

JNPA'S REPLY

Sub: - Suggestions and Objections for the proposed Development of Greenfield Port at Vadhvan, District Palghar, Maharashtra by SPV comprising of M/s JNPA and MMB - Public Hearing

A. Preliminary Comments

Suggestions and Objections for the proposed Development of Greenfield Port at Vadhvan, District Palghar, Maharashtra by SPV comprising of M/s JNPA and MMB - Public Hearing

S. No.	Comments	Reply from JNPA
1.	<p>The proposed port by Jawaharlal Nehru Port Trust (JNPA) and Maharashtra Maritime Board (MMB) at Vadhvan will be constructed by reclaiming within and beyond the inter-tidal area in CRZ IA, IB, III and IV categories.</p>	<p>Please refer Annexure 3 of EIA report at Pg. No. 18 & 19 wherein it is indicated that there is no development proposed under CRZ 1A.</p> <p>The proposed greenfield Vadhvan Port CRZ demarcation as per CRZ Notification 2019 conducted through MOEF&CC approved technical agency Institute of Remote Sensing (IRS), Anna University, Chennai.</p> <p>The proposed Port and Rail and Road development is proposed in CRZ IB, CRZ III, CRZ IV and outside CRZ area as per CRZ notification 2019.</p> <p>Port has not planned any development works at CRZ 1A area of Port Limit.</p>
2.	<p>We would like to point out that this proposed port is in violation of the approved Master Plan/Regional Plan of Dahanu Taluka, the Supreme Court order dated 31st October 1996 in Writ Petition No. 231 of 1994 as well as CRZ Notifications of 1991, 2011, and 2019 published by MoEF&CC.</p>	<p>DTEPA in its order dated 31st July 2023 has discussed all the relevant points and has issued NOC for development of Vadhvan port.</p> <p>Based on the directions of DTEPA, Master/ regional plan was developed by Government of Maharashtra and accordingly, the regional plan allows for the development of rail and road connectivity. As per the master plan, the port infrastructure is located in the offshore.</p> <p>Further, the revised regional plan notified by Govt. of Maharashtra permits development of a project of national importance and Vadhvan port is of national importance. This too has been amply discussed in DTEPA order mentioned above.</p>
3.	<p>The development of a port at Vadhvan, Dahanu Taluka, district Thane (now</p>	<p>The detailed order passed by DTEPA on the 31st July 2023 has considered all</p>

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	<p>Palghar} has already been discussed and rejected by order dated 19th September 1998 passed by the Dahanu Taluka Environment Protection Authority ('DTEPA'). The Order dated 31st July 2023 of the Chairman of the DTEPA has been challenged in the Bombay High Court by the Conservation Action Trust as well as other organizations.</p>	<p>relevant points and has given NOC for development of Vadhvan Port. This has the effect of reviewing and superseding the earlier order of DTEPA. This latest order of DTEPA is legal and valid as of today.</p>
4.	<p>On 17th February 1997, the State Government of Maharashtra accepted a proposal from P&O Australia for the development of a modern and all-weather port at Vadhvan. This proposal was forwarded by the MoEF to the DTEPA in November 1997 for examination. The DTEPA heard representations from the project proponents, the citizens of the area and from various environmentalists in the region and concluded that the construction of a port at Vadhvan would be 'wholly impermissible and, therefore, will be illegal' based on the grounds discussed below-</p> <p><i>The Dahanu Taluka coastline is ecologically significant because of inter alia, the presence of Marine Benthic Life, dense mangrove habitats and breeding and spawning grounds of fish and other marine life in the area.</i></p>	<p>Please refer DTEPA order dated 31st July 2023 This narrative is old more than 25 years old. Since then environment rules and notification have been amended and considering all the relevant factors and after giving hearing to all the stakeholders DTEPA issued a well-reasoned order on the 31st July 2023</p>
5.	<p>The MoEF had recognized the need to protect 'the ecologically sensitive Dahanu Taluka, and to ensure that the development activities are consistent with principles of environment protection and conservation', issued notification dated 20th June 1991(S.O. 416(E)), wherein the Dahanu Taluka</p>	<p>Please refer DTEPA order dated 31st July 2023 Development of a port is not prohibited under MoEF&CC various notifications and orders being an activity which has to take place on the waterfront. Dahanu notification does not prohibit development of a port per se and</p>

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	was declared as an ecologically fragile area and restrictions were imposed on activities as well as the setting up of industries that have a detrimental effect on the environment ('Dahanu Notification').	therefore DTEPA considering all the relevant factors and after hearing all the concerned parties has issued NOC allowing development of Vadhvan port.
6.	The Government of Maharashtra was directed to prepare a Master Plan or Regional Plan within one year of the Notification, 'based on existing land use'. No change of such land use is permitted in the green areas, orchards, tribal areas, or other environmentally sensitive areas as demarcated in this Master Plan or Regional Plan for the Taluka.	The Regional Plan of Dahanu Taluka is published on 29 th march 2023 in which the road and rail connectivity which are permitted activities for national importance project. As such the observation is not correct. The revised regional plan as notified by the state government allows projects of national importance in Dahanu taluka and Vadhvan port development has been declared as a project of national importance.
7.	The total area within the Dahanu Taluka for location of permissible industries is restricted to a maximum of 500 acres within the industrial area earmarked in the Master Plan.	The port is not an industry and permitted activity as per the clarification issued by MoEF&CC on 26 th may 2022. Port development is an infrastructure where cargo is loaded and unloaded and transferred to other modes of transport. Hence it cannot be treated as an industry. The restriction of 500 acres is applicable to industry in Dahanu taluka.
8.	As per the draft EIA Report, the proposed "port will be constructed majorly 6.5 Kms away from the sea shore and for support activities small part of space between inter-tidal zone (land between low tide and high tide) in low lying land will be reclaimed from sea for the basic infra for foreshore development and connectivity to fore shore Port and operational area. Only for rail and road linkage approx. 571 hectares land (consisting of private, tribal and	Development of Vadhvan port has been proposed on its own merits after considering the natural and geographical advantages as also growing foreseeable need of infrastructure having regards to the country's e increasing Exim Trade and GDP. Comparison with the earlier developments does not in any way diminish the importance and need of Vadhvan port development. There is no need to compare the proposal in1998 and proposal

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	<p>government land} will need to be acquired in a strip of 120 meters throughout the length of 33.4 kms. for connecting to the National Highway8 (Mumbai Delhi} and rail line at a distance of 12 kms from the port for which 60 meters strip will be required.". In addition, the area required to be reclaimed for the proposed port is mentioned as 1448 ha.</p> <p>As per the EIA report for Vadhvan Ports Pvt Ltd - P&O Ports - the land requirement for proposed port and the associated infra was approximately 284.265 ha (702 acres}.</p> <p>This means that the JNPA proposal for the new port is more than 600% larger than the P&O port that was rejected earlier by the DTEPA in 1998.</p>	<p>submitted to DTEPA vide case no. 2 of 2022 for development of Port at Dahanu Taluka in the off coast of Vadhvan to be implemented by JNPA. After considering the proposal DTEPA has granted permission for development of Port subject to further environmental clearance by MoEF&CC.</p>
9.	<p>The inter-tidal zone wherein the said port is proposed to be built falls under CRZ IA, where no new constructions are permissible. The coastline along Vadhvan, Dahanu Taluka, wherein the said port is proposed to be located falls under CRZ IA area under the CRZ Notification 2011& 2019. Therefore, as per the CRZ Notification 2011& 2019, the said port cannot be proposed at this location.</p>	<p>No development and activities have been proposed in CRZ-1A Only permissible activities as per CRZ Notifications will be undertaken. The Port development activities proposed only in CRZ 1B, CRZ-II & IV and as per CRZ notification 2011 and 2019 are permitted activities. JNPA has already carried out the classification survey as per the MOEF&CC directions and IRS has mapped the development. Development of Vadhavn port has very limited requirement of intertidal land and reclamation of intertidal land under CRZ is permissible for port development because it is waterfront based activity.</p>
10.	<p>It is further submitted that clause 3(viii} of CRZ 2011 & clause 4(vii} of CRZ</p>	<p>The shoreline changes have been studied by NCSCM, Chennai a</p>

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	<p>2019 specifically notes that 'Ports and harbour projects in high eroding stretches of the Coast' are prohibited activities within the CRZ. It is submitted that the coastline along Vadhvan, Dahanu Taluka falls under the ambit of this definition. The "Shoreline Change Atlas of India, Volume 2 Maharashtra and Goa" 2014, prepared by the Space Applications Centre (ISRO) and Coastal Erosion Directorate, Ministry of Water Resources, Government of India shows that this coastal area is eroding. As observed in the map, the High Tide Line has receded in the years 2004-06 as compared to the High Tide Line of 1989-91 (page 25). The map clearly shows that this is an eroding coastline. Therefore, as per the CRZ Notification 2011 & 2019, the proposed port cannot be constructed at this location. Attaching the relevant map given in "Shoreline Change Atlas of India, Volume 2 Maharashtra and Goa", 2014 for your ready reference.</p>	<p>Scientific Organisation constituted by MoEF&CC to map coastline of India for the shoreline changes. The Maps for high and low eroding zones were issued by NCSCM for Maharashtra in 2015. As per the directions of MOEF&CC the studies conducted by NCSCM need to be referred for identification of high and low eroding zones along the coast for all purpose of development.</p> <p>In this regard it is submitted that the purpose of the report and data collection by MoWR, GOI is not known and these report are not referred by Ports.</p> <p>The National centre of Coastal Research (NCCR), a Scientific Organisation under the Ministry of Earth Science has also examined the assessment of coastline changes in 2017 and issued report that Thane and Palghar District in Maharashtra coast line is 126.64 Kms out of which only a 1.12 Kms is highly eroding & 4. 98 kms is a moderate eroding zone and balance 90% of the coast of 126 kms of coast is having status of either low or stable. There is no high eroding zone in the vicinity of Vadhvan port location and is declared as stable coast.</p> <p style="text-align: center;">Table 10: Erosion-stable-accretion status of Maharashtra coastal districts</p> <table border="1" data-bbox="873 1430 1408 1587"> <thead> <tr> <th rowspan="2">Sl No</th> <th rowspan="2">District</th> <th rowspan="2">Coast Length (In km)</th> <th colspan="5">Coast length (in km)</th> </tr> <tr> <th>High Erosion</th> <th>Moderate Erosion</th> <th>Low Erosion</th> <th>Stable</th> <th>Low Accretion</th> <th>Moderate Accretion</th> <th>High Accretion</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sindhudurg</td> <td>137.02</td> <td>0.04</td> <td>0.20</td> <td>6.50</td> <td>82.00</td> <td>46.88</td> <td>1.02</td> <td>0.38</td> </tr> <tr> <td>2</td> <td>Ratnagiri</td> <td>258.93</td> <td>0.78</td> <td>1.08</td> <td>36.32</td> <td>203.39</td> <td>15.80</td> <td>0.82</td> <td>0.74</td> </tr> <tr> <td>3</td> <td>Raigad</td> <td>134.83</td> <td>0.58</td> <td>2.90</td> <td>42.98</td> <td>81.73</td> <td>5.16</td> <td>0.70</td> <td>0.78</td> </tr> <tr> <td>4</td> <td>Mumbai city</td> <td>41.02</td> <td>0.00</td> <td>0.00</td> <td>1.34</td> <td>38.36</td> <td>1.32</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>5</td> <td>Mumbai suburban</td> <td>41.15</td> <td>0.02</td> <td>0.22</td> <td>17.54</td> <td>18.77</td> <td>2.78</td> <td>0.58</td> <td>1.24</td> </tr> <tr> <td>6</td> <td>Palghar & Thane</td> <td>126.64</td> <td>1.12</td> <td>4.98</td> <td>61.66</td> <td>48.44</td> <td>6.28</td> <td>2.26</td> <td>1.90</td> </tr> <tr> <td colspan="2">TOTAL</td> <td>739.57</td> <td>2.54</td> <td>9.38</td> <td>166.34</td> <td>472.67</td> <td>78.22</td> <td>5.38</td> <td>5.04</td> </tr> </tbody> </table> <p>The scientific studies and remote sensing data have established that the coast line near Vadhvan has been stable and generally free from erosion and development of Vadhvan port by offshore reclamation will not have adverse impact on the coast line.</p>	Sl No	District	Coast Length (In km)	Coast length (in km)					High Erosion	Moderate Erosion	Low Erosion	Stable	Low Accretion	Moderate Accretion	High Accretion	1	Sindhudurg	137.02	0.04	0.20	6.50	82.00	46.88	1.02	0.38	2	Ratnagiri	258.93	0.78	1.08	36.32	203.39	15.80	0.82	0.74	3	Raigad	134.83	0.58	2.90	42.98	81.73	5.16	0.70	0.78	4	Mumbai city	41.02	0.00	0.00	1.34	38.36	1.32	0.00	0.00	5	Mumbai suburban	41.15	0.02	0.22	17.54	18.77	2.78	0.58	1.24	6	Palghar & Thane	126.64	1.12	4.98	61.66	48.44	6.28	2.26	1.90	TOTAL		739.57	2.54	9.38	166.34	472.67	78.22	5.38	5.04
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11.	It is pertinent to note that there is no provision for a port at Vadhvan or any other site at Dahanu Taluka in the Regional Plan prepared for the Dahanu area. In keeping with the notifications, no change may be made to the ecologically sensitive area, including areas under the Coastal Zone Management Plan (CZMP). Further, the location and area allotted for permissible industries is already limited.	The regional Plan do not have provision for Off shore development. The land use plan is only depicted in the RP. Since Port is proposed to be located in the offshore of Dahanu taluka, however there is provision for allowing any new road and rail development in RP and approval is with State and DTEPA who may permit such development as per the provisions of RP for project of National Importance
12.	Writ Petition No. 231of 1994 was filed in the Supreme Court for proper implementation of the notifications concerning Dahanu Taluka. The Supreme Court in its judgement dated 31 st October 1996, upheld the Dahanu Notification and its stipulations prohibiting any change of land-use in the region. The Supreme Court also directed that the two notifications of 1991 i.e., the CRZ Notification and the Dahanu Notification as well as the recommendations of the Report of the National Environment Engineering Research Institute ('NEERI Report' prepared under order dated 24.09.1996, examining whether the Regional Plan is in conformity with the CRZ and Dahanu notifications and offering suggestions to protect and preserve the ecology of Dahanu need to be implemented.	The RP is published on 29 th March 2023. JNPA being conscious of the judgement of the Supreme Court has taken due care to abide by the principles established by the court while proposing the port and has conducted 24 studies relating to environment, topography, demography and socio economic impact/ assessment to ensure that port development is environmentally sustainable.
13.	The DTEPA by its order dated 19 th September 1998, had dismissed the argument of the project promoters that a port is not 'industry' within the meaning of the notification. It noted that although the word 'industry' was not defined in the Dahanu Notification, 'such a vast port, will obviously fall	The JNPA is a major Port of India and working under the MoPSW, GOI and has mandate to develop new Port at Vadhvan. (The Vadhvan Port was a minor port and used for fishing activities). A large cargo handling Port was envisaged in the past and DTEPA has rejected the proposal of GoM

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	<p>within the ambit and scope of the word industry', and that, therefore, 'the construction or establishment of such a Mega Port is wholly prohibited by [the] notification'.</p>	<p>awarded project to P&O Port a Private entity. Subsequently, Gol has decided to develop off-shore Port and accorded in-principle approval for the same in 2020 As per the legal status of the Port, which are service industry and do not come under the manufacturing as such the CPCB has placed the Port in 'Non-Industry' category and are permissible activity as per EIA and CRZ notifications. The DTEPA need to examine the proposal in light of the notification and clarifications provided by MOEF&CC on 26th May 2022 in this regard. The DTEPA was requested to review its decision based on the modifications and new authority in place for the appraisal and approval process. Accordingly, the DTEPA has reviewed and issued order on 31st July 2023</p>
14.	<p>The DTEPA pointed to the large back up facilities which would be required for the operation of the port and to the fact that the cargo handled by the port will include cement, coal, petroleum products and chemicals (pages 6-7). Access to the port would also require the construction and widening of roads, railway lines, storage facilities, residential accommodation, water pipelines, garbage disposal facilities, loading and unloading areas for trucks, dhabas, tea shops, etc. that will be located on land.</p>	<p>As per the CRZ and EIA notification only permitted activities will be allowed as such DTEPA may allow only permitted activities in the area falling within Port. As far as Dahanu Taluka area is concerned JNPA has proposed only Road and rail and is a permitted activity as per RP. The port master plan clearly shows the area required for port development in which coal and cement are excluded from handling. Further, local administration will ensure that no activity prohibited in Dahanu taluka takes place and DTEPA has powers to supervise. Within short distance from proposed Vadhvan port lies Palghar taluka where all ancillary activities can be established keeping Dahanu taluka free from them.</p>

