

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI**

Original Application No.141 of 2022

- D.Karunakaran
Son of Shri.Dev,
No.192, Orangavali Village,
Kattudevathur Panchayat,
Neerpeuyar post, Maduranthagam Taluk,
Chengalpattu District- 603 313
-Applicant

VS

1. State Level Environment Impact Assessment Authority,
Through the Chairman,
3rd Floor, Panagal maligai,
No.1, Jeenis Road, Saidapet,
Chennai – 600 015
2. Department of Geology and Mining,
Through the Deputy Director,
Alandur Road, Guindy Industrial Estate,
Guindy, Chennai - 600 032.
3. Tamilnadu Pollution Control Board,
Through the chairman,
No.76, Mount Salai,
Guindy, Chennai – 600 032
4. The District Collector, Chengalpattu
Collectorate,
GST Road,
Chengalpattu – 603 001
5. The Superintendent of Police, Chengalpattu
Hospital Road, Bypass Road,
Chengalpattu – 603 002



6. K.K.Raghavan,
S/o.M.Krishnan,
No.195, Theradi Street,
Madurantangam,
Chengalpattu – 603 306

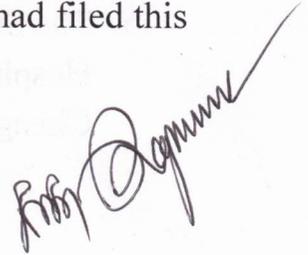
OBJECTIONS FILED BY THE 6TH RESPONDENT

I, K.K.Raghavan S/o.M.Krishnan, Hindu, aged 56 years, residing at No.195, Car Street, Maduranthakam, Chengalpattu – 603 306, i.e.,the 6th Respondent, do hereby solemnly affirm and sincerely state as follows;

- 1. I am the project proponent/ 6th Respondent herein and I am well acquainted with the facts and circumstances of the case and I am competent to file this preliminary objection to the application filed by the applicant.
- 2. This respondent denies the allegations set out in the present original application and specifically denies the baseless allegations stated in the facts-in-brief and the following other paragraphs.

FACTS IN BRIEF:

- 3. The applicant is a politically motivated person in that locality and holding the post of Vice-President in a political party and Vice president post in the Panchayat union. As claimed, the applicant is not concerned about the environment or ecology of the area, but highly concerned about the business magnates of the locality and hence he had filed this application to harass this respondent and his business.

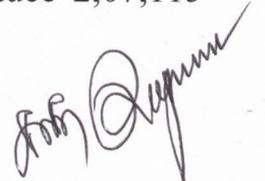


4. It is submitted that the leased-out survey number in SF.No. 121/3 over an extent of 2.34.50 hectares of lands in Keelvasalai Village, Madurantagam Taluk, Chengalpattu District is owned by Tvl. Aalayam Enterprises Private Limited and this respondent is one of the Director for the said patta lands and patta no.1151 stands as Joint patta in the name of one Mr.V.Venkatesan and this Respondent. The said Mr.V.Venkatesan has given a no objection and his consent for quarrying activities in the name of 6th Respondent.

5. It is submitted that, the quarry wherein project proposed is the virgin quarry and this respondent had obtained all the necessary valid permissions and licenses from the competent authorities for establishing the quarrying activities and been carrying a legal business.

a. Foremost, the mining plan of this respondent dated 14.06.2021 was approved by the Assistant Director, Geology and Mining Chengalpattu.

b. Therein, the 1st Respondent, the Member Secretary, State Environment Impact Assessment Authority (SEIAA), Tamilnadu had granted the Environmental Clearance (EC) to this Respondent by its proceedings/by its approval in Lr.No.SEIAA-TN/F.No.8576/1(a)/EC.No.4914/2021 dated 03.11.2021. The said Environmental Clearance is granted to produce 2,07,115

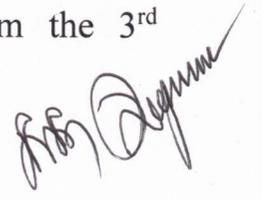


cu.m of rough stone and 35,738 cu.m of gravel for the period of 5 years from the date of execution of the mining lease.

