ENVIRONMENTAL FOUNDATION
(GUARANTEE) LIMITED

Comments on the Environmental Impact Assessment Report (EIAR) of the proposed Northern Province Sustainable Fisheries Development Project- Point Pedro Fisheries Harbor Development Project

20 March 2020

20/03/ 2020

Director General,
Department of Coast Conservation and Coastal Resource Management,
4th Floor, New Secretariat Building,
Maligawatte,
Colombo 01000

Dear Sir,

Comments on the Environmental Impact Assessment Report (EIAR) of the proposed Northern Province Sustainable Fisheries Development Project- Point Pedro Fisheries Harbor Development Project

In response to the website notification appearing in the your website, on the above-mentioned project, the Environmental Foundation (Guarantee) Ltd (EFL) hereby forwards comments on the Environmental Impact Assessment (EIA) report.

The comments on the EIAR are as follows:

Coastal and marine ecosystems are extremely productive systems that provide an essential goods and services to the communities. They constantly provide food, coastal protection against storm surges and erosion, and trade and recreational opportunities to the society. They are also one of the most sensitive and vulnerable systems, being subject to a range of threats from anthropogenic and natural sources.

Overall purpose of this project

Currently, marine resources are exploited at an unprecedented rate globally and locally. Since, the 1980s global fisheries have been experiencing a state of crisis due to overfishing. It is recorded that 30% of target fish species are over-fished and 24% is at the risk of extinction (FAO, 2018).

The given project's main outcome is defined as "*Fisheries production in the Northern Province sustainably increased*" (pg. 2). The objectives of the proposed project include *increasing the national fish production for export and increasing deep sea fish production* (pg. 3), *by also increasing the fishing effort in the coastal and offshore/deep sea subsectors by increasing the fleet size* (pg. 20).

Fisheries production in the Northern Province is driven almost exclusively by coastal fishing, in small boats (< 7 m) up to a distance of 25 km from the shore. According to the Department of Fisheries and Aquatic Resources (DFAR) (2018) statistics (Table1), shore seine/small fish, rock fish, trevally, thora, shark, ray, prawn, crab and other fish fisheries contributed 85% of the total fish production in the Northern Province in 2017 (71,043 mt, DFAR 2018). Almost a third of this production came from shore seine/small fish fisheries (28%, 23,400 mt, DFAR, 2018). Small scale coastal fisheries operate from the beach, using non-motorised and motorised traditional boats (NMTRB and MTRB), non-motorised beach seine boats (NBSB) and fibre-reinforced plastic boats with outboard engines (OFRP). 95% of the vessels registered in the Northern Province in 2018 (13,044 out of 13,729) were MNTRB, MTRB, NBSB or OFRP craft.

Table 1 Marine Fish Production by District and Major Commercial Groups – 2017 (Mt) (DFAR 2018)

Fisheries District	Thora (Seer)	Paraw (Trevally)	Balaya (Skipjack tuna)	Kelawalla (Yellowfin tuna)	Tuna Like fishes (other blood fishes)	Thalapath (Billfish)	Mora/Maduwa (Sharks/Skates)	Rock fish (Mullets)	Shore Seine (Small fish)	Issa (Prawns)	Pokirissa (lobster)	Kakuluwa (Crabs)	Other fish	Total
1 Negombo	460	600	3,120	8,350	1,220	1,680	1,450	1,500	7,470	820	20	210	2,820	**29,720**
2 Colombo	250	440	210	100	1,240	100	260	1,030	1,440	180	45	80	560	**5,935**
3 Kalutara	310	2,370	4,080	1,100	6,150	1,070	1,000	760	25,370	40	40	10	140	**42,440**
4 Galle	480	1,900	6,230	8,580	3,910	460	530	280	24,940	90	80	30	240	**47,750**
5 Matàra	210	270	10,210	6,360	5,700	1,930	590	290	3,130	10	10	10	80	**28,800**
6 Tangalla	480	1,110	26,360	5,410	7,790	14,420	1,330	1,890	8,050	50	90	10	1,060	**68,050**
7 Kalmunai	550	1,590	2,750	840	860	620	530	2,220	8,540	340	100	340	1,600	**20,880**
8 Batticaloa	1,080	2,330	1,460	1,010	1,270	910	510	2,560	6,090	2,030	10	320	3,920	**23,500**
9 Trincomalee	610	2,810	1,820	5,460	7,890	970	300	4,250	7,150	500	40	410	1,200	**33,410**
10 Mullaithivu	580	710	120	70	300	150	270	490	1,820	330	10	260	360	**5,470**
11 Kilinochchi	20	750	10	40	120	30	960	1,270	2,430	1,920	30	2,160	2,100	**11,840**
12 Jaffna	1,740	4,460	90	70	400	3,300	2,060	7,670	14,480	5,070	5	2,390	2,730	**44,465**
13 Mannar	540	1,390	20	-	190	3,820	1,490	1,430	4,670	2,560	10	2,400	2,860	**21,380**
14 Puttalam	370	2,010	640	900	1,700	790	1,660	2,370	14,650	2,940	40	2,610	5,210	**35,890**
15 Chilaw	110	950	840	670	5,780	2,930	680	3,090	13,020	740	10	270	820	**29,910**
Total	**7,790**	**23,690**	**57,960**	**38,960**	**44,520**	**33,180**	**13,620**	**31,100**	**143,250**	**17,620**	**540**	**11,510**	**25,700**	**449,440**

