



BEFORE THE NATIONAL GREEN TRIBUNAL EASTERN ZONE AT KOLKATA
MEMORANDUM OF APPEAL
(Under Sections 16(e) read with 18(1) of the National Green Tribunal Act, 2010)

Appeal No. 11 of 2026

Munidei Majhi & 3 Ors.

...Appellants

-Vs-

The Ministry of Environment, Forest and Climate Change & 4 Ors.

...Respondents

TABLE / KEY FILED BY THE APPELLANTS

Dated this the 14th day of May, 2026

A handwritten signature in black ink, appearing to be 'y..', located above the text 'Counsel for the Appellants'.

Counsel for the Appellants



SL NO.	DATE	DOCUMENT	DESCRIPTION OF ROAD
1.	August, 2023	Draft EIA submitted for mine by Vedanta @ Pg 252	"Bauxite shall be mined from Sijimali mine site by open cast method and dispatched by development of new road connecting mine site at hill top to state highway - 44"
2.		Traffic Study Report submitted by Vedanta @ Pg 259 @ 263	"Vedanta will construct a road from NW site of mine which will connect to SH-44. This road will pass through forest area so FC is required, and land will be acquired by VIL."
3.	03.02.2024	<p>Proceedings of meeting held on 24.01.2024 under the chairmanship of the Chief Secretary, Odisha ... "on the issue of transportation of Bauxite from Sijimali Mines." @ Pg 279</p> <p>Note: The CEO mines of Vedanta made presentation on proposed transportation routes.</p>	<p>"1. Transportation of Bauxite from Sijimali to Tikiri/ Singaram siding through SH-44 (PHASE- 1) Mine Top to SH-44</p> <ul style="list-style-type: none"> i. Vedanta to submit the land schedule from Mine top to SH 44 road. ii. IDCO to facilitate acquisition and transfer of land to PWD and giving NOC to Vedanta for construction of the road. PWD will remain as the owner of the road."
4.	14.11.2024	<p>Letter from Chief Construction Engineer to Superintending Engineer, enclosing approved DPR for proposed road @ 282</p> <p>DPR dated September, 2024 prepared by Vedanta Ltd @ Pg 284</p>	<p>... "for development of proposed road connectivity from Sijimali mines to SH-44 for transportation of Bauxite Ore for M/s Vedanta Ltd"</p>



		<p>"For transportation of bauxite ore from mine to railways station (Loading point), M/s Vedanta Ltd. (VL) has engaged Logistic Partner M/s Mythri Infrastructure and Mining India Pvt Ltd. (MIMIPL) and the Logistic partner is the executing agency of the road from Mines top to SH-44.</p> <p>Since, the road connectivity from Sijimali Mines top to SH-44 is not available at site; it was as decided to execute suitable road connectivity from Mines top to SH-44 for transportation of Bauxite ore through Bulklers/trucks.</p> <p>MIMIPL has decided to take up the construction of new road from Sijimali Mines top to SH-44 up to a distance 3.4 km in the state of Odisha."</p>	
5.	10.02.2025	<p>FC application for 4.911 Ha diversion by IDCO for subject road @ 233</p> <p>Letter of Authorization uploaded by IDCO states that it is for "...diversion of forest land... for construction access road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation by Vedanta Ltd." @ 442</p>	"The proposed road is from Sijimali Bauxite mines top to SH-44 to facilitate Bauxite transportation"



		<p>Description of Project uploaded by IDCO has Vedanta's seal/stamp and name of project is described as "construction of access road... for transportation of Bauxite ore through Bulklers/trucks from Sijimali Bauxite Mines of M/s Vedanta Ltd." @ 443</p> <p>Justification for this project submitted by IDCO contains Vedanta's seal/stamp. "... transportation of Bauxite from Sijimali mines in Rayagada district, a road from Sijimali Bauxite mines to SH-44." @ 446</p> <p>Map of road submitted by IDCO contains Vedanta's seal/stamp @ 448.</p>	
6.	04.03.2025	<p>Letter from DFO to IDCO raising EDS @ Pg 455 "as the states purpose of the road is to facilitate Bauxite transportation from the Sijimali Bauxite Block to SH-44"</p>	"construction of road from Sijimali Bauxite Mines Top to SH-44"
7.	24.03.2025	<p>Letter from IDCO to DFO submitting reply to EDS @Pg 458</p> <p>Note: Copy marked to Vedanta and EDS reply contains Vedanta's stamp/seal.</p>	"construction of approach road from Sijimali Bauxite Mine (hill top) to SH-44 for facilitating Bauxite transportation by M/s Vedanta Limited"
8.	07.04.2025	<p>Reply to EDS by IDCO to DFO @ 465</p>	" for construction of road from Sijimali Bauxite mines (hill top) to SH-44"



