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சுற்றுடல் நீதிக்கான கேந்திர நிலையம்
Centre for Environmental Justice



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30th March 2020

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

Dear Sir,

Subject: Comments on EIA of Northern Province Sustainable Fisheries Development Project- Point Pedro Fisheries Harbor Development Project

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)

Project site is not located close to any inland or coastal sensitive area such as national park, forest reserve or marine park with sea grasses or corals. Coral is not abundant in the area. EIA report states

“The percentage of live hard and soft coral coverage was very low throughout the inter-tidal and sub-tidal marine areas of the PPFHDP site and adjacent control assessment sites to the east and west. The sub-tidal marine area located close to the existing wharf recorded the assessments highest percent live coral coverage of 6 percent. The highest inter-tidal percentage hard and soft coral coverage was 5%. However, the majority of the inter-tidal and sub-tidal reef areas adjacent to the PPFHDP and neighbouring control sites recorded percent coral coverage below 1 percent.”

Also the site is not recorded for turtles or other sea animals. Mobile invertebrates (e.g. sea cucumbers, sea urchins, crabs) were located in very low numbers throughout this area whilst finfish schools and individuals were recorded. Mangroves are also not observed in the area. Therefore project is unlikely to cause major habitat destruction in the sea area or inland.

The critically endangered land snail *Trachia fallaciosa* which was recorded within the projects influenced area. Therefore project activities need to make sure no harm done to its habitats or if found relocated to a similar habitat.

However, It is estimated that 18,000 m³ of lime stone has to be removed for the establishment of harbor basin along with mud and sand. Dredging certainly does affect benthic life, which is destroyed by crushing or being sucked-up. Also it would take years to recover the habitats and flora such as algae and sea grass to grow. Most importantly EIA report should look into to the chemical changes, which could arise in the sea due to the limestone mining. Dredging should be undertaken during non- monsoon period and only the mid days within a phase of the new and the full moon days. During these days, the tidal amplitude is the lowest in the particular moon phase. As the water movement is the least, siltation on marine biota can be minimized

The estimated armor requirement is 327,500 m³. Potential quarries are located in Mullaithivu and Anuradhapura districts. It is also estimated that about 99,000 m³ of filling materials are required for the reclaim of land for the shore facilities and this also should be acquired from neighboring districts. This could arise significant environmental and social issues during extraction and transport. Therefore Central environmental authority should closely monitor the activities.

The Proposed Rehabilitation of Port of Kankasanturai (KKS) in Jaffna District also require rock excavation (260000 m³ and quarry sites are located in Mullaithiv district. Therefore if both projects were initiated simultaneously extra pressure would be added to the environment, road network. Therefore cumulative assessment is necessary.

Kodday is already a fishing village located in the Vadamarachchi North Divisional Secretariat (DS) Division. The divisional data reveals that 42.10% of the population, receive a monthly income of below Rs. 5,000 with only 16.69% of the population receiving a monthly income above Rs. 25,000. Therefore construction of the harbor would benefit them in increased economic activities in the area. However, a cost benefit analysis is not included in the EIA report to get a clear observation on this.

Necessity for any resettlement of families does not arise. However, extent of 0.0552 ha of private land will be acquired for the proposed harbor construction. Therefore, market value of the land should be offered as compensations to the affected 13 land owners. Utilize local labour and hire local skilled person would benefit the people in the area. Dredging activities might disturb the inshore fishing activities as fish schools can be moved away due to sediment plums created. Therefore 29 fisherman who has been using this area for fishing must be assisted financially if their harvest fails. This can be addressed through the proposed grievance redress mechanism.

It was revealed that the marine biodiversity is too rich in the area and the reason was given as human activities. Therefore once harbor development is over, a management plan should be developed to improve marine water quality and bio diversity in the area

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 Environment management plan, 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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