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15.	<p>Moreover, it must also be noted that the proposal to develop the said port has led to large- scale social unrest among the fishermen, farmers and Adivasis at Vadhvan village and its surrounding areas.</p> <p>Some links to some of the news articles are provided below-</p> <ul style="list-style-type: none"> • Vadhvan Port: Leo Cola co Of National Fishworkers Forum Announces Agitation Against Rs 65,545 crore Project In Maharashtra • Maharashtra: NFF, other fishing outfits to oppose Vadhvan Port construction • Villagers use festival to send 'Boycott Vadhvan' message 	<p>In the context of social unrest and related issues, it may be pointed that for the development of infrastructure projects such as a rail, road, ports etc. are necessary requirement. Care, however, has to be taken to ensure that such development is environmentally sustainable. Moreover, the local people and the industries need to be counted by proper education and familiarities with the project and the possible benefit flowing out of its development. Ultimately, it's a question of larger to be interested in developing infrastructure project of national importance as against interested in few and interested parties. the genuine grievance of the locally affected people can be considered and met by making alternate compliance of employment such as skill development training, it will be made local people employable. It may be noted that Vadhvan Port Project does not envisage displacement and transfer of human population as no habitation for the development of port will be acquired. JNPA therefore has already started offering skilled development training to the local people.</p> <p>All the news referred have been published without going into the submissions before DTEPA.</p> <p>CAT observations are based historic facts and without taking into consideration any of the fact submitted before the authority.</p> <p>The local fishermen engaged in fishing and related fishing activities will be adequately compensated as per the policy framed by the state government in March 2023. It is suspected that outsiders are instigating the local fishermen by floating rumors of</p>

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		displacement of villages etc. and vested interests aspire to maintain their dominance over the local people by misleading them
16.	Similar social unrest was caused by the proposal of P&O Australia in 1997 for the project which would deprive them of their livelihood and violate environmental regulations that were specially formulated for the area.	JNPA will consult all the stakeholders in this regard and try to reach consensus on the question on livelihood to all concerned. The State Govt has several Policy to address the local issues for Fishermen and rehabilitation and resettlement Packages etc for the affected people and would be available for the affected people.
17.	In spite of the development of the said port being contrary to the provisions of the law, and against the wishes of the people of Dahanu, the Governments of India and Maharashtra, through the Jawaharlal Nehru Port Authority and the Maharashtra Maritime Board, have undertaken to spend public money and resources on the same. This infructuous spending of public money must be brought to an end.	The Govt of India has approved the project in Feb 2020 and notified Vadhvan as Major Port of India and directions have been issued to JNPA to implement the project. At present activities pertaining to statutory clearance & project appraisal and approval are in progress. There are number of institutions established by law to ensure that there is no loss of public money and only when they ascertain all relevant facts then such development takes place.
18.	As observed in the DTEPA order mentioned above, Dahanu is the last surviving green belt on that coastal area. Based on the grounds discussed above, it is submitted that the DTEPA cannot permit the development of a port at Vadhvan, Dahanu Taluka.	The DTEPA in its order dated 31 st July 2023 has granted permission for development of Port in the off coast of Vadhvan in Dahanu Taluka.
19.	The development of the said port is in violation of the provisions of the CRZ Notification 2011 and 2019 and would fall in CRZ IA areas that are ecologically sensitive and its development would constitute a change in the approved Master	The question is repetition and clarification is already given

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	Plan/Regional Plan for Dahanu Taluka	
20.	The said port is also in contravention of the said Plan, the Supreme Court order dated 31 st October 1996 in Writ Petition No. 231 of 1994 as well as the notifications of the MoEF&CC on Coastal Regulation Zones and the Dahanu Taluka.	The question is repetition and clarification is already given
21.	We would like to point out that the JNPA, in contravention of the past Orders of the DTEPA, has gone ahead and carried out various studies and have also written to the Government Authorities for land acquisition for the road and rail lines. We would like to point out that these roads and rail lines will be constructed on forest lands, agricultural and horticultural lands, lands owned by tribals, etc. which will therefore be in violation of the Dahanu Notification and the Orders of the Supreme Court.	In this regard JNPA has already submitted affidavit on dated 13 th Feb 2023 on preliminary objection by Respondents, which is self-explanatory. Accordingly, the cognisance of the clarification submitted by JNPA has been considered and a speaking order has been issued by DTEPA on 31 st July 2023. No orders or judgement of any court has been violated by JNPA and port development will take place only after receiving all necessary clearances.
22.	In addition to the rich agricultural, horticultural and fishery activities in and around Vadhvan, there is a huge cottage industry that has been thriving in this area for more than a century- this is the dye making industry. Almost every household in Dahanu has one or more of its members engaged in this thriving and prosperous non-polluting industry that is providing sustainable and prosperous employment to the traditional villagers of this beautiful region. The location of this port would completely disrupt the livelihood of thousands of local villagers and destroy the social fabric of this region.	No land is proposed for acquisition in the villages which traditionally busy in their activities. No shifting of villages and small scale industry is envisaged. There will be demographical changes due to Port and economy of the region will boost the per capita income. The tribal who have been deprived of income from depleting fish catch and with no profit in agriproducts will have opportunity to join the service sector and lead dignified life. This is farfetched assertion as no one is being displaced due to port development.

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23.	We would also like to point out that the DPR and the EIA Reports do not reflect the existence of corals and mud flats in the vicinity - nor do they reflect the indirect impacts that the proposed port would cause on the corals and mangroves that are not directly impacted.	Please refer Annex 6 and Annex 17 for details of presence of coral and mangroves. This assertion is without any sound basis as the scientific studies have not concluded as such. Further no mangroves is to be destroyed or damaged.
24.	In addition, since the draft EIA Study covers only part of the project area, the draft EIA Report needs to be rejected on this ground alone. Please see our comments in item serial numbers 31, 35 and 70 below.	The EIA report is complete in all respects and studies as suggested under ToR of MoEF &CC have been carried out.
25.	<p>The Cover Page of the draft EIA Report mentions "Terms of Reference (ToR) obtained by MoEF&CC vide no. 10-52/2020-IA.III dated 7th October 2020 and Additional ToR obtained dated 2nd June, 2023. STUDY PERIOD: MARCH TO MAY 2021. Monitoring done by M/s Excellent Enviro Laboratory & Research Center (Air & Noise); M/s. Envirocare labs Pvt. Ltd. (Soil & Water) (NABL approved & MoEF&CC recognized firm)".</p> <p>i. It is therefore clear that no studies have been carried out for the rest of the year as is mandated by the EIA Notification.</p> <p>ii. It is also clear that no monitoring has been carried out as per the revised TOR of June 2023.</p> <p>iii. This draft EIA Report needs to be discarded since it seems to be based on the earlier port configuration, that has been discarded by the project proponent.</p> <p>iv. As per the EIA Notification, data used should not be more than three years old. Why has this not been complied with?</p>	<p>All the studies carried out as per the ToR have been Annexed to the EIA report and a list of studies carried out and duly updated have been listed at pg. no. 21 of EIA report.</p> <p>As per the ToR, EIA studies have been conducted and they are conducted in one season. Comprehensive study (in another season) has been conducted. In addition to this marine environmental studies have been conducted through the respective expert agencies of GoI as per the ToR and also Government renowned research organizations Central Water and Power Research Station (CWPRS), Pune, CSIR - National Institute of Oceanography (NIO), Indian Institute of Technology Bombay and Madras, Indian National Centre for Ocean Information Services (INCOIS), ICAR-Central Marine Fisheries Research Institute, Institute of Remote Sensing (IRS), Chennai, India Meteorological Department, Zoological Survey of India (ZSI) and National Centre for Coastal Research (NCCR) & Indian National Centre for Ocean Information Services (INCOIS)</p>

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		<p>have conducted baseline survey at study area and the same is incorporated in the Draft EIA report.</p> <p>i. Please refer pg. no. 105 of EIA report, the final layout considered for EIA assessment and which a final an offshore alignment.</p> <p>v. The EIA report is based on latest studies up to October 2023.</p>

B. Comments on the Draft EIA report

S. No	Comments	Reply from JNPA
1.	The statement made that no mangroves will be unaffected is not correct. Even if there is no direct destruction, the mangroves will be impacted because of the sedimentation, change in currents and tidal patterns because of the offshore reclamation as well as reclamation in the inter tidal areas.	Detailed study in regard to sedimentation change in current/ flow conditions has been carried out by CWPRS as part of the proposed development and as per the ToR received from MoEF. Based on the studies, it was concluded that there is no impact of sedimentation and flow conditions due to the offshore reclamation as well as reclamation in the inter tidal areas. Refer Annex 4
2.	Similarly, the statement made that there will be no seacoast erosion is also questionable, because reclamation at any part of the coast creates erosion and accretion in another part of the coast.	Study was conducted as compliance of ToR for Impact of Breakwaters and Transport Carrier on the Erosion/ Accretion for the Vadhvan Port' by National Centre for Coastal research (NCCR) and Indian National Centre for Ocean Information Services (INCOIS) under Ministry of Earth Sciences (September 2023) and it was concluded that there is no effect on the coastal stability
3.	The statement that there is no land acquisition for the port is also incorrect. The port cannot operate without the road and rail connections, and the land that is proposed to be acquired for the port amounts to 571 hectares, comprising of forest lands and tribal lands. As per the Dahanu notification, forest lands cannot be diverted for non-forestry purposes.	Please refer the EIA report in which the land requirement for road and rail connectivity is envisaged and will be acquired as per the Land Acquisition Act (LARR) 2013. As per the regional plan of Dahanu taluka, the development of road and rail for project of national importance is a permitted activity. DTEPA has already approved the port development and issued order on 31 st July 2023.
4.	On page 23 of the draft EIA Report, it is stated that - <i>"However, port development and operational activities may create a wide range of impact on the environment through activities like dredging, reclamation, construction work, development of utilities and services, discharges from ships and</i>	It is a statement.

S. No	Comments	Reply from JNPA
	<p><i>waterfront industries, cargo operations and other port related activities. The potential adverse effects of port development encompass water pollution, contamination of bottom sediments, damage to marine ecology and fisheries, beach erosion/ accretion, current pattern changes, waste disposal, oil leakage and spillage, emission of hazardous gases, air pollution, noise pollution, flood light effect and other socio-cultural impact."</i></p>	
5.	<p>This is perhaps the most factually correct statement in the draft EIA Report. It is further mentioned on page 24 of the draft EIA Report that - <i>"The preparation of EIA report and implementation of EMP are essential to effectively address this adverse effect."</i> We would like to state that this would only be possible if - (i) The EIA report is prepared based on accurate and up to date data. (ii) All the relevant information is included in the EIA Report e.g. existence of corals (iii) The draft EIA Report is prepared as per the TOR (iv) The impact of all the components of the proposed project is assessed in totality (v) The EMP report is prepared based on the evaluation of all the likely impacts (vi) The EMP report mentions in detail each individual impact, the timeframe for implementing the mitigation measures, the cost of doing so, and the agency that will be responsible for ensuring that these are implemented.</p>	<p>The EIA has taken into consideration all the aspects as stated in the query and also complied with all the Terms and conditions of the ToR for Environmental Clearance.</p>
6.	<p>On page 24 of the draft EIA Report, whilst 4 major impacts are mentioned, other major impacts such as change of land use, socio-economic impact,</p>	<p>The EIA report covers the impact of change in Land use and socio impact at para 4.4.6 Pg, No. 176 of EIA report. As regards to the impact of informal and</p>

S. No	Comments	Reply from JNPA
	<p>impact of informal and unplanned activities are unfortunately not mentioned.</p>	<p>unplanned activities are concerned the same have been covered in Socio impact assessment in Annexure 14 of the submission to public hearing.</p>
7.	<p>One of the most important issues is that of site selection.</p> <p>(i) It is apparent that the original proposal for the port involved reclamation of land along the shore only within the inter-tidal zone. There was no reclamation proposed out in the sea.</p> <p>(ii) Vadhvan was identified as the most suitable location in view of the fact that it was the only location that had a draft of 18 to 20 metres available that would enable large ships to dock here.</p> <p>(iii) JNPA on its own has unilaterally decided to change the configuration of the proposed port so that the port will now be located 6.5 kilometres off shore from Vadhvan.</p> <p>By proposing to build an offshore port, the locational advantage offered by Vadhvan is no longer a deciding factor. In fact, an examination of the Admiralty Charts of the west coast of India reveals that there are many locations where a draft of 18-20 metres is available even closer that 6.5 km to the shore, including at locations north of Vadhvan. (please see page 28 of draft EIA Report}</p> <p>The additional TOR also required the project proponent to look at the siting of the proposed port. This has clearly not been done.</p>	<p>Please refer to chapter 3 of EIA report on the selection of port site.</p> <p>The location advantage with respect to the Connectivity, Rocky terrain and Mangroves, dredging requirement, reclamation possibility, shoreline stability and least population have been examined in the EIA report and as per the evaluation matrix the most suitable site was considered for the proposed port development.</p> <p>The change in the original proposal of the port from nearshore to offshore has been covered in detail in section 2.15 of EIA report and Fig. 10. The port master plan layout was developed taking into consideration the following:</p> <ul style="list-style-type: none"> - The capital investment required for the project needed to be reduced. - The high operating costs associated with the long access trestles connecting the offshore berths to the onshore back-up storage facilities meant that the project was not attractive to potential terminal operators interested in investing in the project. - Operation efficiency <p>There was a requirement to review the port master plan with a view to reducing both the capital and operating costs (CAPEX & OPEX) and improving the operability of the container terminals.</p> <p>The main factors influencing the high CAPEX are the breakwater, reclamation and shore protection bunds. The long access trestles are the main factor influencing the OPEX and also the operational efficiency of the port.</p> <p>Based on the above factors, further assessment of port layout has been</p>

S. No	Comments	Reply from JNPA
		<p>carried out in order to enhance the operational efficiency and optimizing the CAPEX and OPEX cost.</p> <p>However, the location advantage as stated above are not available in the southern side of the Maharashtra state as they do not qualify for other factors such as connectivity, stable coast, and hinterland.</p> <p>Accordingly, the EIA report at Section 3 deals with all the factors as per the ToR requirement.</p>
8.	<p>It is extremely important that the project proponent explain why there were no consultations with the "Public-Citizens and media - Special interest groups such as the NGO's, environmental agencies, labour unions form the public participation group who have a role in identifying specific environmental concerns" as is mentioned on page 24 of the draft EIA Report.</p>	<p>Consultation with various stakeholders is part of the public hearing which was held in 19th Jan 2024 where in all the aspects of the project development was discussed and the concerns and feedback of various parties were received by DC, Palghar and MPCB which will meet the requirement of EC process as mandated under EIA notification 2006.</p>
9.	<p>On page 27 of the draft EIA Report, and in Chapter 1, the parameters for selection of ports are mentioned. It is clear that the environmental, ecological and legal aspects have not been considered at all at the time of site selection.</p>	<p>After consideration of all the proposal of project proponent, the EAC had approved the ToR covering all the aspects of environmental, ecological and legal issues has been considered and additional ToR along with the standard ToR for port setting was issued on 7th Oct 2020.</p>
10.	<p>Also, the proposal to set up a major port at Great Nicobar Island and the expansion, with Indian participation, of the Colombo Port has not been mentioned. Since the Vizhinjam port has also been commissioned, there will be a significant change in marine cargo traffic that will have to be factored in. This has obviously not been done.</p>	<p>The traffic assessment for Vadhvan port has been carried out as indicated in section 2.6 of EIA report. Vadhvan port is proposed to cater the gateway traffic serving the hinterland, whereas Colombo and Vizhinjam ports in particular are developed to cater the transshipment traffic which has no bearing on Vadhvan port traffic.</p>
11.	<p>It is also surprising that the Deendayal Port that is also on the west coast of Gujarat is not even mentioned even though it is going through a significant expansion in capacity.</p>	<p>The traffic assessment for Vadhvan port has been carried out taking into account the expansion of the existing ports as well as the potential for any new port along the west coast and</p>

S. No	Comments	Reply from JNPA
		accordingly, the traffic potential has been arrived as indicated in Appendix 3 of DPR report enclosed as Annex1 to EIA report.
12.	Significantly, the traffic cargo projections ignore the fact that due to the wonderful initiative of our government to invest in Renewable Energy projects, the imports of fossil fuels will reduce dramatically. It is estimated that there would be a reduction of up to 50% of marine cargo shipping by the year 2050. This implies that ports that are currently handling non container traffic will switch over to handling containers.	Yes. The implication is correct. The subject development is a port construction for container handling and there is a need for container handling ports to meet the EXIM trade for global trade.
13.	What is also shocking is that the impact of Climate Change, Sea level rise, increase in intensity and frequency.	The port takes into account the impact of climate change, sea level rise in the design of all the marine/ waterfront structures.
14.	<p>On page 29 of the draft EIA Report, it is mentioned that</p> <p><i>"JNPA has been assigned the responsibility to develop Vadhvan port as a major port on landlord port development model. Port site has natural and strategic advantages to become a mega port and has prospect of achieving throughput of 300 million Tonnes."</i></p> <p>JNPA, along with MMB, have set up a SPV to implement this project. It is apparent that since MMB is a partner, the project will have to be set up within Maharashtra. It is also not clear why this application is being made only by JNPA and not by the SPV.</p>	<p>As per the approval of the union government on 5th Feb. 2020, the Vadhvan port to be developed under Landlord model by an SPV incorporated under Companies Act, 2013 with JNPA as lead partner.</p> <p>JNPA being the major stakeholder, the application has been filed by JNPA. And as per the Companies Act, any majority stakeholder can file for the application.</p>
15.	On page 30 of the draft EIA, it is mentioned that the water required for the port will be sourced from the Surya Dam. We would like to point out that the Surya Dam was built primarily for supplying water to the Adivasis for cultivation. This water cannot be	The water source has been identified based on the availability and it has been confirmed by MJP who the implementing agency for the water supply to the port. The independent assessment has been made by MJP for allocation of water demand to Vadhvan Port.

