

**BEFORE THE HONOURABLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
(Under Section 14, 15, 20 R/W Section 18 of the National Green
Tribunal Act, 2010)
Original Application No. 137 of 2026/EZ**

IN THE MATTER OF:-

Sanjaya Kumar Mishra

...Applicant

VERSUS

State of Odisha & Ors.

....Respondents

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Place: Balangir

(FILED BY)

Date: 22.05.2026

Sanjaya Kumar Mishra
Sanjaya Kumar Mishra

Applicant

Masjid Chowk, Tikrapra, Balangir 767001 (Odisha)

Contact No. 9310326647, 9818326647

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SYNOPSIS

The present Original Application raises substantial questions relating to the environment arising from repeated submission of materially deficient, misleading, and ToR non-compliant EIA/EMP Reports by Respondent No. 5 (R-5), namely J.M. EnviroNet Pvt. Ltd., a NABET-accredited EIA Consultant Organization.

The Applicant, acting bona fide in public interest, examined EIA Reports prepared by R-5 in relation to projects of UltraTech Cement Ltd., Dalmia Cement (Bharat) Ltd., and NALCO and found serious deficiencies including omission of mandatory baseline air pollution data, scientifically deficient air quality modelling, inconsistent and untenable water balance, incomplete assessment of impact on water environment, misleading wastewater disclosures, and non-disclosure of material information required under the NABET Scheme.

Despite repeated complaints and reminders, no effective action has been taken by the concerned authorities. The Applicant further relies upon prior instances of debarment of consultants for furnishing misleading environmental appraisal documents.

Hence, the present Application.

LIST OF DATES AND EVENTS

- 29.10.2024 Environmental appraisal by the Ministry of Environment, Forest and Climate Change of the proposal of NALCO on the basis of EIA Report submitted by R-5
- 23.12.2024 Reminder on Complaint Dated 09.12.2024 regarding Non-Conformity with ToR by R5 and Non-Adherence to Procedural Standards in Environmental Appraisal by the EAC (Coal Mining Sector), the complaint also referred complaints dated 08.11.2024 and 25.11.2024
- 13.02.2026 Environmental appraisal by SEIAA, Odisha of the proposal of UltraTech Cement Ltd. (Unit: Jhasuguda Cement Works) on the basis of EIA Report submitted by R-5
- 10.03.2026 Complaint regarding gaps and inconsistencies appear in the EIA Report prepared by the R-5
- 21.04.2026 Environmental appraisal by the Ministry of Environment, Forest and Climate Change of the proposal of Dalmia Cement (Bharat) Ltd. on the basis of EIA Report submitted by R-5
- 27.04.2026 Complaint against NABET Accredited EIA Consultant M/s J.M. EnviroNet Pvt. Ltd. for submission of ToR non-compliant, misleading and materially deficient EIA Reports
- 12.05.2026 Follow-up seeking status/action taken on Complaint dated 27.04.2026 concerning materially deficient and misleading EIA Reports
- 12.05.2026 CPCB issues Show Cause Notice to M/s J. M. Envirolab Pvt. Ltd.
- This Original Application

**BEFORE THE HONOURABLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
MEMORANDUM OF APPLICATION
(Under Section 14, 15, 20 R/W Section 18 of the National Green
Tribunal Act, 2010)
Original Application No. _____ OF 2026 / EZ**

IN THE MATTER OF:

Sanjaya Kumar Mishra

Masjid Chowk, Tikrapara, Balangir 767001 (Odisha)

Mobile No. 9310326647

Email Id: sanjayakmishra@gmail.com

...Applicant

VERSUS

1. State of Odisha

(Through Chief Secretary)

Lok Seva Bhawan (Odisha State Secretariat)

Sachivalaya Marg, Unit-2, Bhubaneswar – 751001 (Odisha)

Email id: csori@nic.in

**2. State Environment Impact Assessment Authority (SEIAA),
Odisha**

(Through Member Secretary)

5RF-2/1, Acharya Vihar, Unit – IX, OPTCL Colony, Anand Bazar, Bhoi
Nagar, Bhubaneswar, Odisha 751022

Email id: seiaaodisha@gmail.com

3. Ministry of Environment, Forest and Climate Change**Government of India**

(Through Secretary)

Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj,

New Delhi – 110003

Email id: secy-moef@nic.in

4. National Accreditation Board for Education and Training

(NABET) (Through its CEO), World Trade Centre, K-100, Block K,

Nauroji Nagar. New Delhi – 110029

Telephone: 011 – 42600800, Email id: ceo.nabet@qcin.org

5. M/s J.M. EnviroNet Pvt. Ltd. (NABET Accredited EIA Consultant)

(Through Managing Director)

Emaar Digital Greens, Tower-B, Unit No. 1517, Golf Course

Extension Road, Sector 61, Gurugram 122011 (Haryana) Email id:

jmenviron@hotmail.com

....Respondents

MOST RESPECTFULLY SHOWETH:

- 1.** The address of the Applicant is as given above for the service of the notices, replies, rejoinders, and other correspondences of this Application.
- 2.** The addresses of the Respondents are as given above for the service of notices of the Application.
- 3.** The Applicant above-named begs to present the Memorandum of Application on the facts and grounds set-out hereunder.

4. That the present Application raises substantial questions relating to the environment arising from repeated instances of non-compliance with the Terms of Reference (ToR) issued under the Environmental Impact Assessment (EIA) Notification, 2006, as well as from misleading and materially deficient EIA reports prepared by M/s J. M. EnviroNet Pvt. Ltd., a NABET-accredited consultant, thereby vitiating the environmental clearance process under the Environment (Protection) Act, 1986 and the EIA Notification, 2006, and necessitating urgent judicial intervention in light of the principles of sustainable development, and the precautionary principle.

FACTS OF THIS CASE:

5. That the present Original Application (hereinafter referred to as the "OA") is being filed bona fide in public interest. The Applicant has, on several occasions, brought instances of environmental violations to the notice of statutory and regulatory authorities and has also approached this Hon'ble Tribunal in matters concerning environmental protection. The Applicant is also an Advocate enrolled with the Orissa State Bar Council under Enrolment No. O-1047/2011 and maintains a chamber at GF-1, 115, Sagar Enclave, Sector-104, Gurugram - 122001, Haryana, in addition to the address stated in the cause title. The Applicant has no personal, pecuniary, or private interest in the subject matter of the present OA and is acting in

furtherance of the constitutional duty under Article 51A(g) of the Constitution of India.

6. That Respondent No. 5 is an Environmental Impact Assessment (hereinafter referred to as "**EIA**") Consultant Organization accredited by Respondent No. 4, namely the National Accreditation Board for Education and Training (hereinafter referred to as "**NABET**"). Under the NABET Scheme, accredited EIA consultants are classified as Accredited Consultant Organizations ("ACO"). A true copy of the accreditation certificate downloaded from the PARIVESH Portal is annexed herewith and marked as **ANNEXURE A-1**.

7. Respondent No. 5 has prepared EIA Reports along with Environmental Management Plans ("EMPs") for various industrial and mining projects in the State of Odisha. The Applicant has examined the following EIA Reports prepared by Respondent No. 5:

A. Proposal No. SIA/OR/IND1/555921/2025, File No. J-11011/212/2011-IA-II (I) pertaining to UltraTech Cement Ltd. (Unit: Jharsuguda Cement Works) in Jharsuguda District of Odisha;

B. Proposal No. IA/OR/CMIN/500323/2024, File No. J-11015-31-2007-IA-II-M pertaining to National Aluminium Company Limited (NALCO) located in Angul District of Odisha;

C. Proposal No. IA/OR/MIN/440925/2023, File No. J-11015/80/2018-IA.II (M) pertaining to Dalmia Cement (Bharat) Ltd., Malkangiri, Odisha.

The documents available on the PARIVESH Portal disclose that Respondent No. 5 acted as the EIA Consultant in all the aforesaid projects. True copies of the relevant extracts are annexed herewith and marked as **ANNEXURE A-2**.

