

Date : 15th February, 2010

To,

Shri.Jairam Ramesh,

Hon Minister,

Ministry of Environment and Forests.

Government of India.

Sub: Issues with respect to CRZ in Gulf of Kutch

Kutch, India's largest district has a 400 km coastline bordering the Gulf of Kutch. Mainly the haven of traditional fisherfolk and salt farmers, the Kutch coastline is characterised by rich mangrove ecosystem, wide intertidal zone and numerous creeks and estuaries. Parts of Gulf of Kutch were declared as Marine National Park and Sanctuary in 1982. Over the last five years, Kutch has been witnessing a massive industrialisation drive. Much of this industrialisation is happening on the coast and is affecting the unique and fragile Gulf of Kutch ecology in an adverse manner. Industries coming up around Gulf of Kutch:

Category	Existing	Ongoing	Mou
Metallurgical	41	40	8
Chemical	20	19	10
Infrastructure (Ports, SEZ)	3	15	13
Cement	4	11	6
Petrochem	5	7	2
Others	193	210	27
Total	266	302	66

With just one-third of projects functioning, the Gulf of Kutch is already showing sign of irreversible deterioration. Following are cases of adverse impact on livelihoods/environment around gulf of kutch due to industries.

Akri Moti coal based power plant is located in Lakhpat Taluka of Kutch. Coal dust released by the 250 MW power plant is affecting agricultural productivity in a 6 km radius. Also, people say that their dress turns blackish if they stand in their fields for half an hour. Not just farmers, fisherfolk are complaining of drastic decline in fish catch over the years after the power plant started releasing warm water and saline water into the sea. The Akri Moti power plant is just a 250 MW power plant and affecting nearly 10 km of coast. Over 25,000 MW coal based power plants being proposed in the

Mundra coast of Kutch. Coastal communities are concerned that the marine ecology that is the basis for their livelihoods is at threat and will be wiped out in a few years because of the cumulative impact of these projects.

The villagers of Gunau in Abdasa Taluka say there used to be over 70 fishing boats in their village till 5 years ago. Today, the number of boats has reduced to just 4. The reason: Effluents released by Sanghi power plant, Desalination plant and cement factory which are located near the village. The Sanghi power plant is located right on the intertidal zone in blatant violation of CRZ regulations. The number of boats in nearby Jakhau, which used to be around 1500 10 years ago has reduced to about 250 due to decline in fish production caused by industrial pollution. The industries, mostly cement and mining industries have their captive power plants, desalination plants and private jetty in spite of port facilities at Kandla/Mundra thereby causing unnecessary damage to the environment and livelihoods of coastal communities.

In Mundra, the entire 60 km stretch of coast having 5-7 km wide intertidal zone is being used for development of Port / SEZ by Adani Group. While studies for integrated coastal management, conducted by Department of Oceanography in 2002 recommended Mandvi coast as the most suitable location for industrialisation and ports, the Adanis thought otherwise and are constructing their ports/SEZ in the ecologically significant Mundra coast. Mundra coast, with its wide intertidal zone and nearly 5000 Ha mangroves, which have reduced to 2000 Ha currently after the Adanis started construction, is home to over 10000 fisherfolk and other coastal communities. The 16,000 Ha used by the Adanis for their port/SEZ comprises mainly of intertidal area and grazing land, with as little as 10% private land. The Adanis deny the existence of fishing communities in the project area, thereby causing widespread fears of adhoc displacement in the minds of the fisherfolk. To make matters worse for the local communities, by the time the public hearing was held for the project, the company had already completed a major portion of the project, thereby rendering the environment clearance process meaningless. Till date, the project has not received final forest clearance, but construction goes on in forest and non forest land. We have already raised this issue at the Mumbai CMZ consultation on August 12th, 2009 and you had assured the public that a committee would investigate the violations along Mundra coast.

With enforcement of environment legislation lacking teeth, local communities are often pushed to a corner as in the case of OPG power plant. In spite of large scale public opposition at the public hearing for the 300 MW powerplant which will affect the second largest fishing settlement in Kutch

and while the environment clearance was still pending with the GPCB, the company tried to start construction without the mandatory environment clearance. People's repeated appeals to the Government authorities fell to deaf ears and in the end, it led to a violent clash after which 30 fishermen leaders were jailed for over 3 months. The fisherfolk also took the matter to court and the company has finally admitted its mistake and submitted an affidavit that it will not start construction without clearance. Without stringent enforcement of regulations, the local communities fear that they will be subjected to such harassment by industries wanting to implement projects by hook or by crook.

With these experiences in mind, the fishing communities along the Gulf of Kutch place the following expectations before the Hon Minister Shri.Jairam Ramesh,

- a. Further Strengthening of the Coastal Regulation Zone Notification, 1991 and its enactment in original form
- b. Strengthening of the enforcement of existing environmental legislations by monitoring, taking action on defaulters and working out proper environment management plans for the existing industries.
- c. Conducting carrying capacity studies of the major ecological hotspots such as Gulf of Kutch.
- d. Moratorium on further expansion of industries till carrying capacity studies are carried out and environmental management plans are worked out.
- e. Consultation with traditional fisherfolk and other coastal communities on a traditional fishing protection Act.

Thanking you,

Yours Truly,

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