S. No	Comments	Reply from JNPA
	diverted for port activities. The impact of diverting water from the Surya Dam for the port should also form part of the CIAS.	
16.	On page 30 of the draft EIA, it is mentioned that the power will be obtained by constructing a power line from the Boisar power plant. Unfortunately, the impact of this transmission line has not been dealt with in the draft EIA. This should also be included in the CIAS.	<p>The power source for Vadhvan port is from the existing 220 KV Tarapur Borivalli transmission line and the tapping will be near to the alignment of road at sawali village and would be aligned along the proposed road RoW. The land use plan for the road is already covered in the EIA report under Chapter 4.</p> <p>There is no impact of transmission of power from the identified source to the port.</p>
17.	On page 30 of the draft EIA, it is mentioned that four liquid cargo terminals and a tank farm will be built at the proposed port, even though this has been rejected by the MoEFCC. This is a clearcut indication that the project proponent is confident that all the clearance conditions can be modified to suit its requirements. In Chapter 1, on page 68, and page 96, the project proponents have even indicated the quantum of oil, chemicals and liquid cargo that they will be handling from 2030 onwards.	The proposed liquid cargo to be handled at Vadhvan port are oil, chemical which are the non-hazardous cargo proposed to be handled at Vadhvan port and no hazardous cargo has been proposed to be handled.
18.	The environmental impact of the pipeline that will be used to transport liquid cargo has not been assessed.	Please refer standard ToR for assessment of EIA for Ports and harbors covering all aspects of Port cargo e.g. bulk cargo, liquid cargo and bulk break cargo as such the comprehensive port development is envisaged under the present proposal. The handling of liquid cargo is subject to further approval of statutory authority.
19.	The environmental and safety aspects of the proposed Coast Guard facilities have not been assessed. The Coast Guard vessels will obviously be carrying	As per the security and safety requirement, the allocation for Coastguard vessels is required to be provided as per the policy guidelines

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	firearms and munitions.	issued by Ministry of Shipping. As such, the facility for coastguard has been provided in order to combat oil spill and other security considerations. The ICG will have their own SOP for all contingencies.
20.	The Disaster Management Plan does not take into account the storage and transportation of flammable oils and chemicals, nor the munitions and explosive substances that will be present in the Coast Guard vessels.	The disaster management plan covers all exigencies and natural calamities for handling liquid cargo.
21.	On page 31 of the draft EIA, it is mentioned that the Vadhvan location is the most suitable location in view of the availability of a 20-metre draft. However, it is obvious that locations north of Vadhvan that have similar or greater drafts that are even closer to the coastline have not been considered.	Refer response to query 6.
22.	<p>However, surprisingly, on page 98 of the draft EIA Report, it is mentioned as follows –</p> <p>It is not clear that if a draft of 20 metres is available at Vadhvan, why dredging is required at all. See also page 99 for details of dredging without tidal advantage.</p>	It is not possible to locate the entire port facilities at 20 m depth. Please be noted that to cater the port requirement the channel starts from 20 m depth entering the port. The berth pockets are being dredged in order to facilitate draft of 20 m as the contour at some places is less than 20 m.
23.	<p>On page 31 of the draft EIA, it is mentioned that land will be reclaimed from the inter-tidal zone.</p> <p>i) Since the reclamation of mud flats is not permissible as per the CRZ Notification, it is not clear how JNPA has decided to reclaim this area.</p> <p>ii) The impact of the proposed reclamation - both direct and indirect - on the mangroves and corals has also not been studied.</p> <p>iii) It is not clear why the project proponent has not applied to MCZMA for CRZ clearance.</p>	<p>i) As per the reclamation plan, there are no mud flats in the proposed reclamation area and as per the CRZ classification mapping by IRS has indicated that CRZ 1A, no activities have been proposed in CRZ 1A.</p> <p>ii) The proposed reclamation will not affect the mangroves as the flow of tides and current are not restricted by the proposed reclamation. The studies</p>

S. No	Comments	Reply from JNPA
	<p>iv) It is also not clear how the EMP will be enforced in a situation wherein all the legal safeguards put into place by the MoEFCC and the Supreme Court are being blatantly violated.</p>	<p>carried out as per the direction of DTEPA through NIO for studies on the impact of Biodiversity, there is only presence of pseudocoral and which is found in Shankhodhar area and no development is proposed in this area.</p> <p>iii) As part of the EC process, the project proponent has applied for MCZMA for CRZ clearance.</p> <p>iv) All the studies and impact due to the proposed development has been assessed based on the ToR issued by MoEF&CC and accordingly the mitigation measures have been proposed for various/ any impacts to protect the ecological surroundings in the region.</p>
24.	<p>On page 33 of the draft EIA, there is a reference to tribal and their subsistence level economy. One of the major reasons for this is the lack of water for irrigation from the Surya dam. This is because the canal network has still not been completed. And water is being diverted for the thermal power plant at Dahanu, for urbanisation in Mira Bhayandar and now for the proposed port.</p>	<p>The allocation of water to the proposed Vadhvan port is based on the assessment and availability to cater the port requirement including the local requirement and as per Govt norms by MJP.</p> <p>Also, refer to response to query 14.</p>
25.	<p>On page 33 of the draft EIA, the sequence of events regarding the administrative decisions taken to set up the proposed port has been mentioned. Given the fact that the Union Cabinet has already taken a decision to set up this project at Vadhvan, and that this decision has been endorsed by the MoEF, could you please clarify what is the purpose to be served by this Public Hearing?</p>	<p>As part of EC process, public hearing is the requirement of MoEF&CC.</p>
26.	<p>On page 33 of the draft EIA, it has been mentioned that as per the revised CWPRS layout, the location was changed from onshore to offshore port. It is not clear.</p>	<p>Refer the response to Query 7.</p> <p>Among the various alternative layouts developed for the port, one alternative layout was taken forward for further</p>

S. No	Comments	Reply from JNPA
	<p>(i) How the CWPRS decided to change the location of the port.</p> <p>(ii) Why it was done at this stage.</p> <p>(iii) Why this option was not considered earlier.</p> <p>(iv) Why only this location was selected.</p>	<p>assessment and suitability based on the mathematical model studies by CWPRS. Any changes in the layout or the proposed scheme is part of the Detailed assessment which has been taken up in view of the operational efficiency as described in section 3.2 of EIA report. This option has been evolved taking into consideration the local conditions and maintain the ecological balance in the nearby area.</p> <p>The location and option have been selected based on the justification provided in section 3.2 of the EIA report.</p>
27.	<p>On page 33 of the draft EIA, it has been mentioned that the quantity of dredged material required has been changed from 88.68 MCUM to 200 MCUM.</p> <p>i) It is not clear how this increase has been computed.</p> <p>ii) It is not clear how this site for dredging has been identified</p> <p>iii) It is not clear what the impact of the dredging would be on fisheries and biodiversity</p>	<p>i) It is clarified that the quantity of reclamation 88.68 million cum is based on the bathymetry levels at the location proposed in the past to be sourced from the land. However, due to environmental and economical consideration, the location of reclamation shifted from nearshore to offshore for storage of container and other loading and unloading facilities. Accordingly, the seabed level is deeper than the nearshore as such there is increase in quantity to the extent of 200 million cum which is proposed to be sourced from off coast of Daman to reduce the impact on the land area.</p> <p>ii) The location for dredging for sourcing of sea sand has been explored after conducting geophysical surveys and availability of sea sand.</p> <p>iii) The impact on fisheries and biodiversity study for the borrow pit in the Arabian sea with reference to Vadhvan port has been studied by ZSI and is part of the EIA report as Annexure 11.</p>

S. No	Comments	Reply from JNPA
28.	<p>On page 34 of the draft EIA, it has been mentioned that the DTEPA has granted environmental clearance to the proposed project on 31st July 2023 based on the draft EIA submitted to them. However, since the studies that were required to be carried out as per the revised TOR issued on 2nd June 2023 had not been submitted to DTEPA as on 31st July 2023, can you please explain how this clearance could have been granted on the earlier draft EIA report, since it required to be updated as per the revised TOR?</p>	<p>Please refer order dated 31st July 2023 in the case No. 2/2022 of DTEPA and the contents of the order at S. No. 21. It may also be noted that the clarification with respect to additional ToR and studies required to be carried out for sourcing of sea sand from Daman were submitted to DTEPA on 28 June 2023 and is documented as Document No. 8 in the said DTEPA order dated 31st July 2023. Based on the submission, the Hon'ble DTEPA has granted permission to establish and develop Vadhvan port in Dahanu taluka subject to the terms and conditions imposed by MoEF&CC and its authorities including EIA as well as carrying out the recommendations made by the expert group and expert agencies in the respective reports.</p>
29.	<p>On page 34 of the draft EIA, it has been mentioned that</p> <p><i>"It may be noted that the road/rail ESIA will be merged to the Port EIA to represent the overall Port infrastructure EIA (i.e., Port EIA + Road rail connectivity ESIA = overall Port infrastructure EIA). This overall EIA will be submitted to the Maharashtra State Pollution as the draft EIA to carry out public hearing. Later, a Draft EIA will be updated with all inputs including those from the public hearing to prepare a Final Draft EIA for Vadhvan Port. The Final Draft EIA will be used for obtaining other State and Central clearances."</i></p> <p><i>"Since this is part of Port project and the road and rail being very private in nature (This is not an NH, SH, MDR or even for that matter a rural road /Rail which connects villages) for the port project, the MOEF/ASCI manual on highways does not apply to this project."</i></p> <p><i>We have the following comments on the above —</i></p>	<p>i) Please refer Pg. No. 35 of EIA. The proposed road connectivity is not an NH, SH, MDR or even for that matter a rural road /Rail which connects villages) for the</p>

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	<p>(i) It is not clear what is meant by "the road and rail being very private in nature". Please clarify.</p> <p>(ii) Is this road and rail being built on land that will be acquired from the Public, the Tribals, and the Forest Department?</p> <p>(iii) Since the road/rail connectors are an integral part of the port project (since the port cannot function without road and rail connectivity), their environmental impact also needs to be assessed. Just doing the ESIA is not adequate.</p> <p>(iv) Where is the rail yard proposed to be located? No details are provided at page 102.</p> <p>(v) There will also need to be a bridge or tunnel required to connect the proposed port to the mainland. The impact of this bridge or tunnel on the corals, mangroves and mudflats would also need to be assessed.</p> <p>(vi) It seems that the design of this bridge will be done so as to not have any adverse impact on the port facilities (page 102 of the draft EIA).</p> <p>(vii) It is necessary that all other clearances, including CRZ clearances, be obtained and those documents required for CRZ clearance be included in the draft EIA Report that is shared with the Public for the Public Hearing, particularly since the MoEF issues a combined CRZ and EIA clearance.</p>	<p>port project, the MOEF/ASCI manual on highways does not apply to this project.</p> <p>ii) Yes.</p> <p>iii) This is a Comprehensive project. Please refer clarification to query 30.</p> <p>iv) Please refer pg. No. 105, S. No 2.21.5 at Pg. No 130 -135, S. No 2.22 Pg. No. 139 of EIA report.</p> <p>v) The development proposed for rail and road connectivity is in CRZ Zone 1B and IV and all such activities are permitted.</p> <p>vi) Yes</p> <p>vii) Yes. This will be part of EC clearance and will be available for general public.</p>
30.	<p>On page 34 of the draft EIA, it is mentioned that "<i>The scope of EIA study includes: Assessment of Baseline Environmental Conditions for terrestrial environment within the study area based on field studies and review of literature</i>"</p> <p>(i) It is not clear why only the terrestrial environment is being studied.</p> <p>(ii) The impact of the proposed port</p>	<p>As per the EIA notification 2006, the comprehensive environmental clearance has been sought from MoEF&CC and accordingly, Form 1 indicating all the features of the port viz port development, dredging and disposal, reclamation, road, rail connectivity etc.</p> <p>In the year 2015, MoEF had issued EIA guidance manual to help the project proponent and consultant for the</p>

S. No	Comments	Reply from JNPA
	<p>on the marine environment is also critical.</p> <p>(iii) The studies should cover a 10 km radius along the periphery of the</p> <p>(a) Area proposed to be reclaimed in the sea</p> <p>(b) The area proposed to be reclaimed in the inter-tidal zone (c) The area around the sea bed that is proposed to be dredged (d) The area around the proposed road and</p>	<p>preparation of EIA report. The EIA guidance manual accordingly addresses the sector specific environmental concerns of the specific sectors like ports and harbour. The port and harbour sector specific manual under various chapters has mandated a generic to be followed in compliance with EIA notification. The standard ToR for port and harbour have been indicated in Annexure 1 which is the generic structure for the compliance of ToR. This document is available on MoEF website.</p> <p>The JNPA proposal for subject environmental clearance was appraised by EAC (Infra 1) in its 241st meeting held on 26th Aug. 2020 and issued additional ToR apart from the standard ToR with the specific conditions to be complied. In view of the above, the suggestion of CAT have already been covered in the ToR suggested by EAC committee of MoEF&CC.</p>
31.	<p>On page 35 of the draft EIA, it is mentioned that <i>"In addition to the 10 km radius general study area, a 15 km radius study area that had been scanned and used during the Form 1 & ToR stage for mapping ecologically or environmentally sensitive areas and features in the vicinity of the project"</i>.</p> <p>We would submit that the 15 km radius general study area should be demarcated around the periphery of the</p> <p>(a) Area proposed to be reclaimed in the sea</p> <p>(b) The area proposed to be reclaimed in the inter-tidal zone</p> <p>(c) The area around the seabed that is proposed to be dredged</p> <p>(d) The area around the proposed road and rail corridors</p> <p>(e) The area around the proposed</p>	Refer response in S. No. 30

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	township	
32.	<p>On page 37 of the draft EIA, it is mentioned that "The baseline terrestrial environmental surveys were carried out for one month, i.e. during March - May, 2021 for the road and rail connectivity alone. Site specific hourly meteorological data was generated during the study period. Ambient air quality monitoring at the identified monitoring locations in the study area was carried out during the study period with twice a week frequency. Hourly noise levels were recorded once identified monitoring locations during the study period."</p> <p>(a) We submit that a comprehensive EIA is required, and that a one-month survey is inadequate and not in compliance with the provisions of the EIA notification.</p> <p>(b) Secondly, please explain how the hourly site-specific meteorological data was generated during the study period.</p> <p>(c) Please also explain how hourly noise levels were recorded, and why this was done only twice a week.</p>	<p>a. As per the ToR, EIA studies have been conducted and they are conducted in one season. Comprehensive study (in another season) has been conducted. In addition to this marine environmental studies have been conducted through the respective expert agencies of GoI as per the ToR and also Government renowned research organizations Central Water and Power Research Station (CWPRS), Pune, CSIR - National Institute of Oceanography (NIO), Indian Institute of Technology Bombay and Madras, Indian National Centre for Ocean Information Services (INCOIS), ICAR-Central Marine Fisheries Research Institute, Institute of Remote Sensing (IRS), Chennai, India Meteorological Department, Zoological Survey of India (ZSI) and National Centre for Coastal Research (NCCR) & Indian National Centre for Ocean Information Services (INCOIS) have conducted baseline survey at study area and the same is incorporated in the Draft EIA report.</p> <p>b. As above.</p> <p>c. As above.</p>
33.	<p>The Cumulative Impact Assessment Study (CIAS) that has been carried out is not adequate. The CIAS should include, inter alia, the existing and proposed activities in the region including the backup facilities for the operation of the port. As access to the port would require the construction and widening of roads, railway lines, storage facilities, residential accommodation, water pipelines, garbage disposal facilities, loading and unloading areas for trucks, truck washing areas, dhabas, tea shops, godowns, warehouses,</p>	Refer response No. 36

S. No	Comments	Reply from JNPA
	<p>customs, custom clearance agents, cargo agents, shipping offices, police stations, hospitals, etc. that will be located in the area. The CIAS also needs to include the pollution and environmental impacts caused by the existing thermal and nuclear power plants, as well as the existing roads and railway networks, the proposed bullet train, quadrupling of railway lines, the DFCL project, the Vadodara Mumbai Bangalore Expressway, gas pipelines, transmission towers, water pipelines, etc. that are dissecting the Dahanu Taluka.</p>	
34.	<p>This can be observed from the existing facilities of JNPA at Nhava Sheva. The JNPA and CIDCO are still constructing new road infrastructure, widening the existing roads, constructing new flyovers, and new access roads even after so many years of the port being operational. This is accompanied by rampant quarrying, destruction of hills, air and noise pollution, destruction of wetlands and water bodies, etc. A similar situation will arise in Dahanu taluka if the proposed port is allowed to be constructed.</p>	<p>The development at JNPA are based on the requirement to commensurate with the traffic in order to reduce the congestion and environmental hazard. It may be noted that the ports need to upgrade the infrastructure for evacuation of cargo in order to reduce the dwell time and also take care of the demographical changes due to the development in the region. Accordingly, JNPA has taken initiatives to construct well developed road and rail infra to facilitate the general public without payment of any toll or cess.</p>
35.	<p>JNPA has still not provided the 500 metre green belt around the periphery of their land, as was required as per their environmental clearance.</p>	<p>JNPA has adequate green cover and also developed the green cover within the port area. JNPA meets all the requirements and environmental law and monitors all the activities. JNPA has developed greenery within the port by rejuvenating the ponds and hill side.</p>
36.	<p>Hence, it is necessary to carryout the cumulative impact assessment of all these facilities on the ecologically sensitive area of the Dahanu Taluka. We had provided an example of how such a study should be carried out to both the</p>	<p>For the development of Vadhvan Port Project, extensive environment studies have been carried out by reputed expert agencies such as, CWPRS, NIO, CMFRI, IIT MADRAS, IIT MUMBAI, IRS CHENNAI, NCSCM. This has been done</p>