c. Therein, the Tamilnadu Pollution Control Board had granted Consent to operate under section 25 of the Water (prevention and control of pollution) Act, 1974 by its proceedings no.F.3520MMN/RS/DEE/TNPCB/MMN/W/2021 and had granted Consent to operate for industrial plant under section 21 of the Air (prevention and control of Pollution) Act 1981 by its proceedings no.F.3520MMN/RS/DEE/TNPCB/MMN/A/2021 dated 30.11.2021 and the above said consents are valid up to 31st March 2026

d. Thereupon, the Assistant Director, Geology and Mining Chengalpattu District by his proceedings in Na.Ka.No.46/Ku2/202 dated 22.12.2021 and based on G.O.Ms.No.208 Industries and Trade (M.M.C-I) Department dated 21.09.2020, had granted permission for quarrying 10 years i.e,22.12.2021 to 21.12.2031 and registered joint agreement was executed by way of Doc.no.4379 of 2021 dated 22.12.2021

6. It is submitted that, based on the above said Environmental Clearance from the 1st Respondent SEIAA and mining plan approval from the competent 2nd Respondent and consent to operate from the 3rd



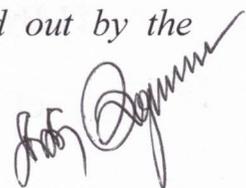
Respondent and valid transport permits from the competent authority, this respondent is operating the quarry without any hindrances.

7. It is submitted that; the Applicant had filed the above said Original Application before this Hon'ble National Green Tribunal Southern Zone, Chennai with a following reliefs:

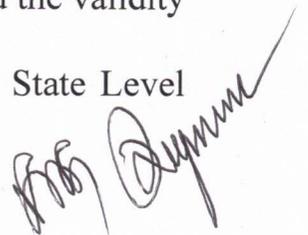
(i) *Direct the Respondent no.1 ie. State Environment Impact Assessment Authority, Tamilnadu to withdraw the impugned Environmental Clearance dated 12/11/2021 for the grave violations of the significant conditions imposed by the said authority for the mitigation of Air, Water, Noise pollution as well for the safety of the people in the surrounding areas.*

(ii) *Direct penal action and impose environmental compensation including restitution of environment on the project proponent for violating the conditions of the Environmental clearance granted on 12.11.2021 by the State Environmental Impact Assessment Authority, Tamilnadu breach of statutory provisions and inter-alia for loss of ecological services foregone and costs to restore the damage done to the environment and ecology.*

(iii) *Direct the Respondent Nos.3 to 6 to conduct surprise inspection on the project site for the unregulated and unscientific operation namely drilling and quarrying carried out by the Respondent No.6 during night hours.*

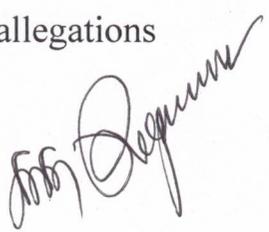


8. This Respondent submits that, the applicant had filed the above said application with factual defects and without conducting proper study and with an ulterior motive to defame the reputation of this Respondent's business.
9. The applicant has been harassing this respondent right before establishment of the quarrying activities. This respondent had initially sent a representation for quarrying establishment on 24.02.2020 and had submitted the mining plan on 14.06.2021 and had submitted the online application for SEIAA on 21.06.2021. But, the applicant had started sending a representations right before the establishment of quarrying activities, ie., 23.01.2020, 18.11.2020. Hence, the applicant's intention to stop the quarry activities could be witness by his attitude.
10. It is submitted that the applicant had relied his own case based upon the records available in his hands and completely devoid of any particulars and the case has been made on the basis of surmises, without any actual verification for the allegations made thereon and without verifying the fact that, this Respondent had obtained proper permission for quarrying 10 years legally for extracting the quantum of 2,07,115 cu.m of rough stone and 35,738 cu.m of gravel by submitting subsequent application before the authorities.
11. By means of this application, the Applicant has challenged the validity of the procedure adopted by the authorities such as, the State Level



