

BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE, CHENNAI

Original Application No.104 of 2021

K.Ramsingh
S/o.Kandasamy,
No.3/93, South Street,
Theertharappapuram post,
Alangulam Taluk, Tenkasi District

.....Applicant

VS

1. State Environment Impact Assessment Authority,
Government of Tamilnadu,
3rd Floor, Panagal Maligai,
No.1 Jennis Road, Saidapet,
Chennai, Tamilnadu-600 015.
2. The Chairman,
Tamilnadu Pollution Control Board,
No.76, Mount Road,
Chennai. 32
3. The Deputy Director,
Dep of Geology and Mining,
Collectorate, Kokkirakulam,
Tirunelveli.
4. The District Collector,
Collectorate,
No.82, Railway Feeder Road,
Tenkasi.
5. The Superintending Engineer,
TANGEDCO, Anna Building,
Thiyagaraya Nagar, Tirunelveli 627 011
6. The Assistant Engineer,
Distribution- TANGEDCO,
Servaikkarapatti, Kadayam,
Tenkasi District.
7. N.Mohamed Mahaboob,
Proprietor- AP Nadanoor Rough Stone,
Jelly and Gravel Quarry,
No.8/142, Main Road,
Pottal Pudur, Ambasamudram Taluk,
Tenkasi.
8. K.Sasikumar,
S/o.V.Kalangiam,
Proprietor- AP Nadanoor Rough Stone,
Jelly and Gravel Quarry,

K. Sasikumar

No.9/303, Nainar Koil Street,
Velappanaiyeripaatti, Thippanampatti Village,
Tenkasi District- 627 423

**8th RESPONDENT REPLY TO THE OBJECTIONS FILED BY THE
APPLICANT**

1. I submit that; this Respondent had filed the preliminary objection on 22.09.2021 and had filed reply objections on 24.11.2021. It is humbly requested that the said objections can be treated part and parcel of this reply to the objection filed by the applicant.
2. I submit that, the Tamilnadu Pollution Control Board/2nd Respondent had filed its report dated 22.09.2021 the same was taken into file on 23.09.2021 and I submit that, as per the orders of this Hon'ble Tribunal, the Joint Committee had filed its Report dated 26.10.2021 before this Hon'ble Tribunal and the same was uploaded in the Hon'ble National Green Tribunal website on 27.10.2021
3. It is submitted that, the conclusion of the joint committee is that, this 8th Respondent had followed all rules and procedures in the quarrying operation and had not committed any violations.
4. With regard to the counter objection of the applicant to the joint committee, it is submitted that this 8th Respondent had followed the procedures suitably followed in the quarry area and it is further submitted that,
 - (i) The medical facility and accident care insurance policy had been provided to the working labourers and employees (The photographs for the same is annexed herewith- **Annexure-I**)
 - (ii) The internal road is graded and water sprinklers is done by using lorries, hereby dust pollution during vehicle movement is avoided. (The photographs for the same is annexed here with- **Annexure - II**)
 - (iii) This respondent had taken all steps to allocate funds for CSR activity.

/s/ S. H. Kumar

(iv) The green belt was well maintained in the quarrying area

(Annexure -III)

(v) It is submitted that the quarry activities were carried within the permitted level and there is no illegal transmission of stones and gravel and the allegation of applicant is baseless and the applicant is put to the strict proof of the same.

5. I submit that, because of the pendency of the case, the quarrying operations had been stopped on 16.07.2021 and the Department of Geology and Mining has not issued the transport pass thereon for the past 159 days (i.e, 16.07.2021 to till date) and it is submitted that, the Corona pandemic situation and government mandated lockdown has already disrupted the business chain, which had led to closure of manufacturing facilities and had already caused loss of lakhs of rupees to this 8th Respondent.
6. I submit that, though this respondent had not committed any illegality, due to the non-operation of the quarry, this respondent facing a huge financial suffering and livelihood of this respondent and employees is at stake. I further submitted that, this respondent unable to pay salary and bonus for the working labourers and employees, even for the upcoming important festival of Tamilnadu (i.e., Pongal festival).
7. I submit that, years of heavy investment in quarrying machineries are indebted in bank loans and massive damages were caused due to Covid pandemic and it had already caused huge loss to this Respondent and due to non-operation of quarry, this respondent has been suffering from financial stress and unable to repay the EMI for Bank loans. The several employees who are all dependant on this quarry and allied industries are jobless and their livelihood affected.