Source: Statistics Unit, Ministry of Fisheries and Aquatic Resources Development

Note: Estimated based on the monthly fish production reports submitted by the Fisheries Inspectors of DFAR for their FI Divisions

Table 2 Fishing Craft by Type by District– 2017 (DFAR 2018)

	Fisheries District	IMUL	IDAY	OFRP	MTRB	NTRB	NBSB	Total Boats
1	Negombo	730	24	1,565	6	1,160	39	3,524
2	Colombo	36	26	394	1	318	24	799
3	Kalutara	400	3	369	-	244	32	1,048
4	Galle	628	20	412	198	232	38	1,528
5	Matara	956	84	806	273	636	7	2,762
6	Tangalle	514	24	840	129	687	101	2,295
7	Kalmunai	116	84	678	179	877	197	2,131
8	Batticaloa	327	28	1,209	8	4,095	171	5,838
9	Trincomalee	174	16	2,865	20	1,575	117	4,767
10	Mullaitivu	-	-	873	-	613	76	1,562
11	Kilinochchi	2	-	689	91	254	-	1,036
12	Jaffna	90	351	3,830	621	1,823	111	6,826
13	Mannar	34	208	2,767	443	839	14	4,305
14	Puttalam	73	-	2,961	209	1,342	203	4,788
15	Chilaw	116	-	2,136	7	1,340	82	3,681
	Total	**4,196**	**868**	**22,394**	**2,185**	**16,035**	**1,212**	**46,890**

Source: Statistics Unit, Ministry of Fisheries and Aquatic Resources Development

Estimated based on the monthly reports submitted by the Fisheries Inspectors of DFAR for their FI Divisions

Note : IMUL - Inboard Multi-day Boats, IDAY - Inboard Single-day Boats, OFRP - Out-board engine Fiberglass Reinforced Plastic Boats, MTRB - Motorized Traditional Boats, NTRB - Non-motorized Traditional Boats NBSB -Non Motorized Beach Seine Crafts

Small scale, coastal fishing vessels are designed to launch and land from beach landing centres and cannot be used in harbours of the sort proposed by the project in Point Pedro. In view of the composition of the marine resources harvested in the Northern Province (Table 1) and the types of vessels engaged in fishing (Table 2), it is difficult to envisage how the proposed Point Pedro harbour development will contribute to the project's main outcome to sustainably increase fish production in the Northern Province.

At best the proposed harbour in Point Pedro will have no overall positive effect on small scale fisheries production. However if the harbour is used by one day (IDAY) and multi-day (IMUL) boats to further establish trawl net fishing in the Northern Province – as is the case in Kalpitiya Harbour – the proposed development will likely have a very serious negative impact on the environment and overall fish production in the Northern Province.

The Kalpitiya Harbour commissioned in 1968 is mainly used by 24 one-day fishing boats, which operate trawl nets in the Puttalam estuary (Images 1). Trawl net fishing in the Puttalam estuary is wildly understood to have serious, detrimental impact on marine resources in the Puttalam estuary and broader Gulf of Mannar marine ecosystem.

Image 1 One day (IDAY) boats berthed at Kalpitiya Harbour, used to operate trawl nets in the Puttalam estuary

24 IMUL vessels operating trawl nets are currently in operation from the Velveththethurai anchorage, located within 10 km of the proposed Point Pedro harbour construction (Image 2). The Point Pedro harbour development proposes a considerable environmental risk to fish stocks off the northern and northeastern coast of the peninsula, if the harbour becomes a berthing point of IDAY and IMUL vessels using trawl nets in shallow, coastal waters of small scale fishermen in the Northern Province.