8. That the records available on the PARIVESH Portal further disclose that the aforesaid projects have been granted Environmental Clearance ("EC") on the basis of EIA Reports prepared by Respondent No. 5.
9. That the Respondent No. 5 did not disclose the cost of the EIA study or baseline monitoring in Chapter 1 of the EIA Reports, despite such disclosure being specifically required under Clause 9.1(g) of the [NABET Scheme Document](#). True copies of the relevant extracts from the Scheme Document are annexed herewith and marked as **ANNEXURE A-3**.
10. That in respect of Proposal UltraTech Cement Ltd. hereinafter referred to as "**UTCL**"), the EIA Reports are non-compliant with the Terms of Reference (hereinafter referred to as "ToR") relating to baseline ambient air quality monitoring. The ToR required monitoring of Hydrocarbons ("**HC**") and other specified parameters. Although the EIA Reports state that HC monitoring was carried out and refer to Chapter 3, Section

3.5.5, no HC monitoring data has been furnished in the reports. Instead of HC monitoring data, the EIA Reports furnish data relating to Poly Aromatic Hydrocarbons ("PAH"). Monitoring of PAH does not substitute the specific ToR requirement relating to total Hydrocarbons. No explanation for omission of the ToR-mandated parameter has been provided, nor is any revised or amended ToR permitting such omission disclosed. The omission materially affects assessment of hydrocarbon pollution in ambient air and undermines the completeness of the environmental appraisal process. True copies of the relevant extracts from the EIA Report downloaded from Government of India's PARIVESH Portal are annexed herewith and marked as **ANNEXURE A-4.**

- 11.** That in the case of Proposal of UTCL, despite substantial coal consumption and proposed expansion involving continued coal usage, the EIA Report does not include assessment of heavy metal pollutants such as Nickel and Mercury in the ambient air quality analysis. The omission assumes significance having regard to the nature of the industrial activity and associated emissions.
- 12.** That in addition to the above paragraph, the air quality modelling undertaken is incomplete and materially deficient, inasmuch as the predictive modelling for PM_{2.5} and PM₁₀ has been undertaken only with respect to the presently installed DG sets of 1.0 MW and 1.2 MW capacity, whereas the prior

Environmental Clearance dated 25.10.2011 permitted installation of two DG sets of 6 MW each; however, the EIA Report and the baseline ambient air quality assessment have been prepared without considering emissions from the full sanctioned DG capacity of 6 MW each, which may be installed and operated at any point of time in terms of the existing approval. Consequently, the Ground Level Concentration ("GLC") modelling has been undertaken on substantially lower operational assumptions, thereby likely underestimating the resultant pollution load and environmental impacts, and failing to assess the worst-case operational scenario. True copy of relevant documents annexed herewith and marked as **ANNEXURE A-5.**

- 13.** That the Water Balance submitted in the EIA Reports for UTCL Project and Dalmia Cement (Bharat) Ltd. are scientifically incorrect, deficient and untenable. In the EIA report for UTCL the inputs for green belt irrigation exceed the stated requirement.
- 14.** That in Proposal of Dalmia Cement (Bharat) Ltd., the "Questionnaire: Proforma for Environmental Appraisal of Mining Projects" states that Septic Tank-Soak Pit / Sewage Treatment Plant ("STP"), together with 13 KLD for plantation and 4 KLD of treated effluent for dust suppression, have been considered while computing freshwater requirement at 83 KLD. However,

the Mine Water Management section of the EIA Report does not reflect the STP component.

- 15.** That the EIA Report further contains inconsistencies regarding wastewater discharge. At Serial No. 30 of the said Questionnaire, "NIL" has been declared against the point of final discharge into surface water/forest/greenbelt. However, subsequent sections of the report, including the Water Balance section, state that 13 KLD of STP-treated wastewater is proposed to be utilized for plantation and 4 KLD of treated effluent is proposed to be used for dust suppression. The aforesaid inconsistencies materially affect the reliability of the Water Balance assessment and wastewater management analysis.

True copy of Water Balance Diagrams downloaded from the PARIVESH Portal is annexed herewith and marked as **ANNEXURE A-6.**

- 16.** That Respondent No. 5 has, in the EIA Reports prepared by it, used the expression "treated water" in place of "treated sewage". Such terminology obscures the nature of the treated effluent proposed to be utilized and materially affects transparency in environmental disclosures relating to wastewater management.
- 17.** Further, the Respondent No. 5 has failed to address management of treated sewage during monsoon period/rainy

days. Such omission by the Respondent No. 5 has significant environmental implications and renders the assessment incomplete and inadequate.

- 18.** That in the proposal of Dalmia Cement (Bharat) Ltd., the EIA Report has declared that Sabari/Kolab River is flowing at a distance (adjacent to mine site) of nearly 30 meters in the North-West direction. Although Chapter 2 of the EIA Report prescribes certain protection measures for the river, the report does not specify the location or distance of the proposed borewell intended for abstraction of 83 KLD groundwater, nor does it assess the likely impact of such abstraction on the river system.

Further to the above paragraph, in the EIA Report at Chapter 9: Summary and Conclusion, the assertion that groundwater flow is towards the river and therefore mining-induced seepage will not affect river flow is scientifically misconceived. The said conclusion does not examine post-project hydrogeological conditions, drawdown effects, or the possibility of alteration in hydraulic gradients due to groundwater abstraction and mining activities. The assessment consequently fails to adequately evaluate the potential impact on groundwater dependent river flow. True copy of relevant extract downloaded from the PARIVESH Portal is annexed herewith and marked as **ANNEXURE A-7.**

- 19.** That all the aforesaid EIA Reports contain laboratory test reports issued by J.M. ENVIROLAB Pvt. Ltd. describing itself as “Approved by MoEF&CC”. True copies of the Test Reports downloaded from the PARIVESH Portal are annexed herewith as samples and marked as **ANNEXURE A-8**.
- 20.** That, contrary to the aforesaid claim, Notification No. S.O. 2340(E) dated 16.06.2021 provides that recognition of private laboratories under Section 12(1)(b) of the Environment (Protection) Act, 1986 is granted by the Central Pollution Control Board (“CPCB”). Further, CPCB issued a Show Cause Notice dated 12.05.2026 to the said laboratory, thereby indicating that the laboratory functions under CPCB recognition and regulatory supervision. The laboratory reports neither bear the NABL symbol nor disclose the CPCB recognition status in the manner required for regulatory verification and certification assessments. Accordingly, the reliability and regulatory acceptability of the said reports require examination. Relevant true copies are annexed herewith and marked as **ANNEXURE A-9**.
- 21.** That in the proposal of NALCO it was brought to the knowledge of Respondent No. 3 that the EIA/EMP report fails to comply with standard ToR. Specifically, despite ToR mandating baseline monitoring of heavy metals (Hg, Pb, Cr, As), the report omits all such data while inconsistently listing them in methodology tables. Further, the report provides no baseline health data for

the impact zone, contradicting publicly available studies showing high rates of respiratory diseases and cancer in the region. However, no action was taken despite complaints and reminders. That the Applicant raised a Complaint vide email dated 08.11.2024, followed with reminders dated 25.11.2024, 09.12.2024, 23.12.2024 and 28.08.2025 regarding discrepancies and omission of key environmental data (air pollutant data) in EIA Report prepared by Respondent No. 5. The complaints remained unaddressed.

True copies of email dated 23.12.2024 and 28.08.2025 as supporting documents annexed herewith and marked as **ANNEXURE A-10**. Copies of the remaining emails are not being annexed for the sake of brevity and to avoid unnecessary repetition.

- 22.** That the Respondent No. 2 (SEIAA, Odisha), vide Letter No. 6710/SEIAA dated 03.09.2025, debarred M/s NENO Technical Services from submitting Mining Plans, Annual Replenishment Rate Study ("ARRS") Reports, and related documents for obtaining Environmental Clearance under the EIA Notification, 2006, for a period of twelve months. The action was taken after SEIAA recorded that the consultant had furnished misleading assessments relating to river sand replenishment and ARRS studies, thereby affecting environmental appraisal relating to sand mining projects. A true copy of the debarment letter is annexed herewith and marked as **ANNEXURE A-11**.

