Cruise cum Multipurpose Cargo Berth, the berths 12, 13 and 14 (POL Berth) as shown in the Conceptual Plan of Vasco Bay Development, shall under no circumstances be used for the purpose of any cargo/raw material like that of coke/coal, petroleum and chemicals liquid, dry bulk (dirty cargo) or otherwise. Only cargo/raw material which is clean cargo, non-hazardous and non-polluting should be permitted on the said aforesaid berths Any cargo/raw material which has the effect of monitoring the pollution levels to ensure whether the same is in violation of the Environmental Laws shall also not be permitted to be handled at the aforementioned Berths 12, 13 and 14(POL Berth).</p>	<p>Please refer to reply at item 18.6 of audio public hearing.</p>
13.4	<p>The above objections are raised as it is noticed that therefore mentioned berths are in close proximity to the city and have the effect of causing both health hazard as well as danger to the life of the public and past experiences have revealed that the Mormugao Port Trust has not made any concerted efforts to safeguard the interest and health of the public which had resulted in law and order problem in the past.</p>	<p>Please refer to reply at item 18.6 of audio public hearing.</p>

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13.5	It is made abundantly clear that this Association has no objection whatsoever to the construction of Berths 12, 13 and 14(POL Berth) as shown in the Conceptual Plan of Vasco Bay Development however the objections are only restricted to the usage of the said berths 12, 13 and 14(POL Berth) of the said Plan aforementioned.	No remarks.
14.0 Goa Green Brigade		
14.1	That we strongly object to the manner. in which the EIA Report has been prepared without taking into consideration the degradation of the marine ecology and the consequent serious impact on nearby living population.	Please refer to reply at item 2.1 of audio public hearing.
14.2	That the EIA report fails to take into consideration the entire Sagarmala project in its totality including berths, dredging, new roads and railway tracks and other ancillary projects and therefore does not truly reflect the entire impact of this expansion plan	Please refer to reply at item 2.1 of audio public hearing.
14.3	That the EIA report does not analyse the impact on the communities dependent on the sea coast including the fishing communities, toddy tappers, canoe operators and non-mechanised traditional fishermen whose livelihoods have been dependent for several centuries on the clean and undisturbed sea coast and will now make them extinct if this project expansion is allowed	Please refer to reply at item 2.1 of audio public hearing.
14.4	That mitigation measures suggested in the EIA report suffers from lack of any serious foresight or attempt in overcoming any man-made disaster due to the proposed berths expansion at Vasco bay that could have serious repercussions for the residents of Vasco considering that highly inflammable cargo is proposed to be handled without any disaster: management plan being Proposed,	Please refer to reply at item 2.20 of audio public hearing.
14.5	That the failure of the EIA report to engage indigenous communities while preparing its report nor taken any formal consent violates the International Conventions including human rights to which India is a signatory.	Please refer to reply at item 2.14 of audio public hearing.
14.6	That the EIA report fails to take into consideration the impacts of the Proposed	Please refer to reply at item 2.20 of audio public hearing.

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	massive dredging to facilitate the berths expansion on the nearby eco-sensitive areas including Goa`s beaches, estuaries, bays, coral reefs and a wide variety fish and shell-fish breeding grounds and any adverse impact will deny Goans of their staple diet of fish.	
14.7	That there is no scientific study or data collected of the declining fish stocks caused due to the current coal pollution and other cargo handling activities of the MPT and the magnifying impact the current expansion will have on the fisheries industry which is not only important for the local population but also the tourism industry where the tourists come to taste the local fish delicacies.	Please refer to reply at item 15.47 of audio public hearing.
14.8	That the proposed project of building a POL and General Cargo facility at Vasco bay will have a disastrous impact on the breeding grounds of hump-back dolphins, turtles, porpoises, whales and other species of marine life.	Please refer to reply at item 17.21 of audio public hearing.
14.9	That the expansion of these two berths which involves massive dredging will cause serious erosion of the Vasco beach and other parts of Goa `s coastline	Please refer to reply at item 3.3 (b) of audio public hearing.
14.10	That it is crystal clear that the proposed berths expansion is mainly to promote handling of coal for the transnational companies trading in the most dirtiest fuel called coal which is being abandoned by most progressive countries, but promoted by the Indian Government to the peril of local communities.	This is not true.
14.11	That the EIA report fails to make true and transparent disclosures with regard to the hidden agenda of dredging and the fact that the same has been stayed by a court order as it was undertaken illegally and clandestinely.	This is not true.
14.12	That no rail and road connectivity impacts have been analysed on the overall environment of the locality and its communities as these are the vital parts of these two berths on-land transport infrastructure.	Please refer to reply at item 3.1 of audio public hearing.

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14.13	That the proposed reclamation of land for the expansion of the berths Nos 8 & 9 will have disastrous environmental impact on its people living on this coastline at Vasco and far beyond.	Please refer to reply at item 3.1 of audio public hearing.
14.14	That in the absence of Goa's State Coastal Management Plan being finalised, any attempt to push this dubious and spurious EIA report is completely illegal.	No remarks.
14.15	That the very fact that the EIA report highlights the dangerous and high concentration of heavy metals in sediments due to extension of maritime and marine industrial activities in the Mormugao harbour region, calls for an right rejection and throw out of hand this EIA report in to the Arabian sea.	Please refer to reply at item 2.28 of audio public hearing.
17.0 Illma Dias		
17.1	I wish to strongly protest against the failure to approach the Gram Sabhas of Goa to obtain their consent for the coal expansion project. In fact, over 100 Gram Sabhas of the ponchayats of Goa (out of 190 panchayats) have adopted resolutions that coal should not be transported through Goa, but the EIA Report does not state anything in this regard. Copies of the gram sabha resolutions adopted by Gram Sabhas across the state of Goa can easily be collected by the concerned officials from the secretaries of the Panchayats or Block Development Of f leers. These Gram Sabha resolutions are much " more than a referendum in their value and significance, especially when the coal expansion is being pursued in the most sinister secrecy. These Gram Sabha resolutions are also legally binding on the Government and MPT.	Please refer to reply at item 3.1 of audio public hearing.
17.2	I live in Betalbatim, a coastal village to the south of MPT, probably within 20 kms distance from it. The ongoing coal handling is a big disaster for us since our fish, which is our staple food, is being poisoned by heavy metals from the coal. Our fishermen are under severe pressure due to scarcity of fish and the proposed coal expansion will further	The person submitted representation is concerned about his village Betalbatim which falls beyond the Study Area of the present Project.

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	destroy the fish stocks. However, the EIA Report does not even mention or consider the facts	
17.3	The existing 351 m long jetty used by the trawlers is being snatched by MPT through this project. The trawler owners are being misled by politicians, taking advantage of their inability to understand the EIA Report that they are gaining from the project, while the truth is that their independent jetty of 351 m berthing length is being grabbed by MPT by pushing them into areas of traditional fishermen, to be shared with passengers, cargo and POL terminal. They will effectively lose area and productivity and are thus being displaced.	This is not true.
17.4	The new constructions, jetties, ship movements, trawler movements, roads, back-up spaces and reclamation works will all take place in the areas which are used by the traditional fishermen of Khariwado for fishing and their settlement. The large population of traditional fishermen already are short on space and this loss of area can easily destroy them completely. Important: The figures provided with the EIA Report such as 2.2 and 2.3 are totally blurred and illegible. The layouts and the extents of the areas required for the project cannot be deciphered from the EIA Report. Is this an intentional concealment? In any case, the Public Hearing must be held again as the EIA Report must be corrected and made fully legible before being placed before the people for a month's scrutiny preceding the Public Hearing.	Please refer to reply at item 2.27 and 36.8 of audio public hearing.
17.5	The appropriate solution is to give the berth 11 to the fishing trawlers and restore the Vasco Beach to its earlier glory by facilitating natural regeneration of the sandy beach, thus giving more space for the traditional fishermen, and also precious recreational space for the residents of Vasco City. Berths 8 and 9 can be used for general cargo along with berth 10 while the POL terminal can remain where it is, until the handling of dirty and hazardous cargoes at MPT is permanently ended, in a timely manner.	No remarks