Image 2. 24 Multi-day (IMUL) boats berthed at Velveththethurai anchorage, used to operate illegal trawl nets off the northern coast of the Jaffna peninsula.

The proposed project seeks to *increase the national fish production for export and to increase deep sea fish production*. Deep sea fish production generally refers to beyond the continental shelf fishing up to the boundary of Sri Lanka's exclusive economic zone (EEZ) and beyond the EEZ (bEEZ). Sri Lanka's deep sea fishery resources are the least off the coast of the northern province, where the distance to the EEZ is less than 50 km in the case of the districts of Mannar, Kilinochchi and Jaffna. Only Mullaitivu offers fishermen the opportunity to fish 200 nautical miles from the coast (Fig. 1).

The deep sea fishery in Sri Lanka mainly targets a large number of highly migratory species for export such as tuna, swordfish and other bill fishes (Joseph and Moyiadeen 1986). The tuna fisheries are dominated by the highly migratory skipjack and yellowfin tunas. As can be seen from Table 1 skipjack represents only 0.3% (240 Mt) of the fish production in the Northern Province, while yellowfin tuna contributes only 0.2% (180 Mt). Given the fisheries profile of the Northern Province and the extent of Sri Lanka's EEZ available to fishermen to harvest these deep-sea resources, it is difficult to understand how the proposed harbour development will enable the project to increase deep-sea fish production of skipjack and yellowfin for export from within Sri Lankan waters.

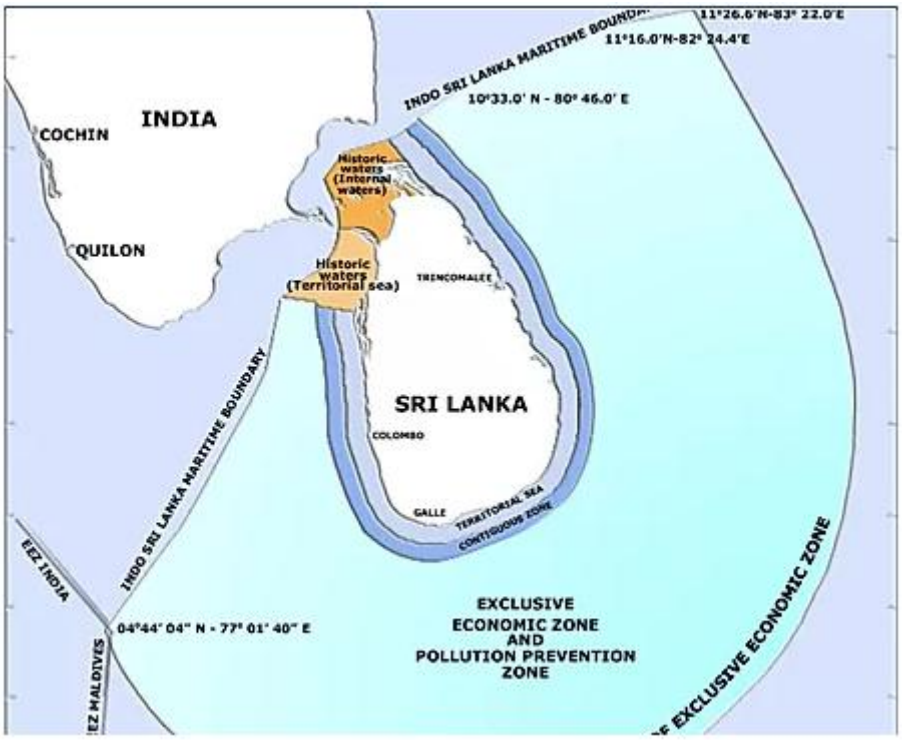

Figure 1 Extent of Exclusive Economic Zone of Sri Lanka

Beyond Sri Lanka's EEZ, the Indian Ocean's Tuna Commission (IOTC) stock assessment carried out in 2018, specifically states that increased catches in the last few years has significantly increased the pressure on Indian Ocean stock. Especially, yellowfin tuna stock, which majority of the local deep sea fisheries target, was determined to remain overfished. Sri Lanka was one of the five countries that caught the most Indian Ocean yellowfin tuna in 2017 (Fig. 2).