S. No	Comments	Reply from JNPA
	<p>MoEF and to the DTEPA. PP may kindly be asked to explain why this methodology was not accepted. https://apps.ecology.wa.gov/publications/SummaryPages/1706013.html</p> <p>a) A carrying capacity study of the region, including Dahanu Taluka, should be carried out by the project proponent.</p> <p>b) Status of mangroves, corals, sea-grasses, mudflats, creeks, sand dunes, and other ecologically sensitive features of coastal areas should be studied using the satellite imageries from 1984 till date</p> <p>c) change detection map should be provided, using satellite data of 1991 and the latest available satellite imagery.</p> <p>d) The impact of the noise, light, and vibration in the environment, marine biodiversity, and wildlife should be studied. The proposed mitigation measures should also be submitted.</p> <p>e) Studies pertaining to the heavy metals in the creek, soil, flora, and fauna of the region should be undertaken. The impact of the proposed project on the same should be provided.</p> <p>f) Details pertaining to the movement of the barges and vehicular movement and the impact of the same on the areas it would pass through should be thoroughly analysed by a reputed institute. This would include a comprehensive traffic and transportation study.</p> <p>g) The impact of the proposed project on the fish biodiversity and the livelihoods of the coastal communities should be studied.</p> <p>h) The status of water pollution in the Dahanu and the impact of the proposed activities on the biodiversity, wildlife corridors, human health, and livelihoods should be provided, especially on the tribals and fisher folk.</p>	<p>as a part of compliance of ToR issued by MOEF & CC. All these studies have concluded that development of Vadhvan Port Project will not cause environment damage and will be ecological permissible. This conclusion is based on numerous field data collected as a part of studies. It has been established by the studies that offshore development of Vadhvan Port will not cause any adverse impact of environment in respect of the coastline as well as surrounding areas and villages. In fact, development of exclusive rail and road linkage to the proposed Vadhvan port are the only infrastructure which will be falling on the existing land in Dahanu Taluka. These linkages are infrastructure project and in no way can be categorized as an industry. Further, only 10 villages in Dahanu Taluka are affected by rail and road connectivity. The rest of the development of rail and road will take place in 11 villages in Palghar Taluka/district. There is no other infrastructure development excepting in railroad linkage which is established in Dahanu Taluka. Therefore, the impact of rail and road development in Dahanu Taluka will be minimal. Other supporting infrastructure like rental accommodation, truck parking, repair of vehicles etc., will all be located in Palghar Taluka. Care has been taken to limited use of land in Dahanu Taluka considering the Dahanu notification of June 1991.</p> <p>a) The carriage capacity study has been carried out by JNPA through IIT Mumbai. The conclusion of the study in section 5 clearly establishes about the adequate carrying capacity of road infrastructure development by JNPA through dedicated rail and road as also existing the State and District Roads in the Area.</p> <p>b) NCSCM, an Expert Agency has</p>

S. No	Comments	Reply from JNPA
	<p>i) Detailed existing and proposed land use maps should be provided by the project proponent for all the activities existing and proposed on 1:4000 scale</p> <p>j) Toposheet and the Georeferenced maps should be submitted by the project proponent demarcating the proposed project and ancillary activities.</p> <p>k) The impact of the proposed activities on the Scheduled/ protected species as per the Wildlife (Protection) Act, 1972 and IUCN red list.</p> <p>l) Detailed studies of the endemic species in the area and the impact of the proposed project on the endemic species.</p> <p>m) A detailed Disaster Management Plan should be provided based on Maximum Credible Accident scenarios.</p> <p>n) Evaluation of Tarapur Nuclear Power Plant in light of terrorist attack or other unfortunate eventualities.</p> <p>o) Safety Risk Assessment of existing power plant facilities.</p> <p>p) The project proponent should provide the details of housing, toilets, cooking facilities, and other facilities that will be provided to the workers and staff during the construction phase and after the commencement of the project. The impact of these activities on the land-use patterns and environment should be studied.</p> <p>q) The modelling study must also have detailed plan for traffic dispersal.</p> <p>r) Details pertaining to the source of water for the proposed project should be provided.</p> <p>s) Details pertaining to the truck repair and parking facilities, loading, and unloading facilities for the cargo and restrooms along with a detailed layout should be provided.</p>	<p>conducted comprehensive study using satellite imageries of last 40 years. This study covers all the coastal features including mangroves and shoreline changes. It may be added that the proposed Vadhvan Port layout has been made in such a manner that no mangroves will be impacted and as a result of mangroves existing at Vadhvan will be fully preserved.</p> <p>c) We would request to refer to NCSCM report wherein the satellite data imageries have been provided.</p> <p>d) The impact on the marine diversity has been carried out by NIO and CMFRI as per the additional ToR suggested by EAC, MoEF&CC. The effect of noise, light and vibrations in the environment has been addressed in detail along with the mitigation measures in EIA report as well as report prepared by NCSCM. (Refer to section 5.7 of EIA report, and section 6 and 11 of NCSCM report)</p> <p>e) Kindly refer to EIA study which outlines the possible impacts due to development of Vadhvan Port and mitigation measures required to be taken during construction and operational phases as a part of Environment Management Plan/ (EMP). Please refer to para 4.1.1. and table 138 of the EIA report.</p> <p>f) As pointed out in Sr No. 2 above, IIT Mumbai at the request of JNPA has conducted a comprehensive study in respect of Vehicular movement and the regular movement and the measures which required to be taken in relation to increase in traffic in future in the light of the port's volume of cargo. In so far as barges movement is concerned, this will be only during construction phases and its possible impact on water quality will be attended to as per the EMP.</p> <p>g) The impacts assessment on the</p>

S. No	Comments	Reply from JNPA
		<p>fish biodiversity was carried out by CMFRI and details have been furnished in Report on “Marine Biodiversity management plan for the proposed Greenfield port at Vadhvan” prepared by NIO.</p> <p>h) CMFRI has also carried out the impact on the livelihoods of the coastal community. The impacts and recommendations have been covered in the report (Refer Section 4 of the report). A copy of the Smart Port Policy is enclosed.</p> <p>i) The land use map of the proposed port development is provided in the section 4.4.4 of the EIA report and the land use plan is part of Annexure 1.</p> <p>j) The port is located in offshore, however all the survey data and bathymetry charts are available, and proposal mapped in GIS by IRS, Chennai with georeferencing are available with Port and can be seen at JNPA Administrative Office. The Topo sheets are a classified document is not copied.</p> <p>k) According to IUCN red list data of threaten species 4 species was recorded as Near Threaten sp. viz. Curlew Sandpiper (<i>Calidris ferruginea</i>), Eurasian Curlew (<i>Numenius arquata</i>), Black tailed godwit (<i>Limosa limosa</i>), Oriental ibis (<i>Threskiornis melanocephalus</i>). But these 4 species was observed at Chinchani beach which is 5 km away from the project site. Proposed project will not have any significant effect on the presence and migratory status of those Near Threaten species as well as for abundance of other birds which is present in the surrounding area. The details have been covered in “Avian Diversity” of the EIA report.</p> <p>l) Endemic species refer to those species that are found in just one region and nowhere else in the world. MoEF has</p>

S. No	Comments	Reply from JNPA
		<p>provided the list of endemic species that need to be taken care. As per the study carried out by NIO for the project, no Endemic species were encountered at the project site. (Refer section 4.3.8 of the NIO report for “Marine Biodiversity management plan for the proposed Greenfield port at Vadhvan”</p> <p>m) A detailed Disaster management plan has been covered in the EIA report. The details of Risk Assessment and Disaster Management Plan is mentioned in Chapter 8 of EIA report</p> <p>n) Being a nuclear power plant, the TAPS is under highly protected security and the eventualities of terrorist attack will always be there in the scenario of with and without the port. The details may be obtained from TAPS as it is classified document.</p> <p>o) The JNPA and TAPS had discussion on the location of Port and as per the advice of TAPS additional studies for the likely effect of Port on the existing infrastructure of the TAPS have been carried out. As per approved mitigation measures suggested by TAPS, JNPA has assured to complete the same along with development of Port. Both entities are governed by Union Govt all SoP for safety will be followed.</p> <p>p) During the construction phase labor camp will be established for the construction staff. The temporary accommodation with all amenities for disposal and processing of solid and liquid waste will be provided and no impact is envisaged. The temporary accommodation will be provided as far as possible on Govt owned Land. Its impact and the possible mitigation measure due to this facility is provided in the EIA report (Refer section 5.2). A separate site for the development of the township for the port staff has been</p>

S. No	Comments	Reply from JNPA
		<p>identified which is located in Palghar city. The township will have a separate STP. The impact on the land use pattern</p> <p>q) The IIT Mumbai report envisages the dedicated road to the Port and connected only to the National Highway Grids. The dispersal of cargo is separate in 4 lanes each.</p> <p>r) The source of water for the proposed project is from Surya River supplied through Maharashtra Jeevan Pradhikaran.</p> <p>s) Refer 1st para of response to S. No. 36</p>
37.	<p>On page 32 of the draft EIA Report, it is mentioned that a Socio-economic study has been conducted. In view of the fact that there is consistent and long-term opposition to this port project, please furnish full details of the manner in which this study was carried out, how the participants were selected, copy of the questionnaires, etc. and details of police personnel who accompanied the interviewers.</p>	<p>Please Refer Chapter 3 of Annexure 14 of EIA report for details of macro level socio economic status of impact villages and consultation process in detail from Pg. C3-1 to C3-38.</p>
38.	<p>Chapter I, page 95, mentions various studies carried out by CWPRS regarding the layout of breakwater and revetments. These were completed in November 2021</p> <p>a) Could you please explain why these were not shared with the DTEPA?</p> <p>b) When were these studies commissioned?</p> <p>c) What was the TOR for these studies?</p> <p>d) Which computer models were used for these studies?</p> <p>e) Are these models 2D or 3D?</p> <p>f) Please provide details of the physical data collected as inputs for these models?</p> <p>g) Was CWPRS asked to validate their recommendations of their past</p>	<p>a) Please refer DTEPA order dated 31st July 2023 para 5 (g) – Submission by JNPA ‘The Applicant’ and Pg NO. 20 of the order in which it is stated that the Applicant has submitted various paper books containing various report. As such, all the report were part of DTEPA’s order.</p> <p>b) The studies were commissioned in 2017 and revised from time to time based on the ToR for the project.</p> <p>c) Please refer S. No. 30 above.</p> <p>d) The studies carried out by CWPRS using the Mike 21 software.</p> <p>e) These models were 2D.</p> <p>f) Please refer S. No 4 Filed data for</p>

S. No	Comments	Reply from JNPA
	<p>reports for coastal and marine projects as requested by an expert member of the DTEPA?</p> <p>h) If yes, please provide full details. i) If not, please explain why this was not done.</p> <p>Please explain why a distance of 300 metres between the bund and the shoreline has been considered adequate for the protection of mangroves?</p> <p>Please provide copies of any studies that have been carried out in this regard?</p> <p>Have any studies been carried out to assess the quantity of the sedimentation drift along this part of the coast over a 12 month period?</p> <p>What will be the impact of the dredging, the reclamation, and the siltation on the corals?</p>	<p>model studies of report No. 6173 of CWPRS (Annexure 5) used for all model studies.</p> <p>g) Please refer order dated 31st July by DTEPA h) Please refer order dated 31st July by DTEPA i) Does not arise.</p> <p>As per CRZ notification 2019, the buffer zone for mangrove is 50 m and accordingly, as per the development plan, no development is proposed in CRZ 1A and CRZ 1A - buffer zone.</p> <p>Please refer Annexure 10 of EIA report by NCCR in which the littoral drift and shoreline evolution comparing to the original shoreline- and proposed port indicates an insignificant effect on the adjacent shoreline (Pg. No. 17 of NCCR Report).</p> <p>As per the NIO report (Annexure 6), the presence of only pseudo-coral is found which is continue to be present in the inter-tidal zone.</p>
39.	Please explain why a distance of 300 metres between the bund and the shoreline has been considered adequate for the protection of mangroves?	Please refer response in S. No. 38
40.	Please provide copies of any studies that have been carried out in this regard?	Please refer Annexure 3 of EIA report
41.	Have any studies been carried out to assess the quantity of the sedimentation drift along this part of the coast over a 12 month period?	Please refer response in S. No. 38
42.	What will be the impact of the dredging, the reclamation, and the siltation on the corals?	Please refer response in S. No. 38
43.	At page 107, it is mentioned that the <i>"The study on "Impact of the</i>	

S. No	Comments	Reply from JNPA
	<p><i>breakwaters and transportation on erosion and accretion" was carried out by the National Centre for Coastal Research (NCCR) and report was submitted in September 2023, as per the proposal amended and submitted to MoEF & CC Infra-1 Committee and appraised in the 324th EAC meeting. The report is enclosed as Annexure-10."</i></p> <p>(i) As per Annexure 10 page 8, it is mentioned that the data used for preparing this report was received by NCCR vide letter dated 30th May 2023. This would mean that this report has been prepared based on the old TOR, and not the revised TOR that were issued on 2nd June 2023.</p> <p>(ii) It is mentioned that MIKE, TELEMAC, LITPACK modules, LITDRIFT and LITLINE models were used. Please clarify whether these models are 2-D models or 3-D models.</p> <p>(iii) On page 11 of Annexure 10, it is mentioned that there is a possibility of formation of a salient. What measures will be taken to remove it if it does form?</p> <p>(iv) (On page 12, it is mentioned that "The oceanographic data used for the purpose of mathematical model study includes; the monsoon (September-October 2020) and non-monsoon (January- February 2017) period."</p> <p>a. Does the EIA notification permit the use of such old data?</p> <p>b. Should not the data of the same year be used for both the periods?</p> <p>c. How has the impact of sea level rise been factored in this study?</p>	<p>(i) No such mention in Pg. 8 of Annexure 10.</p> <p>(ii) The software models used were 2D.</p> <p>(iii) The salient formation is mentioned in Pg. 17 and such formation are dynamic in nature and will be monitored and suitable action will be proposed after careful observation including dredging annually.</p> <p>(iv)</p> <p>a. Yes</p> <p>b. Historical data is required for profiling of coastal behavior.</p> <p>c. The sea level rise has no impact on this study and accordingly the study has been carried out specific to the site considering the sea conditions.</p>
44.	<p>On pages 116 and 117 of the draft EIA, it is mentioned that land is required for back up facilities. However, the proposed location is not shown on the map. The area requirement is 3,070 acres for the year 2025 and 4,399 acres</p>	<p>i. No. The area requirement in Pg.</p>

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	<p>by 2030.</p> <p>i. Are these facilities going to be set up in Dahanu taluka?</p> <p>ii. What is the location of these facilities?</p> <p>iii. What is the existing land use?</p> <p>iv. Will this land be acquired by Government/ JNPA? Or will it be a free for all where private parties will buy land that they consider suitable?</p> <p>v. Why was this never discussed earlier with the DTEPA?</p> <p>vi. Given the restrictions on change in land use within Dahanu taluka, would it be possible to locate these facilities outside Dahanu taluka?</p> <p>vii. What would be the environmental impact of change of land use of 3070 acres of land?</p> <p>viii. Would this include the additional roads, transmission lines, water pipelines, and other infrastructure requirements? Especially if these are scattered randomly?</p>	<p>116 117 are in the offshore area and does not fall in the existing land in Dahanu Taluka. Please refer Annexure 1 DPR for the project.</p> <p>ii. As above</p> <p>iii. As above</p> <p>iv. The land will be developed by JNPA in the offshore of Vadhvan</p> <p>v. Please refer DTEPA order dated 31st July 2023 as its annexures and documents and the area requirement has been discussed in detail in the report under para 5(g) of the order.</p> <p>vi. No port facilities are planned on the land except for the road and rail connectivity. The port facilities will be developed in the reclaimed land of 1448 ha.</p> <p>vii. As above.</p> <p>viii. The road and rail, overhead and underground services will be passing through Dahanu and Palghar taluka and a dedicated ROW is planned for all the connectivity issues in a dedicated corridor of 34 km.</p>
45.	<p>DREDGING</p> <p>a) It is not clear how and where the dredging will be carried out</p> <p>b) It is not clear how the dredged material will be transported</p> <p>c) It is not clear where the unsuitable dredged material will be dumped</p> <p>d) It is not clear where the material obtained through maintenance dredging will be utilized or dumped</p> <p>e) What will be the environmental impact of capital dredging and maintenance dredging?</p> <p>f) It is not clear where the rocks required for building the bunds (for the port reclamation) will be obtained from?</p>	<p>a) Please refer Table 33 and Para 2.20 of EIA report</p> <p>b) Please refer para 2.20.4 of EIA report.</p> <p>c) Please refer 2.20.5 of EIA report.</p> <p>d) The maintenance dredging material will be disposed off at designated site as stated in para 2.20.5 of EIA report.</p> <p>e) Please refer Annexure 4 study carried out by CWPRS for Impact of proposed Capital Dredging on tidal hydrodynamics on nearby area of proposed Vadhvan port and assessment of the impact of dredging and dumping on marine ecology around the project site by NIO in Annexure 6.</p> <p>f) Please refer para 2.32 of EIA</p>