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17.6	<p>The EIA report fails to provide the essential studies listed in the terms of reference: Making it impossible for anyone to assess the impact. These are: Paragraph 4, (ix) - detailed analysis of the physic-chemical and biotic components of the highly turbid waters round the project site and comparison with adjacent blue waters in terms of baseline and impact assessment and draw up a management plan.</p>	Please refer Chapter 3.7 of EIA report.
17.7	<p>Paragraph 4, (xvi) - The Marine biodiversity impact assessment report and management plan through the National Institute of Oceanography (NIO) or any other institute of repute on marine, brackish water and fresh water ecology and biodiversity. The report shall study the impact of the project activities on the intertidal biotopes, corals and coral communities, molluscs, sea grasses, sea weeds, sub tidal habitats, fishes, other marine and aquatic micro, macro and mega flora and fauna including benthos, plankton, turtles, birds etc. as also the productivity. The data collection and impact assessment shall be as per standards survey methods.</p>	Marine biodiversity impact assessment report and management plan through the National Institute of Oceanography (NIO) will be incorporated along with Final EIA report.
17.8	<p><u>South Western Railways double tracking is only for this project:</u> without which the coal expansion cannot take place. The existing single track is so close to our houses and settlements that we are already facing problems due to the coal operations, which occupy a large portion of the total train operations. The present single track is quite congested by the present operations, as indicated by MPT itself in its own reports available with MOEF and other authorities and which I can provide on request, The second track is a part of MPTs coal expansion project and its impact must be studied along with the rest of the project. Unfortunately, the railways has totally violated the law by proceeding with sections of the double tracking without carrying out any EIA studies, unmindful of the fact that the route runs through Western Ghats and thickly populated villages and towns of Goa, like ours.</p>	Please refer to reply at item 3.1 of audio public hearing.

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17.9	<p>The EIA report fails to mention any of the ongoing cases against , MPT directly related to the project There are matters pending before the NGT related to illegal capital dredging by MPT, ecological damage done by illegal dredging, etc. The Public Hearings for various related projects such as for berth improvements and capital dredging have been conducted over 1 year ago, but have not been taken forward yet. There are criminal matters filed by Goa State Pollution Control Board against MPT for environmental degradation. There are appeals f fled recently against consents for expansion of MPTs operations. There is a PIL filed against coal handling at MPT. All of these court matters have fundamental implications to MPTs coal plans. These legal matters are however not even mentioned in the EIA Report. Instead, it falsely states that there are no cases against MPT in relevant matters, though the capital dredging matter before NGT, which was pending for the entire duration of the study, is directly related to the subject proposal.</p>	Please refer to reply at item 2.31 of audio public hearing.
17.10	<p>The EIA report fails to collect any of the environmental and socio-economic data or to assess impact of the proposal. The EIA report does not have any of the baseline data related to the marine or land environment. The data provided is nominal and even false, thus making the impact assessment an empty exercise. There is no socio-economic data, especially regarding the fishermen of the study area who will be the worst affected. Even the displacement of the local fishermen is concealed totally.</p>	Please refer to reply at item 1.5 and 1.6 of audio public hearing.
17.11	<p>I therefore demand that the terms of reference for the subject project be quashed and the EIA report be rejected. The officers of MPT responsible for the misrepresentation and attempt to help private parties must be severely dealt with, especially in these days of grave environmental challenges. The attempt to move the POL closer to the densely populated areas of Vasco city, exposing thousands to explosions that will wipe out all lives is gravely criminal and</p>	Statements are not agreed.

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	personal responsible must be punished in an exemplary manner	
18.0	John D'Souza	
18.1	A fully equipped fishing jetty will be a boon for our business, so am for the development of the Vasco bay and the New Fishing Jetty but i am Against M,P.T plan according to the EIA Report building of POL Berth and Multipurpose Cargo Berth which I am not aware what it will be. Anything that M.P.T may do with the berth should clean taking into consideration the life of the people of Vasco. For the sake of Development M.P.T or any other government or semi Government bodies should not play with the, life of people leaving in or around the place of any Project.	Statements are not agreed.
19.0	Savio Corriea & others	
19.1	We the undersigned are public spirited citizens residing in Vasco da Gama and have been actively involved in environmental protection and social issues concerning our town for the last several years.	No remarks
19.2	We have learnt that Goa State Pollution Control Board is conducting an environmental public hearing of the POL Berth-cum "fishing Harbour at Vasco Bay proposed by Mormugao Port Trust (MPT) at Chicalim Grounds on 5th October 2018 from 10.30 am onwards. We write to you to express our strong objections to the selection of the venue, to bring to your notice the deficient and flawed publicity for the hearing and to ensure that due publicity is given as required by law and adequate arrangements are made for the attending public.	Please refer to reply at item 10.30 of audio public hearing.
19.3	You may be aware that the last round of public hearings on MPT expansion projects was held over eight days in April/May 2017 at Tilak Maiden, Vasco. Tilak Maiden was the chosen venue for the very same public hearing that was scheduled to be held in April 2017 but was cancelled by your office. However the venue . selected for the hearing on 5th October i.e. Chicalim Ground Baina located within ½ km of the project site not	As per EIA Notification 2006, EPH is organized by State Pollution Control Board and Chaired by Collector & District Magistrate. Accordingly, GSPCB organized the EPH. Project Proponent, i.e. MPT has to present the project to the public.

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	considered? It belong to the project proponent itself, Is the idea to ensure minimum attendance at the hearing?	
19.4	Hon'ble Gujarat High Court in <i>Centre For Social Justice v. Union Qf India & Qrs</i> AIR 2001 Gujarat 71, held (at para 6.3) that it would be convenient to hold environmental public hearings at <u>taluka headquarters</u> .	No remarks.
19.5	We call upon your good selves to cancel the hearing proposed at Chicalim on 5th October 2018 and reconsider the choice of venue and have it at a location in close proximity to the project site that would be convenient for the public in general and the most affected traditional fishermen in particular. Without prejudice to the foregoing, the description of the venue as " <i>Chicalim Ground</i> has puzzled us, and is bound to confuse many. To our knowledge, there is no venue known as " <i>Chicalim Ground</i> ; we know of a Chicalim Sports Complex that is located along Airport Road, and of a Chicalim Panchayat Ground located next to the Chicalim Panchayat office. At which of the two venues is the public hearing proposed to be held; or is there some other? Is this confusion being caused deliberately to ensure minimum attendance at the hearing?	Statements are not agreed.
19.6	For the benefit of the affected persons, stakeholders and public at large, we call upon your goodselves to postpone the public hearing slated for 5 th October 2018 and to ensure that the venue and its location are clearly describe in the public notices that would follow.	Statements are not agreed.
19.7	Without prejudice to the foregoing, and while on the issue of public notice/publicity for the public hearing, we wish to point out that you have failed to comply with' mandatory requirements in this regard as prescribed by law. You must be aware that Hon'ble Delhi High Court, in its judgment in <i>Utkarsh Manda! v. Union of India</i> , held (at para 43) as follows: " <i>It is a matter of concern that the requirement of public hearing under the EIA notification has been taken so lightly by the</i>	Statements are not agreed.

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	<i>MoEF. This needs immediate correction. If the hearing has to have adequate publicity then the notices would have to be repeated and spread over a period of ten days so that as many people as possible are made aware of such public hearing</i>	
20.0	Swapnesh B. Shelekar	
20.1	The real reason for the proposed development of MPT is suppressed and not part of this proposals / EIA report. The Proposed Development of Fishing jetty Passenger Jetty Multipurpose General Cargo Berths and POL Terminal at Mormugao Port of M / s Mormugao Port Trust are all consequential changes and are not the parent or true proposals,	No remarks.
20.2	AS mentioned at section 1.3, page 10 of the EIA Report; <i>Temporary fish landing plat form occupies prominent waterfront area close to Berth No. 11 making development of Port Infrastructure difficult.</i>	No remarks.
20.3	As mentioned at section 2.3.1, page 27 of the EIA Report; <i>Fishing activities within Vasco Bay is one of the major limitation for expansion of the Mormugao Port.</i>	No remarks.
20.4	As mentioned at section 2,3.3, page 36 of the EIA Report; <i>Present Liquid cargo is handled at Berth Nos 8, 10 and 11. Berth 8 handles various liquid cargoes viz. Caustic Soda, Furnace Oil, HSD, Liquid Ammonia, Motor Spirit, Palm oil, etc. Bert 8 & 9 are being handed over to PPP operator for redevelopment and cargo handling due to which the POL cargo being handled at Berth 8 has to be shifted to other berths which is Berth 10 & 11 only. Berth 10 & 11 are being over utilized and hence there is no other alternate left for the port to develop a POL/LIQUID cargo berth to handle the liquid cargo.</i>	No comments and also refer to reply item No.29.9 of audio public hearing.
20.5	The proposal for development of new fishing jetty is basically to remove it from existing location and relocate it elsewhere so as to develop 2 more berths one for POL and another for general Caro in place of existing area utilized for fishing activities.	Statements are not agreed.