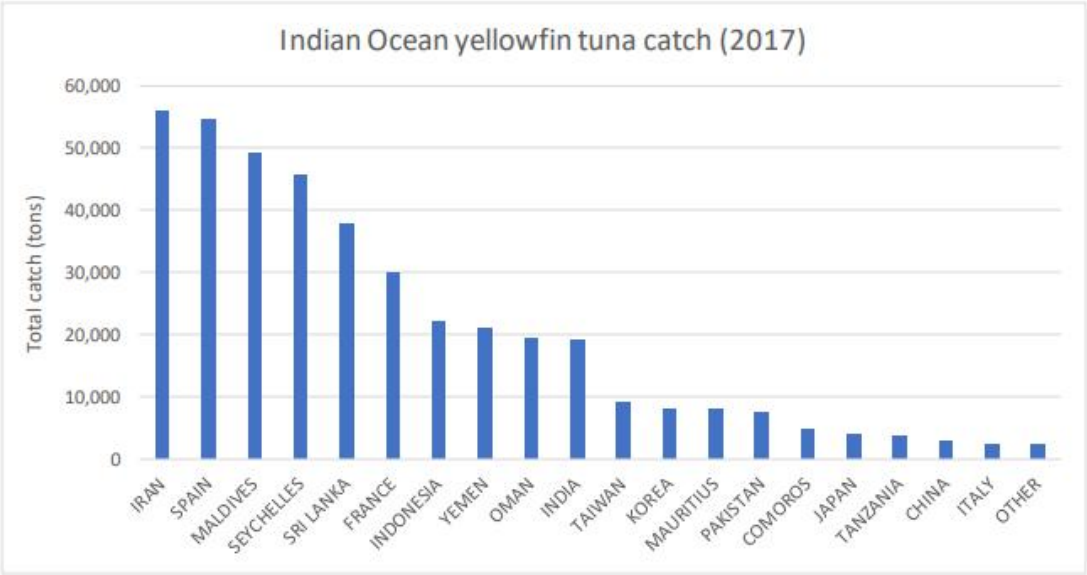

Figure 2 Total 2017 IOTC yellowfin tuna catch (source: Blue Marine Foundation based on IOTC 2018 data)

Globally, yellowfin tuna is categorised as "Near Threatened", due to declining populations (IUCN 2011). Projections done by IOTC illustrate the trends in yellowfin tuna stock from 2018-2027 under potential changes in catch level that range from 60% to 120% (Fig. 3). The black line indicates a collapse in yellowfin tuna stock if business as usual is carried out and if fishing remains as high as they currently are in the Indian Ocean. It is estimated that a catch reduction of at least 25% is required if the stock is to have any chance of recovery (Blue Marine Foundation, 2019).

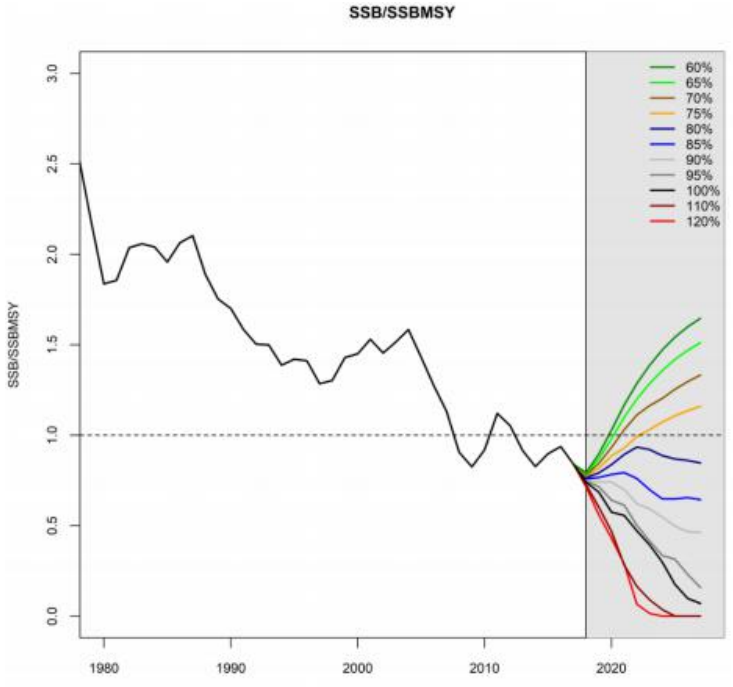

Figure 3 Trajectory of the state of Indian Ocean YFT stock with a 10-year projection (2018-2027) assuming a constant level of catch at 60% –120% of the 2017 catch level. The grey area represents the projection period (Source: Blue Marine Foundation based on IOTC 2018 data)