Environmental Impact Assessment Authority headed by the District Collector and the Tamilnadu Pollution Control Board. In this connection it is necessary to highlight the fact that, without even verifying the above fact, the applicant had filed the above said application with baseless and unconnected allegations and this Respondent had obtained all necessary permission from the authorities, with all statutory formalities **including the consent and approvals required for quarrying 2,07,115 cu.m of rough stone and 35,738 cu.m of gravel from the competent statutory authorities.**

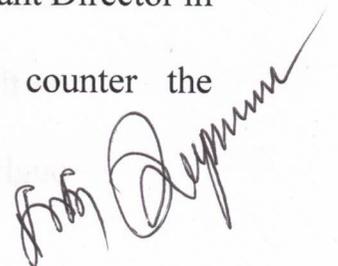
12. With regard to allegations in Para III, the quarrying activities are highly regulated by experts and blasting of rocks are done under the supervision of the authorised manager. The method of quarrying adopted by this respondent quarry is tractor compression drilling blasting and the quarrying mechanization of open cast method, shallow jack hammer drilling, slurry blasting and therefore, the applicant having lack of knowledge in the quarrying activities had failed to define the term scientific mining in his application and this respondent submits that the quantification of the minerals such as gravel and roughstone could be possible only before the extraction of mineral based on a scientific application of extraction and the same is carried out based on the submissions in the mining plan. Hence the general allegations ought to be rejected at the threshold.



13. With regard to para IV, the applicant had placed a baseless allegation by bringing in the Air Pollution as a tool but without providing a valid proof for such allegations. This respondent submits that the quarrying areas are properly fenced with 20ft blue metal sheets and the scope of emission of dust, smoke does not arise. This respondent adopts the method of NONEL BLASTING (Non-Electrical Technology), which is recommended/mandated by the 1st Respondent in the State. The said techno-blasting reduces the vibration on the ground and alleviate harmful effects arising from the blasting. Thus, the question of Air pollution and noise pollution does not arise. Hence the baseless allegation of the applicant without providing any proof with regard to Air pollution and Noise pollution ought to be rejected at the threshold.

14. Countering para V of the application, the lands surrounded in the quarrying area belongs to this respondent and no agricultural lands are affected and no harm is caused to the vegetation and plants around the area. Moreover, the few adjacent agricultural lands belong to this respondent and this respondent is witnessing good harvest rate without any harm.

15. With regard to para VI of the application, the approved mining plan of this respondent quarry and the observations of the Assistant Director in her approval proceedings is sufficient enough to counter the



unsubstantiated allegations set out by the applicant. Page 16 of the approved mining plan state as follows,

8.1 Habitations/villages natham:

There is no approved habitation within 300m radius from the lease applied area.

8.3 water bodies (river, pond, lake, odai, canal, etc.,)

There is no River, Pond, Canal, Lake, Reservoir located within 50m radius of the area.

Page 5 of the Proceedings of the Assistant Director, Geology and Mining Chengalpattu District in Na.Ka.No.46/Ku2/202 dated 22.12.2021, state as follows,

“மேலும் வரையறுக்கப்பட்ட 10 மீ, 50 மீ, மற்றும் 300 மீ சுற்றளவில் ஆட்சேபனைக்குரிய நில வகைபாடுகள், மின்கம்பிவடம், கிராம சாலைகள் நீர் ஆதாரங்கள் மற்றும் குடியிருப்புகள் எதுவும் இல்லை எனவும் தனது அறிக்கையில் தெரிவித்துள்ளார்”.