- 23.** That the Respondent No. 2, vide Letter dated 28.12.2023 bearing File No. SEIAA-103/12-2023, debarred Shri Aseesh Rath, RQP/Consultant, from submitting reports and documents for obtaining Environmental Clearance under the EIA Notification, 2006, for a period of six months after finding discrepancies and misleading information in environmental appraisal documents relating to a stone quarry project. A true copy of the debarment letter is annexed herewith and marked as **ANNEXURE A-12.**
- 24.** That the Respondent No. 2, vide Letter dated 06.04.2024 bearing File No. SEIAA-103/12-2023, debarred M/s P & M Solution, a NABET-accredited consultant, from submitting EIA/EMP Reports and related documents for obtaining Environmental Clearance under the EIA Notification, 2006, for a period of six months after recording that false and misleading information had been furnished in cluster EIA/EMP Reports concerning stone quarry projects. A true copy of the debarment letter is annexed herewith and marked as **ANNEXURE A-13.**
- 25.** That a media report published in The Times of India dated 30.03.2022 reported that Respondent No. 3 had debarred M/s Ramky Enviro Services Pvt. Ltd., a NABET-accredited EIA consultant, from appearing before the Expert Appraisal Committee for six months after deficiencies and non-compliances were noticed in EIA Reports prepared by the consultant. The said action demonstrates the regulatory

significance attached to accuracy and reliability in EIA documentation. A true copy of the Media Report is annexed herewith and marked as **ANNEXURE A-14**.

26. That it is also pertinent to submit that, as per the [Office Memorandum dated 02.12.2009](#) issued by the Ministry of Environment, Forest and Climate Change, only EIA/EMP reports prepared by NABET/QCI registered consultants are considered with effect from 30.06.2010. A true of the OM dated 02.12.2009 is annexed herewith and marked as **ANNEXURE A-15**.

27. That section 9.3 of the NABET Scheme Document provides for suspension, cancellation, or debarment of accreditation in cases involving concealment or misrepresentation of facts in EIA Reports. The Scheme Document further provides that action may be taken where complaints relating to EIA work carried out by an Accredited Consultant Organization are brought to the notice of NABET and are confirmed by statutory authorities, courts, or the National Green Tribunal. A true copy of the extract from the Scheme document is annexed herewith and marked as **ANNEXURE A-16**.

28. That the Applicant lodged a complaint with the Respondents via email dated 27.04.2026 against Respondent No. 5 regarding ToR non-compliant and materially deficient EIA Reports with respect to UTCL and Dalmia Cement (Bharat) Limited, followed

by a reminder dated 12.05.2026. However, no action has been taken till date. Both remained unaddressed. Copies of the emails are annexed herewith and marked as **ANNEXURE A-17**. Annexures to the complaints are not being repeated as they already form part of the pleadings, for the sake of brevity and to avoid repetition.

- 29.** That in Hanuman Laxman Aroskar vs. Union of India, the Hon'ble Supreme Court emphasized the importance of strict compliance with the environmental appraisal framework under the EIA Notification, 2006 and observed that environmental protection constitutes an integral component of sustainable development. The Hon'ble Supreme Court held as follows:

"56. The 2006 Notification embodies the notion that the development agenda of the nation must be carried out in compliance with norms stipulated for the protection of the environment and its complexities. It serves as a balance between development and protection of the environment: there is no trade-off between the two. The protection of the environment is an essential facet of development. It cannot be reduced to a technical formula. The notification demonstrates an increasing awareness of the complexities of the environment and the heightened scrutiny required to ensure its continued sustenance, for today and for generations to come. It embodies a commitment to sustainable development. In laying down a detailed procedure for the grant of an EC, the 2006 Notification

attempts to bridge the perceived gap between the environment and development.”

GROUNDINGS:

The following grounds are respectfully submitted, which involve substantial questions relating to the environment and require the application of the Precautionary Principle and the Polluter Pays Principle under Section 20 of the NGT Act:

- A.** Because Respondent No. 5, despite being an accredited EIA Consultant Organization under the NABET accreditation framework, prepared and submitted EIA Reports that are materially non-compliant with the Terms of Reference prescribed under the EIA Notification, 2006, including omission of mandatory environmental parameters and incomplete environmental assessment.
- B.** Because omission of critical baseline environmental parameters materially affects scientific assessment of environmental impacts and defeats the purpose of environmental appraisal based on reliable and verifiable environmental data.
- C.** Because the EIA Reports prepared by Respondent No. 5 contain internal inconsistencies, misleading disclosures, and scientifically untenable water balance and wastewater management assessments, thereby affecting the credibility and reliability of environmental appraisal documentation submitted before statutory authorities.

- D.** Because Respondent No. 5, being an accredited consultant entrusted with statutory environmental assessment responsibilities, was required to exercise due professional diligence, scientific rigor, and transparency while preparing EIA Reports, but failed to do so, thereby undermining the integrity of the environmental decision-making process.
- E.** Because Respondent No. 5 failed to comply with mandatory obligations under the NABET Scheme Document including disclosure requirements and standards governing preparation of EIA Reports, thereby attracting regulatory action under Clause 9.3 of the Scheme.
- F.** Because despite repeated complaints supported by documentary material regarding deficiencies and misleading disclosures in EIA Reports prepared by Respondent No. 5, the concerned regulatory authorities failed to undertake any meaningful examination or corrective action, thereby frustrating the regulatory safeguards embedded in the environmental appraisal framework.
- G.** Because the environmental appraisal mechanism under the EIA Notification, 2006 is fundamentally dependent upon accuracy, transparency, and scientific credibility of EIA Reports prepared by accredited consultant organizations, and submission of deficient and misleading EIA documentation defeats the very object of the environmental regulatory regime and compromises informed environmental decision-making.

LIMITATION:

Most respectfully submitted that the present Original Application is within limitation under Section 14 of the National Green Tribunal Act, 2010. The cause of action is continuing and recurring in nature, arising from repeated preparation and submission of materially deficient and ToR non-compliant EIA Reports by Respondent No. 5 and the continued failure of the concerned authorities to take corrective action. A fresh cause of action further arose on 27.04.2026 and 12.05.2026 when the Applicant submitted complaints and reminder representations before the concerned authorities highlighting the deficiencies and non-compliances in the EIA Reports prepared by Respondent No. 5, which remain unaddressed till date. Hence, the present Application is within limitation.

PRAYER:

In light of the foregoing facts, circumstances, and grounds, it is most respectfully prayed that this Hon'ble National Green Tribunal, the Apex Green Court of India, may graciously be pleased to:

- 1) Direct Respondent Nos. 1 to 4 to conduct an independent examination/inquiry into the materially deficient, misleading, and ToR non-compliant EIA/EMP Reports prepared by Respondent No. 5 in respect of the three projects referred to in the present Application;
- 2) Direct Respondent No. 4, namely National Accreditation Board for Education and Training (NABET), to initiate proceedings under Clause 9.3 of the NABET Scheme for Accreditation of EIA Consultant Organizations against Respondent No. 5 and take appropriate action in accordance with law, including suspension, cancellation, or debarment, if found warranted;
- 3) Pending inquiry into the deficiencies and non-compliances detailed in the present Application, direct Respondent Nos. 1 to 3 to restrain/debar Respondent No. 5 from preparing, submitting, processing, or presenting EIA/EMP Reports and related environmental appraisal documents before any regulatory authority;

- 4) Direct Respondent Nos. 1 to 4 to file an Action Taken Report with respect to the complaints and representations submitted by the Applicant;
- 5) Pass such further order(s) as this Hon'ble Tribunal may deem fit and proper in the interest of environmental justice, transparency, and integrity of the environmental appraisal process.

And for this act of justice in safeguarding the larger public interest and the integrity of environmental governance, the Applicant as in duty bound shall ever pray.

Place: Balangir

Dated: 22.05.2026


(Applicant)

VERIFICATION

I, Sanjaya Kumar Mishra, son of Shri Nilamani Mishra, the Applicant (also an Advocate enrolled under Enrolment No. O-1047/2011 with the Orissa State Bar Council) R/o Maszid Chowk, Tikrapara, Balangir 767001, Odisha, do hereby solemnly affirm and verify that the contents of this application are true and correct to the best of my knowledge, information, and belief.

Verified today, the 22nd day of May 2026


(Signature of the Applicant)

**BEFORE THE HONOURABLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
ORIGINAL APPLICATION NO. _____ OF 2026
(U/s 14, 15, 20 R/W Section 18 of the NGT ACT, 2010)**

IN THE MATTER OF:-

Sanjaya Kumar Mishra

...APPLICANT

VERSUS

State of Odisha & Ors.