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	<p>As for the reason assigned for development of two new berths is due to over utilization of Berth 10 & 11.</p> <p>As for the reason assigned for over utilization of Berth 10 & 11 is due to shifting of operations of Berth 8 to Berth 10 & 11. The reason for shifting of operations of Berths 8 to Berth 10 & 11 is due to Berth 8 & 9 are being handed over to a PPP operator for redevelopment and cargo handling.</p> <p>Therefore, the actual reason for all these developmental proposal (which are of consequential nature) is due to handing over of Berth 8 & 9 to PPP operator for redevelopment and cargo handling and the status of Approval / ECs of this parent or true proposal, is not part of any of the documents shared to public, amounting to suppressing of information.</p>	
20.6	<p>Illogical proposal for creating additional Berth for POL Handling or liquid cargo that too of capacity lower than existing liquid cargo berth: In table 2.5 titled existing berthing facilities at Mormugao port for Berth no 8 the capacity is fraudulently mentioned as 1.5MTPA</p>	Please refer to reply at item 29.12 of audio public hearing.
20.7	<p>Whereas at section 2.3.3 page no. 36 of the EIA report it is mentioned that: the capacity of berth is stated to be 2.2 MTPA with about 70% occupancy. Also further down it I mentioned as it is proposed to have a POL jetty of capacity 2MTPA in the Vasco Bay.</p>	Please refer to reply at item 29.12 of audio public hearing.
20.8	<p>In table 2.4 titled commodity wise traffic forecasted at Mormugao port from 2016 to 2030, the forecast for year 2030 of handling liquid cargo (including POL) is merely 1.55 MTPA</p>	No remarks.
20.9	<p>The project proponent are frequently trying to create a picture that the existing liquid bulk handling berth (berth 8) is of lower capacity (1.5 MTPA) than the forecasted requirement of year 2030 of 1.55MTPA. The berth 8 is of 2.2MTPA at 70% capacity well sufficient for catering to forecasted requirement of year</p>	Please refer to reply at item 29.12 of audio public hearing.

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	2030 and beyond. Also it is absolutely beyond sense of PP to create a new Liquid Bulk handling berth of lower capacity (2 MTPA) by delivering higher capacity Berth no. 8, used for same purpose for other use.	
20.10	<p>The problem appears to be more of Mismanagement and senseless planning of port than anything else: There is absolutely no need for additional expansion of the port provided the management of the port is handled professionally and by competent team. The opinion is based on following extracts of the EIOA report.</p> <p>As mentioned of section 1.2, page no- 8 of EIA report. Mormugao Port managed by MPT currently has total 11 Berths out of which 6 BERTHS (Berth 1,2,3,5,6,7) area leased out of some other organizations and remaining 5 berths (berth no. 4,8,9,10,11) area under MPT.</p>	Please refer to reply at item 29.12 of audio public hearing.
20.11	As mentioned at section 2.3.3 page no 36 of EIA report, Berth 8 & 9 are being handed over to PP operator for redevelopment and cargo handling.	Please refer point no 29.16 of audio public hearing
20.12	It appears that MPT is functioning as developer and facilitator for developing of the jetty/ berths and handing it over to the private players. From the above extracts of EIA report, out of 11 no. of berths are operated by private players and MPT are left with only 3 berths.	No remarks.
20.13	<p>The proposal is basically for increasing the coal handling capacity and rigorously object to that: There is absolutely no doubt that the proposal is basically for increasing the capacity for handling coal as can be seen from following extracts of the EIA report:</p> <p>As mentioned at section 1.1, page no. 8 of the EIA report. The requirement of coal from the various steel industries and power generating units have made it an attractive and cost effective destination for coal impacts and steel exports.</p>	This is not true.
20.14	In table2.4 titled commodity wise traffic forecasted at Mormugao Port from 2016 to 2030. The forecast for year 2030 of handling	Please refer to reply at item 29.18 of audio public hearing.

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	<p>coking coal is mentioned as 36.7 MTPA out of total dry bulk cargo forecasted to 64.91 MTPA. It can be seen from the above table that the one commodity which is significantly forecasted to be increasing is cooking coal constituted about 50% compared to total dry bulk cargo handled at port, besides thermal coal. Universally known as Dirty cargo, I strictly object to handling of such huge volumes of coal through not only MPT but entire Goa. Increased volumes of handling such dirty cargo mean increase in pollution levels and consequential health hazards for the people of port town of Vasco and surrounding areas.</p>	
20.15	<p>Considering all of above: I vociferously object to this proposal development of fishing jetty, passenger jetty, multipurpose general cargo berths and POL terminal at Mormugao Port of M/s MPT as MPT is not coming out with entire information which is beneficial for them. I demand that the application for grant of Environmental Clearance be rejected outright along with EIA report, since the concealments are fatal and fundamental. I also demand that action to be taken against MPT chairman and EIA consultant for their roles in the gross fraud with criminal intent in risking the health of lakhs of citizens for private profits.</p>	No remarks
21.0	Tania Devaiah	
21.1	<p>The specific TOR was issued on 8th May 2017 whereas the EIA consultant had completed data collection from March 2017 to May 2017. There is no guarantee that all the conditions stipulated in the TOR are sufficiently addressed or if the data collected has been manipulated to suit the TOR.</p>	Please refer to reply at item 3.3(o) of audio public hearing.
21.2	<p>Chapter I of the EIA states "Port records show that the volume of coal arriving at the port rose from 7 million tonnes in 2012-'13 to nearly 12 million tonnes in 2015-'16 – two thirds of the total cargo handled that year." This point is important as it underlines the</p>	Please refer to reply at item 17.2 of audio public hearing.

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	<p>exponential growth in coal handling at MPT in a period of 5yrs. More importantly it fails to reveal that from 2012 - 2017 year, the coal handling increase has been in excess of handling quantities sanctioned by CTO to SWPL. How can an illegal increase in handling be used to put forth an argument to showcase growth of cargo handling?</p>	
21.3	<p>3.Para I .4 states "Further, deepening of the channel to -19.80 m for Capesize vessels is in process. There is no disclosure that this capital dredging has in fact been stayed by an order of the NGT as it was done illegally. No new EC has been given for the Capital Dredging proposal till date. The EIA gives a misleading picture that works to enable Capesize vessels is already underway when this is in fact false.</p>	Please refer to reply at item 17.2 of audio public hearing.
21.4	<p>Based on Port cargo handling data presented in tables 2.1, 2.2, 2.3 and forecasted handling data in 2.4, it is evident that the only significant increase in handling quantities is that of coking coal. Forecasted increase POL handling from 2018 to 2030 is merely & from 0.09 million tons per annum to 1.55 MTPA which is an increase of 0.58 MTPA. On the other hand, the handling of thermal coal forecasted from 2018 to 2030 is of 7.2 Impacts to 14. 34 MTPA. That's an increase of 7.13mTPA, double of 2018 quantities. Coking coal handling is projected to increase from 13.2MTPA in 2018 to 36.7 MTPA in 2030 i.e. an increase of 23.SMTP A – almost 35 times more that quantities to be handled in 2018!</p>	Please refer to reply at item 17.5 of audio public hearing.
21.5	<p>This analysis also makes it very clear that the reason for shifting the POL berth is to accommodate the expansion and redevelopment of Berths 8 and 9 for increasing the Ports coal handling capacity. It is public knowledge that an agreement has already been signed between MPT and Vedanta for the use of Berths 8 & 9 for coal handling operations. In addition, It is important to note that a proposal for</p>	No remarks.