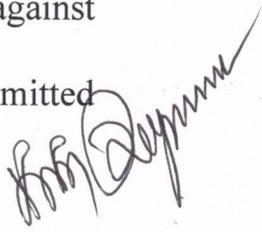
16. With regard to para VII, the applicant is put to the strict proof of the allegations made out in the application. As stated above, this Respondent had obtained all valid permissions and licenses from the competent authorities and carrying on a quarrying activity abiding the statutes and rules and the Pollution Control Laws. The applicant had failed to apply his mind, that the quarry permission was obtained right

before 13 months and being a virgin quarry, this respondent had quarried within a permitted level and permitted quantity. This respondent had quarried well within the permitted quantity i.e., 17m as per the approved depth of the 1st Respondent proceedings. Moreover, this respondent holds valid permit till 2031, which is such a long passage of time and valid quantum is yet to be extracted from the leased-out area. The actual proposed depth approved by the Assistant Director, Geology and Mining, Chengalpattu is 42m and the Assistant Director, Geology and Mining Chengalpattu District in his proceedings in Na.Ka.No.46/Ku2/202 dated 22.12.2021 had categorically held that,

5).....மேலும், மேற்படி புலங்கள் இதற்குமுன் குவாரி பணிகள் எதுவும் செய்யப்படாத புதிய இனம் (Virgin Lands) என்றும், விண்ணப்ப புலங்கள் முழுவதும் சமதளமாக உள்ளது எனவும். மேற்பரப்பு முழுவதும் 3 முதல் 10 அடி ஆழத்திற்கு கனமான மண்ணால் மூடப்பட்டுள்ளது எனவும், அதற்கு கீழாக கற்படிவம் அமைந்துள்ளது என்றும், இந்த பாறைபடிவுகள் சார்கோனைட் வகை பாறைகளாகும் என்றும், இவ்வகை பாறைகள் சாதாரண கற்கள் மற்றும் சாலை பணிக்கு பயன்படும் ஜல்லிகற்கள் உற்பத்தி செய்ய ஏற்றதாகும் என தெரிவித்துள்ளார்.

Hence, the allegations set out with regard to the depth of mining is false and unsupported. The minerals were covered with more than 10 ft of sand particles and this respondent spent huge money to remove the sand and extracted the minerals legally.

17. The Applicant is unclear of his very own case and allegations against this Respondent is baseless, inconsistent and contrary. It is submitted

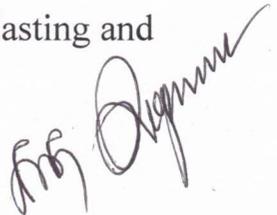


that; this Respondent has been carrying on the quarrying operation within the permitted area and in accordance with law and terms of the license. **The applicant disorientates with his very own case by challenging the Environmental Clearance by stating that violations have been detected without even providing a ample proof for such baseless allegations and such, this application is filed with vested interest without verifying the records and identification of quarries.**

18. With regard to allegation in para 1, the Applicant is not a resident of the locality ie., Orangavali Village, Kattudevathur Panchayat, Neerpeuyar Post, Maduranthagam Taluk. The applicant is not a public-spirited person and never participated in any of the environmental protection activities.

19. With regard to Para 2 of the application, reiterating, this respondent is carrying on a quarrying and mining activities by complying all the conditions mandated under the statutes and the allegation of the applicant is not provided with any sort of credentials.

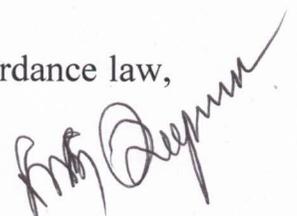
20. With regard to para 3 of the application, as this respondent submitted earlier, the quarrying activities are highly regulated by experts and blasting of rocks are done under the supervision of the authorised manager. The method of quarrying adopted by this respondent quarry is tractor compression drilling blasting and the quarrying mechanization of open cast method, shallow jack hammer drilling, slurry blasting and



therefore, the applicant having lack of knowledge in the quarrying activities had failed to specifically point out the 'unregulated' quarrying activities done by this respondent. This respondent adopts the method of NONEL BLASTING (Non-Electrical Technology), which is recommended/mandated by the 1st Respondent in the State. The said techno-blasting reduces the vibration on the ground and alleviate harmful effects arising from the blasting. Thus, the question of enormous Air pollution and Noise pollution does not arise.