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	<p>g) Please provide details of the clearances/permissions issued to these quarries.</p> <p>h) What will be the environmental impact of these activities?</p>	<p>report for the details of rock required for building of bunds.</p> <p>g) The quarry permission will be issued by state government after EC.</p> <p>h) Refer para 5.3.2.3 Impact on Soil and Geology and Mitigation Measures (Pg. No. 401, 403) of EIA report.</p>
46.	<p>Simulation Studies</p> <p>a) Could you please provide full details of the data sets used for carrying out the simulation studies, including the period, duration, locations, etc.?</p> <p>b) Could you please provide full details of the computer models used for doing the simulation studies?</p> <p>c) Could you please provide details of the differences between results obtained the 2-D and the 3-D models?</p> <p>d) Were any studies conducted based on the revised TOR?</p> <p>e) Please provide details of the studies carried out on the revised TOR, if any.</p>	<p>Please refer response in S. No. 38 and 43</p>
47.	<p>Dispersion of Sediment Plume</p> <p>On page 128 of the draft EIA it is mentioned the turbid plume does not reach the shore.</p> <p>a) What is the definition of "turbid plume"?</p> <p>b) Do the studies reveal that there is no sedimentation reaching the shore?</p> <p>c) Does the sedimentation reach the corals and the mangroves and mudflats?</p> <p>d) Can you please provide some more details of how this finding</p>	<p>a) Turbid plume is the region of turbid water in the sea in the zone of dredging.</p> <p>b) Yes. As per the study conducted by IIT Madras, on dispersion of silt during the dredging from marine borrow pit for sourcing of sea sand for reclamation will not reach the shore. Please refer Annexure 9 of EIA report.</p> <p>c) As per the ZSI report there are no corals presence is found in the</p>

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	<p>has been arrived at? e) If there is no sedimentation, what is the need to do maintenance dredging?</p>	<p>dredging area for sourcing of sea sand. Refer Annexure 11 of EIA report. d) Please refer Annexure 9 of EIA report e) The sedimentation in Dahanu area of the port location is due to annual transport of sediment in the offshore area. Whereas your reference under (e) is at Daman which is 64 km from the port location.</p>
48.	<p>Please provide full details of the container yards, open storage and onshore facilities mentioned on page 129</p>	<p>Please refer para 2.24 for container yards, open storage and onshore facilities</p>
49.	<p>Please also provide full details of the "surcharge fill" including quantities, source, etc. and the environmental impact of the same.</p>	<p>The surcharge fill is envisaged for consolidation of storage yard which will be developed in phases. For each terminal the area of development is about 60 ha. which will be sourced from available approved quarries for private operators.</p>
50.	<p>It is not clear why the proposed rail line is being designed to enter the left side of the port and not the right side. If the rail line is shifted to the right side, there will be no need to build the proposed flyover.</p>	<p>The proposed rail connectivity at Vangaon station is proposed to connect to DFCC services as there is no capacity on the western line.</p>
51.	<p>On page 130, it is mentioned that <i>"Pavement area of 204 ha. will be designed/or stacking 5.5 T/sqm. After consolidation and removal of preload material, the yard area will be levelled, followed by fill material (CBR> 10), and compacted for the base layer. For area other than RTGC beam and cross over, the pavement consists of a Granular sub-base GSB layer 300 mm thick, GB layer of 300 mm, followed with 150 mm CBM layer of crushed rock and base course of 575 and 600 mm thick based on the loading conditions and functional requirements. Sand of 30mm thick is laid over the base course layer. The top layer of the stacking area will be paved</i></p>	<p>a) The fill material for reclamation will be sourced from Daman coast and sea sand will be used as fill material. The preloading would not be</p>

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	<p><i>with M50 cement concrete CC blocks of 100 mm thick. The precast concrete block paving is based on the guidelines of BPA Interpave manual for 5 stack high containers."</i></p> <p>a) It is not clear from the draft EIA Report where all these materials will be sourced from.</p> <p>b) It is not clear what is the "preload material"</p> <p>c) It is not clear what is the quantity of the preload material.</p> <p>d) It is not clear how and where the preload material is proposed to be disposed of.</p> <p>Please provide full details of the above.</p>	<p>required for this material.</p> <p>b) As above</p> <p>c) The area to be filled is 204 ha. The surcharge fill is envisaged for consolidation of storage yard which will be developed in phases. For each terminal the area of development is about 60 ha. which will be sourced from available approved quarries for private operators.</p> <p>d) The surplus surcharge material available would be kept as a reserve for future requirement within the port area.</p>
52.	<p>What are the bulk liquids proposed to be handled in the port (as mentioned on page 134)? Please provide full details.</p>	<p>Bulk liquids include non-hazardous liquid cargo.</p>
53.	<p>Page 151- para 2.43.3-It is not clear why bulk liquid storage and handling systems are being provided in a container handling port and in violation of the EC conditions.</p>	<p>There is no violation of EC conditions for storage of liquid cargo along with container cargo. All are permitted activity in port area as per the CRZ notifications.</p>
54.	<p>Pages 154, 178- Power supply - Please furnish full details of the solar panels and windmills that will be installed to meet the power requirements of this project.</p>	<p>The details are not worked out at present as these are the part of green initiatives proposed with the leverage on new technology and in line with vision of MIV 2030. At present, it is envisaged the electrically operated cranes will be powered by the power source obtained from the national power grid from MSDCL.</p>
55.	<p>Page 158-Water from Surya Dam - Please provide full and complete details of</p> <p>a) the availability of water in the Surya Basin in April and May</p> <p>b) the quantity of water being supplied to urban settlements and power projects.</p>	<p>a) The water supply project is implemented by Maharashtra Jeevan Pradhikaran (MJP) and the assessment of the water availability has been made in consultation with irrigation department of Maharashtra.</p>

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	<p>c) the quantity of water being supplied to the tribals</p> <p>d) What percentage of the sewage water be treated and recycled?</p> <p>e) How will the recycled sewage be utilized?</p> <p>f) What kind of sewage treatment will be provided? Primary, secondary, tertiary or more?</p>	<p>b) The water demand for the port is indicated in para2.26.1 of EIA report. Further details are not available with PP.</p> <p>c) As above.</p> <p>d) 20%</p> <p>e) For sanitary and greenery</p> <p>f) STP with SBR technology will be provided with a capacity of 5000 KLD.</p>
56.	<p>Please provide full details of the new proposed New Palghar station of WDFC</p> <p>a) How much land is required for this station?</p> <p>b) What is the location?</p> <p>c) What is the existing land use?</p> <p>d) Has this been included in the Cumulative EIAS?</p>	<p>a) The existing facility of DFCC at the New Palghar Station will be utilized for the rail connectivity to the port.</p> <p>b) Same as above</p> <p>c) The existing land use has been prepared by DFCC.</p> <p>d) This is part of the Cumulative EIA and is included in EIA report. Refer section 2.22.1 of EIA report</p>
57.	<p>Ballast water-</p> <p>a) What are the anticipated quantities of ballast water?</p> <p>b) How will ballast water be treated?</p> <p>c) Where will it be stored?</p> <p>d) Where will the treated water be discharged?</p>	<p>No ballast water is allowed to be exchanged within the port. Refer para 5.3.3.1 of EIA report.</p>
58.	<p>Page 165 - Will all the harbour craft-tugs, launches, pilot vessels, etc. also have STPs on board?</p>	<p>Yes</p>
59.	<p>Page 176 - Fire Protection/Disaster Management</p> <p>(a) What is the Maximum Credible Accident (MCA) scenario?</p> <p>I) With containers only</p> <p>II) With containers plus coal</p> <p>III) With containers, coal, fertilizers</p> <p>IV) With containers, coal, fertilizers, oil</p>	<p>The details of fire patching system have been provided page no 170 to 176 and exigencies as covered in table 38.</p> <p>The details of onsite equipment's and protection type have been provided in table 38 and would be provided as per standard norms and guidelines and fire protection manual and rules etc.</p>

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	<p>V) With containers, coal, fertilizers, oil, gas</p> <p>(b) Please provide full details of the onsite equipment that will be required for MCA disasters, along with the cost?</p>	
60.	Project Proponent may kindly be asked to provide a certified copy of the sanctioned Regional Plan for Dahanu Taluka.	The sanctioned regional plan of Dahanu Taluka is available on website of Urban development department of Maharashtra. Or physical copy may be obtained from UD department.
61.	Project Proponent may kindly be asked to provide a certified copy of the draft and sanctioned CZMPs for all the components of the proposed project areas.	Please refer Annexure 3 for demarcation of STL and LTL report by institute of Remote Sensing Chennai.
62.	Page 180-What steps will be taken to ensure that the trucks and other vehicles that enter the port are Bharat Stage IV and above, and have valid PUC certificates?	This operation matter and vehicles are plying from all over India and will follow all the RTO rules and regulations.
63.	Is there a proposal to remotely monitor vehicle tail pipe emissions as they enter the port?	Noted.
64.	<p>Quarrying</p> <p>i) The figures on pages 184 and 185 do not tally</p> <p>ii) The transport of quarried material through Boisar cannot be permitted</p> <p>iii) Please furnish full details of each of the quarries, including copies of their environmental clearances, lease documents, restoration plans, etc.</p> <p>iv) What mitigation measures are in place in each of these quarries?</p> <p>v) Are the quarry operations and transport included in the CEIA</p> <p>vi) How many of these quarries are operating on forest lands?</p>	<p>The quantity in Pg. 185 indicates the approximate requirement.</p> <p>The transport of the quarry material will be along the proposed road alignment. The report does not mention transport is through Boisar.</p> <p>The mining plan and further details will be required for the quarrying at the quarries and all the relevant reports will be submitted before the Mining Approving authority.</p> <p>The JNPA will follow all the rules and regulations which will be stipulated by the concerned agencies.</p>

S. No	Comments	Reply from JNPA
	<p>vii) Why is a quarry site been selected on a virgin hillock? (Khanivade-pages 186 and 223).</p> <p>viii) What will be the land requirement of roads have to be constructed from the private quarries mentioned on page 187?</p> <p>ix) Will any forest land be required for any of these roads?</p> <p>x) How will the quarrying activities affect the ground water?</p> <p>xi) Do the existing quarries comply fully with their environmental clearance conditions?</p> <p>xii) Will there be blasting?</p> <p>xiii) What are the quantities of explosives that will be required?</p> <p>xiv) How will the explosives be transported?</p> <p>xv) How and where will the explosives be stored?</p>	
65.	Table 41 on page 191 does not include the environmental ecological and social costs. These may please be added.	This provision is available in the total estimated cost and the environmental and ecological cost will be met from contingencies.
66.	It is not clear why a LPG jetty is being built when this had not been approved. Table 42 Item 14 page 192	The LPG jetty is not allowed by DTEPA as such the same will be not be constructed and may be considered as no LPG jetty under the present EIA.
67.	<p>CRZ Issues</p> <p>i) The CZMP maps are inaccurate since they do not depict the corals, breeding grounds of fish, sea grass beds, sand dunes, mangroves and mudflats accurately. These need to be corrected.</p> <p>ii) High eroding coastline also needs to be clearly demarcated in the CZMPs.</p> <p>iii) No work can be allowed in CRZ IA areas as per the CRZ notification.</p> <p>iv) Any activities that will impact the CRZ IA areas cannot be permitted.</p>	.Please refer Annexure 3 the report by IRS and the details provided in table 2 of the report at page no 18 and 19.
68.	SITE SELECTION - Pages 199-201	

S. No	Comments	Reply from JNPA
	<p>a. It is not clear at all why the supposed reduction in financial costs should be the main consideration for site selection.</p> <p>b. It seems clear that the 2-member committee selected the site that the Maharashtra Government had pre-selected.</p> <p>c. The Report of the 2-member committee and the AECOM Report may kindly be provided.</p> <p>d. There are many other locations that provide the same "advantages"</p> <p>e. How does Vadhvan fall on the International sea route?</p> <p>f. Doesn't every port on the west coast of India have direct access to the middle east ports?</p> <p>g. It is not clear how the Location Matrix on page 201 Table 45 has been prepared.</p> <p>h. Please provide details of how the weightages were decided.</p> <p>i. Please provide details of how marks were allotted for each parameter, and by whom.</p>	<p>a. Please refer chapter 2 of EIA report for the selection of site and also Please refer DPR provided at Annexure1 to EIA report.</p> <p>b. The initial assessment only to indicate the Major Port.</p> <p>c. Please refer official website of Vadhvan Port project under media link; www.vadhvanport.in</p> <p>d. The Vadhvan has advantage over all other sites.</p> <p>e. The distance between Europe and Gulf countries is a shorter and international connectivity will be more economical.</p> <p>f. Based on consultant experience.</p> <p>g. Details are available In EIA report.</p> <p>h. The weightage points is derived based on the consultant experience from 1 to 5 points with grading from low to high. i.e. low is 1 and high is 5.</p> <p>i. As stated above.</p>
69.	<p>Table 47 Matrix for Alternative analysis</p> <p>i) It is not clear how this Matrix on page 210 Table 47 has been prepared.</p> <p>ii) Please provide details of how the weightages were decided.</p> <p>iii) Please provide details of how marks were allotted for each parameter, and by whom.</p> <p>iv) This location Matrix also does not include the ecological, environmental and social parameters</p>	Please refer reply to point no. 68 above.
70.	<p>Study Area - Page 210 para 4.3</p> <p>The Study Area is 10 km along the periphery of the entire project and all</p>	As per general conditions of EIA notification 2006 at pg. no. 52 issued on 14 th September 2006. The any project activity needs to be examined with

S. No	Comments	Reply from JNPA
	<p>its components, and not the area selected by the consultants.</p> <ul style="list-style-type: none"> • 	<p>respective to 10 km from the boundary. The study area has been considered as per the EIA notification 2006.</p>
71.	<p>It is not clear if the period of primary data collection over one season or one month meets the requirements of the EIA Notification.</p>	<p>Refer para 32.</p>
72.	<p>On page 220, it is stated - "4.4.2 Land The Vadhvan port is planned to be located on reclaimed land on inter tidal zone at Vadhvan Point." i. Is this statement still valid? ii. Hasn't the location of the port project been changed?</p>	<p>i. The reclamation of 200Ha is planned near to the shore which is in inter tidal zone and balance is in offshore area</p>
73.	<p>Item 4.4.5 of the draft EIA report titled "Transportation from the Proposed Quarry Site to Project Site" identifies the road that have to be widened, flyovers that have to be constructed, etc. to avoid bottlenecks and disruption of existing traffic. i. Which are the agencies that will be responsible for widening each of these roads? ii. What is the funding that will be required? iii. Will these road improvements, and construction of flyovers, etc. be completed before the quarrying is commenced? iv. How many trees will be required to be cut for the proposed widening of all these roads? v. Where will the compensatory plantation of 10 trees for every tree that will be cut take place? vi. Please provide geo tagged photos of the sites identified for compensatory afforestation.</p>	<p>i. The agency for development of road connectivity is NHAI and NHAI will appoint a contracting agencies. ii. All the rules and regulations related to improvement, development, widening etc. will be followed by NHAI and their Agencies. iii. iv. The compensational plantation and Geo tagging will be done as per requirement of approving Authorities for tree plantation and tree relocation.</p>
74.	<p>On page 233, it is stated that "However, considering the Palghar</p>	<p>i. All the structures will be designed for Zone IV as per the relevant IS code.</p>

S. No	Comments	Reply from JNPA
	<p>earthquake sequence, whose largest magnitude was 4.5 till now and considering the project of national importance and vital installations, it was advised by CSIR - National Geophysical Research Institute to consider the seismic zone IV in design parameters."</p> <p>i. What are the additional costs that will have to be incurred if the port project, the flyovers, roads, buildings, railway lines, storage tanks, etc. have to be constructed to meet Seismic zone IV parameters?</p> <p>ii. Will it be safe to build on reclaimed land as proposed?</p> <p>iii. Has this been factored in the DMP?</p>	<p>ii. All structures design has been carried out as per relevant IS code no separate cost is assessed.</p> <p>iii. Please refer 7.2.7.</p>
75.	<p>Most of the rivers mentioned in item 4.5.1 on page 240 are not found within the Study area identified by the EIA consultants. This statement is therefore factually incorrect and misleading, particularly since it gives the impression that the quantum of water that will be diverted from the Surya River for this project is insignificant.</p>	<p>The 4.1.1 depicts the surface water flow and tributaries for rivers in the region.</p>
76.	<p>On page 252, it is mentioned that the <i>"Site specific wave data collection was carried out by M/s. Seageo Surveys Pvt. Ltd. Acoustic Doppler Current Profiler (ADCP) for measuring waves and currents was deployed at 11.5 km off Dahanu, in the Arabian Sea for period of one month i.e., from 10th Jan. 2017 to 10th Feb.2017 covering one full cycle of neap and spring tides."</i></p> <p>i. This clearly indicates that no primary data was collected by these Consultants.</p> <p>ii. The antecedents of M/s. Seageo</p>	<p>i. The data collected by Seageo are the primary data used for the study. Please refer to the details covered in Pg. 254 where it clearly mentioned and the same in CAT's query that measurements were carried out using ADCP It is not clear from CAT what primary data they are referring to.</p> <p>ii. The antecedents of Seageo may be found on their website.</p> <p>iii. The study has been envisaged from 2017 and various studies are being carried out as per the ToR as per the guidelines of MoEF&CC.</p>