...RESPONDENTS

AFFIDAVIT

I, Sanjaya Kumar Mishra, son of Sh. Nilamani Mishra, R/o Maszid Chowk, Tikrapara, Balangir 767001, Odisha, do hereby solemnly affirm and declare as under:

- 1) That I am the Applicant in the present Original Application and am fully conversant with the facts and circumstances of the case and competent to swear this Affidavit.
- 2) That I am also an Advocate enrolled under Enrolment No. O-1047/2011 with the Orissa State Bar Council with my address as Maszid Chowk, Tikrapara, Balangir - 767001, Odisha, which I am using for this Original Application for the service of notices related to the Application, Replies, or Rejoinders. Besides, I also have a communication address at 115, Sagar Enclave, Sector-104, Gurugram - 122001, Haryana.
- 3) That the accompanying Original Application has been drafted by me, and I hereby declare that its contents are true and correct to the best of my knowledge and belief.
- 4) That the contents of the accompanying Original Application shall be read as part and parcel of this Affidavit, as the same are not repeated herein for the sake of brevity.
- 5) All annexures annexed are true copies of their respective originals and records downloaded from Government websites.



Sanjaya Kumar Mishra
DEPONENT

VERIFICATION:

Verified at _____ on this _____ Day of May 2026 that the contents of the above Affidavit are true and correct to the best of my knowledge and nothing material has been concealed there from.



ATTESTED

RAM NIWAS, ADVOCATE
NOTARY PUBLIC (HR) INDIA

Sanjaya Kumar Mishra
DEPONENT

This document has been registered
at Sr. No. 1179, Book No. 274
Page No. 107 On Dated 23-2-2026

COPY OF ADVOCATE ID CARD OF THE APPLICANT ~~XXXXXXXXXX~~

	The Orissa State Bar Council CUTTACK - 753 002 Phone No.- 0671-2607885	
	Enrolment No. & Date 0-1047/17.12.11	Name SANJAYA KUMAR MISHRA, ADV.
	Place of Practice : Cuttack	Date of Birth : 04.03.1969
	Sign of the Chairman	Sign of the Secretary

TO WHOM IT MAY CONCERN

The holder of this card is an advocate under Orissa State Bar Council. If found, please return or post in the following address.

Father's **Sri Nilamani Mishra**
 Husband's Name :

Address **At:-Maszid Chowk,**
P.o/Dist:-Bolangir,

Phone No. :
06652:-232723

Sanjaya Kumar
 Sign. of the Card Holder



ATTESTED

RAM NIWAS MALIK, ADVOCATE
 NOTARY, GURUGRAM (HR.) INDIA

National Accreditation Board for Education and Training

Certificate of Accreditation

J. M. EnviroNet Pvt. Ltd.

Unit No. 1517, Tower – B, Emmar Digital Greens, Golf Course Ext. Road, Sector – 61, Gurugram- 122011

JMEPL accreditation is continued (SA5) as Category-A organization under the QCI-NABET Scheme for Accreditation of EIA Consultant Organizations (Version 3), for the preparation of EIA/EMP reports in the sectors listed below, as per the specified categories-

S.No	Sector Description	Sector (as per)		Cat.
		NABET	MoEFCC	
1	Mining of minerals including opencast and underground	1	1 (a) (i)	A
2	Offshore and onshore oil and gas exploration, development & production	2	1 (b)	A
3	River Valley projects	3	1 (c)	A
4	Thermal power plants	4	1 (d)	A
5	Coal washeries	6	2 (a)	A
6	Mineral beneficiation including pelletisation	7	2 (b)	A
7	Metallurgical industries (ferrous and non-ferrous)	8	3 (a)	A
8	Cement Plants	9	3 (b)	A
9	Petroleum refining industry	10	4 (a)	A
10	Coke oven plants	11	4 (b)	A
11	Chlor-alkali industry	13	4 (d)	A
12	Soda ash Industry	14	4 (e)	A
13	Chemical fertilizers	16	5 (a)	A
14	Petro-chemical complexes (industries based on processing of petroleum fractions & natural gas and/or reforming to aromatics)	18	5 (c)	A
15	Manmade fibers manufacturing	19	5 (d)	A
16	Petrochemical based processing (processes other than cracking & reformation and not covered under the complexes)	20	5 (e)	A
17	Synthetic organic chemicals industry (dyes & dye intermediates; bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates)	21	5 (f)	A
18	Distilleries	22	5 (g)	A
19	Pulp & paper industry excluding manufacturing of paper from wastepaper and manufacture of paper from ready pulp without bleaching	24	5 (i)	A
20	Sugar Industry	25	5 (j)	B
21	Industrial estates/ parks/ complexes/ Areas, export processing zones (EPZs), Special economic zones (SEZs), Biotech parks, Leather complexes	31	7 (c)	A
22	Ports, harbours, break waters and dredging	33	7 (e)	A
23	Common Municipal Solid Waste Management Facility (CMSWMF)	37	7 (i)	B
24	Building and construction projects	38	8 (a)	B
25	Townships and Area development projects	39	8 (b)	B

Note: Names of approved experts and sectors are mentioned in SAAC minutes dated July 17, 2025 posted on QCI-NABET website.

The Accreditation shall remain in force subject to continued compliance to the terms and conditions mentioned in QCI-NABET's letter of accreditation bearing no. QCI/NABET/ENV/ACO/25/3796 dated July 25, 2025. The accreditation needs to be renewed before the expiry date J. M. EnviroNet Pvt. Ltd., Gurugram following due process of assessment.

Valid up to
August 7, 2026

Issue Date
July 25, 2025



Certificate No.
NABET/EIA/23-26/SA 0250

Varinder Kanwar
Prof (Dr) Varinder S Kanwar
CEO - NABET

For the updated List of Accredited EIA Consultant Organizations with approved Sectors please refer to QCI-NABET website.

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Page 055



Government of India
Ministry of Environment, Forest and Climate Change
 (Issued by the State Environment Impact Assessment
 Authority (SEIAA),
 ODISHA)



Minutes of 271st Meeting State Environment Impact Assessment Authority
meeting held from 10/02/2026 to 10/02/2026

Date: 13/02/2026

MoM ID: EC/MOM/SEIAA/954765/2/2026

Agenda ID: EC/AGENDA/SEIAA/954765/2/2026

Meeting Venue: Conference Hall of SEIAA Odisha

Meeting Mode: Physical

Date & Time:

10/02/2026	10:30 AM	02:30 PM
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1. Opening remarks

Dr. Sudarsan Panda, Chairman, SEIAA, Odisha extended a warm welcome to Shri K. S. Pradeep, Member Secretary, SEIAA, Odisha and Shri Gopal Prasad Roy, Member SEIAA Odisha and started the discussion on the proposals placed in the meeting

2. Confirmation of the minutes of previous meeting

http://parivesh.nic.in/utildoc/1218579144_1770444375541-signed.pdf

3. Details of proposals considered by the committee

Day 1 -10/02/2026

3.1. Agenda Item No 1:

3.1.1. Details of the proposal

Expansion in Cement Production Capacity from 5.1 Million TPA to 8.1 Million TPA of Existing Standalone

Grinding Unit by installation of New Line - II (3.0 Million TPA) at Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha) by M/s. UltraTech Cement Ltd. (Unit: Jhasuguda Cement Works) by UltraTech Cement Limited located at JHARSUGUDA,ODISHA			
Proposal For		Expansion EC	
Proposal No	File No	Submission Date	Activity (Schedule Item)
SIA/OR/IND1/555921/2025	J-11011/212/2011-IA-II (I)	31/10/2025	Cement plants (3(b))