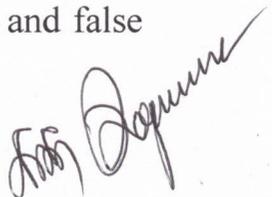
21. With regard to para 4, the applicant is put to the strict proof of the allegation mentioned. As stated earlier, no quarrying activities are been carried out rather than permitted time and moreover, this respondent being a law-abiding citizen, had never involved in day-and-night mining activities and there is a stipulated time schedule been followed by this respondent ie., 3pm-5pm every day except Sundays for blasting and the same is done by following all the due procedures contemplated under the governing rules. The applicant without even having a knowledge of technology used by this respondent for blasting, had made a general allegation.

22. With regard to averments in para 5 of the application, with a mist of repetition this respondent humbly submits, the applicant without any substantial proof and evidence making a false-allegations. This Respondent submits that, the quarry was operating in accordance law,



with all precautionary measures, with the terms of the licenses granted by the competent authorities, the Tamilnadu Pollution Control Board and by the Mining plan approved by the Department of Geology and Mining and such, the transport permit was issued to this Respondent since the inception of the lease period till now and there is no violation whatsoever regarding the same, if there is any violation or illegal quarry operation, the authorities ought to have not permitted the same and ought to have stopped the quarry operations. Moreover, the applicant along with one Mr.Sekar had tried to object the establishment of quarry prior before the initial application for quarrying submitted by this respondent. The Assistant director had rightly rejected the false plea of the applicant and granted a permit/license to quarry in the patta land of this respondent. Further, the applicant is once again making a false-allegations by making his submission such as agricultural lands are affected and never produced a scientific report or evidence to prove the same. Moreover, as stated earlier, the adjacent agricultural lands belong to this respondent, who is also an agriculturist for the said lands and solidly, no agriculturist would let his own land/crops/plantations getting affected by causing harm to the environment. Hence the claim of the applicant is fallacious and frivolous and ought to be rejected.

23. With regard to averments in para 6, 7 of the application, this respondent vehemently denies the following allegation, as it is baseless and false

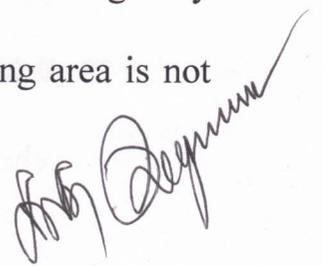


allegations intended to cause harm to the business of this respondent.

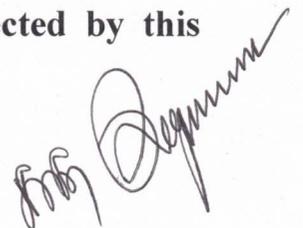
The mining operation has been carried out following all due procedures contemplated in the statute and averments of the applicant is countered

- by the documents produced by this respondent and all the conditions of the SEAC, SEIAA, TNPCB are duly followed by this respondent from the inception of lease. It is submitted that, the applicant has struck with his facts by relying upon the same allegations and repetitious allegations are already answered by this respondent. This Respondent submits that, the quarry was operating in accordance law, with all precautionary measures, with the terms of the licenses granted by the AD Geology and Mining, the Tamilnadu Pollution Control Board and by the Mining plan approved by the Department of Geology and Mining and such, the transport permit was issued to this Respondent since the inception of the lease and there is no violation whatsoever regarding the same, if there is any violation or illegal quarry operation, the authorities ought to have not permitted the same and ought to have stopped the quarry operations. The allegations of the applicant are answered herein,

- a. Proper benches are found in the quarrying pit and quarrying is done by way of scientific method and with the assistance of experts in the field and no threat to the labourers as alleged by the applicant and the hydrology of the surrounding area is not affected.



