



ENVIRONMENTAL FOUNDATION
(GUARANTEE) LIMITED

Comments on the Environmental Impact Assessment (EIA) for Construction of Harbour Facilities at Haraspola, Balapitiya in Galle District

14 December 2021

14th December 2021

Director General,
Coast Conservation & Coastal Resource Management Department
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Dear Sir,

Comments on the Environmental Impact Assessment (EIA) for Construction of Harbour Facilities at Haraspola, Balapitiya in Galle District

The Environmental Foundation (Guarantee) Ltd (EFL), established in 1981, is a non-profit environmental public-interest litigation and scientific research organisation. Its' mission is to conserve, protect the natural environment of Sri Lanka, assuring a sustainable future for the country, people, and biodiversity.

In response to the website notification appearing on the Coast Conservation & Coastal Resource Management Department website, on the project as mentioned above, the EFL hereby forwards comments on the Environmental Impact Assessment report (EIA).

The specific comments are provided in Annex 1, along with a reference to the page number of the EIA document. The following section of general comments highlights the key concerns.

We would like to request an open discussion to present our comments and thoughts, if an opportunity is provided by the project proponent.

We hope that our comments will assist you in further improving the EIA and to ensure environmental feasibility of this project.

Yours faithfully,



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Dinithi Panagoda
Head of Science

Annex 1: Comments on EIA Report of Construction of Harbour Facilities at Haraspola, Balapitiya in Galle District

Comment No	EIA Pg No	EIA Section reference	Comment
1	122	Marine Ecology	<p>Construction of breakwaters can carry several impacts; thus, the construction and its impacts need to be adequately addressed as part of the EIA process.</p> <p>The EIA recognises that “<i>Some rocky habitats are likely to be lost due to construction work of the breakwaters</i>” and further ascertains “<i>these habitats are relatively low in overall biodiversity and ecological importance.</i>” However, the EIA does not provide any data or results of an ecological survey of these rocky shore habitats. It is imperative that a survey is conducted that establishes the species diversity found in these rock shore habitats, as they are often important breeding grounds for groups such as echinoids.</p> <p>Moreover, the EIA denotes, “<i>development of onshore facilities that may require clearing of coastal vegetation</i>” it is again necessary for a floristic survey to be conducted that identifies the vegetation that will be lost. Sri Lanka’s Biodiversity Profile Update 2019 identified the islands coastal and marine belt region as a special floristic region of the country due to the distribution of unique vegetation types restricted to the region such as <i>Crinum asiaticum</i>, <i>Calophyllum inophyllum</i> and <i>Terminalia catappa</i>.¹ This is necessary to be done to safeguard against the clearing or loss of unique and / or threatened species.</p>
2	iii, 105	Impacts on the beach and shore waterline	<p>Coastal erosion is anticipated as a possible result of the dredging that is to occur during the construction phase. This if it were to occur, would directly impact the beach front of the area. The proposed mitigatory measure for this is “<i>that dredged sand be used for replenishing the eroded coastal areas.</i>” Sand replenishment is documented to carry negative impacts such as that the sand may continue to erode during storm surges / storms and is an expensive process that requires repeated application over an extended period. These aspects are not analysed in the EIA; thus, it is recommended that when mitigatory measures are proposed a cost benefit analysis is also provided that pays due consideration to the ease of application.</p>
3	120	Contamination of nearby water bodies due to run off.	<p>It is necessary that during both the construction and operational phases of the project the water quality of nearby water bodies are continually monitored to ensure adverse impacts on ecosystems and communities are not experienced due to the runoff.</p>

¹ MoMD&E 2019 Biodiversity Profile - Sri Lanka, Sixth National Report to the Convention on Biological Diversity, Biodiversity Secretariat, Ministry of Mahaweli Development and Environment, Sri Lanka. pp.200