		Note: Copy marked to Vedanta	
9.	15.04.2025	<p>EDS raised by PCCF, Odisha</p> <p>"As per sub-para (f) of para 7.8 of Chapter 7 of Consolidated Guidelines and Clarifications issued under the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980, Rules, 2023, the approach road/ conveyor belt and other additionally activities related to mining shall be considered as part of the Mining Project and should therefore be processed accordingly. But the UA has applied access path as standalone project. As per sub para (I) (3) the UA needs to submit the cogent and convincing reason/justification of not including such linear infrastructure at the inception stage. So, the UA should submit the required clarification." @ 467</p> <p>Same EDS raised by MoEF on 19.05.2025 @ page 473</p>	
10.	17.04.2025	<p>Reply from IDCO to DFO replying to the EDS raised above @ Pg 467</p> <p>Note: Copy marked Vedanta.</p> <p>"1. There are 5 villages namely Dumperpadar, Porlang, Sagabari, Bichapinda & Malipadar having no road connectivity to the minaland below the valley. Around</p>	<p>For the first time the excuse/justification that the road is meant to connect five villages is raised.</p>



	<p>1500 people residing in these villages and they are facing hardship for their day-to-day family maintenance especially for health security.</p> <p>2. The people are disconnected with the market system due to lack of road connectivity. Mostly they are dependent on barter system for their day-to-day needs.</p> <p>3. Government has proposed to make a road connecting to all these villages, for their ease of living. Beside this, the proposed road will facilitate to dispose any horticultural crop group-up by the tribal community residing in the inaccessible remote are in hilltop.</p> <p>4. Further government has leased out a bauxite mines to M/s Vedanta limited, which is located at the hilltop of landscape. This road will provide access to the ML area for operationalization of the mines. The road proposed is solely not meant for the Vedanta limited for which it is going to be constructed by the state PWD department.</p> <p>5. The project should not be considered as a stand alone linear project of Sijimali mine rather it should be treated as normal linear road project.</p> <p>6. From the above points it does not attract the provision of sub-para (f) of para 7.8 of Chapter 7 of Consolidated Guidelines and Clarifications issued under Van (Sanrakshan Evam Samvardhan Adhinyam, 1980</p>	
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		and Van (Sankrakshan Evam Samvardhan) Rules, 2023.”	
11.	22.05.2025	Letter from IDCO to DFO replying to EDS raised by MoEF&CC on 19.05.2025 @ 473 – same reply as above submitted.	Same reason as above stated – 5 villages mentioned.
12.	28.05.2025	Letter from DFO to APCCF – Above EDS Reply- Verbatim extracted and sent as reply to EDS @ 471 Note: Copy marked to Vedanta	“construction of road from Sijimali Bauxite Mines Top to SH-44”
13.	02.07.2025	Site Inspection Report of MoEF&CC Regional Office @ Pg 363 Note: Refers to EDS and reply that raised on 19.05.2025 and response that the road will provide access to 5 villages- Dumepadar, Porlang, Sagabari, Bichapinda & Malipadar. Notes that “the alignment proposed width of the road its primary function is to support the movement of heavy vehicles associated with Sijimali Bauxite mine.” “Utility of project: To establish connectivity from Sijimali Mine Top to SH-44, the construction of this road is proposed with the right of way of approximately 35 to 40 metres.”	... “for construction of access road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation”