S. No	Comments	Reply from JNPA
	<p>Surveys Pvt. Ltd are not known.</p> <p>iii. This data is also old and outdated.</p> <p>iv. Also, since the wave intensities are maximum during the monsoon, this data doesn't serve the purpose.</p>	<p>iv. Refer response to S. No. 38</p>
77.	<p>On page 254, it is mentioned that <i>"Currents are significant in the project area and primarily forced by tide and wind components. The vertical variation of currents measurements was carried out at the location using ADCP instrument. ADCP data for currents were collected in the project area for the period of 27 days.,,</i></p> <p>i. This clearly indicates that no primary data was collected by these Consultants.</p> <p>ii. The antecedents of <i>M/s. Seageo Surveys Pvt. Ltd</i> are not known.</p> <p>iii. This data is also old and outdated,</p> <p>iv. Also, since the wave intensities are maximum during the monsoons, this data does not serve the purpose</p> <p>v. In view of Climate Change and Sea Level Rise, it is imperative that up-to-date data be collected by the project proponents.</p> <p>vi. It is also imperative that the impact of Climate Change and Sea Level Rise be factored into this project.</p>	<p>i. The data collected by Seageo are the primary data used for the study. Please refer to the details covered in Pg. 254 where it clearly mentioned and the same in CAT's query that measurements were carried out using ADCP It is not clear from CAT what primary data they are referring to.</p> <p>ii. Refer response to S. No. 76</p> <p>iii. Refer response to S. No. 76</p> <p>iv. Refer response to S. No. 76</p> <p>v. All data has been collected based on the guidelines for ToR by MoEF&CC.</p> <p>vi. Refer response to S. No.13.</p>
78.	<p>On page 255, it is mentioned that <i>"Site specific tide measurements were carried out for the proposed development. The tidal observations were carried out using the Auto Tide Gauges</i> On page 255, The recording of the data was carried out for a period of one month covering one full cycle of the neap and spring tides. The period of observation started from near spring tide covering near neap tide from 10th January to 10th February 2017</p>	<p>i. Refer response to S. No. 76</p> <p>ii. Refer response to S. No. 76</p> <p>iii. Refer response to S. No. 76</p> <p>iv. All data has been collected based on the guidelines for ToR by MoEF&CC.</p> <p>v. Refer response to S. No.13.</p>

S. No	Comments	Reply from JNPA
	<p>i) This clearly indicates that no primary data was collected by these Consultants.</p> <p>ii) This data is also old and outdated.</p> <p>iii) Also, since the tidal intensities are maximum during the monsoons, this data does not serve the purpose.</p> <p>iv) In view of Climate Change and Sea Level Rise, it is imperative that up to date data be collected by the project proponents.</p> <p>v) It is also imperative that the impact of Climate Change and Sea Level Rise be factored into this project.</p>	
79.	<p>On page 257, it is mentioned that "A detailed and recent geophysical survey of the seabed in the Project area was conducted by M/s Seageo Surveys in 2017."</p> <p>i) Please explain how a survey of 2017 can be treated as "recent"?</p> <p>ii) Please show the locations of the boreholes superimposed on a map of the proposed project? Are the boreholes shown in figure 70 on page 259 the only bore holes that were drilled?</p> <p>iii) Please explain how M/s Seageo became aware of the changed location of the project in 2017 when the revised TOR were issued in June 2023?</p> <p>iv) Was the area to be reclaimed offshore also surveyed?</p> <p>v) Was the area where dredging is proposed also surveyed?</p> <p>vi) Please share a copy of the M/s Seageo survey report.</p>	<p>i) Refer response to S. No. 76 (iii)</p> <p>ii) Refer to Annexure 1 of the EIA report.</p> <p>iii) How does it matter.</p> <p>iv) Survey has been carried out for the entire port limit.</p> <p>v) Refer to the above</p> <p>vi) The details of the survey is covered in Annexure 1 of EIA report.</p>
80.	<p>Shoreline Erosion - pages 263 - 268</p> <p>i) This seems to be done on the basis of the earlier location</p> <p>ii) It is accepted that a portion of the coast line is eroding</p>	<p>i. Please refer Annexure 10 in which the location study has been indicated and the location in as per the present proposal please page no 17 of the report by NCCR</p>

S. No	Comments	Reply from JNPA
	iii) Unfortunately, the erosion along Dahanu and the flooding at is not dealt with at all. iv) In view of the revised TOR, this study will obviously have to be carried out again.	and also mitigation measures to be adopted for the affected coast at Dahanu and is in compliance with TOR.
81.		
82.	Cyclonic Storms i) Figure 77 on page 271 presents out dated data on storms up to 2015. Given the increase in frequency of cyclones in the Arabian sea, this data needs to be updated ii) The DMP needs to include the impact of cyclones on the proposed project.	i. The effect of cyclone have been covered in section for major hazard Tsunamis and the effect of cyclone and response have in indicated at para 7.2.7(a) under DMP plan.
83.	Air quality and noise pollution - pages 273 to 289 i) It seems that the frequency of date collection is not up to the mark. ii) It is not clear what will happen to the air quality during quarrying operations iii) It is not clear how the passage of thousands of trucks will affect the air quality. iv) There are no measures suggested to reduce the air pollution. v) There are no measures suggested to reduce noise pollution. vi) The issue of light pollution has not even been mentioned.	i. Please refer Sr. No.32 ii. Please refer table 144 of EIA report. iii. Please refer para 5.6.1.3 of EIA report and table 145. iv. Please refer table 144 of EIA report and 145. v. Please refer table 144 of EIA report and 145. vi. Please refer table 144 of EIA report and 145.
84.	Socio Economic Environment-pages 288 to 344 i) Sadly, there is very little primary data. ii) In cases where some primary data has been collected, there are no details available. iii) It is evident that this is a highly productive region in terms of livelihood. iv) It is evident that this area is also	i. Please refer Annexure 14- Social Impact Assessment Report for details. ii. As above. iii. As above. iv. As above. v. The allocation of water is from Irrigation Department of GoM. vi. No comments.

S. No	Comments	Reply from JNPA
	<p>rich in marine biodiversity, and fisheries is a major occupation.</p> <p>v) It is a pity that despite the existence of the Surya projects, the majority of the land holdings do not receive canal water and are unirrigated. Page 301 <i>"Altogether 13264.22 ha cultivable land (irrigated and un-irrigated) was observed in the study area. The irrigated land admeasures to about 816.78 ha in the study area which works out to be 3.89% of total study area. The un-irrigated land admeasures about 12447.44 ha and works out to about 58.38% of the total study area." This means 94% of the agricultural land is still unirrigated.</i></p> <p>vi) It is also unfortunate that despite the huge sums of money made available to the Tribal Department, the tribals are still living hand to mouth.</p> <p>vii) It is unfortunate that secondary data was collected from 2001 data sources.</p> <p>viii) It is unfortunate that CMFRI did not interview the fishing communities.</p> <p>ix) On page 335, it is mentioned that <i>"As per the guidelines of environmental impact studies, an area of 10 km radius and the villages falling in this area from the boundaries of the proposed port area have been identified. As explained earlier, a few villages beyond the radius of 10 km are also included in the survey as the fishing boats from these villages utilizing the landing, operating facilities in the identified coastal villages within 10 km range."It seems that the project proponent is well aware of the requirement that the 10 km limit is applicable from the project boundaries.</i></p>	<p>i. The census of 2011 has been referred and extrapolated.</p> <p>ii. Please refer Annexure 12 pg. no. 88 to 146 of CMFRI report in which assessment has been carried out in consultation with fishermen association.</p> <p>iii. Please refer the pg. no. 13 to 19 of CMFRI report for the influence area assessment.</p>
85.	<p>Compliance with fly ash notification Please give full details of how this proposed project and the related infrastructure such as roads, railways</p>	Noted and all the notification for use of fly ash will be adhered.

S. No	Comments	Reply from JNPA
	and bridges will comply with the provisions of the fly ash notification.	
86.	<p>Ready Mix Concrete Plants Please provide full details of the number of RMC plants, their locations, existing land use, sources of raw materials, mode of transport, pollution mitigation measures, etc.</p>	The ready mix plant will be installed with the approval of MPCB after compliance of all the aspects related to setting up of RMC plant.
87.	<p>Biological Environment Para 4.11Pages 344 –</p> <p>i) Please provide full details of the team members deployed by the various consultants to do the ecological surveys along with their 0/s</p> <p>ii) Please provide full details of the number of days spent by each of the above- mentioned team members doing field surveys.</p> <p>iii) Please explain why there are serious discrepancies between the survey reports compiled by M/s Enkay and M/s NIO especially with respect to mangroves, mammals, corals, etc. (please see pages 361, 362, 363, 374, 375)</p> <p>iv) What are the species of flora and fauna recorded in the Working Plans of Dahanu Forest Division?</p> <p>v) What will be the direct impact of the proposed project on the flora and fauna?</p> <p>vi) What will be the indirect impact of the proposed project on the flora and fauna?</p> <p>vii) Why has the impact of transportation of the dredged material not been studied?</p> <p>viii) When was the study of the proposed burrow site conducted?</p> <p>ix) Please provide full details of the composition and expertise of the team that conducted the biodiversity study of the proposed burrow site along with their</p>	<p>i. Please refer pg. no. 648 to 650 of EIA report and pg. No. i) of Annexure 6 for the team members of the respective studies.</p> <p>ii. Please refer all the reports Annexed at pg. no.21 for duration of study.</p> <p>iii. No comparison of discrepancies have been indicated in the query.</p> <p>iv. Please refer table 129 of EIA report of pg. no. 353 and table no. 133,134, 135, 136, 137, 138 and 139 at pg. no. 363 to 370.</p> <p>v. Please refer chapter V of EIA report.</p> <p>vi. As above.</p> <p>vii. Please refer 5.8.6 and 5.8.7 of EIA report and table 168.</p> <p>viii. Please refer reply at Sr. no. 90.</p> <p>ix. Please refer Annexure 11 (Pg. 3).</p> <p>x. Please refer ToR dated 2nd June 2023.</p> <p>xi. Please refer Annexure 11-ZSI report.</p> <p>xii. Please refer Sr. No.90.</p> <p>xiii. ToR conditions have been complied.</p> <p>xiv. Please refer pg. no. 648 and 650 of EIA report and Annexure 6, Annexure 13 and Annexure 17.</p> <p>xv. please refer Annexure 6 and 17 for details of biodiversity study.</p> <p>xvi. Based on the assessment that the Port development is in the offshore and no habitats have been observed in the project area. However, the ZSI has been entrusted monitoring of Flora and Fauna during the project implementation.</p> <p>xvii. Please refer Annexure 6, 11, 12, 13 and 17 for assessment of Biodiversity.</p>

S. No	Comments	Reply from JNPA
	<p>O/s.</p> <p>x) Why was the study area not extended to cover the rail and road corridors, the quarry sites, the burrow site, etc?</p> <p>xi) It is not clear why a secondary or desk search has not revealed the presence of loggerhead Turtles, 385 species of medicinal plants, etc that are found in Dahanu ta luka.</p> <p>xii) Please explain how a field study of only one month can help establish the baseline biodiversity of the study zone?</p> <p>xiii) What are the requirements as per the EIA notification?</p> <p>xiv) Please provide full details of the experts who compiled the list of bird, butterfly and coral species.</p> <p>xv) Please explain why the NIO report does not mention the presence of corals in the study area?</p> <p>xvi) On page 372, it is stated that "These 4 NT species were recorded in 10 km radius area and it is 5 km away from the actual project site. All these birds are seasonal migratory and the proposed project work will not affect their presence and migratory pattern." Please provide the scientific basis on which this assumption has been made.</p> <p>xvii) On page 374, it is mentioned as follows - "Reptiles – No sightings of marine turtles were recorded during the present study period." Please explain why marine turtles are classified as Reptiles. Please also explain what is the duration of the study period. Please give details of the breeding and nesting patterns of turtles found along the Indian coasts.</p>	
88.	<p>Para 4.11.2 Marine Diversity by NIO-Annexure 6</p> <p>i) Please explain how this report is</p>	The NIO conducted studies in the entire area of Dahanu coast considering port limits.

S. No	Comments	Reply from JNPA
	<p>valid since the location of the project has been significantly altered by the project proponent</p> <p>ii) Please explain how the existence of corals is not mentioned in this report</p> <p>iii) What was the duration and period of the field studies conducted by NIO staff?</p> <p>iv) Please provide full details of their qualifications and CVs of the NIO staff that conducted the field studies.</p> <p>v) Has NIO studied the indirect impacts of the proposed project on the mangroves and corals? Please provide details, if any</p>	<ol style="list-style-type: none"> 1. The old and new layout are within the port limits and located in the study area. 2. There are no coral observed by NIO as the presence of only Pseudocorals was found by NIO team at Shankhodar and the same is available in the DTEPA's order. 3. The details are available in the report. 4. The study carried out by NIO the scientific organization under the CS&IR the central government organization and the list of team is available at page no. (i) of the report Annexure VI 5. Please refer page no 50, 89,100 of the report of NIO.
89.	<p>Para 4.11.3 Marine Biodiversity at Shankodhar Point, Dahanu Taluk, Maharashtra conducted by CSIR - National Institute of Oceanography (June 2023} AND Annexure 17</p> <p>i) It is ironical that a two-day survey of Shankodhar Point by the same NIO has revealed the existence of corals.</p> <p>ii) Please explain why only a two-day study was carried out?</p> <p>iii) Since the Shankodhar beach is easily accessible by road, it is not clear why a trawler was required and scientists had to swim there with cameras, etc.</p> <p>iv) Please explain which recommendations of the Report annexed as Annexure 17 will be implemented-</p> <p><i>Recommendations</i></p> <p>a. <i>Continuous monitoring of the ecological characteristics of the habitat during and after the port construction, dredging, and land reclamation to assess the changes in the water quality, coastal hydrology, bottom contamination and diversity & abundance of marine organisms.</i></p> <p>b. <i>Deployment of artificial reefs as a</i></p>	<ol style="list-style-type: none"> i. The NIO study of the Shankodhar study was carried out by DTEPA. ii. All the recommendation will be monitored by NIO during construction period iii. As regards artificial reef is concerned the proposed breakwater will act as an artificial reef and rejuvenate the biotic life and improve the biodiversity of the region. iv. The NIO will be associated with monitoring mechanism. v. The above aspect will be monitored as stated in EMP. vi. The underwater noise on cetaceans has been carried by NIO and report is enclosed as Annexure VI for the same project and is in compliance with TOR.

S. No	Comments	Reply from JNPA
	<p><i>measure of compensation for the loss of fishing grounds, if any, due to dredging and land reclamation.</i></p> <p><i>c. Marine mammals such as dolphins were sighted near Shankodhar point. Induct a marine mammal observer in to the ships to monitor the movement of marine mammals and ensure a safe distance between the moving vessels and mammals by limiting the speed of the vessels.</i></p> <p><i>d. Include measures recommended in the EIA and other studies to (i) prevent water pollution; (ii) limit disturbance of sediment, and (iii) limit the movement of barge/vessel movements.</i></p> <p><i>e. Underwater noise can be minimized by using bubble curtains which can reduce the noise emission up to 95% and ensure that marine mammals reliant on sound wave communications are not distressed.</i></p> <p><i>f. The work time can be reduced to minimize the sediment disbursement during adverse weather conditions.</i></p> <p><i>g. Establish 'no wash zone' based on the local hydrodynamics between the port and Shankodhar point to prevent the introduction of marine pests due to washing/cleaning of ship hulls and release of ship waste.</i></p> <p><i>h. All vessels coming to the port shall be checked for the presence/absence of invasive species on the hull.,,</i></p> <p><i>v) Please explain in detail how the above-mentioned recommendations will be implemented.</i></p> <p>vi) Please explain why the TOR re impact of underwater noise on cetaceans has not been complied with.</p>	
90.	Page 378 4.11.4 Biodiversity Study For The Proposed Burrow Pit Region	

S. No	Comments	Reply from JNPA
	<p>In Arabian Sea by Zoological Survey of India (ZSI) and Annexure -11</p> <p>i) Please explain how this site was selected.</p> <p>ii) Please provide a copy of the site selection report</p> <p>iii) Please provide details of alternate sites selected</p> <p>iv) Though the TOR requires data for two seasons, the survey has been carried out only during the monsoon season, and that too for a very short time.</p> <p>v) Even during the one season short term survey, the ZSI report indicates that the selected site is extremely rich in biodiversity and in fisheries.</p> <p>vi) Please explain how the 102.77 square kilometer area will be dredged, and to what depths.</p> <p>vii) Page 24 of the ZSI report confirms that the site selected is the breeding ground of Bombay duck.</p> <p>viii) Page 26 of the ZSI Report indicates the presence of at least 2 endangered species of birds that are found in the proposed burrow pit area. What will be the impact of dredging on these species if their feeding habitats are destroyed?</p> <p>ix) It is not clear how the ZSI Report concludes that this is not an important fishing area even though the ZSI records the fact that 10 trawlers were found fishing in this area even during the monsoon survey of the ZSI.</p> <p>x) Please explain the contradictions in the ZSI Report on pages 43 and 44.</p> <p>xi) Please explain how the Chilika lagoon example of dredging is relevant to the dredging proposed in the deep sea, particularly since the dredging in Chilika is being carried out after undertaking long term scientific studies</p>	<p>i) The selection of Daman site was based on extensive bathymetry survey carried out by JNPA.</p> <p>ii) Please refer 2.21.2.4 of EIA report for details of Borrow pit.</p> <p>iii) The site is selected based on depth of sand bed in an area of 15kms x 4kms.</p> <p>iv) Please refer ZSI report Annexure 11 of EIA for further details it is clarified that the report is based on survey carried out in August and October 2023 and secondary data available with various agencies.</p> <p>v) As observed.</p> <p>vi) A total of finfishes (10 species), elasmobranch (six species), shrimps (four species), lobster (one species), crabs (11 species), cephalopods (two species) and other shellfishes (14 species of mollusca) comprised the trawl catch, over all 51 marine species were documented within the proposed burrow pit. Biodiversity in terms of number of species was in the depth range of 20-30 m and poor representation of the faunal groups indicate that the area is not rich or productive. The dredging will be carried out as stated in Sr. No. 9.2 reclamation and sr. no. 9.3.1 and 9.2.3.2.</p> <p>vii) During the survey, major catch while trawling in the proposed burrow pit site was Bombay - duck (Harpadon nehereus) fish including that of juveniles and therefore, it is presumed to be fishing site for the species, where they may be feeding and breeding. In general, the most common species of fish found in the project location was Bombay - duck (Harpadon nehereus) which is otherwise a common and abundant species all along the Maharashtra and Gujarat coastal waters. No dredging is proposed in fish breeding zone.</p>