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4	141	Mitigation Measures for Impacts on the Beach and Shoreline (for the Impacts mentioned under 4.1)	<p>Specific mitigation impacts are not identified in the EIA, and this is said to be because of the “low level of impacts envisaged.” However, it is imperative that mitigatory measures are identified as part of the EIA process in order to ensure that erosion of adjacent beaches and possible changes in hydrodynamic patterns as identified in the EIA can be addressed adequately.</p> <p>The lack of a contingency plan presented, means the local communities who depend on fisheries, tourism can be adversely affected. The location of the proposed site at Haraspola, Balapitya is 1.2 km north of the river mouth of the Madu Ganga and the area is hub for tourism operations upon which many livelihoods are dependent. Thus, erosion of beaches could be detrimental to supporting these livelihoods.</p>
5	91	Threatened and Endangered Species	<p>While the EIA denotes that no evidence of turtle nesting was observed during field visits for the preparation of the EIA report – it recognises the surveys were conducted during a very short period. Thus, it is important to take into account, as the EIA correctly denotes that Kosgoda beach is less than 10 KM from Harasapola and has been “<i>identified as the best nesting beaches in southern Sri Lanka and recommendations were made to declare them as protected sea turtle nesting habitats.</i>”² Therefore, it is very likely that turtles visit and spend time, and may even be nesting along the stretch of beach in Balapitya. Further, taking into account that all five species of marine turtles found Sri Lankan waters are categorised as endangered or critically endangered, as is the leatherback sea turtle it is imperative that an intensive study is conducted to ascertain if these threatened species will be affected by development of the harbour facilities.</p> <p>Further, Sri Lanka’s 6th National Report to the Convention on Biological Diversity identified specifically that the most significant threats to marine turtles include becoming victims of by-catch, beach front developments and especially light and water pollution from developmental activities.³ This further highlights the importance of evaluating the threats to threatened species thoroughly prior to proceeding with a project of this nature.</p>

² Amarasooriya, K. (1999), A Classification of the Sea Turtle Nesting Beaches of Southern Sri Lanka, Paper Presented at the 22nd ASEAN Symposium and Workshop on Biology and Conservation of Sea Turtles, Kota Kinabalu, Sabha, Malaysia.

³ MoMD&E 2019 Biodiversity Profile - Sri Lanka, Sixth National Report to the Convention on Biological Diversity, Biodiversity Secretariat, Ministry of Mahaweli Development and Environment, Sri Lanka. pp.200

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			The adequate mitigatory measures for turtles should be further proposed as part of the EIA process, conducting field observations regularly is not a sufficient mitigatory measure as proposed by the EIA. The nesting location should be identified and demarked accordingly prior to proceeding of the proposed project.
6	106	Erosion effects in either sides of the coastal stretch during construction and long term.	The proposed location of the development is in proximity to a popular tourism area, with many beachside establishments. Thus the erosion of coastline can have a long term impact upon these establishments dependent on pristine and accessible beach fronts. This will in turn affect local livelihoods. Simple mitigation techniques, such as coral farming and habitat expansion, can be investigated further and implemented as needed to ensure long-term viability.
7	112	Impact on water quality	As the EIA recognises during the construction phase of the project impact on water quality can be considered high, due to dredging activities anticipated. Thus, this will affect the tourism ventures and local communities directly living in in proximity to the project area. Adequate mitigatory measures for during the construction phase that are pre-emptive need to be identified and presented as part of the EIA.
8	121	Anticipated problems related to solid waste disposal	During both construction and the operational phases of the project it is duly recognised that solid waste disposal is likely going to be problematic. During the operational stage <i>“solid waste such as fish discards and domestic waste will be mainly generated.”</i> This statement is correct, however, there needs to specific consideration placed to how discarded / abandoned / and damaged fishing gear will also be handled at the harbour during the operations of the project. In Sri Lanka, a survey in 2020 found that a lack of regulatory provisions and monitoring on the part of authorities to manage the abandonment of fishing gear coupled with lack of awareness and little incentives provided to fisherman means that damaged equipment is chosen to be discarded or abandoned in the ocean. ⁴ This practice has a detrimental impact on marine ecosystems. Thus, it is recommended the EIA incorporates and addresses specifically mitigatory measure for how the disposal of fishing gear will be managed at the harbour.

⁴ Status of Ghost Fishing Gear Removal in Sri Lanka. *Centre for Environment, Fisheries and Aquaculture Science (CEFAS)*. 2020.

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9		Socio Economics aspect	Increased facilities and the expansion of the harbour will have an impact on the carrying capacity of marine fisheries in the vicinity, which has not been examined and implemented limitations and necessary action has yet to be developed for the fishing community.
10		Socio Economics aspect	Have not defined what the substitute income sources for families will be after relocating, and a more in-depth analysis of the families who would be directly affected by the proposed harbour is required.
11		Request for a Public Hearing	EFL requests for a public oral hearing to be organised on the above EIA that brings together residents, business owners of the Haraspola Area, Balapitya, and records and address comments that may arise before any project approval is granted. EFL further wishes to join such a public hearing and to share our comments verbally as well.