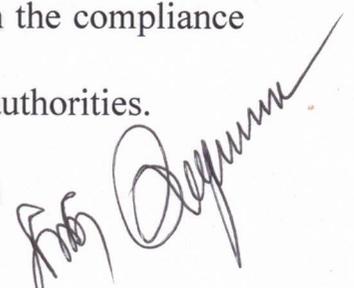
- b. Cautionary boards are installed at the necessary areas and no government schools and residential activities are found near the quarrying area. If so, the authorities would have not granted a permission for quarrying. This proves that the applicant failed to conduct a proper study or field visitation before filing an alleged application before the Hon'ble Forum.
- c. No dust or emissions is found and all these allegations are answered in above paragraphs suitably.
- d. Noise level is under the control and the technology used by this respondent is stated in the above paragraphs. Moreover, water sprinklers is used in and around the quarrying area with water tanker lorries and hence no air pollution is found in the locality and hence the general allegations without proof ought to be rejected by this Hon'ble Tribunal.
- e. Green belt is properly and perfectly maintained by this respondent. Per se, 15,000 trees were planted around the quarrying area and no complaint or violation has been reported against this respondent whatsoever. Hence no harm is caused to the environment. The applicant repeatedly making a false allegation without proper observation of the quarry site and hence same ought to be rejected by this Hon'ble Forum.**



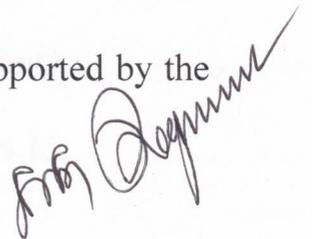
- f. The mist of repetitious allegations answered suitably in the above paragraphs. No noise pollution or air pollution is found in the quarrying area and no harm is caused to the agricultural lands near the quarrying area.
- g. No agricultural activities are affected because of the quarrying and this general allegation of the applicant is repetitious and baseless.
- h. Green belt is properly maintained and all the safely measures had been taken by this respondent. Sufficient security guards were put in the boundaries of the quarrying site and so far, no complaint is registered on this respondent regarding safety measures.
- i. All the competent certificates were placed before the 1st respondent and to the other competent authorities and thereupon the license or permit is issued to this respondent.

24. With regard to averment that the conditions of SEIAA in condition numbers 12, 13,16,17,18,19,21,34,43,48, 52,53,54 and 55 is violated, this respondent humbly submits that,

- a. the quarrying activities is carried on the scheduled time and the authorities granting a transport permit based on the compliance of the conditions of the SEIAA and competent authorities.

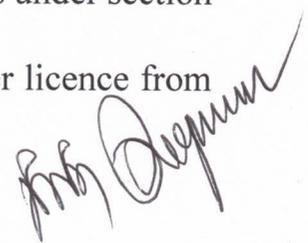


- b. No adverse impacts is detected and no harm is caused to the human habitation.
- c. Before blasting, a proper the public notice is spread around the locality and blasting is done by the competent and authorised persons in authorised manner by following all the conditions. The mining plan averts all the allegations.
- d. Proper roads are maintained and water is sprinkled at regular intervals to suppress the dust. Moreover, a 20ft metal sheets are installed in the boundaries of the quarrying area and hence no pollution is caused in and around the quarrying area.
- e. The quarrying operation is done after the due study of the area and by the opinions of the experts in the field. The applicant having no knowledge about the quarrying operations is making a frivolous-allegations and the same ought to be rejected.
- f. With regard to ix, It is submitted that, since high motion lights is installed in the locality, the necessity for the solar lighting system doesn't arise and on requirement, this respondent is ready to provide the same.
- g. With the mist of repetition, the environmental clearance granted after the due verification of the site and no air, water or noise pollution is detected till now. The applicant is supported by the flimsy claims.



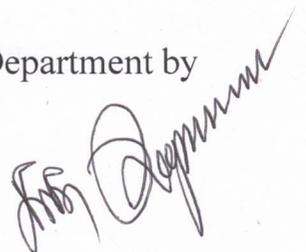
25. The averments in para 8 is suitably answered by this respondent. With regard to para 9 of the application, a proper environmental clearance had been obtained by this respondent from the competent authorities and hence all the statutory requirements, laws, rules and the Hon'ble Supreme Court orders with regard to environment are considered by the authorities and thereupon proper valid legal permission is issued to this respondent.

