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சுற்றாடல் நீதிக்கான கேந்திர நிலையம்
Centre for Environmental Justice



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9th December 2019

Director General
Department of Coast Conservation and Coastal resource management
4th Floor, Ministry of Fisheries Building,
New Secretariat, Maligawatta, Colombo 10

Dear Sir,

Subject: Comments on EIA of The Proposed Rehabilitation of Port of Kankasanturai (KKS) in Jaffna District

Centre for Environmental Justice is a public interest environmental organization based in Sri Lanka established in 2004. We herewith send our comments to the above EIA under the request for public comments as per the section 16 of the Coast Conservation Act (No. 57 of 1981).

The EIA report does not provide any economic analysis to prove the fact that this project would be economically feasible. For example information such as number of expected trade ships, expected saving in terms of money by developing this port are missing in the report. Therefore, Cost benefit analysis must be done. Terms of reference (TOR) given by Coast Conservation Department also request an Environmental Cost Benefit Analysis.

Is this the development, the people living in the area expect from the government. Or something else. Report mention that the total fishing population in the KKS west FI Division in 2018 was 1934 and of them 439 were active fishermen. May be a fishing harbor might bring more economic benefits. Therefore a feasibility study should be conducted before the Environment impact assessment.

Project Justification of EIA report (sec 1.2) state that the port will accommodate industrial cargos and cargos with agricultural goods such as onions, potatoes etc. We should not forget that Jaffna peninsula lies on a limestone layer and the whole population depends on the underground water filled in cracks in this layer. Therefore, ground water pollution through chemical pollution is possible by accommodating more industries. Therefore, caution must be taken by relevant authorities either Central Environmental authority or Board of Investment.

According to section 3.2.2 of the EIA report Sea grasses and corals were observed in deep waters in sub tidal zone. also sixty three species of reef fish were identified during the survey. This indicates presence of a biologically rich environment. These ecosystems can be affected during the dredging activities especially during dumping the dredged materials. Coral ecosystems are one of the very productive eco system and harbor lots of marine species. Report also assumes that the reef may have

already undergone some stress by the presence of sediment tolerant species. Coral coverage is also vary between 15 % to 30 %. Therefore there is a high risk that these corals might lose permanently. Therefore close monitoring the health of corals and sea grasses and fish in this area is essential. Also plans should be proposed to restore these eco systems.

Sec 3.2.1.3 of the EIA report mention the presence of turtles hatching site of the species *Olive ridley* near the port area to the east of the breakwater. Therefore it is possible that there are more sites nearby and their activities could be disturbed due to increased human activities. All sea turtles encountered in Sri Lanka are at risk of disappearance and are listed as endangered.

Report mention that this beach is a very picturesque location in the area in the region with the presence of the light house, the natural vegetation and the beach itself with white sand. Therefore port development activities are more likely to pollute the sea water and the nearby area and ultimately the beach will loose its scenic beauty which is bad for the tourism industry.

Data shows that there are about 467 fishing families in the coastal belt of the KKS west FI Division. Fishing takes place generally in coastal waters beyond sub tidal coral ridge and mainly confined to the depths beyond 20m and extends up to about 40-50m depths depending on the target and sea condition. Monthly net income of a Fiberglass Reinforced Plastic boats (OFRP) owner was estimated as 1493.34 rupees and crew member as 746 rupees. Fishermen who use non-motorized traditional craft earned about 1480 rupees. (Table 3.14) Their livelihood can be disturbed temporarily due to lack of fish in the area or permanently due to restrictions to access. Therefore they should be compensated.

Quarry sites, used for rock excavation (260000 cubes) are located further to the project location in Mullaithiv district. Environment damage during the quarry operation could be considerable and CEA should monitor these activities closely.

Social issues that can be arisen by allowing passenger movement, also must be addressed properly. Such as drug smuggling, Terrorism etc

In conclusion, we request the developer to address the above mentioned issues and to adhere with all the mitigation measures proposed in the EIA report, and the Coast Conservation Department to closely monitor the project activities. Funding should be allocated for the environment monitoring.

Thank you

Your Sincerely

Centre for Environmental Justice

Prepared by
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