3.1.2. Deliberations by the committee in previous meetings

<p>Date of SEAC 1 :03/12/2025</p> <p>Deliberations of SEAC 1 :</p> <p>Considering the information / documents furnished by the proponent and presentation made by the consultant M/s J.M. EnviroNet Pvt. Ltd., on dtd. 03.12.2025. The SEAC recommends the following:</p> <p>A. The proponent may be asked to submit the following for further processing of EC application:</p> <ol style="list-style-type: none"> i. Permission from Concerned Authority for tree cutting of 133 nos. ii. The SEAC suggested to explore possibility to transplant maximum number of trees to greenbelt zone. iii. Revise layout map showing existing and proposed parking area. iv. Report of a scientific study by a domain expert/expert(s) from an Institute of repute, which should include (a) the particulate matter concentration (PM_{2.5} , PM₁₀ , TSP) along with its characterization, in the nearby villages in the buffer one, (b) the adequacy and preformance of existing dust control measures, and (c) specific additional measures to be undertaken for control of particulate matter emission with time frame. v. As the approach road from Plant site to NH is in bad condition causing dust pollution which is major concern in Public Hearing and parking of vehicles in the said road, the PP shall submit the action plan to mitigate it. vi. Brief note including documents and details of expansion from 4.0 MTPA to 5.1 MTPA alongwith compliance report of conditions for the same. vii. Permission for drawing additional 50 KLD water from ground. viii. Copy of approval of Wildlife Conservation Plan. <p>A brief note on how the dust (1,60,000 TPA) collected from air pollution control equipment is being/will be recycled into the process.</p>

<p>Date of SEAC 2 :20/01/2026</p>
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Deliberations of SEAC 2 :

Considering substantial compliance by project proponent on the information sought, the SEAC recommends for grant of Environmental Clearance valid for 10 years with stipulated conditions as per **Annexure - C** in addition to the following specific conditions.

- i) The PP shall conduct a scientific study by IIT, BHU as proposed, which should include (a) the particulate matter concentration (PM_{2.5} , PM₁₀ , TSP) along with its characterization, in the nearby villages in the buffer one, (b) the adequacy and pre-performance of existing dust control measures, and (c) specific additional measures recommended in the study report to undertake for control of particulate matter emission with time frame.
- ii) The proponent shall maintain the approach road from Plant site to NH and increase frequency of water sprinkling to control fugitive dust emission during plying of vehicles.
- iii) The proponent shall obtain necessary permission from CGWA for drawl of additional water of 50 KLD.
- iv) The proponent shall obtain approval of Wildlife Conservation Plan.
- v) The proponent shall provide adequate capacity of parking area to accommodate the vehicles used for transport products and raw materials.
- vi) The proponent shall explore the possibility to transplant maximum nos. of trees to green belt zone.
- vii) The proponent shall maintain "Zero Liquid Discharge (ZLD)" concept as proposed.
- viii) The proponent shall develop green belt of 33% of the total area. (In the safeguard submitted by SPCB, it is stipulated to provide 50m width greenbelt. However, it is not feasible as per submitted layout map).

Date of SEIAA 3 :29/01/2026

Deliberations of SEIAA 3 :

Not Appraised/To Be Reconsidered

Date of SEIAA 4 :03/02/2026

Deliberations of SEIAA 4 :

After detailed deliberation, the authority decided to seek clarification / document from the PP on the following: -

1. Scrutiny fee of Rs. 5.0 /- Lakh to be deposited.
2. The PP has submitted that the project site is situated at a distance of 2.5 kms from the boundary of critically polluted area or severely polluted area and therefore as per OM dated 24.10.2019 and 31.10.2019, the project will be appraised at the Central Level. The PP has also obtained ToR from MOEF&CC, Govt. of India vide Letter no. J-11011/212/2011-IA-II (I) dated 27.03.2025 accordingly. Now, the PP has to furnish detail justification for grant of EC at the State Level.
3. Approved Wildlife Conservation Plan from PCCF, Odisha to be uploaded as per TOR condition no. 13.1.4 of ToR dated 27.03.2025.

3.1.3. Deliberations by the SEIAA in current meetings

After detailed deliberation, the authority approved the expansion of EC proposal valid for a period of ten years for enhancement in production capacity of Cement from 5.1 MTPA to 8.1 MTPA of the existing standalone grinding unit subject to standard and specific conditions as recommended by SEAC along with the following additional condition.

The Wildlife Conservation Plan shall be formulated and approved by the PCCF(W), Odisha and the fund for implementation of the same to be deposited with PCCF, Wildlife and report compliance to be submitted to the Regional Officer, MoEF&CC, Bhubaneswar.

3.1.4. Recommendation of SEIAA

Approved

3.1.5. Details of Environment Conditions

3.1.5.1. Specific

Specific Condition	
1.	<ul style="list-style-type: none"> i) The PP shall conduct a scientific study by IIT, BHU as proposed, which should include (a) the particulate matter concentration (PM_{2.5}, PM₁₀, TSP) along with its characterization, in the nearby villages in the buffer one, (b) the adequacy and pre-performance of existing dust control measures, and (c) specific additional measures recommended in the study report to undertake for control of particulate matter emission with time frame. ii) The proponent shall maintain the approach road from Plant site to NH and increase frequency of water sprinkling to control fugitive dust emission during plying of vehicles. iii) The proponent shall obtain necessary permission from CGWA for drawl of additional water of 50 KLD. iv) The proponent shall obtain approval of Wildlife Conservation Plan. v) The proponent shall provide adequate capacity of parking area to accommodate the vehicles used for transport products and raw materials. vi) The proponent shall explore the possibility to transplant maximum nos. of trees to green belt zone. vii) The proponent shall maintain "Zero Liquid Discharge (ZLD)" concept as proposed. viii) The proponent shall develop green belt of 33% of the total area. (In the safeguard submitted by SPCB, it is stipulated to provide 50m width greenbelt. However, it is not feasible as per submitted layout map).

3.1.5.2. Standard

3(b)	Cement plants
Statutory compliance	
1.	The Environment Clearance (EC) granted to the project/ activity is strictly under the provisions of the EIA



Government of India
Ministry of Environment, Forest and Climate Change
IA Division
(Coal Mining)



Minutes of 17th EAC (Coal Sector) meeting meeting Coal Mining held from 21/10/2024 to 22/10/2024

Date: 29/10/2024

MoM ID:	EC/MOM/EAC/493155/10/2024	
Agenda ID:	EC/AGENDA/EAC/493155/10/2024	
Meeting Venue:	N/A	
Meeting Mode:	Virtual	
Date & Time:		
21/10/2024	10:30 AM	05:30 PM
22/10/2024	10:30 AM	05:30 PM

1. Opening remarks

At the outset, the Chairman welcomed the Expert members & other participants and requested to start the proceeding as per the agenda listed for this meeting. The list of members who participated in the meeting is at Annexure – V. The Standard/Generic ToR conditions shall be system generated through the PARIVESH Portal.

2. Confirmation of the minutes of previous meeting

Confirmation of the Minutes of the 16th Meeting of the EAC (Coal): The minutes of the 16th meeting of the EAC (Coal) held during 8-9th October, 2024 have been confirmed by the EAC.

3. Details of proposals considered by the committee

Day 1 -21/10/2024

3.1. Agenda Item No 1:

3.1.1. Details of the proposal

CHATTI BARIATU COAL MINING PROJECT by NTPC MINING LIMITED located at HAZARIBAGH, JHA RKHAND	
Proposal For	Amendment in EC

6 2.	The compliances of ToR must be properly cited with respective chapter section and page no in tabular form and also mention sequence of the respective ToR complied within the EIA-EMP report in all the chapter,s section.
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3.4. Agenda Item No 4:

3.4.1. Details of the proposal

Modification in existing ECs of Utkal D Coal Block (ML Area 301.28 ha with Granted production capacity 2.0 M TPA) and Utkal E Coal Block (ML Area 523.036 ha with Granted production capacity 2.0 MTPA) by amalgamating the D & E block with total coal production capacity of 4 MTPA and total lease area of 824.316 ha Revenue vil lages of Tehsil: Chhendipada District: Angul, Odisha - Environment Clearance under Para 7 (ii) of EIA Notificat ion, 2006 by NALCO located at ANUGUL,ODISHA			
Proposal For		Fresh EC	
Proposal No	File No	Submission Date	Activity (Schedule Item)
IA/OR/CMIN/500323/2024	J-11015-31-2007-IA-II-M	11/10/2024	Mining of minerals (1(a))