S. No	Comments	Reply from JNPA
	<p>to restore the water flow that has been restricted due to siltation?</p> <p>xii) With reference to page 45 of the ZSI report, please clarify as to what thickness the sand and gravel will be extracted? How will this be monitored?</p> <p>xiii) Will dredging activities be completely stopped during the breeding season as recommended on page 46?</p> <p>xiv) When will the further studies as recommended by ZSI on page 47 be carried out?</p> <p>xv) Please provide details of studies carried out in the Arabian Sea and the Bay of Bengal on the impacts of dredging on marine biodiversity and fish production.</p> <p>xvi) Please clarify how the mitigation measures and the recommendations suggested on page numbers 49 to 53 will be implemented along with the costs and time schedules.</p> <p>xvii) What are the quantities of silt that is dredged due to maintenance dredging by JNPA, BPT/MbPT, Kandla, Mundra, etc.?</p> <p>xviii) Why is this not utilized in this project</p>	<p>viii) Although the proposed site falls under the migratory route of the birds, since there is no land mass for roosting/ resting of birds and to transit during their flying close to the proposed burrow pit, the impact on migratory birds seems to be very unlikely due to the proposed dredging and sand mining.</p> <p>ix) During the surveys, on an average 10 fishing boats were observed in the vicinity of the study site (not within the proposed burrow pit but in the periphery) and these were actively fishing, may be targeting for Bombay-duck (Harpadon nehereus) fish in the area. In general, the most common species of fish found in the project location was Bombay-duck (Harpadon nehereus) which is otherwise a common and abundant species all along the Maharashtra and Gujarat coastal waters. Therefore, the propose burrow pit area is unlikely to be a major fishing ground for commercially viable fishes and shellfishes and in terms of capture fisheries in the Arabian Sea, it is not an important fishing area. The fishing activity is permitted in the coast and the dredging activity on any given day is limited to filling of the dredger which will be monitored and prior information and mariner notice will be issued in local papers for the benefit of fishermen.</p> <p>x) Pg 43 is part of recommendation and pg. 44 is for references.</p> <p>xi) Dredging inside the Chilika lagoon was carried out after undertaking long term scientific studies to restore the water flow that has been restricted due to siltation. The case of Chilika lagoon in the current report is cited in the context of Irrawaddy Dolphins (<i>Orcaella brevirostris</i>) in the dredging areas and reported to have no disturbances to them due to the mining of sand and dredging operations and continue to occupying the habitats</p>

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		<p>before and after dredging of sands. Nevertheless, the level of dredging and the quantity of dredged materials may be much lesser than from the burrow pit proposed in the Arabian Sea. Therefore, it is suggested by ZSI in the report to halt dredging / sand mining activities to the possible extent especially during fish breeding period and as far as possible to be avoided during night hours which will pave a movement of turtles, dolphins and other nocturnal fauna may be using this shallow area their feeding and breeding.</p> <p>The reference is only to understand the dredging in offshore and reclamation.</p> <p>xii) The thickness of sand available as per the probes is 4 to 10m and the dredging will be carried out in layers as per the capability of dredging equipment which will be monitored and reported under Daily Dredging Reports(DDR's) and will be shared to monitoring agency ZSI.</p> <p>With regarding to monitoring, ZSI suggested that a state-of-art research Institutes/ laboratory should be developed in the proposed project area with the consultation of expert scientists to monitor the ecosystem with greater emphasis on breeding grounds for fishes and shellfishes, their health and population status.</p> <p>xiii) Yes.</p> <p>xiv) The studies and monitoring are continuous during the implementation of the project. ZSI study is for a period of two years covering two seasons and field work proposed to be carried out during later part of January / February 2023 and further period also.</p> <p>xv) This study is not relevant to for the present proposal.</p> <p>xvi) The ZSI is nominated by MOEF and CC to study Biodiversity as per the</p>

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		<p>ToR and it is also proposed to assign the monitoring during the project implementation.</p> <p>xvii) JNPA annual maintenance dredging is in the order of 15 to 20 million cum per year and MBPT is about 3 to 5 million cum. The information on Kandla and Mundra is not available with JNPA.</p> <p>xviii) The dredged material at JNPA and MBPT is not suitable for reclamation.</p>
91.	<p>Page 382 Para 4. Impact Assessment of Proposed Sand Mining on the Marine Fisheries and Fisher Community of Daman Union Territory by ICAR-Central Marine Fisheries Research Institute, Mumbai Regional Station, ICAR-CMFRI</p> <p>i) Please clarify whether only the fisherfolk of Daman will be impacted by the sand mining.</p> <p>ii) If fisherfolk from other parts of the west coast of India are fishing in this area, please explain how will the sand mining affect them?</p> <p>iii) How will these fisher folk be compensated?</p> <p>iv) Please share details of the compensation schemes, if any</p> <p>v) How has this site been selected (please see page 386)</p> <p>vi) The outdated Lanka study mentioned on page 386 is contradicted by the ZSI Report on sand dredging. Can you please explain which one is correct?</p> <p>vii) Please see earlier comments re the IIT Madras modelling study.</p> <p>viii) Even assuming that the sediment "plume" does not reach the shore, does the IIT study say that there will be no increase in sedimentation, and that it will have no impact on the corals and the mangroves and other biodiversity?</p> <p>ix) On page 386, it is also mentioned that "<i>Guidelines for Management of Marine Sediment Extraction may be</i></p>	<p>Please refer the Pg. no. 30 of Annex13 cited for preparation of the study report. The guidelines if any will be followed for strictly compliance of the dredging activity and will be monitored by ZSI.</p> <p>Please refer pg. No. 577 for the EMP of dredging and reclamation.</p> <p>Please refer the statement of issues raised by the participants and responses by JNPA during Public Hearing at Daman and proceeding of the public hearing issued by Collector and District Magistrate dated 10.01.2024.</p>

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	<p><i>followed strictly to prevent any harmful effect on fisheries and their dependent community". Please furnish a copy of the Guidelines that will have to be followed.</i></p> <p>x) Are these guidelines incorporated in the Environmental Management Plan?</p> <p>xi) On page 387, it is mentioned that "A number of commonly accepted and proven practices are available for mitigation of specific effects associated with offshore extraction of sand mining. These practices reduce the potential for deleterious/ detrimental effects on the environment of the proposed sand mining area."</p> <p>xii) Please furnish copies of these practices.</p> <p>xiii) Are these practices incorporated in the EMP?</p>	
92.	<p>CHAPTERS -ANTICIPATED ENVIRONMENTAL IMPACT AND MITIGATION MEASURES-pages 388to480</p> <p>i) The contents of these pages are repetitive and do not actually commit the project proponent nor the statutory authorities to any definitive or time bound action for mitigation.</p> <p>ii) In fact, this Chapter seems to be more in the nature of wishful thinking.</p> <p>iii) There are serious discrepancies wrt to the quantity of dredged material, quarried material, use of ground water, water availability from the Surya River, etc. These discrepancies may please be clarified.</p> <p>iv) Please explain why all the trees cannot be transplanted along the road and rail corridors.</p> <p>v) Please explain how the provisions of the Forest Clearances regarding compensatory afforestation will be implemented.</p>	<p>i) Noted</p> <p>ii) Noted</p> <p>iii) Periodically water quality monitoring will be done.</p> <p>iv) It will be explore in consultation with forest department</p> <p>v) Due forest clearance process will be followed.</p>

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93.	<p>Risk Assessment/ Disaster Management</p> <p>vi) What is the Maximum Credible Accident (MCA) Scenario? Please furnish full details.</p> <p>vii) Does this include risks associated with the proximity to nuclear reactors?</p> <p>viii) Dahanu has been subjected to a series of earthquakes over the past few years. What steps are being taken to minimize risks from earthquakes?</p> <p>ix) What Seismic Zone does Dahanu taluka currently fall in?</p> <p>x) Is there any proposal to upgrade this categorization?</p> <p>xi) Please provide details of equipment that will be provided at the site for Disaster Management</p> <p>xii) Please provide details of equipment that is available off site for Disaster Management</p> <p>xiii) What will be the consequence of a terrorist attack on an oil tanker that has just berthed at the port?</p> <p>xiv) What will be the consequence of an earthquake on the ships, oil and gas storage tanks, etc.?</p> <p>xv) What will be the consequences of a nuclear accident?</p> <p>xvi) What are the additional risks posed to the nuclear establishments in the vicinity of this proposed project due to the influx of foreign vessels, and tens of thousands of trucks?</p> <p>xvii) If the proposed port will be a "landowner" port, please specify which agency will be responsible for the financing and implementation of the DMP.</p> <p>xviii) What is the role of the Maharashtra Maritime Board in preparation and implementation of the DMP?</p> <p>xix) Has the DMP been approved by the Coast Guard?</p>	<p>vi) Maximum Credible Accident (MCA) is a probable accident with maximum damage distance. In practice, the selection of accident scenarios for MCAA is carried out on the basis of engineering judgement and past accident analysis. MCAA does not include quantification of the probability of occurrence of an accident. The successful concessioner will submit the list of chemical to be stored on the port and will carried out further details before court operation.</p> <p>vii) This issue has been discussed with Secretary DAE and informed about the security and safety aspects of the Port and vessels calling at Port are subjected to check by CISF and will meet the requirement under ISPS and these aspects will be dealt under the same.</p> <p>viii) Please refer Sr. no. 4.4.8 of EIA. As per discussion with National Geophysical Research Institute the Dahanu Taluka falls in zone-III however NGRI has instructed to consider Zone-IV for the structural design.</p> <p>ix) As above</p> <p>x) Information is not available.</p> <p>xi) Please refer DMP under Chapter 7.3 of Disaster Management Plan.</p> <p>xii) As above.</p> <p>xiii) These are the national security issues pertaining to defense and will be Dealt accordingly.</p> <p>xiv) This issue has been discussed with Secretary DAE and informed about the security and safety aspects of the Port and vessels calling at Port are subjected to check by CISF and will meet the requirement under ISPS and these aspects will be dealt under the same.</p> <p>xv) The question pertains to TAPS.</p>

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	<p>xx) Has the DMP been approved by the NDMA?</p> <p>xxi) Why has the DMP of DG shipping not been followed?</p> <p>xxii) Why has the "Sendai Framework for Disaster Risk Reduction" not been followed whilst preparing the Risk Assessment and DMP?</p> <p>xxiii) Please provide details of the existing situation at the JNPA/JNPA at Nhava Sheva.</p>	<p>xvi) The DMP for the nuclear establishment will be followed after suitable amendments to the DMP of TAPS and JNPA agreed to all the conditions to be stipulated by District Collector.</p> <p>xvii) The implementation of DMP is by Port and all Concessioners will be stakeholders for the actions to be taken under DMP.</p> <p>xviii) The MMB is equity partner in VPPL.</p> <p>xix) After EC clearance all the stakeholders will be considered.</p> <p>xx) As above.</p> <p>xxi) Port DMP is followed as per NMDP model.</p> <p>xxii) As above.</p> <p>xxiii) JNPA's DMP plan is available in the official website on JNPA.</p>
94.	<p>R&R</p> <p>i) What is the role of the World Bank, ADB and JICA re this project?</p> <p>ii) Please provide details of the compensation that will be paid to land owners.</p> <p>iii) Please provide details of the compensation that will be paid to landless.</p> <p>iv) Please provide details of the compensation that will be paid to fisher folk.</p> <p>v) Please provide details of the compensation that will be paid to tribals.</p> <p>vi) Please provide details of the compensation that will be paid in cases of fragmentation of land holdings.</p> <p>vii) Please provide details of the compensation that will be paid to locals for additional travel costs that they will incur whilst crossing the proposed road and rail corridors.</p> <p>viii) Please provide details of the compensation that will be paid to locals</p>	<p>i) As on date no role is assigned to these Institutions.</p> <p>ii) As per compensation policy of NHAI act.</p> <p>iii) As above.</p> <p>iv) As above.</p> <p>v) As above.</p> <p>vi) As above.</p> <p>vii) There is no infringement to existing road network.</p> <p>viii) JNPA will implement EMP.</p> <p>ix) As per compensation policy of NHAI act.</p> <p>x) All the issues related to local fishermen folk at Uran have been resolved by withdrawing court case.</p> <p>xi) As above.</p>

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	<p>due to increased air, noise and water pollution.</p> <p>ix) Please provide details of compliance, or lack thereof, with the statutory provisions of PESA and FRA.</p> <p>x) Please provide details of the Court Cases filed by the local fisher folk at Uran regarding compensation.</p> <p>xi) Please provide details of the Court Cases filed by the JNPNJNPA challenging the Court Orders regarding payment of compensation to the fisher folk.</p>	
95.	<p>Chapter 8 Project Benefits Page 545-549</p> <p>i) There seems to be no basis for the assumptions made in this Chapter. Can you please provide some case studies to substantiate these assumptions?</p> <p>ii) What percentage of the benefits accrue to the local residents?</p> <p>iii) Will these benefits accrue even at any alternate location of this port?</p> <p>iv) What are the site specific benefits of this port at this location?</p> <p>v) How many people currently employed by JNPA are local residents?</p> <p>vi) Please also mention details of the nature of the jobs that the local residents have been hired for at Nhava Sheva.</p> <p>vii) What will be the impact of this project on the local economy in terms of inflation and price rise?</p> <p>viii) What facilities has JNPA and MMB set up to train local people at Nhava Sheva and at Dahanu/ Vadhvan?</p> <p>ix) How many people have been trained in these facilities?</p> <p>x) How many of the trained people are employed by JNPA and MMB?</p> <p>xi) Will all the socio-economic impacts be beneficial?</p> <p>xii) What will be the health costs due</p>	<p>i) The economic and social benefits have been brought out in the chapter 8 of EIA report.</p> <p>ii) As above.</p> <p>iii) The benefits shown in the chapter 8 of EIA is for the subject proposal.</p> <p>iv) Please refer chapter 9 of the EIA.</p> <p>v) The employment opportunity have been given to about 1000 PAP's. there are large number of locals employed port allied services e.g. CFS, warehouses, CHA's and misc. services to the extent of nearly 50000.</p> <p>vi) The employment available for locals are highly skilled, skilled, semiskilled and unskilled and also large number of professional graduates are employed.</p> <p>vii) The demographic change due to port establishment will bring prosperity and employment opportunities coupled with affordability to spend money as overall economy will improve.</p> <p>viii) JNPA and MMB have proposed to provide skilled training for port operations and services and at present training is in progress at JNPA training center.</p> <p>ix) As on date about 1000 people have been trained.</p>

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	<p>to increased pollution?</p> <p>xiii) How much will the cost-of-living increase by if the proposed port comes up at this location?</p>	<p>x) At present, the employees appointed are working and same is stated at as above.</p> <p>xi) Yes.</p> <p>xii) The state government has proposed to develop well equipped hospital at Dahanu with a reservation for locals.</p> <p>xiii) The demographic change due to port establishment will bring prosperity and employment opportunities coupled with affordability to spend money as overall economy will improve.</p>
96.	<p>In Page 549, it is mentioned that <i>"8.5 Aesthetics and Landscape It is proposed to develop greenbelt around the plant, which will go a long way to achieve environmental protection as well as aesthetics of the area. 121A vegetative cover at both ends of the project and also along internal roads will certainly reduce the air pollution. This vegetation cover will also act as a barrier for any penetration of air quality and odor in the nearby area. Approach roads will be covered with green belt on both the sides to avoid any air quality problems to the nearby residents"</i></p> <p>Can you please clarify which plant is referred to in this paragraph?</p>	<p>There are varieties of plants intend to be used for shelter, shed and prevent wind and reduce air pollution and advise of the State Forest department will be sought for the selection of trees.</p>
97.	<p>CHAPTER 9 - ENVIRONMENTAL COST BENEFITS Page 550 -</p> <p>i) This Chapter needs to be re written completely since it gives the impression that there are no environmental costs associated with this proposed project.</p> <p>ii) Ecosystem services are provided by forests, mudflats, mangroves, corals, sand dune, sea grass beds, marine biodiversity, etc. These have not been</p>	<p>i) The environmental cost is associated with the proposed project is shown in 10.9 budget for Environmental Management Plan.</p> <p>ii) The cost for this will be given by forest department in addition to EIA.</p> <p>iii) No.</p> <p>iv) The same will be completed during the forest clearance process.</p>