14.	30.07.2025	<p>7th Meeting of FAC @ Pg 378. Subject road considered as Agenda 25.</p> <p>Notes: Takes note of explanation that the road is for five villages and decides that "the road is primarily designed to support movement of heavy vehicles for mineral evacuation from Sijimali Bauxite Mine."</p>	<p>... "for construction of access road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation"</p> <p>The reason stated that the road is to service 5 villages was not accepted by the FAC.</p>
15.	07.08.2025, 11.08.2025	EDS raised by MoEF stating Road proposal cannot be considered until FC clearance for mine is granted @ page 449	
16.	16.09.2025	<p>Letter from IDCO to Vedanta issuing NOC for construction of road from Sijimali mine top to nearest SH-44 @ Pg 332</p> <p>Note: Condition 12 specifies that Vedanta shall obtain clearance from MoEF&CC</p>	<p>... "construction of road by M/s Vedanta Ltd., from Sijimali Mine top to nearest SH-44"</p>
17.	December, 2025	Final EIA submitted by Vedanta @ Pg 273 @ 275	<p>"To reduce the length for connecting mine top to SH-44 Vedanta Limited had adopted another route and the Company will construct a road of 3.4 km from NW site of mine which will connect to SH-44 (Owner of the road shall be PWD)"</p> <p>"For the same forest diversion proposal is submitted for an area of 4.911 Ha out of the</p>

			total Road area of 11.314 Ha vide proposal no. FP/OR/OTHERS/523366/2025 dated 24.03.2025 by IDCO, Govt. land alienation (area of 6.243 Ha) was also completed & NOC was obtained from IDCO to construct the road, for Pvt. Land (area of 0.160 Ha) the SIA study was completed. Copy of NOC is enclosed with this EIA/EMP Report."
18.	12.12.2025	Letter from Vedanta to IDCO stating that Stage I Clearance for mine has been recommended in favour of Vedanta and hence, stage I proposal for construction of subject road be considered @ 504 Note: EDS reply contains Vedanta seal/stamp.	"Construction of road from SH-44 to Sijimali Bauxite mines (hill top)"
19.	12.12.2025	IDCO to DFO stating Stage I Clearance for mine has been issued by MoEF @ pg 508	"Construction of road from SH-44 to Sijimali Bauxite mines (hill top)"
20.	15.12.2025	Letter from DFO to PCCF stating Stage I Clearance for mine has been recommended in favour of Vedanta and hence, stage I proposal for construction of subject road be considered @ Pg 506	"Construction of road from SH-44 to Sijimali Bauxite mines (hill top)"
21.	17.12.2025	Letter from APCCF to MoEF stating Stage I Clearance for mine has been recommended in favour of Vedanta and hence, stage I proposal for construction of subject road be considered @ Pg 478	"Construction of road from SH-44 to Sijimali Bauxite mines (hill top)"

		Note: Copy marked to Vedanta	
22.	05.01.2026	Stage I FC issued in favour of IDCO @ Pg 98	... "for construction of access road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation"
23.	09.01.2026	Letter from DFO to IDCO – seeking deposit of Compensatory levies of Rs. 1,60,25,258/- @ 509	" For construction of access road from Sijimali Bauxite Mines Top to SH-44 to facilitate Bauxite transportation"
24.	31.01.2026	Letter from IDCO to Divisional Forest Officer (DFO), Rayagada @ 124 "IDCO through Project Proponent, Vedanta Limited has deposited Compensatory Afforestation levies of Rs. 1,60,25,258/-" "Project Proponent, Vedanta Limited has requested for grant of working permission to commence of road work (copy enclosed)"	... "of road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation"
25.	27.02.2026	Working Permission from Divisional Forest Officer (DFO), Rayagada to IDCO @ Pg 49 "User Agency IDCO" "Has applied for Working Permission"	... "for construction of access road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation"



		"User agency has deposited through online MoEF&CC portal" 47,03,658 + 59,06,200+ 54,15,400 = 1,60,25,258/-	
26.	05.03.2026	Letter from IDCO to DFO regarding Tree Felling Permission @ Pg 133 Note: Copy marked to Vedanta	... "for construction of access road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation"
27.		Tree Enumeration List submitted by IDCO @ 135 Note: The list from Pg 136 to Pg 141 contains Vedanta's seal/stamp. The map of the proposed road also bears Vedanta's stamp/seal. (pg. 142)	"Access road connecting from Sijimali Bauxite Mines (Hill Top) to SH-44"
28.	26.03.2026	Tree Felling Order of DFO to Odisha Forest Development Corporation (OFDC) Limited @ Pg 55 "User Agency has requested permission for removal of 91 no's of miscellaneous trees" Note: Copy Marked to IDCO	... "for construction of access road from Sijimali Bauxite Mines (Hill Top) to SH-44"
29.	05.05.2026	Stage II FC issued in favour of IDCO @ Pg 42	... "for construction of access road from Sijimali Bauxite Mines (Hill Top) to SH-44 to facilitate Bauxite transportation"