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	<p>redevelopment of Berth 8 and 9 has also been submitted by MPT and is yet to receive any EC from the MoEF & CC. With this in mind, it begs the question as to how and why MPT is pushing this new proposal to shift the POL berth and move the existing jetty when it has no real reason to do.</p>	
21.6	<p>It also highlights the fact that the current proposal is intrinsically linked to the redevelopment of Berth 5a, 6a , 8, 9 and dredging of the navigation channels - all of which have been pitched as individual projects completely separate from each other - in complete defiance of the MoEF&CC OM No. J-11013/41/2006-IA.II(I) dated 24/12/2010. These project need to be presented as interlinked and interconnected projects and their impact has cumulative impact has to be studied. The PP needs to explain why these projects have been fraudulently presented as individual projects to the MoEFCC and the EAC.</p>	<p>Please refer to reply at item 17.2 of audio public hearing.</p>
21.7	<p>Para 2.3 states exactly how the current proposal is linked to all the other proposal for "redevelopment and expansion" that MPT has put in and also reveals its direct linkage to rail expansion works and road expansion works currently underway in Mormugao and other parts of Goa at a break neck speed. None of these projects have been appraised for their cumulative impact on the state's environment, ecology or society. The same para goes on to state "The proposed modernization and expansion at Mormugao Port comes under the Sagarmala project. A total marine reclamation work of about 85195 m2 is involved. A total dredged quantity of about 15,05,660m3 is involved". Can the PP i.e. provide any data on the comprehensive / cumulative impact of such a massive undertaking on Vasco Bay, Zauri estuary and beaches of</p>	<p>Please refer to reply at item 12.29 and 12.30 of same document.</p>

	<p>Kharewado, Baina and others? If so, please provide this data.</p>	
21.8	<p>Para 3.7.5 of the EIA states "High concentrations of heavy metals in sediment are attributed to extensive maritime and marine industrial activities in Mormugao harbour region. Disturbance to sediment due to dredging will lead to further deterioration of water column due to suspension of polluted sediment"</p> <p>Please note that this observation is in context of the dredging to be done as per the current proposal in question only i.e.</p> <ol style="list-style-type: none"> 1. for fisheries harbour - from 2.5 to 4 mts - 1,00,000 m³ (pg 31) 2. for passenger jetty - 2.5 to 5.10 mts - 20,000 m³ ~ 34) 3. for POL berth - from 2.5 mts to 13.10 mts 4,00,000 m³ (page 38) 4. for General and Cargo berth - from 2.5 to (initially) 13,10mt and eventually 15mts- 3,40,000 m³ and 1,40,000m³ respectively (page 41) that is a total of 10,00,000 m³ of dredging for this proposal which in effect is made up of 6 proposals. <p>Given the observation in para 3.7.5, what will the impact of this dredging on the stability of the water column in this region and how that will in turn impact the livelihood of fisher communities living along Vasco and Baina bay and Zuari??</p> 	<p>Anticipated impacts and mitigation measures are described in Chapter 4.5 of EIA Report.</p>
21.9	<p>If we subtract this from the total amount of dredging envisaged and stated in this EIA i.e.15,05,660m³ (Para 2.3, page 25), it shows us that apart from the elements explained in Chapter 2.3, MPT proposes to dredge a further 505,660 m³ which is not explained in this EIA.</p> <p>This is a major discrepancy between the total quantity of dredging mentioned and the Nair! of the dredging quantities mentioned in chapter 2.3. Where and why is the 505,660m going to be dredged and why is not mentioned in the EIA clearly ?Why should an EIA with such a serious flaw be accepted at all? EIA should be declared null and void immediately.</p>	<p>Please refer to reply at item 17.9 and 17.10 of audio public hearing.</p>

21.10	<p>Its also important to note that chapter 2.3 makes no mention of any other dredging details. Deepening of Berths 10 and 11 is conspicuously absent from this chapter and reappears in Chapter 2.4, Table 2.7 and speaks only of reclamation of 14800m of land</p> <p>Are we to assume berth 10 and 11 are not going to be dredged for deepening going by Chapter 2.3 or are we to go by the details of Table 2.7? The EIA continues to confound the reader and is hence defeats the purpose of this exercise,</p>	Please refer to reply at item 17.9 and 17.10 of audio public hearing.
21.11	<p>Based on information submitted in EIA chapter 2.3 and 2.4.</p> <p>From a total of 10,00,000m³ that will dredged as per Chapter 2.3, only 25% will be useable for reclamation works Le. 250,000m³. This amount of useable dredging material will result in reclamation of 6305m² of land.</p> <p>The PP states in many parts of the EIA (as cited before) that majority or in some cases "all" of the construction activities will take place on reclaimed land. When the reclamation possible from the said dredging is only 6305m² which is less than 10% of the 2 varying figures for Total land requirements as per Table 2.4 (Page 44,EIA) and Chapter 2.3 respectively, it raises a crucial ques6on of where the balance 90% land for the development of these proposal will come from.</p> <p>It is shocking to see that this EIA intentionally tries to confound the reader by playing with numbers and does not offer any insight into the question raised about. This EIA should be set aside immediately. Thorough investigation needs to be done into this aspect of the report and communicated back to all communities who stand to be affected by this project.</p>	Please refer to reply at item 12.33 of same document.
21.12	<p>Para 2.3.1. Berth requirements (h) (page 30) states "The proposed development area for the fisheries harbor is around 33,744 m². This area comprises of jetty area, backup area, slipway area and area near approach, In the above proposed development area the</p>	Please refer to reply at item 17.13 of Audio Public hearing.

	<p>utilities such as security cabin, office & radio communications, auction hall, canteen, rest shed, net mending shed, gear shed, ice plant, equipment & operating rooms, petrol pumps and toilets. A separate road of 12 m width along with gate complex has been proposed for the fisheries harbour with exclusive approach to the commercial area through the rehabilitation area" (Please note that all text and formatting errors in the quote are reflective of the text in the EIA report) None of these facilities are clearly demarcated on any of the layout maps for the project nor are any specifications given regarding the size, equipment's etc. Throughout the EIA it is maintained that there is no land acquisition and no scope for evictions and/or R&R (Pt9 in TOR compliance table). Can the PP please explain what is the "rehabilitation area" referring to? Who are they rehabilitating and from what? The EIA offers no clarity on the same.</p>	
<p>21.13</p>	<p>13.Para 2.3.1. Berth requirements (h) (page 30) states "A security wall has been proposed to be executed by Mormugao port between the proposed fisheries harbor and the proposed port developmental area on the west side of the fisheries harbor." (Page 30) "In this process of development in Vasco Bay, it is proposed to build a compound wall around the residential area of fishermen on Southern shore of the Proposed developments as a security measures." (page 31)</p>	<p>Please refer to reply at item 17.13 of Audio Public hearing.</p>
<p>21.14</p>	<p>The EIA is not at all clear on what impact all of this construction and reclamation work will have on the hundreds of families currently living along Kharewado beach. How will the construction and operation of these berths + dredging be done without causing significant harm and interference with the lives of these people? Here is a Boogie earth image taken on 2.09.2018 with the red circles showing</p>	<p>Please refer to reply at item 12.40 of this document.</p>

	<p>canoes parked on the beach near the proposed project site.</p> <p>The EIA needs to clarify exactly where it plans to construct compound walls around existing residential areas and how that will impact residents access to that section of Kharewado beach where canoes are currently parked</p>	
21.15	<p>On page 30 total dredging of 1,00,000 m³ for the fishing jetty along out, of which 25% can be used for reclamation i.e. 25,000 m³. This will create approx 3968.5m² of land mass'</p> <p>The EIA further states on page 30 that the proposed area for development of fisheries harbour is 33,744 m².</p> <p>Since the PP has stated in Pt 2 of the TOR compliance table that "all constructions are proposed on the reclaimed marine area" Can the PP clarify where the balance land area i.e 299,775.5m² of land is going to come from ? Neither the Project layout maps nor the text of the EIA is clear on this. By verifying the ground location, it is clear that the homes of the local community exist along this area and maybe at risk of eviction'</p>	Please refer to reply at item 12.33 of same document.
21.16	<p>Page 32 & 33 states the proposed Passenger Jetty is supposed to have on its landward side a parking area, toilets, charging area, office, approach road etc" these facilities are not clearly marked on any of the layout maps Provided'</p> <p>Page 34 also states that the proposed development area of 3307m². It further states that of the proposed dredging quantity of 20000 m³ , 25% is suitable for reclamation Le 5000m³ Simple calculation shows that with this amount of dredged material it is possible to create 292.4m² of reclaimed land.</p> <p>The EIA does not explain where the balance 3014.6 m² will be sourced from the landward side activities of the passenger jetty. Will this have any implication on the Resettlement & Rehabilitation of communities living in Kharewado? Please explain why the EIA has not spoken about this?</p>	Please refer to reply at item 12.35 of this document.