3.4.2. Project Salient Features

<p><u>Agenda item no: 17.4</u> 17.4 Modification of existing Environment Clearances (ECs) of Utkal D Coal Block (ML Area 301.28 ha with Granted production capacity 2.0 MTPA) and Utkal E Coal Block (ML Area 523.036 ha with Granted production capacity 2.0 MTPA) by amalgamating the D & E block with total coal production capacity of 4 MTPA and total lease area of 824.316 ha by M/s. National Aluminium Company Limited (NALCO) located at Village: Nandichhod (Gopiballavpur), Gopinathpur Jungle, Kosala, Kundajhari Jungle, Korada, Raijharan, Similisahi, Tehsil: Chhendipada District: Angul, Odisha - Environment Clearance under Para 7 (ii) of EIA Notification, 2006 –reg. [Online Proposal No. IA/OR/CMIN/500323/2024; File No. J-11015-31- 2007-IA-II-M] [Consultant: JM EnviroNet Pvt. Ltd. NABET/EIA/2326/RA0308, valid up to 07.08.2026]</p> <p>17.4.1: M/s. National Aluminium Company Limited (NALCO) has made an application online vide proposal no. IA/OR/CMIN/500323/2024 dated 10.10.2024 along with Certified compliance report, Form and EIA/EMP report (based on standard ToR) for the amalgamated Utkal D&E block and sought for Environment Clearance (EC) under the provisions of the para 7(ii) of EIA Notification, 2006 for the project mentioned above. The proposed project activity is listed at schedule no 1 (a) ‘Mining of Minerals’ under Category "A" of the EIA Notification, 2006. Hence, the project is being appraised at Central Level.</p> <p>The project of M/s. NALCO is located in Nandichhod (Gopiballavpur), Gopinathpur Jungle, Kosala, Kundajhari Jungle, Korada, Raijharan, Similisahi, Tehsil: Chhendipada District: Angul, Odisha is for modification of existing Environment Clearances (ECs) of Utkal D Coal Block (ML Area 301.28 ha with Granted production capacity 2.0 MTPA) and Utkal E Coal Block (ML Area 523.036 ha with Granted production capacity 2.0 MTPA) by amalgamating the D & E block with total coal production capacity of 4 MTPA and total lease area of 824.316 ha.</p> <p>Details of the proposal, as ascertained from the proposal documents and as revealed from the discussions held during the meeting, are given as under:</p> <p>17.4.2: Details of existing ECs, FCs, implementation and its compliance status</p> <p>A. Status of ECs obtained for Utkal D & E block and its present status</p>
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Government of India
Ministry of Environment, Forest and Climate Change
IA Division
(Non-Coal Mining)



Minutes of AGENDA FOR 4th MEETING OF THE RE-CONSTITUTED EXPERT APPRAISAL COMMITTEE (NON- COAL MINING SECTOR), SCHEDULED ON 9th - 10th APRIL, 2026 meeting Non-Coal Mining held from 09/04/2026 to 10/04/2026 Date: 21/04/2026

MoM ID: EC/MOM/EAC/432351/4/2026
Agenda ID: EC/AGENDA/EAC/432351/4/2026
Meeting Venue: Teesta Hall, Indira Paryavaran Bhawan, Jor Bagh, New Delhi
Meeting Mode: Physical
Date & Time:

09/04/2026	10:00 AM	06:30 PM
10/04/2026	10:00 AM	06:30 PM

1. Opening remarks

MINUTES OF 4th MEETING OF THE RE-CONSTITUTED EXPERT APPRAISAL COMMITTEE (NON- COAL MINING SECTOR) HELD ON 9-10TH APRIL, 2026

2. Confirmation of the minutes of previous meeting

Deliberation & Circulation of Earlier Minutes

(1.0) Deliberation & Circulation on the Minutes of 3rd EAC (Non-Coal Mining) Meeting held during 25th March 2026.

The minutes of the 3rd meeting of the EAC (Non-Coal) held on 25th March, 2026 through physical mode have been confirmed by the EAC.

Proposed Kottameta Limestone Mine (Auctioned Block) (ML Area: 802.25 ha) with total excavation of 7.6 million TPA (Limestone Production Capacity – 3.0 Million TPA, Soil 0.5 Million TPA and Waste 4.1 Million TPA) along with 1000 TPH Crusher located at Village – Katamater, Tehsil & District – Malkangiri, Odisha by M/s. Dalmia Cement (Bharat) Ltd. by DALMIA CEMENT (BHARAT) LIMITED located at MALKANGIRI, ODISHA			
Proposal For		Fresh EC	
Proposal No	File No	Submission Date	Activity Sub-Activity (Schedule Item)
IA/OR/MIN/440925/2023	J-11015/80/2018-IA.II (M)	27/09/2023	Mining of minerals Non-Coal Mining (Major Minerals)- Opencast (1(a))

3.1.2. Project Salient Features

The proposal is for Environmental Clearance of proposed Kottameta Limestone Mine (Auctioned Block) of M/s. Dalmia Cement (Bharat) Limited with Total Excavation of 7.6 Million TPA (Limestone: 3.0 Million TPA, Soil: 0.5 Million TPA and Waste: 4.1 Million TPA) along with 1000 TPH Capacity Crusher in the mine lease area of 802.25 ha, located at Village: Katamater, Tehsil & District: Malkangiri, Odisha

2. The proposal details as submitted by the Project Proponent are given under:

i. Project details:

Name of the Proposal	Proposed Kottameta Limestone Mine (Auctioned Block) (ML Area: 802.25 ha) with total excavation of 7.6 million TPA (Limestone Production Capacity – 3.0 Million TPA, Soil 0.5 Million TPA and Waste 4.1 Million TPA) along with 1000 TPH Crusher located at Village – Katamater, Tehsil & District – Malkangiri, Odisha.	
Location	Village	Katamater/Kottameta
	Tehsil/Taluka	Malkangiri
	District	Malkangiri
	State / UT	Odisha
	Latitudes	18°19'27.10956" N to 18°20'53.76444" N

	Longitudes	81°39'08.01756" E to 81°41'38.08968" E
	Soil Toposheet No.	Core Zone: E44J11 (65 F/11) Buffer Zone: E44J11 (65 F/11), E44J12 (65 F/12), E44J15 (65 F/15) & E44J16 (65 F/16)
Company's Name	Dalmia Cement (Bharat) Ltd.	
Accredited Consultant and certificate no. and Validity	JM EnviroNet Pvt. Ltd. Registered EIA Consultant by NABET (QCI) Certificate No. QCI/NABET/EIA/23-26/SA 0250, dated 25.07.2025 and Valid up to 07.08.2026	
KML file	KML is uploaded on Parivesh 2.0 Web Portal	
Seismic zone	Zone - II as per IS:1893 (Part - I): 2025	

ii. Category details:

Category of the project	As per EIA Notification dated 14 th September, 2006 as amended from time to time, the project falls under Category "A"
Schedule No.	Project or Activity 1 (a) - 3 for "Mining of Minerals"
Mining lease Area (MLA) (In ha)	802.25 ha
General Conditions (if any)	None

iii. ToR Details:

Date of application	Proposal No/ File No	Consideration by EAC	Details of ToR	Date of accord
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In case of delay in payment of applicable fees at any stage beyond one month from the date of issuance of NABET's invoice, penalty @1.5% per month of delay is applicable.

Failure to pay the applicable dues by the deadline given in invoices may result in removal of sectors against the ACOs' name. This may be followed by cancellation of accreditation if the dues remain unpaid.

9.0 GRANT OF ACCREDITATION

Results of the accreditation committee meeting are uploaded on the QCI/NABET website within a month of the AC meeting in which the relevant case is discussed. A formal letter from NABET is sent within one month from the date of approval by the accreditation committee mentioning the approved sectors with category, experts approved with category, detailed conditions of accreditation and NCs and Obs., if any. NABET's certificate of accreditation is issued on successful closure of all NCs and Obs.