Therefore, in the view of the above, it is most humbly prayed before this Hon'ble Tribunal to record the submissions stated and consider the

H. S. Kumar

reasons stated in this reply affidavit and pleased to dismiss this original application and pleased to pass such orders deem fit and render justice.

Solemnly affirmed at Chennai, on this) the 22nd day of December, 2021,) and signed his name in my presence.)

1/6 Jt/Kom
BEFORE ME,
D. [11/6/2021]
ADVOCATE, CHENNAI
*Do-301, 2nd floor
Ambalpet
Ch-1.*

VERIFICATION

I, K.Sasikumar, Son of V.Kalangiyam, Hindu, aged about 38 years, residing at No.9/303, Nainar Koil Street, Velappanaiyeripatti, Thippanampatti Village, Ambasamudram Taluk, Tenkasi District do hereby verify the above said 1-7 paragraphs to be true to the best of my knowledge on material facts.

K. Sasikumar

COUNSEL FOR RESPONDENT

RESPONDENT

1/6 Jt/Kom



UNITED INDIA INSURANCE COMPANY LIMITED

37/2, MATTAPPA STREET NEEL COMPLEX, II FLOOR, TENKASI TENKASI, TIRUNELVELI, TAMIL NADU
TIRUNELVELI - 627811 TAMIL NADU
PH: (4633) 222124 FAX: EMAIL:

MICRO-INSURANCE PRODUCT-GROUP ROAD SAFETY POLICY
POLICY NO.: 0918004720P111724531

PERIOD OF INSURANCE
From 00:00 Hrs of 14/01/2021
To Midnight of 13/01/2022

Insured

MS SASIKUMAR ENTERPRISES

PROP.: K.SASI KUMAR, 9/203-1, NAINAR KOVIL STREET, VELLAIPANAYERIPATTI, ARIYAPURAM, TENKASI

627808
TIRUNELVELI
TAMIL NADU

IMPORTANT NOTICE: KINDLY UPDATE YOUR AADHAAR NO. AND PAN/FORM 60. PLEASE IGNORE IF ALREADY UPDATED.

Agent Name : ALAGUSHUNMUGAM KUMAR K
Agent Code : AGD0022311
Mobile/Landline Number/Email : 9361011611
: alagu23041980@rediffmail.com

The genuineness of the policy can be verified through "Verify Your Policy" link at www.uiic.co.in.

For any Information, Service Requests, Claim intimation and Grievances please write to 091800@uiic.co.in

Download Customer App(www.uiic.co.in), REGD. & HEAD OFFICE, 24, WHITES ROAD, CHENNAI - 600014.
Website: <http://www.uiic.co.in>

Printed By : CUSTOMER @ 14/12/2021 1:19:47 PM

This document is digitally signed

Signer: N MOHAN SANKAR
Date: Tue, Dec 14, 2021 13:19:47 IST
Location: United India Insurance Company Ltd
Reason: Signing Policy for UIR



**MICRO-INSURANCE PRODUCT-GROUP ROAD SAFETY POLICY
SCHEDULE**

Policy No.:	0918004720P111724531	Previous Policy No.:	0918004719P111657655
Name of Insured/ID:	MS SASIKUMAR ENTERPRISES /23075572271		
Tel.(O):	Fax: 0	Tel.(R):	Mobile:
Business/Occupation :	0	Email:	
Period of Insurance:	From 00:00 Hours of 14/01/2021 To MIDNIGHT of 13/01/2022		

Coinsurance	UIIC 091800 : 100%
Premium:	Seven hundred eighty rupees only

No of Members	Total Sum Insured	Type of Cover
3	300,000.00	Cover B

Sl.No	Employee Name	Employee ID	Gender	Age	DOB	Assignee Name	Assignee Relationship	Sum Insured	Premium
1	BASKAR THANGASAMY	1	Male	56	30/07/1963	SELVI	Self	100,000.00	260
2	MURUGAN	2	Male	42	24/07/1977	MAHESHWARI	Self	100,000.00	260
3	MARIMUTHU	4	Male	59	01/04/1960	VALLI	Self	100,000.00	260

