



M. ஸ்ரீதர் B.Com.,

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திண்டுக்கல் மாவட்டம்.

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தேதி :

To:

Chairperson
Tamil Nadu Pollution Control Board
76 Anna Salai, Guindy
Chennai 600 090

Respected Sir,

Sub: Proposed clean up standard by M/s HUL –
Mercury thermometer factory, Kodaikanal

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I noted with disappointment the lax levels of clean up proposed for the mercury contamination site in Kodaikanal in the Detailed Project Report that was shared with me by ex-workers. I have sought scientific advice on understanding the report and would be able to provide a detailed note in a few days. I admit that I have been made aware of this issue in my backyard only recently. But now that I am aware, I cannot shirk my responsibility to my constituency to ensure that the issue is resolved to the benefit of Kodaikanal residents of today and of future generations of people in this hill town. I also understand the onerous burden on Kodaikanal as its forests serve as an overhead water tank for towns as distant as Palani, Madurai, Dindigul, Theni and Periakulam.

A report titled "Double Standards" which was released in 2010 by the Tamil Nadu Alliance Against Mercury-- an alliance with many members from Kodaikanal --documents how the relaxed clean-up standards of 20-25 mg/kg were developed assuming a future use of the factory site as a residential area or for recreational purposes. That report also argued how even for residential purposes, the standard adopted was 20 times more lax than the 1 mg/kg standard in the UK which is where Unilever is headquartered. That report also rightly argues that the site ought to be cleaned up to a level that is protective of the ecologically sensitive area -- the Pambar Shola and Kodaikanal Wildlife Sanctuary -- within which it is located. You can find a copy of this report at: <http://kodaimercury.org/double-standards-kodai-unilevers-mercury-fever-kodaikanals-ecological-time-bomb/>

I am surprised that despite these valid issues being raised in 2010, the relaxed standards have been endorsed by a Scientific Experts Committee. This raises questions in my mind about the scientific integrity of the evaluation by these scientists.

I am not a scientist, but Kodaikanal has many residents who are knowledgeable about these matters, and have their counsel.

I am glad to learn that the Tamil Nadu Pollution Control Board has not taken a decision on this matter. I would be keen that the current DPR be set aside until the controversy regarding standards is resolved. Once that is done, it is only logical to ensure that any cleanup proceeds on the basis of sound science that relies on independently generated data.

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I would also like to point out that the proposal contains no information about what is the reparation for the 1000s of kilograms of mercury dispersed into Kodaikanal's environment. It may be a fact that most of this is unrecoverable. But if that is the case, the polluter must be penalised for making us bear the long-term effects. Also, there must be a mechanism to ensure that the build-up of mercury in the environment in the long-term is monitored.

The Municipality of Kodaikanal is keen to work with you to ensure that the polluter not only cleans up the site, but also compensates the local body for the mercury discharged into its atmosphere, and for a long-term environmental monitoring and rehabilitation program for the environment.

Sincerely,

(M. Sridhar,)
Municipal Chairman