26. With the mist of repetition, para 10 to 16 are answered suitably in the above paragraphs and this respondent reiterates that the allegation of the applicant is totally false and unscientific and completely erroneous and such harm is caused to the environment based on the quarry operations and it may be stated that such allegation by the applicant is not true and totally unconnected to the ground reality. It is submitted that, this respondent quarry was operated by using Non-EL (Non-Electrical) detonators which will have less NVH level (Noise Vibration and Harshness level) compared to other explosive like Electrical, ANFO (Ammonium Nitrate Fuel Oil) detonator. Moreover, the blasting is done once in day, on necessity and the allegation that blasting is done day and night times in a day is highly erroneous. If such, the Tamilnadu Pollution Control Board ought to have not provided the Consent to Operate for operation of plant and discharge of emissions under section 21 of Air Act, 1981. This respondent had obtained proper licence from



the Tamilnadu Pollution Control Board for the industrial plant and for the quarrying operation.

27. The allegation in para 17 to 20 is highly erroneous and put to strict proof of the allegation thereon. No untreated effluents are discharged from the quarry site and moreover, the effluents are properly disposed at due intervals and no complaints has been filed against this Respondent. As claimed by the applicant, no violations have been caused by this Respondent and it is respectfully submitted that, the ariel distance of the nearest habitation is tabulated in the mining plan and same may be verified. The water level in the locality depends on the monsoon and this respondent had never caused a water pollution in the locality. Such the water bodies or canals or water channels are not disturbed by this respondent. Moreover, being an agriculturist and being involved in the farming activities, this respondent is maintaining water channels for his agricultural activities. Further proper footpath for water is maintained by this respondent. It is to reiterate the fact that, the leased-out quarry was functioning after obtaining license and permission from the competent authorities as per Environmental Protection Act and no case has been registered on this Respondent for causing environmental hazard with regard to the survey numbers mentioned by the applicant. This respondent humbly submits and would like to reiterate the fact that, the quarrying passes is issued by the office of the Mines Department by

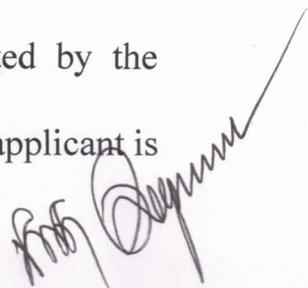


due inspection and there was no fault found by the Authorities till expiry of lease date.

28. This respondent submits, from the beginning, even prior before submitting the proposal for quarrying, the applicant intended to stall the quarry and industrial unit. He had tried all sorts of methods using a rival competitor. The applicant had given various petitions to various authorities even before the quarrying activities were started or even before the proposal for quarrying put-forth. The applicant had played a strong-arm tactics and this respondent never heeded to the same and hence he had filed this Original Application suppressing all vital facts and without proper knowledge about the quarry.

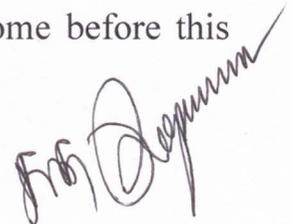
29. This Respondent re-assures that he has never quarried anything illegally during the said lease period and had always quarried in allocated area and is a Law-abiding citizen.

30. The applicant in Grounds 22 (A) to (S) had reiterated the same sort of allegations which are baseless, false and frivolous and not supported by any evidences. The allegation that the representation has been given by the villagers is false. The applicant on his own motion had created a ruckus and prior before the application for quarrying, this applicant is making a distress to this respondent by taking shelter under fake environmental concerns and the same was rightly rejected by the authorities and permission has been granted. Till today, the applicant is



causing a huge hindrance to this respondent by making a false claim against this respondent. The averments raised by the applicant in the Grounds is objected and denied as follows,