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	<p>computed.</p> <p>iii) Can the proposed port function without the rail-road connector?</p> <p>iv) If not, why has the eco-system services provided by forests not been computed?</p> <p>v) Is this not an attempt to provide false and misleading information?</p> <p>vi) Do the port activities not cause any pollution?</p> <p>vii) What is the pollution caused by storage, transshipment, leakage, etc of cargoes?</p> <p>viii) What is the pollution caused during theft of diesel from ships?</p> <p>ix) Will fragmentation of agricultural land not lead to displacement?</p> <p>x) If the rail-road corridor is not accessible to the public, will this also not lead to negative impacts to the local residents?</p> <p>xi) Please clarify that there will be no diversion of roads, transmission lines, canals (proposed and existing), etc. due to this project as mentioned in item 4 of the Table on page 550.</p> <p>xii) Can you please clarify what is meant by the Remarks re Item 5 of the Table on page 551?</p> <p>xiii) Even if no houses are directly acquired, loss of livelihoods would lead to displacement. Can you please clarify this aspect?</p> <p>xiv) Please provide full details re fragmentation of land holdings, including forest land, as well as a detailed map.</p> <p>xv) On page 553, there are some assumptions made re avoided diversion and generated cargo. Can you please substantiate this with the track record of JNPA at Nhava Sheva?</p> <p>xvi) What will the impact of this project be on existing ports if their cargos are diverted to the proposed port?</p>	<p>v) No as mention above the same will be computed while carrying out forest clearance process.</p> <p>vi) Environmental mitigation measures during construction and operation phase will be followed as mentioned in EIA report.</p> <p>vii) We do not anticipate such pollution on routine basis in case on any such incidents environmental mitigation plan will be implemented.</p> <p>viii) This issue will not anticipate and not take place due to round a clock security and CCTV arrangement.</p> <p>ix) We do not anticipate this as project doesn't anticipate any agriculture and household land. To the maximum best. In the rail-road alignment only small structures will be affected and condensation will be done as per the current government regulations.</p> <p>x) No.</p> <p>xi) This will be greenfield project and do care will be taken during the alignment.</p> <p>xii) Kindly clarify more on this quarry.</p> <p>xiii) CMFRI as carried out detailed socio-economic report. Kindly refer to it.</p> <p>xiv) This information will be available during land acquisition.</p> <p>xv) This is case study scenario.</p> <p>xvi) The theoretical assumption have been made to arrive at economical benefits for the subject proposal of Vadhvan.</p>

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98.	<p>Environmental Management Plan</p> <p>i) EMP needs to be prepared for the revised port configuration.</p> <p>ii) EMP needs to be specific and not full of generalities.</p> <p>iii) For each item of concern, it should be clearly mentioned who is responsible for implementation, the period within which it needs to be implemented, and the costs of implementation.</p> <p>iv) Re noise pollution, it is the responsibility of the project proponent to ensure that ambient noise standards are strictly followed.</p> <p>v) Noise barriers should be installed around the quarry sites, the rail and road corridors, pile driving areas, etc. and the mechanized handling systems and storage areas.</p> <p>vi) Re vehicular pollution, the project proponent should ensure that all the vehicles used are Bharat Stage IV or V or VI, and have valid PUC certificates, issued by a certified centre.</p> <p>vii) Storage of bulk cargo in the open should be strictly prohibited.</p> <p>viii) Sea water cannot be used for dust suppression inland.</p> <p>ix) Project proponent needs to set up a proper network of CC TV cameras and ensure that all operational activities are covered at all times. This would include the quarry, the road and rail corridors, the storage areas, etc.</p> <p>x) All mechanized handling systems should be fully covered.</p> <p>xi) Project proponent should set up a complaint mechanism through a dedicated email id and a dedicated WhatsApp number. All complaints should be recorded in a register and numbered serially. All complaints should be resolved within 24 hours.</p>	<p>(i) EMP is carried out for revised configuration only.</p> <p>(ii) This EMP is project specific only</p> <p>(iii) Item 10.7 Explains this.</p> <p>(iv) JNPA follow the current norms and regulations.</p> <p>(v) Noted and will be followed</p> <p>(vi) Noted and will be followed</p> <p>(vii) Noted and will be followed.</p> <p>(viii) Noted and Will be followed</p> <p>(ix) Noted and will be followed.</p> <p>(x) Noted and will be followed.</p> <p>(xi) Noted and will be followed.</p> <p>(xii) Noted and will be followed.</p> <p>(xiii) In addition to windshields all latest techniques will be implemented as well as guideline issued by Environment department is followed.</p> <p>(xiv) Noted and will be followed.</p> <p>(xv) Noted and will be followed.</p> <p>(xvi) Noted</p> <p>(xvii) Noted and will be followed.</p> <p>(xviii) It is responsibility of JNPA and NHAI and local traffic police department.</p> <p>(xix) Noted and followed as per the MPCB directions.</p> <p>(xx) Noted and will be followed strictly</p> <p>(xxi) Noted and will be followed strictly</p> <p>(xxii) Noted and will be followed strictly</p> <p>(xxiii) Noted and will be followed strictly the proposed greenbelt details are given in the same and addition to this is done by successful concessioner in consultation with forest department.</p> <p>(xxiv) As per new plan.</p> <p>(xxv) This information covers all the aspects of management actions.</p> <p>(xxvi) Please refer Annexure 12 CMFRI report and information at Pg. No. 122 to 150.</p> <p>(xxvii) Please refer Sr. no. 8.4 of DPR enclosed as Annexure 1 to EIA report.</p> <p>(xxviii) As above.</p>

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	<p>xii) If complaints cannot be resolved within 24 hours, the activity that is the subject matter of the complaint should be stopped.</p> <p>xiii) It is not clear how providing windshields will reduce air pollution Para 10.4.5.2</p> <p>xiv) Vehicle access to undeveloped areas should be restricted by erecting appropriate physical barriers.</p> <p>xv) All contracts should have a provision where costs of non-rectification of complaints by the contractor will be deducted from the contractual amounts.</p> <p>xvi) Use of terms such as "where practical", "where necessary" etc. may please be avoided.</p> <p>xvii) All DG sets must be in modern acoustic enclosures and should be operated only when the doors are fully closed.</p> <p>xviii) It is not clear who will be responsible for "effective traffic management".</p> <p>xix) Since the predominant wind direction changes with the seasons, the location of DG sets etc will need to be changed accordingly.</p> <p>xx) DG sets should not be located within 500 metres of any habitation.</p> <p>xxi) Noise levels above 65 dBA during day time are not acceptable.</p> <p>xxii) WhatsApp groups need to be created so that local residents are informed of construction and other activities 24 hours in advance.</p> <p>xxiii) With the help of telecom service providers, all mobile phone users within the 10 km periphery of the proposed project should also be informed as mentioned above Please provide details of the proposed green belt mentioned on page 574.</p> <p>xxiv) Does Para 10.4.8 pertain to the earlier project profile?</p>	<p>(xxxix) As above.</p> <p>(xxx) As above.</p> <p>(xxxix) As above.</p> <p>(xxxix) As above.</p> <p>(xxxix) Top soil will be kept at quarries.</p> <p>(xxxix) This will be carried out with the consultation with local forest department.</p> <p>(xxxix) This will be regulated by State Government Authority.</p> <p>(xxxix) No such restrictions</p> <p>(xxxix) VPPL nominated department and officers.</p> <p>(xxxix) Noted and will take appropriate actions.</p> <p>(xxxix) Noted and will be followed strictly</p> <p>(xi) Noted and will be followed rigorously</p> <p>(xli) That will depend upon the successful concessioner and JNPA authority</p> <p>(xlii) That will depend upon the successful concessioner and JNPA authority</p> <p>(xliv) That will be finalized once the successful concessioner is on board.</p> <p>(xliv) The monitoring of EMP will be carried out by dedicated team appointed by VPPL for complete the obligations under EMP with full powers and will be submitted to MPCB from time to time.</p>

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	<p>xxv) The management prescriptions in para 10.4.8.2 are extremely vague and it will not be possible to monitor compliance based on these recommendations. There are no details whatsoever about the equipment to be used, the standards to be adhered to, the sites identified for exploitation and destruction, etc.</p> <p>xxvi) There is no effort even to compile the phone numbers of boat owners, boat workers, Fisher folk Societies/Unions operating in the area.</p> <p>xxvii) On page 577, it is mentioned that <i>"This outline of a Dredge and reclamation Management Plan is based on the Revised OSPAR Guidelines for the Management of Dredged Material (Reference number: 2004-08)."</i></p> <p>i. Please clarify whether these OSPAR Guidelines are applicable for reclamation projects.</p> <p>j. Please explain why only an outline plan is being presented</p> <p>xxviii) Please give full details of the kind of dredgers that will be used.</p> <p>xxix) Please give full details of the kind of barges that will be used.</p> <p>xxx) Please give full details of the type, duration and dimensions of the silt curtains that will be utilized.</p> <p>xxxi) Please provide full details of all the facilities that will be available as required under the MARPOL Convention.</p> <p>xxxii) Para 10.5.1.1 How will erosion control of topsoil be implemented?</p> <p>xxxiii) Which are the areas earmarked for storage of topsoil?</p> <p>xxxiv) Para 10.5.5- all the trees within the ROW should be transplanted for the green belt. Exotic species of trees should not be planted. The green belt should also include grass, shrubs and creepers and not only trees.</p>	

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	<p>xxxv) Para 10.6.1.1- How will you restrict vehicle speeds in unsealed areas?</p> <p>xxxvi) One of the earlier recommendations was that vehicles would not be allowed in unsealed areas- can you please explain the contradictions?</p> <p>xxxvii) Who will be in overall charge of implementing the EMP?</p> <p>xxxviii) What are the financial and other decision-making powers that this person will have?</p> <p>xxxix) The time limits suggested for handling complaints is not acceptable- 5 business days and one month periods are too long particularly if local residents, tribals and fisherfolk are suffering from port related activities.</p> <p>xl) A detailed record of complaints received and the manner and time frame within which they have been resolved needs to be maintained and should be accessible to the public.</p> <p>xli) Repeat complaints about the same issues should result in effective action against the contractors or agencies responsible. The EMP manager should be authorized to suspend the activity in case of repeated violations</p> <p>xl ii) .Table 16.1 page 607 - please specify time frames for both capital and recurring expenditure against each item mentioned in the budget.</p> <p>xl iii) What mechanism will be put into place to ensure that these funds are spent item wise within the time frames specified?</p> <p>xl iv) Are there no funds being provided for contingencies? Or for budget over-runs?</p>	

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99.	The Table "Inputs of expertise contributed by the Functional Area Experts" on pages 648 to 650 needs to be completed with full details of the period and task filled in.	It is as per the format.
100.	Please clarify if all the experts have been hired for 2 days only as is mentioned in the case of Alka Sharma and Neha Bhargava.	They are hired as per the requirement.
101.	Please also share the CV of the Biological Expert Dinesh Bohra and the other experts who have compiled the list of species and undertaken the biological and ecological surveys.	This CV of the expert are as per the NABET accreditation scheme.
102.	The project proponent may kindly be asked to file a detailed compliance report re the Environmental Clearance granted to the JNPA port at Nhava Sheva.	The half yearly compliance report for JNPA may be seen in JNPA's official website under sustainable link.
103.	<p>JNPA Project at Nhava Sheva</p> <p>i) Please provide details of the destruction of mangroves at JNPA.</p> <p>ii) Please provide details of the 500 metre green belt around the periphery of the Port</p> <p>iii) Please provide details of the change of land use around 10 km of the JNPA project</p> <p>iv) Please provide details of the destruction of wetlands within 10 km of JNPA</p> <p>v) Please provide details of the quarrying activities within 10 km of JNPA</p> <p>vi) Please provide details of the villagers killed during the acquisition of land for JNPA.</p> <p>vii) Please provide details of court cases pending against JNPA for non-payment of compensation to fisher folk.</p> <p>viii) Please provide details of the socio-economic status of fisherfolk who have lost their livelihood because of JNPA port and allied activities.</p>	<p>i) No destruction of mangroves at JNPA.</p> <p>ii) JNPA has about 1200 hectares of greenery including mangroves.</p> <p>iii) Please refer JNPA's website under documents link.</p> <p>iv) No destruction wet land.</p> <p>v) No quarrying activity in port estate.</p> <p>vi) This information is not available.</p> <p>vii) Please refer Nr. no. 94</p> <p>viii) Please refer Sr. No. 94</p> <p>ix) JNPA undertakes annual maintenance dredging for navigational area and work generally commence after monsoon and complete by April every year.</p> <p>x) This information is not related to subject project.</p>

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	ix) Please provide details of the dredging activities carried out by the Port x) Please provide details and studies of the impact of dredging carried out by JNPA	
104.	Project Proponent may kindly be asked to clarify if the port is legally permissible as per the provisions of the CRZ notification, and the Orders of the Dahanu Taluka Environmental Protection Authority, Orders of the Hon'ble Supreme Court of India, the NEERI report ordered by the Supreme Court of India, etc.	Yes. DTEPA issued order dated 31 st July 2023 and the MoEF&CC has issued OM dated 26 th May 2022 which allow the development of port in Dahanu Taluka.
105.	CZMP MAPS AND OTHER MAPS NOT AVAILABLE	Please refer to MCZMA website for approved CZMP maps as per CRZ notification 2019.
106.	Annexure 1 is the "Detailed Project Report for Development of Greenfield Vadhvan Port by Royal Haskoning DHV (May 2023)". In view of the fact that the Port profile and location has been changed, it is suggested that a Revised DPR needs to be prepared.	Please refer para 6.2 of DPR which is about master plan overview of the proposed new layout and recommendation of Master Plan at Sr. No. 6.3 of DPR Annex1.
107.	Annexure II - TOR dated 7 th October 2020 and 2 nd June 2023 - Tables showing Non- compliance with the TOR are annexed.	Please refer Annex 2 and 2a (Annex3 of the document submitted to MPCB as a part of Public Hearing.)
108.	Annexure III - Demarcation of HT Land LTL for preparation of CZMP report by Institute of Remote Sensing, Chennai (October 2023} Remote Sensing, Chennai (October 2023} i) The entire Dahanu Taluka has been classified as Eco-Sensitive Area by the MoEF in 1991. Therefore, the entire CRZ area within Dahanu Taluka is classified as CRZ I. ii) The mangroves, mudflats, salt pans, archaeological and cultural sites have not been shown in the CZMP of 2019 despite the fact that these	The clarification is as follows; Please refer Annex 3 and development proposed in statement under table 2 details of development proposed in the port vis-à-vis the port limits and classification of CRZ. It may be noted that IRS is the MOEF approved agency for preparation of coastal regulation maps by superimposing on approved CZMP maps as per CRZ notification. Therefore, JNPA is not authorized to classify, reclassify or modify the CZPM maps.

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	<p>deficiencies have been pointed out by us earlier.</p> <p>iii) The CZMP maps need to be corrected accordingly.</p> <p>iv) We have repeatedly been informed by MCZMA that the 1:4000 scale maps have not been prepared, and therefore have not been approved by the MCZMA. Could you please clarify who has prepared and approved the 1:4000 scale maps mentioned in this Report?</p> <p>v) Can you please clarify what information is available regarding the "Approach Trestle".</p> <p>vi) Has the alignment of this Trestle been finalized?</p> <p>vii) What is the design of this Trestle?</p> <p>viii) Have the locations of the pillars of the Trestle been demarcated in the CZMP or in any other map?</p> <p>ix) Have the sedimentation/erosion/accretion studies taken into account the impact of the trestle pillars on the tides and current patterns?</p> <p>x) What is the scale of the google earth satellite imagery on page 23?</p> <p>xi) What is the date and time of this imagery?</p> <p>xii) Why has google earth imagery been used for this exercise?</p> <p>xiii) The map at page 25, which is extremely important, is illegible. A legible map may please be provided.</p>	<p>Please refer details of layout plan of Port mapped in CRZ mapping for all the queries stated in your query no. 108. The details of map can be downloaded from Vadhvan port official website under media center link; www.vadhvanport.in</p> <p>The details of approach trestle in the offshore in the region and road alignment have been provided in the CRZ maps prepared by IRS.</p>

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109.	Annexure IV is the "Mathematical Model Studies to assess the impact of proposed capital dredging on tidal hydrodynamics of nearby area of proposed port at Vadhvan by Central Water and Power Research Station (T. R. 5970- November 2021)". In view of the fact that the Port profile and location has been changed, it is suggested that a Revised Study needs to be prepared.	Please refer fig 6 and 7 of Annex IV for the proposed layout of the port as per new location as such the study is as per the new location.
110.	<p>Annexure Vis the "Mathematical Model Studies to assess the impact of Proposed Port Development at Vadhvan on Flooding in Dahanu Creek and Nearby Control area under Cyclonic Conditions by Central Water and Power Research Station (T. R. 6173 - October 2023}"</p> <p>i) The data used for the modelling studies in outdated and not enough data sampling has been carried out at different points.</p> <p>ii) The impact of the reclamation and the trestle bridge have not been factored in.</p> <p>iii) It is not clear how CWPRS mentions that the proposed port is only 3 to 4 km away from the shore (see page 9).</p> <p>iv) It is not clear how much of this Report has been prepared based on the earlier profile and how much is based on the Revised Profile. This may please be clarified in the Report.</p>	Please refer Annex V, Pg. No. 3 Fig. 2 which was considered for the subject study of impact of Port on flooding in Dahanu creek.
111.	<p>Annexure VI is the "Marine biodiversity management plan for the proposed greenfield port at Vadhvan, Palghar district, Maharashtra by CSIR - National Institute of Oceanography (SSP 3374- October 2023}"</p> <p>i) It is not clear how much of this Report has been prepared based on the earlier profile and how much is based on</p>	<p>The NIO conducted studies in the entire area of Dahanu coast considering port limits.</p> <p>1. The old and new layout are within the port limits and located in the study area.</p> <p>2. The details are available in the report (Annex-VI).</p>

S. No	Comments	Reply from JNPA
	<p>the Revised Profile. This may please be clarified in the Report.</p> <p>ii) The inconsistencies between the earlier two NIO Reports and the ZSI Report need to be reconciled.</p> <p>iii) It is not clear why an expert agency such as NIO has overlooked the existence of corals, mudflats, sand dunes, etc.</p>	
112.	<p>Annexure VII is the "2D Desktop Navigation Simulation Study by DHI/Force (March 2022)". In view of the fact that the Port profile and location has been changed, it is suggested that a Revised Study needs to be prepared.</p>	<p>The navigation study has been carried out for the changed location and the proposed port layout and profile is shown in the study area in Fig.2 of Annex VII</p>