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21.17	Para 2.3.3 of the EIA clearly states that Berths is handling liquid cargo and has low occupancy because of the fact that obsolete methods of handling are being used – ships pumps for unloading , small tanks with low parcel size for storage.	Please refer to reply at item 12.7 of same document.
21.18	Sec 2.3.3 also states that Berth 10 and 11 have been over utilized since they have handled liquid cargo in addition to the general cargo.	This is an independent project.
21.19	Sec 2.3.3 also states that " Berth 8 & 9 have been handed over to a PPP operator for redeveloping and cargo handling due to which the POL cargo berth has to be shifted to other berths which is berth 10 and 11 only. "	This is an independent project.
21.20	"Berth 10 and 11 are being over utilized and hence there is no other alternative left for the port to develop a POL/ Liquid Cargo berth to handle liquid cargo." This section of the EIA tries to make one believe that MPT's hands are tied in this matter when it is in fact by MPT's own design of large scale expansion including the redevelopment and modernization of berth 5a 6a, and Berths 8 and 9 along with capital dredging (all components of Sagarmala Project) that have led to this situation.	This is an independent project.
21.21	The EIA needs clarify as to why the low handling capacity of the Berth 8 – the current liquid cargo berth – cannot be rectified simply by modernizing the handling mechanisms at this berth, given that the proposal for redevelopment of Berth 8 and 9 is very much in its nascent stages and has received no EC.	No remarks
21.22	Can the PP clarify why is it in the greater public good to allow massive redevelopment of entire Vasco bay just to entertain the corporate need of a private entity to use Berths 8 and 9 for cargo handling vs simply modernizing the liquid handling capabilities of Berth 8 to address the issue regarding its capacity? The EIA needs to clarify why there is no other alternative left for the port but to develop a	No remarks

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	POL/ Liquid cargo berth apart from the fact that a PPP agreement has been signed for Redevelopment of Berth 8 & 9 (which is still in appraisal)	
21.23	POL berth requirements, Para 2.3.3. Page 37 states that a proposed 3m high security wall will be built between the fisheries harbour and POL/ Coastal Cargo Berths. Can the PP clarify how this 3m high security wall will protect the fisher folk on trawlers that are parked at the proposed fisheries jetty and other civilians who will be in the area of the passenger jetty etc from any explosion that could occur due to an accident at the POL berth?	Please refer to reply at item 12.39 of same document.
21.24	Para 2.3.3. Page 37 also states with regards to slip distance that "a slip distance of 350m is proposed leaving a provision of about 25m for future expansion/ strengthening of the existing berths 10 and 11 , if required in the future." This seem to be very vague. Can the PP clarify what the future expansions could be in this scenarios? Do any of these scenarios include future dredging and if so to what degree and what is it estimated impact?	Please refer to reply at item 17.14 of Audio Public Hearing.
21.25	Para 2.3.3. Page 37 states "Sufficient space has been proposed at the Northern end of the approach jetty for the installation of electrical facilities and fire fighting appurtenances". The EIA fails to define what is the "sufficient space" and by what national / international standard of safety requirements is this defined? The PP must clarify the same.	Please refer to reply at item 17.13 of Audio Public Hearing.
21.26	Para 2.3.3 Page 37 also states that "When the jetty is to be designed for higher DWT vessels, the jetty configuration may be provided with additional mooring dolphins with suitable dredging depth front". The use of language is very vague and does not clearly indicate whether or not new mooring dolphins are being proposed. It does not indicate what the "suitable dredged depth" for the same are. The vessel size being considered for this berth is 85,000 DWT (page36). but the statement above on Page 37 suggests that in	Please refer to reply at item 2.29 of Audio Public Hearing.

	<p>the future if vessels of higher capacity are to be serviced then these mooring dolphins will be needed. Further on Page 38 under the title of "Berth facilities" the EIA now speaks in the affirmative stating "berthing dolphins and mooring dolphins will have the follows" while still not providing details of how many will be built etc.</p> <p>In light of this extremely contradictory and seemingly intentionally confusing text, can the PP clarify whether or not any mooring dolphins are being proposed as Part of this& POL Berth? If so, how many and what are the specification for the same? What is the suitable dredged height for the same?</p> <p>The PP must clarify if it envisages have vessels larger than 85000 DWT. If so, why is the whole POL berth proposal based on 85000 DWT which will become insufficient keeping in mind your own possible plans to have larger size vessels calling on this berth? Bow additional dredging will be required if any for larger vessels to use this proposed berth?</p>	
21.27	<p>The proposed development areas for the POL berth is around 25,934m² The proposed dredging for this berth is 4,00,000m³ of which 25% i.e. 1,00,000 could be used for reclamation. This 25% could lead to creation of 2154.4m². Since the EIA repeated claims that most of the construction activities will be on marine zone / reclaimed land, how does MPT plan to source/ create the balance area required for development of this berth 1.e. 23,780m² of land?</p>	Please refer to reply at item 12.22 of this document.
21.28	<p>Sec 2.3.4 describing the development plans of General and Coastal Berths states on Page 40 " An effective back up area of 0.79ha (7930 m²) is proposed due to space constraint, for handling and movement of the coastal cargo as discussed with MPT officials, without customs formalities. However, the Indian Standard 4651 prescribes a backup areas of 2.5 to 3 hectare for a general cargo berth". This in effect</p>	Please refer to reply at item 12.42 of this document.

	<p>means that MPT has proposed construction of these TWO cargo berths with a combined backup area which is less than 1/3rd of the area prescribed by India's own standards for one, single general cargo berth. What is the rational based on which this plan, in contravention of applicable standards resulting in this drastic lack of backup area for these 2 berths will impact the handling activities at these berths? What will be done in the future to ease most likely scenario of requirement of more space for backup area? Will this requirement have any impact on communities who live of the landward side of the proposed development?</p>	
21.29	<p>Page 41 states that the "Return Wharf" between Berth 11 and proposed Coastal berth could be used for handling general cargo/ Cruise vessels.</p> <p>This EIA is meant to let the appraising authorities and the public know what will specifically and definitely be done during project construction and operation works. The EIA should specify whether or not the Returning Wharf will be used for Cargo Handling. If so, What infrastructure is being provided for the same at the Returning Wharf If the returning Wharf is envisaged to be used as a berth, why is there no proposal for said berth specifying what quantities will be handled here and applying for an EC for the proposed activities? If any handling of cargo takes place at the Returning Wharf without an EC, that will be in direct contravention of EPA.</p>	Please refer to reply at item 12.47 of this document.
21.30	<p>Para 2,3.4 This section describing the development of General Cargo and Coastal Berths does not specified the size of proposed area of development. Page 41 merely states that 4,80,000m³ dredging will be done for both berths of which 25% is suitable for reclamation i.e 1,20,000 m³ . From 1,20,000m³ of dredged material only 2432.9 m² of land can be reclaimed.</p>	Please refer to reply at item 17.12 of audio public hearing

	Is only 2432.9m2 of rec/aimed land required for development of both general cargo berth and the coastal berth? If not, how much land is required? Where will it be sourced/created from? Will this have and R&R impacts of the communities living along Kharewado beach ? Why has the EIA failed to mention these details?	
21.31	Deepening of breakwater: Why is the proposal included for consideration with the other proposal listed? How is it integral to the development of the POL berth and the fisheries harbour and berth 8 & 9 specifically?	Please refer to item 17.9 and 17.11 of audio public hearing.
21.32	Why does sec. 2.3.5 (pg.43) not specify what depth the breakwater berth will be deepened to, while Table 2.7 on page 44 states the new depth at 11.5m?	Deepening of breakwater is from (-)9.5m – (-)11.5m.
21.33	How much dredging will be required for this why? Why is it not clearly stated in the EIA?	Please refer to item 15.30 of audio public hearing.
21.34	Important to note that none of the layouts shown in Figures 2.1 to 2.9 are clearly decipherable, especially in the hard copy. They lack a complete legend for a reader to be able to understand which area going to be used and which areas are being left untouched. This is especially true when it comes to existing homes along Kharewado beach, particularly towards the proposed coastal berth and POL berths.	Please refer to item 2.27 of audio public hearing.
21.35	Para 2.4.2 states that major water intensive activity during operational phase is a fresh water requirement of 140m ³ per day just for fisheries activities. This is based on "fishlanding 20,000 TPA with 300 fishing days". There is no source cited for this standard used as a yardstick to determine water requirement. Neither is there any explanation of where this fresh water will come from. Based on what say has the EIA come to this conclusion? What is source of fresh water supply during operational phase of all the berths listed in this proposal? Why has water requirement been specified only for fishing harbour?	The water will be sourced from the PWD, GoG. Other than fishing harbour not much water requirement is anticipated for other berths.