Further, an ecosystem survey was conducted by National Aquatic Resources Research and Development Agency (NARA) in 2018 as part of a synoptic coverage of the Bay of Bengal marine resources and ecosystems to be conducted by the RV Dr Fridtjof Nansen in 2018 as part of the EAF-Nansen Programme (2017-2021). The preliminary information from this study has shown that Sri Lanka's pelagic fish stocks, especially in all areas except south-west coast, are exhausted as indicated by recorded low biomass.

In the light of above information, it is evident that Sri Lanka's key targeted off-shore species are overfished and this trend will only lead to a crash in fish stocks. Hence, this questions the objectives of the proposed project and the overall environmental integrity of it, given the current status of fisheries in the country. It also questions how the project will contribute to meeting international obligations when we are to reduce our catch quotas to ensure sustainability but take more initiatives to increase fleet size and fishing effort.

Other environmental impacts

Point Pedro area consists of a fringing reef that extends over a vast area and building physical structures on the reef as proposed in this project can greatly modify these natural habitats. Artificial structures have inherently different features from natural habitats such as the material with which they are built, their

orientation and their distance to the sea floor. As a consequence, these structures often support flora and fauna assemblages that differ in many ways from those on natural substrata.

Harbours are also substantial sources of pollutants as commercial fishing vessels can result in the release of various chemical contaminants, including heavy metals or accidental oil spills. Marine debris commonly accumulated in habours, consisting of plastic, can harm organisms by physically entangling species or by releasing toxic chemicals into the marine environment. Harbours can also affect the local biodiversity through the introduction of invasive species. Native systems can be affected through the displacement of native biota, changes to predation and herbivory rates, introduction of new diseases and parasites and the destabilisation of microenvironments

Meeting the needs of the community

EIA states that the direct benefits will be to the fishing community operating IMUL in the country and states that local community will also be directly benefited from the project (pg. 8).

It has been shown by recent studies that Northern fishermen are relying on already exhausted fish stocks. When considering the gear required, out of a total of 4,196, Jaffna has only 90 IMUL boats that are suitable for offshore fishing (Table 2). Additionally, the proposed project site is located in Vadamarchchi North DSD Division, where the report states "*fishing and agriculture are the dominant economic activity*", but studying Table 4-10, this seems only partially true, as 23.7% and 19.9% of the community are engaged in the government sector and agriculture, respectively (pg. 102). Only about 10% of the community is engaged in fisheries.

Opening up a new harbour attracts fishing communities from other areas, which can lead to conflicts between the locals and new comers when there is a battle for resources and subsequent price drops that affect the local communities. A similar impact was observed after the opening of the ADB funded Valachchenei harbour in 2011 (Haltiner, 2013). There was an influx of deep sea fishing boats from the south and west of Sri Lanka who started to land their catch in the newly opened Valaichchenai harbour. These deep sea fishing vessels mainly are registered in Chilaw, Negombo, Matara and Hambantota (Haltiner, 2013). New facilities and opportunities for fishing under depleting marine resources, also thrust fishermen to resort for illegal means of fishing as observed in other parts of the country.

Hence, this questions who will mostly benefit from the proposed new fisheries harbour if the community is not prepared nor equipped to use this new infrastructure. The EIA report also does not adequately address how the needs of the community were assessed and how they can make use of the new facilities to improve their livelihoods.

Addressing other social impacts

It was brought to EFL's notice that the proposed harbour will be built in proximity (15 m) of an all girls' school and the impacts it would have on the children. The EIA states that "*additional consultations have been undertaken to ensure the schools are aware of the project*" (pg. 104) but does not provide any additional details on how the above grievances were redressed. From the limited correspondence we have had with the school, they were discontented with the level of consultations and certain news articles have indicated that affected parties still have concerns about the safety of children (Daily News, 2018).

Recommendations

We strongly suggest the contracting parties re-evaluate the purpose of the project and how beneficial it would be to the local communities, given the fishery resources available to Northern Fishermen, the current state of national and regional fish stocks and the likely impacts the harbour development may have on Sri Lanka's marine environment.

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END OF COMMENTS

Yours faithfully,

Chaturangi Wickramaratne, PhD

Head of Science