Assignee Details	
Name Of Assignee	Relationship
SELVI	Self

Net Premium:	780.00
CGST(9%):	70.00
SGST(9%):	70.00
Stamp Duty:	5.00
Total :	920.00
Receipt No :	10109180020112849590
Receipt Date:	13/01/2021

Agency/Broker Code :	AGD0022311
Dev. Officer Code :	
Direct Business :	

{spcFinancierDtIs}

Customer GST/UIN No.:		Office GST No.:	33AAACU5552C1ZQ
SAC Code:	9971	Invoice No. & Date:	4720I111724531 & 13/01/2021
Amount Subject to Reverse Charges-NIL			

Anti Money Laundering Clause:-In the event of a claim under the policy exceeding ₹ 1 lakh or a claim for refund of premium exceeding ₹ 1 lakh, the insured will comply with the provisions of AML policy of the company. The AML policy is available in all our operating offices as well as Company's web site.

LET US JOIN THE FIGHT AGAINST CORRUPTION. PLEASE TAKE THE PLEDGE AT <https://pledge.cvc.nic.in>.

Date of Proposal and Declaration: 14/01/2021

IN WITNESS WHEREOF, the undersigned being duly authorised has hereunto set his/her hand at DO TENKASI 091800 on this 13th day of January 2021 .

**For and On behalf of
United India Insurance Co. Ltd.**

Duly Constituted Attorney(s)

Underwritten By - MUR45265 (DO UNDERWRITER)

Consolidated additional Stamp Duty Paid as per Tamilnadu Government G. O. RT no.222 dated 10/07/2020 for the period from 01/04/2020 to 31/03/2021
--

This is a system generated document and any manual alteration / correction / overwriting in the document will make it invalid.

SASIKUMAR ROGH STONE AND GRAVEL QUARRY



SASIKUMAR ROGH STONE AND GRAVEL QUARRY



WEST BOUNDARY WITH GREEN BELT



NORTH BOUNDARY WITH GREEN BELT

SASIKUMAR ROGH STONE AND GRAVEL QUARRY



EAST BOUNDARY WITH GREEN BELT



NAME BOARD IN QUARRY ENTRANCE

SASIKUMAR ROGH STONE AND GRAVEL QUARRY



FENCING AROUND BOUNDARY WITH GREEN BELT



SOUTH BOUNDARY WITH GREEN BELT

**BEFORE THE HON'BLE
NATIONAL GREEN TRIBUNAL
(SZ)
CHENNAI**

OA NO.104 OF 2021

RAMSINGH

...APPLICANT

VS

STATE ENVIRONMENT IMPACT
ASSESSMENT AUTHORITY AND
7 OTHERS.

....RESPONDENTS

**8TH RESPONDENT REPLY TO
THE OBJECTIONS FILED BY THE
APPLICANT**

**M/s. S.V. VIJAY PRASHANTH M.L
S.V.BANUPRIYA
N.NAJUMUNISHA
A.S.SHANMUGA RAJAN
COUNSEL FOR THE 8TH RESPONDENT
8825510662
advshan3373@gmail.com**



Shanmuga Rajan <advshan3373@gmail.com>

7th and 8th Respondent Reply to the objections of the applicant in OA No. 104 of 2021 bef NGT SZ

1 message

Shanmuga Rajan <advshan3373@gmail.com>

Wed, Dec 22, 2021 at 11:24 PM

To: mstnseiaa@yahoo.com, "minetnv@gmail.com" <minetnv@gmail.com>, cedtin@tnebnet.org, collr-tks@gov.in, "lingaram74@gmail.com" <lingaram74@gmail.com>, tnpcb-chn@gov.in, dshanmuganathan@outlook.com

Cc: registrar-ngtsz@gov.in

Sir/Madam,

with regard to Original Application No.104 of 2021 filed by one Mr.K.Ramsingh before the Hon'ble NGT - SZ, the 7th and 8th Respondent filing their reply to the objections filed by the applicant to the joint committee report.

The above case listed as item 18 on 23.12.2021 before the Hon'ble NGT - SZ.

Kindly receive the copies annexed herewith and acknowledge the same.

Reg,

--

A.S.SHANMUGA RAJAN

Legum Bacculaureate,

CHENNAI.

2 attachments**Scnd 7R reply to the objections of the applicant.pdf**

7311K

**Scnd 8R reply to the objections of the applicant.pdf**

2757K