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21.36	<p>Para 2.5 states that the existing road along Kharewado beach is sufficient to transport materials and personnel to the site during construction and operational phases.</p> <p>Anyone who has visited Kharewado road knows that the entire length of the road from the existing fishing jetty to the Hindu crematorium is used for allied fisheries activities. The area also densely packed with houses of fisherfolk. what impact will the transport of goods and personnel have on the livelihood related activities and general living conditions of the communities who live in this area? Please share any data / studies done to ascertain the same.</p>	Please refer to reply at item 12.41 of this document.
21.37	<p>Para 2.5 also states that a new 8m road will be built to connect project area to main city. what currently exists in the location proposed for this new road? What impact will the construction activities related to this road have on the live of communities living in adjoining areas and will it effect any livelihood activities of fisherfolk along this road?</p>	Please refer to reply at item 12.42 of this document.
21.38	<p>One of the main benefits of the project as listed in Para 2.5 as well as detailed in Chapter 7, the employment generation during construction phase is 70 individuals only.</p> <p>The PP has failed to provided any estimate for employment generation during operational phase. The entire Chapter 7 on project benefits is built on the basis extremely vague and generalised statements like " if the order is more the employment opportunity is also more and vice versa." It is laughable for such statements to be included in what is meant to be rigorous, fact based study.</p> <p>How much employment will be generated at each berth proposed in this proposal?</p> <p>Why should these proposal be considered to be "for the greater good" when only 70 people will be employed in the construction phase and there is no estimate of jobs to be generated in the operational phase?</p>	Please refer reply at item 12.48 of this document.

21.39	<p>Table 2.9 clearly shows that the major expenditure in this project is towards the POL, Multipurpose cargo berth and Coastal berths. Yet the EIA presents itself as a very benevolent effort to create better infrastructure for the fisherfolk of Kharewado and Vasco.</p> <p>Why the existing Fishing jetty not be modernized as is the demand of both the boat owners as well as traditional fisherfolk of the area?</p>	The project is conceptualized after discussions with all stakeholders.
21.40	<p>Para 3.11 has sentences that will make no sense to say a fisherman who manages to read it. For eg: "Most of the N is bound in organic compounds and its importance to phytoplankton bloom formation is well known." The point that is important to note in this section is that these blooms of phytoplankton exert a heavy pressure on the oxygen carrying capacity of the water and thereby adversely impact fish and other organisms. They also block light entering the water column and decrease its productivity, as stated in the same chapter.</p> <p>Have any studies have been done to understand the impact of such blooms on fisheries both mechanized and traditional? Where is the data and what is the mitigation plan for the same?</p>	Anticipated environmental impacts were envisaged and appropriate mitigations are discussed in Chapter 4 and Chapter 8 of EIA report.
21.41	On Page 76, where the data with respect to Cyclones is provided, the data itself is from the 1990s. Updated data has not been provided.	Available cyclone data will be incorporated in EIA report.
21.42	<p>Impacts and Mitigation measures</p> <p>With respect to the mitigation measures, there are three major shortfalls:</p> <p>a. Instead of providing the manner in which the effect will be mitigated, in several Places the EIA report just mentions compliance with an SPCB order/ the Hazardous Waste Management Rules etc.</p> <p>b. The mitigation measures employ the use of words like "shall" and "should" In Places where they cannot mention any specific guideline to comply with as mentioned in Point (a)'</p> <p>Although the mitigation measure differentiates the effects based on the</p>	Please refer to reply at item 2.1 of audio public hearing.

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	"operational" and "construction" phase, it fails to differentiate the effects and consequent mitigation measure based on the activity. It has to be noted here that the modernization process involves multiple things, why then would the differentiation be limited only to construction/operation?	
21.43	para 4.2.1 says that clearing of vegetation during construction will lead to soil erosion which will lead to increased turbidity in water. The mitigation specified refers to "guidance from MMA" and no further details are shared	Please refer to reply at item 2.1 of audio public hearing.
21.44	Para 4.2.2 says only land parcel involved in operation stage is the back up area of coastal and general cargo berth. Mitigation of impact of waste generated here is also" as per requirements of Mormugao Municipal Authority". No measure is defined.	Please refer to reply at item 2.1 of audio public hearing.
21.45	Para 4.3.1 fails to talk about the possibility of salinity ingress as a result of weakening of the sea floor due to dredging.	Please refer to reply at item 2.1 of audio public hearing.
21.46	Para 4.4.1 clearly states that there will be impact on fishing activities during the construction phase as construction activities "may" displace fisheries resources. Since the habitat itself will be irreversibly changed, this will have long term impacts. But there is no mention of any study to show scale of impact on marine life and its impact on growth of fisheries. There is no mitigation plan for these impacts expect for the usual - defining when dredging can and cannot be done which in fact don't mitigate these specific impacts at all. Hydrodynamic modelling done by CWPRS is based on 1977 data.	Please refer to reply at item 2.1 of audio public hearing. CWPRS study report will be incorporated in Final EIA report.
21.47	Para 4.4.2 impacts on marine area during operation phase can be many like harmful discharge from ships, oil spills etc but the EIA seems to portray that the most polluting activity will in fact be the fisheries harbour! A list of Possible mitigation measures are mentioned but none are committed too nor are any details of schedules etc. available in the EIA.	Please refer to reply at item 12.16 of this document.

	<p>Post dredging monitoring program should be carried out- Will it be carried out and by whom?</p> <p>Discharge of waste in to the sea should be prohibited. 'what does this mean?</p> <p>List of DO's and don't for staff –no list is provided.</p>	
21.48	<p>The mitigation measures suggested is all very vague and says what can and should be done but nowhere commits to actually what will be definitely done.</p>	<p>Please refer to reply at item 12.17 of this document.</p>
21.49	<p>para 4.5.1 says that in construction phase, areas under maintenance dredging will already have lost their benthic communities hence no additional damage will haPPen'</p> <p>This is first time in the EIA the term maintenance dredging is used. Can PP explain which sec6on come under maintenance dredging? Why has it not been called as such in the project title.</p>	<p>Please refer to reply at item 5.38 of this document.</p>
21.50	<p>Para 4.5.1. This Para also speaks about the risk of marine mammal fatalities due to dredger and other vessel movement. But it fails to offer any mitigation for the same. It is important to note there is a recorded presence of many marine turtles, killer whales, whale sharks, humpback dolphins and finless porpoise. Here is video to prove the same : https://youtube.com/watch</p>	<p>Please refer to reply at item 12.13 of this document.</p>
21.51	<p>In fact in the last year alone, in impact radius of this proposed Project there have been a number of turtle and humpback dolphin carcasses and live soundings recorded in the 10 km radius of this proposal. Case in point: gravid humpback dolphin carcass with near term foetus recorded on Baina beach. Goa's humpback dolphins are a Schedule I species. Olive Ridley turtles are endangered and very little is know about the finless porpoise. Merely because the data collection team did not encounter them on these 2 day marine sample collection does not mean they do not frequent these waters. Please find attached a copy of the Ocean Watch reports.</p> <p>The fact that in the mitigation section of this para only has voluminous descriptions of various dredging tech innovations available is</p>	<p>Please refer to reply at item17.36 of audio public hearing.</p>

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	testament to the sorry state of the mitigation plan being push in the EIA. There is not a single mention how impact to marine ecology will be effectively reduced and responded to in the construction phase.	
21.52	In light of this, please find attached a copy of WWF – IUCN report “ Promoting Sustainable Marine Tourism in Goa” 2016. This report highlights the presence of humpback dolphins all along Goa’s coast including near Vasco. It also specifies scientific research that shows that Humpback Dolphins are impacted by offshore activities like coastal development, ship movement, pollution and other anthropogenic activities as their habitat is mainly 0.5km from the coast and estuaries (Sutaria , 2003; Sutaria and Jefferson, 2004) . Please find attached a copy of this report (Annexure 2). The EIA must necessary study this report and other scientific papers referenced therein and incorporate those facts into the EIA. The EIA must also necessarily then define a mitigation plan based on these new facts.	Please refer to reply at item from 15.45 to 15.62 of audio public hearing.
21.53	The Project Proponent, GSPCB and the Ministry of Environment, Forests and Climates Change and other authorities cannot claim to be unaware of this data a group of marine biologist and experts have made formal submission to them In 2017 detailing the impact of MPT’s expansion Plans on marine ecology and specifically on the Humpback Dolphin. Please find attached a copy of their expert comments in Annexure 3. These objection remain extremely relevant to the current proposal in discussion as the location proposed is identical to that of the. Older proposals mentioned in this letter and because the water environment will expert the cumulative impact of all of these Project which are yet to be studied and placed on record.	No remarks
21.54	para 4.5.2 speaks of possibility of oil spills at liquid cargo berth as being the main risk. It state that not only can oil spills be disastrous for birds and fish in the shortterm, it can also cause long term damage to fish stock by causing reduction in growth, enlarged livers	There is approved Oil spill contingency plan which is attached as appendix IV of EIA report.