9.1 Maintaining accreditation

Accreditation of an EIA consultant organization is subject to compliance to the requirements of the QCI – NABET Scheme. These include, but are not limited to:

- a. Implementation of systems/procedures documented in the QMS manual of the ACO including the corrective and preventive actions for the NCs and Obs. of IA, SA, RA, as applicable.
- b. ACOs are encouraged to prepare their own 'EIA preparation manual' detailing the procedures followed right from the time of placing quotes for the work to completion of the project.
- c. Timely replacement of experts - in case any approved EC or FAE leaves the ACO, s/he needs to be replaced with in a specific time mentioned in Section 9.2.1.
- d. Intimation of changes – in case of any change in the organization related to systems, procedures, laboratory and other facilities, the same is to be intimated to NABET in the within one month.
- e. Payment of fees, as applicable, to NABET as per the terms of accreditation and detailed in **Appendix D**.
- f. At the beginning of the EIA reports prepared by the ACO a declaration is to be given by the ACO in the prescribed format as given in **Annexure VII** mentioning the names of the EC and FAEs involved. This form must be duly signed by them and countersigned by the CEO of the organization.
- ✓g. EIA reports prepared by accredited consultants must mention the total cost of the EIA and the cost of monitoring for baseline data in the beginning of the report in Chapter 1.
- h. Familiarity with the site conditions is a fundamental requirement for preparing an EIA. The concerned EC and relevant FAEs are expected to visit the site for appropriate

Expansion in Cement Production Capacity from 5.1 Million TPA to 8.1 Million TPA of Existing Standalone Grinding Unit by installation of New Line (3.0 Million TPA)

At Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha)

Point - Wise Reply of ToR

Point - Wise Reply of ToR

Point-wise reply of the Standard Terms of Reference (ToR) issued by MoEFCC, New Delhi vide letter no. J-11011/212/2011-IA-II (I) dated 27th March, 2025 for carrying out EIA Study for “Expansion in Cement Production Capacity from 5.1 Million TPA to 8.1 Million TPA of Existing Standalone Grinding Unit by installation of New Line (3.0 Million TPA) at Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha) by M/s. UltraTech Cement Ltd. (Unit: Jharsuguda Cement Works)”.

ToR Point No.	ToR Point	ToR Reply	Reference in Final EIA/EMP Report
Standard Terms of Reference (ToR)			
1.	Preliminary requirements		
1.1	EIA/EMP report cover page shall consist of project title with location, applicable schedule of the EIA Notification, 2006, ToR letter No. with date, study period along with EIA consultant & laboratory details with QCI/NABET/NABL accreditation certificate detail.	The cover page of the Final EIA/EMP Report includes project name with location, applicable schedule of the EIA Notification, 2006, ToR file No. along with date of grant of standard ToR letter, study period and EIA Consultant & laboratory details along with details of the project proponent.	-
1.2.	Besides, following points shall be compiled as per QCI/NABET norms:		
a.	Disclaimer by the EIA Consultant.	Disclaimer by EIA Consultant has been given in the Declaration which is enclosed along with EIA / EMP Report.	-
b.	Declaration by the Functional Area Experts contributed to the EIA study and declaration by the head of the accredited consultant organization/authorized person.	Declaration of the Functional Area Experts (FAEs) involved in the EIA study and declaration by head of accredited consultant Organization /authorized person is enclosed along with the EIA / EMP Report.	-
c.	Undertaking by the project proponent owning the contents (information and data) of the EIA/EMP report.	Undertaking by the project proponent owning the contents (information and data) of the EIA/EMP report is enclosed along with this EIA / EMP Report.	-
d.	Undertaking by the EIA consultant regarding compliance of ToR issued by MoEF&CC.	Undertaking by the EIA consultant regarding the compliance of ToR issued by MoEFCC, New Delhi is enclosed along with this EIA / EMP Report.	-
e.	Consultant shall submit the Plagiarism Certificate for the EIA/EMP Report.	Plagiarism certificate is enclosed along with this EIA / EMP Report.	-
2.	Executive Summary		
2.1	Table of Contents of the EIA report including list of tables/ figures/ annexures/ abbreviations/ symbols/ notations.	Table of contents including list of tables/ figures/ annexures/ abbreviations is incorporated in this EIA/EMP Report.	-

Expansion in Cement Production Capacity from 5.1 Million TPA to 8.1 Million TPA of Existing Standalone Grinding Unit by installation of New Line (3.0 Million TPA)

At Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha)

Point - Wise Reply of ToR

ToR Point No.	ToR Point	ToR Reply	Reference in Final EIA/EMP Report
	2006) obtained from the SPCB shall be submitted. Further, compliance report to the conditions of CTO from the Regional Office of the SPCB shall be submitted, as per OM No. IA3-22/10/2022-IA.III [E 1772581], dated 8th June, 2022. CCR on CTO conditions issued by the concerned SPCBs/PCCs shall be valid for a period of one year from the date of inspection of the project.		
15.	Description of the environment		
15.1	Study period	The study period for baseline monitoring & data collection for the proposed expansion project is Winter Season (Dec., 2024, to Feb., 2025).	Chapter - 3, Section - 3.0, Page no. 91
15.2	Approach and methodology for data collection as furnished below:		
	Air Environment		
	Micro-Meteorological <ul style="list-style-type: none"> • Wind Speed (Hourly) • Wind direction • Dry Bulb temperature • Wet bulb temperature • Relative humidity • Rainfall • Solar radiation • Cloud cover • Environmental Lapse rate 	Site-specific meteorological data (dry & wet bulb temperature, relative humidity, wind speed, wind direction (hourly) was collected during Winter Season (Dec., 2024, to Feb., 2025). Hourly meteorological data has been enclosed as Annexure - 5 along with this EIA/EMP Report. Details regarding rainfall, solar radiation, cloud cover & Environmental Lapse rate have been incorporated in EIA/EMP Report.	Chapter 3 Section 3.5.4.1 Page No: 121 Annexure - 5 Page no. 612 - 655
	Pollutants <ul style="list-style-type: none"> • PM_{2.5} • PM₁₀ • SO₂ • NO_x • CO • HC ✓ Other parameters relevant to the project and topography of the area.	AAQ monitoring was carried out at 08 locations for PM₁₀, PM_{2.5}, SO₂, NO_x, CO and HC as per NAAQS, 2009 during Winter Season (Dec., 2024 to Feb., 2025) within 10 km radius study area. The monitoring stations were selected considering the dominant wind direction, population zone and sensitive receptors etc. Detail of the same has been incorporated in this EIA/EMP Report. Raw data of all AAQ measurement / detailed AAQM Tables of all AAQ stations along with min., max. and 98% values for each of the AAQ	Chapter 3 Section - 3.5.5 Page No. 124 - 129

Table - 3.9
Mixing Height & Inversion Levels (Winter Season)

Time (Hours)	Mixing Height (m)	Inversion Level start at (m)
07:00	40	41
08:00	80	81
09:00	250	251
10:00	350	351
11:00	600	601
12:00	850	851
13:00	1000	1001
14:00	1150	1151
15:00	1150	1151
16:00	1050	1051
17:00	950	951
18:00	650	651
19:00	450	451

Source: IMD publication, "Atlas of Hourly Mixing Height and Assimilative Capacity of Atmosphere in India, 2008"

Both (Inversion level and Mixing height) are results of vertical temperature profile; and mixing of pollutants will not take place beyond the inversion layer. Thus, it can be presumed that at 7:00 hours, inversion level starts beyond 41 m during Winter Season.

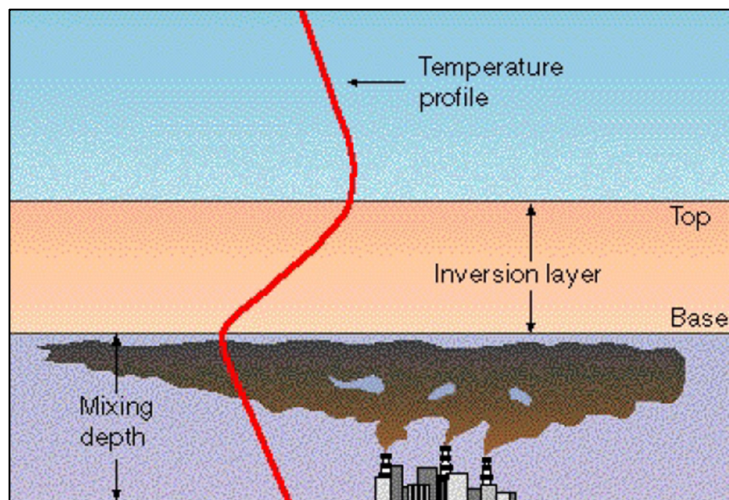


Figure 3.11: Mixing depth and Inversion layer

3-5-5 Ambient Air Environment

Ambient air quality monitoring has been carried out within the 10 km study area of the existing standalone grinding unit to determine the baseline concentration of various air pollutants in the ambient air.