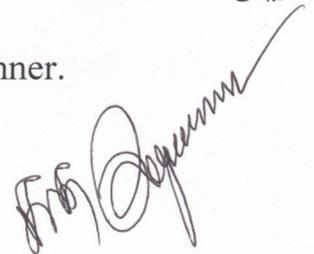
- a. The quarrying activities are carried out following all due procedures and guidelines and the condition of the Environmental Clearance is strictly followed by this Respondent.
- b. No Air, noise and water pollution is caused by the quarrying operation. No valid complaint is filed against this respondent regarding pollution.
- c. A proper buffer zone is provided as mandated in the conditions and the surroundings areas are fenced with the metals sheets and proper safety measures been carried out in and around quarrying area. The quarrying activities is done after proper demarcation by the competent authorities and reports have been submitted and therefore the allegation sounds baseless.
- d. The scope and question of excess mining does not arise and the quarrying operation is done in the area specified and allotted to this respondent. The applicant hasn't placed single evidence that the quarrying is done beyond the specified area. Hence the motive and intention show the applicant has come before this Tribunal with unclean hands.



- e. No smoke, dust emission/pollution is found in the locality and no health hazard is caused in the locality. The applicant is put to the strict proof of the same.
- f. The water bodies no way affected by the activities of this project proponent.
- g. No agricultural activities are affected by the operation of the mining. Infact the lands adjacent to the mining area belong to this respondent and this respondent himself is carrying out agricultural activities in his patta lands.
- h. No day and night quarrying/blasting is carried out. No unregulated blasting is carried out. All the rules and procedures for blasting is strictly followed.
- i. The report of the competent authorities substantiate that no schools are within the radius of 300m from the mining area and the question of fundamental rights affected is unacceptable.
- j. All proper studies of the land specification is conducted and only then a permission/license is issued by the competent authorities.
- k. The orders of the Hon'ble Supreme Court in environmental clearance are followed duly by the authorities and thereupon a environmental clearance is granted.



- l. Proper benches is maintained as per Metalliferous Mines Regulations Act, 1961 and no threat to the hydro-geological is caused.
- m. Cautionary boards are installed in necessary places in and around the quarrying area.
- n. Green belt is properly maintained and moreover 15,000 trees are planted at the surroundings of the quarrying area.
- o. All the safety measures are followed during blasting and drilling and no scope of noise pollution will cause during the Nanal-blasting technology.
- p. No noise pollution is caused and thereby the question of exorbitant noise pollution does not arise.
- q. No dust and air pollution is caused during the course of transportation. The mining area and the boundaries are safely surrounded by the metal fencing and water sprinkling is done frequently to suppress the minimal dust.
- r. The quarrying activities are carried out by the skilled and licensed persons and the safety of labourers is protected.
- s. The applicant is put to the strict proof of the same. No storing is done and handling of explosives are done in safe manner.



31. The repetitious similar allegation of the applicant is countered by this respondent and this Respondent craves leave of this Hon'ble Tribunal to raise additional affidavit at the time of hearing, if required.

Therefore, it is most humbly requested before this Hon'ble Tribunal to consider above said submissions and may be pleased to dismiss the above said Original Application with cost or pass such orders deem fit and render justice.

Solemnly affirmed at Chennai
On this 20th day of March 2023
In my presence.

BEFORE ME,

ADVOCATE, CHENNAI

Office : Old No.125, New No.257,
(Canara Bank Building) 3rd Floor,
Angappa Naicken Street, Parrys,

VERIFICATION

I, K.K.Ragavan, do hereby verified and declare that what is stated in para No.1 to 30 are true to the best of my knowledge and belief and I have not suppressed any material facts before this Hon'ble Tribunal.

Dated at Chennai on this the 20th March 2023

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
(SOUTH ZONE)
AT CHENNAI**

Application No.141 of 2022

D.Karunakaran

.....Applicant

Vs

State Environment Impact Assessment Authority,
And 5 others

.....Respondents

OBJECTIONS FILED BY THE 6TH RESPONDENT

**M/s. S.V.VIJAY PRASHANTH (1366/2003)
S.V.BANUPRIYA (1943/2009)
D.PUSPA (2045/2017)
N.NAJUMUNISHA (2055/2017)
A.S.SHANMUGA RAJAN(3373/2018)**

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