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	and adversely impacts eggs and larval survival. Has any study been undertaken to show how a possible oil spill will impact the livelihood of boat and canoe owners in the long term and short term.	
21.55	<p>Section 4.6 talks about air pollution. One point raised in the construction Phase is that. increase in vehicular movement will increase air Pollution. This statement Is quickly followed by "but, the vehicular pollution is not expected to lead to any major impacts."</p> <p>Regarding the operational phase, the same admission that increase in vehicular traffic will lead to increase in pollution. For mitigation of the same, the EIA goes on to say that DG set, engines etc should be Provided filters, green belt development and that boats should be maintained! There is not one word on how they will mitigate the pollution resulting from vehicular traffic.</p>	Please refer to reply at item15.37 of audio public hearing.
21.56	In fact, in point 8 of the standard TOR compliance table, the PP claims that since the main cargo is liquid bulk, there won't be much change in vehicular traffic. They fail to even mention/ consider that activities at other berths will in fact lead to increase in traffic.	Traffic will be diverted from the flyover which is suppose to be ready before this project.
21.57	In such a scenario, It seems fume to use this EIA as tool to understand the impacts of these projects. Can the PP share the study/ data based on which they have come to this conclusion? Have any traffic intensity studies been done as part of the EIA?	EIA report is based on EIA Notification 2006 and TOR issued by MoEF&CC.
21.58	<p>There is very little detail about noise pollution.</p> <p>There is no mention of light pollution which is also a serious concern as this project is not just in the heart of a town but have impacts on marine areas, estuaries, plateaus, private forests and fields.</p>	Anticipated environmental impacts have been elaborated in Chapter 4.
21.59	There is no mention of the fuel storage tanks located less than 0.5 kms from the proposed POL berth, the risks associated if any explosion etc should happen and	Please refer to reply at item6.30, 6.31, 6.32 of audio public hearing.

	consequently no mitigation measures are mentioned for such a situation. Below is a google earth image showing the distance of the fuel tanks from the project site.	
21.60	<p>Social Impact assessment</p> <p>Sec 4.9 socio cultural impacts is the most insignificant section in this chapter. It appears there will be hard/y any social impacts as per the PP.</p> <p>The pp rules out that any R&R is involved in this project. What extent of land parcel required for the development of backup areas for general cargo and coastal cargo berths is going to be on existing land? Where is the Proposed 8m road going to be constructed and what exists in that location at this time?</p> <p>In this section a very casual statement is made that "when compared to other transportation systems, water transport is environmentally friendly, as it Is less polluting, with low energy consumption." there are no citations to verify this statement. Can the PP share any study they have conducted in GOA to prove the same.</p>	Please refer to reply at item 6.44 of audio public hearing and 21.57 of this report.
21.61	<p>Pre feasibility report for this project states in Sec. 1.3 and para 4 sec. 6.4. "The total development of Vasco Bay will not be possible unless the existing fishing.</p>	Please refer to reply at item 12.50 of same document.
21.62	<p>jetty is shifted. The fishermen were strongly resisting all attempts of MPT to develop Vasco Bay. Keeping in view of the fishermen community who depends on fishing for their livelihood, the development plan has been proposed in such a way that it would not restrict movement of their boats in and out of sea. It will not be desirable for the Port operations to co-exist with fishing activities as there are security concerns. MPT being an ISPS compliant port, have to necessarily address the security problems posed by the movement of fishing trawlers close to its operational water areas. There is a demand from fishermen community to the Gov. of Goa for providing a separate fisheries harbour in the Vasco Bay." And, Sec 4.4</p>	No remarks

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	<p>categorically states existing encroachments and slums along Vasco Bay will have to be relocated to another area to facilitate optimum development of further fort facilities". So from the on set it is evident that the clearing of any civilian activity from Vasco Bay is of top priority.</p>	
21.63	<p>As MPT keeps claiming its jurisdiction over all of these beaches and adjoining areas, it repeatedly states no land acquisition will be involved in these Projects and hence there will be no R&R. In an absence of any clear layout Plans and specific mitigation plans, where does this leave the people of Kharewado? This raises serious questions of the competence of the consultant who has made this EIA and of the PP.</p>	<p>Please refer to reply at item 5.3 of audio public hearing.</p>
21.64	<p>When it comes to addressing the safety risks that will be faced by fisher folk, trawler owners and associated labour, other residents and businesses which exist a few yards from the proposed POL berth, the EIA report seems to indicate that the risk is minimal. The only ones at dire risk are of course anyone who will use the fishing jetty, the Passenger jetty and other launch jetties. The fishing harbour will be separated from the POL berth by a 3m wall. There is no explanation as to how a wall will protect either the fisher folk or tourists or locals in the event of an explosion, oil spill or radiation leak.</p>	<p>Please refer to reply at item 17.13 of audio public hearing.</p>
21.65	<p>The EIA also fails to mention and address the fact that numerous highly congested and important public sites like the local vegetable and fish market, Municipal building, Post office, Court etc lie within 0.5km of the proposed POL berth. In fact, even the fuel storage tanks Hindustan Petroleum Ltd and coal stacks in MPT are about 0.25km from this site'</p>	<p>Please refer to reply at item 10.14 & 10.15 of audio public hearing.</p>
21.66	<p>Fisheries and Livelihood: TOR point 14 states : submit the details of fishing activity and likely impacts on the fishing activity due to the project. Specific study on impacts of construction and piling on marine life.</p>	<p>No remarks</p>

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	Corresponding response provided in the TOR compliance table: Details are presented in chapter 2.3. Proposed project involves development for local fishermen development.	
21.67	Chapter 2.3 states Description of Proposed Modernization and expansion. No sub section of this chapter address the impact on fishing and fishing communities. Rather It lists out In detail the construction, dredging and other works needed to be done for each Portion of the project. There is no projection for fisheries growth, as well no current trends of catch ; landings. Plus it is proposed that all 250 trawlers will be alongside on a 315 metre jetty. This is significant because of the 124 crore construction cost, that will be used to offset the cost of the other jetties.	No remarks
21.68	Contents of table 8.2 Environmental Management Plan: Aspect Impact Matrix are not understandable as right side of the table is cut off <i>in the Hard</i> copy and soft copy of there port. The table headings to are unreadable. Most people in the project area would refer to a xerox copy of the EIA handed to the panchayats and hence would be unable to have access to the complete information in this table which is crucial to impacts and mitigation planned by PP.	Draft EIA report is submitted to GSPCB for public hearing and copy of the same is available online portals and district officials. Based on suggestion/comments at the Public Hearing necessary amendments will be incorporated in the Final EIA Report.
21.69	Chapter 6 – Additional studies Para 6.1- appendix I The appended Compliance Report shows * that the iron and woodchips being handled at the current cargo berths 10& 11 are violating their EC terms as the cargo is not covered with tarpaulin and hence results in spillage and air and noise pollution. Mechanised ore handling has not been given priority till date.	This issue is not forming part of the proposed project. However the statement made is not true.
21.70	Para 6.2 – Appendix II while para 6.2 states that the HTL/LTL studies done by NCSCM are meant to be in compliance with CRZ Notification 2011, a study of the Appendix II shows that in fact NCSCM has used the zonation as specified in a yet to be notified, Draft CRZ Notification of 2018!! this can be	This statement is not true. NCSCM have carried out studies based on CRZ Notification 2011.

