

# A. V. C. B. Traditional Fishermen Association

Office: - 44/A Passagem Assolna Salcete Goa 403 701

REGD. No. 200/GOA/2004

Ref: - AVCBTFA/053/2019 - 20

Date: - 09/12/2020

To

The Captain of ports

Panaji, Goa.

SUB: REQUEST TO STOP ILLEGAL DREDGING OF RIVER SAL BY VAIBHAVI DREDGING

Ref: Work Order No CP/HSO/264/2862 dated 24/11/2020

Dear Sir,

This is to express our shock and disbelief at the arrival of a dredger at River Sal, which is presently parked near Orlim bridge in preparation of dredging of the river. As you are well aware, River Sal is used exclusively by the fisher folk of the villages along the banks of the river, who are the custodians and dependents upon the river and its well-being. Our fish breeding grounds, shell fish grounds and fishing areas are highly sensitive, and dredging can completely destroy the fisheries and our livelihoods.

We have attempted to collect information regarding the proposed dredging and could find only one document as yet, which is the Tender Notice No CP/HSO/264 issued by the Captain of Port Department. As stated in the Tender Notice, you have decided to carry out dredging of the river to a depth of 3 m, width of 12 m and a length of 6 km from the new bridge at Telaulim-Varca. This is clearly and unambiguously a case of capital dredging, since the river depth in most parts of this stretch has always been much less than 3 m, especially along the 'bhats' (mudflats), where shell fish and other fish species breed and flourish.

We draw your attention to the following facts in this regard:

1. The attempt to call this capital dredging as 'desilting' is a clear case of fraud and criminal violence against the fisher folk community of River Sal, especially when there has been no information shared with us, nor have been consulted in any manner.
2. The subject activity of dredging to 3 m depth amounts to capital dredging and hence is in gross violation of the EIA Notification, 2006 and the Environment (Protection) Act, 1984, since no Environmental Clearance is obtained by you.
3. This dredging is a direct assault on our livelihoods and lives and hence is gross violation of Article 21 of our constitution.
4. The subject activity is gross violation of the Coastal Zone Management Plans prepared by us and other villagers along with the respective Village Panchayats. These plans clearly and accurately demarcate the fishing, fish breeding, shell fish breeding and other ecologically sensitive areas of the river, but have not been considered in the Tender Notice which is for fixed dimensions of 3 m depth, 12 m width and 6 km length.

ariant for General category as per actual cost with a ceiling of 80 lakhs per unit.