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	called a fraud for all Practical purposes. It is incredible that a draft that has received severe push back from Coastal communities and environmentalists as well is been used to as the basis of such an important study. Therefore there is no legal basis for this EIA and its CRZ mapping and it must be summarily rejected immediately.	
21.71	<p>Para 6.3 says that as per the Hydrodynamic Modelling studies conducted by Central Water and Power Research Station (CWPRS) done to understand the changes in hydrodynamics and impacts of dredging- no significant changes or risks occur as the tidal movement will not be strong enough to lift up the dredged, dumped materials. But what the pp fails to disclose is that CWPRS's study is based primarily on field observations of tidal activity in MPT area collected in 1977!!</p> <p>how can a study of hydrodynamic and possible impacts of dredging be considered valid when it is based on 40yrs old field observations? MPT area has seen maintenance and capital dredging many times in those 40 years and this has left Vasco bay floor completely changed. The field reading taken 40 years ago cannot be presumed to be accurate today. The presentation of such fraudulent analysis must be considered a violation of the spirit of the EIA notification of 2006.</p>	Please refer to reply at item 3.3 (m) of audio public hearing.
21.72	The Quantitative Risk Assessment of Liquid cargo berth referred to in Chanter 6 and details in Appendix VI clearly show that the main areas exposed to risk are the passenger Jetty and its associated areas, the Fisheries harbour and the Population that live close to the berth areas. Everything that is upwind from the POL berth faces risk not just in terms of immediate damage from leaks, oil spills, explosions etc but also from radiation and overpressure.	Please refer to reply at item 6.30, 6.31, 6.32 of audio public hearing.
21.73	The QRA states that "since relocation of these activities is not feasible a positive barricade/ protection shall be provided against the	Please refer to reply at item 6.30 of audio public hearing. Material used for compound wall will be locally

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	<p>impact. A wall of 3 mts height is proposed between the POL berth and fishing harbour." There is no mention of any specifications of the this 3mt high wall i.e. what material is it to be made of, how do these act as protection etc.</p>	<p>available. Necessary information will be incorporated in Final EIA Report.</p>
21.74	<p>Can the PP ensure that this 3mt wall will protect visiting tourists at the Passenger ferry and allied areas? What about the fishermen and their staff, their material – will they be insured by the port? What about local residence?</p>	<p>Please refer to reply at item 17.12 of audio public hearing.</p>
21.75	<p>The QRA also says that human movement must be minimized during unloading at the POL berth. This raises the question whether the activities of the fisheries harbour will be affected by this provision. Can the PP explain the implications of these recommendation on the functioning of the fisheries?</p>	<p>Please refer to reply at item 17.36 of audio public hearing.</p>
21.76	<p>pending issue against MPT in NGT regarding ecological damages caused today and Kharewado beach "As an extension to the matter mentioned above, it must be noted that the NOT IS currently charged with examining the matter of ecological damage caused to Vasco Bay and Kharewado beach due to the criminal and negligent behavior of MPT.</p>	<p>Please refer to reply at item 2.31 of audio public hearing.</p>
21.77	<p>In light of these facts, it is impossible to accept the Proposal of another Project in this very same area which also includes dredging until the matter of restoration and restitution of environmental degradation done due to capital dredging at navigational channel is heard and disposed of by the NOT as per law. I urge you not to allow this fresh proposal by MPT to be appraised/ implemented until such time.</p>	<p>Please refer to reply at item 2.31 of audio public hearing.</p>
21.78	<p>Goa Coastal Zone Management Plan (CZMP) has not been finalized as Per order of Nov 22nd 2017 it is shocking that the project proponent has conducted this EIA in the absence of the new Goa State Coastal Management Plan that needs to be finalized by the State Government The CZMP is meant to delineate</p>	<p>As regards CZMP no remarks.</p>

	<p>various development /development free zones in coastal areas, hazard line, demarcate fishing villages and the commons being utilized by communities in the area. The NGT in its order on Original Application Nos. 11/2014 and 424 of 2016 issued on 22nd November 2017 stated unequivocally:</p>	
21.79	<p>As the entire development activity out of prohibited area, regulated area and area Permitted to development in accordance with CZMP would be dependent upon finalization of the above. It is suggested by Ministry of Environment, Forest & Climate Change that the States should not grant Environmental Clearance for development activity which falls within the permissible area/ regulated area as that may result in defeating the entire exercise. As per the statement of Ministry of Environment, Forest & Climate Change we direct accordingly."</p> <p>Accurate information on delineation of zones is absolutely central to the appraisal of the project and understanding its impacts on the specific proposed location. Thus, it can be concluded that the EIA presented by the project proponent cannot be technically sound on the environmental and social impacts since it is not based on the new mandated CZMP.</p> <p>In light of the above points, I request you not to take this project forward based on an inadequate and misleading EIA as it will have long term, devastating impacts on the ecology, livelihood and human rights of communities living in its impact radius.</p>	<p>As regards to CZMP remarks not correct. Anticipated impact and mitigation study is described in chapter 4 of EIA report.</p>
21.80	<p>Marine Ecology objections</p> <p>No schedule I species was recorded from entire study area. (pg-116)</p> <p>Several Schedule I species are present in the study area humpback dolphins, olive ridley turtle, hawksbill sea turtle, loggerhead sea turtle, leatherback sea turtle, green sea turtle and corals are schedule I species.</p> <p>All of these species are present in the study area of the EIA. All the turtle species with the exception of the Olive ridley turtle, are mentioned on page 105 of the EIA. Dolphin</p>	<p>Necessary relevant information if required will be incorporated in Final EIA report.</p>

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	<p>are mentioned on page 130. Corals reefs at Grande island (within the 10km radius of the study area have been referred on page no 120 of the document)</p> <p>It is unacceptable that instead of facilitating detailed scientific research on these species and their presence in our waters and developing robust conservation strategies we are instead debating this project that will most definitely impact this ecologically significant area and globally important marine species that have been recorded from this site and its surrounding areas. These species have the potential of helping Goa become a premier marine wildlife tourism destination and provide the opportunity for job creation in the green tourism sector such as scuba diving, snorkeling, dolphin watching tourism, wildlife watching, nature guides, sustainable and ethical tourism and allied activities which are already prevalent in Goa and can be managed and upgrade to follow ethical and sustainable tourism practices.</p>	
21.81	<p>The EIA states that discharge of wastes in to the sea of wastes into the sea should be prohibited. In the absence of clear plan as to how this will be done there is considerable doubt about the management and discharge of wastes during the operation phase. There is also no mention of management plan for bilge water, ballast water as well as oily wastes from ships during the operation phase.</p> <p>This waste can be the cause of pollution and anthropogenic stress in the study area- which includes Grande islands. As stated in the EIA itself Grande island cannot sustain any additional anthropogenic stress.</p>	Please refer reply at item 15.43 of audio public hearing.
21.82	<p>No study has been conducted on the recovery of benthic species following previous dredging activities that were conducted in the study site. hence we do not accept that further removal of species from this ecosystem can be deemed as having a significant impact on the health and long-term viability of the ecosystem. For a project of this nature dredging activities ideally need to be repeated in the form of maintenance</p>	Please refer reply at item 15.37 of audio public hearing.

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	dredging. The project does not provide details of this maintenance dredging- how particular areas will be dredged repeatedly. Without this information the authority cannot claim knowledge of its ill effect.	
21.83	The impacts of dredging from a spatial perspective are highly specific to the project in question and comprehensive studies have to be conducted in transparent manner to ensure that the sediment plumes resulting from dredging from dredging will not travel till Grande island. Sediments plume during dredging is not expected to travel till Grande island is inconclusive and based on conjecture, which is evidence for the fact that these studies have not been conducted.	CWPRS, Pune study report will be enclosed as Appendix III in the Final EIA Report.
21.84	Dolphin have been spotted inside Mormugao port and are know to us this area all through the day. A schedule I species such as humpback dolphin, with specific habitat preferences and strong affinity for shallow (<15m depth) coastal waters can easily be driven away from surroundings sites due to this project thereby causing significant species loss, livelihood loss(dolphin watching boats) and ecosystems imbalance. We cannot accept this destruction of important marine habitat and decimation of protected marine species.	Please refer to reply at item 17.21 of audio public hearing.