The ambient air quality depends upon the emission sources, meteorological conditions and the background concentration of specific pollutants. Samples were collected from the 10 km study area

to observe the ambient air quality conditions throughout the region. It helps in providing a data base for evaluation of the anticipated impacts in 10 km radius study area by the activities of the Expansion project. It will also be useful in ascertaining the quality of air environment in conformity to standards of the ambient air quality during operation phase of the project.

Monitoring Parameters

The samples were collected for the following air quality determinants:

- Sulphur Dioxide (SO₂)
- Nitrogen Dioxide (NO₂)
- Particulate Matter (PM₁₀ and PM_{2.5})
- Carbon Monoxide (CO)
- Poly Aromatic Hydrocarbons (PAH)

Analytical methods prescribed by CPCB & approved Indian Standard methods were used for carrying out air quality monitoring.

Methodology

The methodology adopted for ambient air quality monitoring is given below in Table - 3.10.

Table - 3.10
Details of Test Procedures

S. No.	Parameters*	Test Method Specification against which tests are performed	Range of testing	Limit of detection	Equipment used for monitoring	
					Equipment required for Sampling	Equipment required for Analysis
1.	Sulphur Dioxide (SO ₂)	IS: 5182, (P-2), 2001 Reaffirmed 2017	5 µg/m ³ to 1050 µg/m ³	5 µg/m ³	Respirable dust sampler/Low flow Pump	UV spectrophotometer
2.	Nitrogen Dioxide (NO ₂)	IS: 5182, (P-6), 2006 Reaffirmed 2017	5 µg/m ³ to 750 µg/m ³	5 µg/m ³	Respirable dust sampler/Low flow Pump	UV spectrophotometer
3.	Particulate Matter (PM ₁₀)	IS: 5182, (P-23), 2006 Reaffirmed 2017	10 µg/m ³ to 1000 µg/m ³	10 µg/m ³	Respirable dust sampler,	Desiccators, high accuracy weighing balance
4.	Particulate Matter (PM _{2.5})	IS: 5182, (P-24), 2019	10 µg/m ³ to 500 µg/m ³	10 µg/m ³	Fine Particulate sampler	Desiccators, high accuracy weighing balance
5.	Carbon Monoxide (CO)	IS: 5182, (P-10), 1999 Reaffirmed 2014	0.5 mg/m ³ to 50 mg/m ³	0.5 mg/m ³	Sampling in Tedlar Bag with low flow pump	Gas chromatography with detector (FID)
6.	Poly aromatic Hydrocarbons (PAH)	IS: 5182, (P-12), 2004 Reaffirmed 2014	1.0 ng/m ³ to 2000 ng/m ³	1.0 ng/m ³	Respirable dust sampler (EPM 2000 filter paper)	Gas chromatography with detector (FID)

Protocol Used: CPCB Guidelines/IS-5182

RDS: Respirable Dust Sampler

FPS: Fine Particulate Sampler

Monitoring Schedule

Ambient Air quality monitoring has been carried out at eight locations for 24 hours for **PM₁₀, PM_{2.5}, SO₂, NO₂, CO and PAH** with frequency of twice a week for three months (26 observations for one location).

Monitoring Locations

Sampling locations in the downwind and upwind were selected for AAQ Monitoring keeping in view the pre-dominant wind direction prevailing in the area during the study period and as per the IMD data.

It can be observed from the wind rose diagram {Figure - 3.10 (b)} that the dominant wind direction during the study period was from North(N).

Villages / locations have been selected in the downwind direction as well as in the upwind direction and near the sensitive receptors for AAQ monitoring from the plant site.

Monitoring stations selected for Ambient Air Quality Monitoring during the study period are given in Table - 3.11 & shown in Figure - 3.12.

Table - 3.11
Locations of Ambient Air Quality Monitoring Stations
Study Period: Winter Season (December, 2024 to February, 2025)

S. No.	Monitoring location	Approx. Aerial distance from plant site	Direction from plant site	Selection Criteria
SA 1	Plant site	-	-	Core Zone
SA 2	Village Arda	~1.0 km	North	<ul style="list-style-type: none"> Upwind of dominant wind direction Near To railway Line
SA 3	Village Sialarama	~1.0 km	South	Downwind of dominant wind direction
SA 4	Village Shriyapali	~6.5 km	South	<ul style="list-style-type: none"> Downwind of dominant wind direction Near National Highway
SA 5	Village Khalakiparha	~1.0 km	West	Crosswind wind of dominant wind direction
SA 6	Village Gaurhapanapali	~5.0 km	NE	Downwind direction of annual dominant wind
SA 7	Village Nuapali	~5.0 km	SE	Location in Study Area
SA 8	Town Jharsuguda	~7.5 km	WSW	Populated Area

Source: SOI Toposheet 1st Edition 2009 & Google earth pro

Ambient Air Quality Monitoring

Table - 3.12 below shows the maximum and minimum concentration of the air pollutants monitored at different monitoring locations during the study period. All 24 observations of pollutants for each location are detailed in Ambient Air Quality Monitoring Tables enclosed as **Annexure - 6** along with this EIA/EMP Report.

Table - 3.12
Ambient Air Quality Monitoring Results
Study Period: Winter Season (Dec., 2024 to Feb., 2025)

S. No.	Monitoring Locations	Parameters										
		PM _{2.5} ($\mu\text{g}/\text{m}^3$)		PM ₁₀ ($\mu\text{g}/\text{m}^3$)		Nitrogen Dioxide ($\mu\text{g}/\text{m}^3$)		Sulphur Dioxide ($\mu\text{g}/\text{m}^3$)		Carbon Monoxide (mg/m^3)		Total PAH (ng/m^3)
		Max.	Min.	Max.	Min.	Max.	Min.	Max.	Min.	Max.	Min.	
1.	Plant site	41.6	34.4	78.2	60.7	29.6	14.2	12.2	8.5	0.81	0.61	BDL
2.	Village Arda	35.5	29.1	61.0	48.6	17.4	12.3	10.7	7.0	0.60	0.52	BDL
3.	Village Sialarama	38.3	29.3	62.1	49.0	16.2	11.4	9.1	6.2	BDL	BDL	BDL
4.	Village Shriyapali	40.2	30.4	69.6	54.5	18.4	13.1	11.4	7.0	0.62	0.56	BDL
5.	Village Khalakiparha	41.2	31.6	70.2	57.8	21.2	15.4	13.5	8.7	0.71	0.60	BDL
6.	Village Gaurhapanapali	31.2	23.1	52.1	41.3	15.6	10.2	9.9	5.4	BDL	BDL	BDL
7.	Village Nuapali	30.1	22.1	50.3	40.1	14.7	9.7	9.0	4.8	BDL	BDL	BDL
8.	Town Jharsuguda	62.5	48.7	96.2	81.1	31.8	20.4	15.7	10.3	0.97	0.72	0.60
Detection Limit								4.0		0.5		0.5
NAAQS*		60		100		80		80		4		-

Source: Ambient Air Quality Monitoring (Dec., 2024 to Feb., 2025)

*NAAQS - National Ambient Air Quality Standards; Schedule-VII, [Rule 3 (3B)], [Part-II-sec-3(i)] 16.11.2009

Observation:

Ambient Air Quality Monitoring reveals that the concentrations of PM_{2.5} and PM₁₀ for all the 08 AAQM stations were in range of 22.1 to 62.5 $\mu\text{g}/\text{m}^3$ and 40.1 to 96.2 $\mu\text{g}/\text{m}^3$ respectively and were found to be well within the prescribed limits.

As far as the gaseous pollutants SO₂ and NO₂ are concerned, the prescribed CPCB limit of 80 $\mu\text{g}/\text{m}^3$ has never surpassed at any station during the monitoring season. The concentrations of NO₂ and SO₂ were found to be in range of 9.7 to 31.8 $\mu\text{g}/\text{m}^3$ and 4.8 to 15.7 $\mu\text{g}/\text{m}^3$ respectively. The concentration of the gaseous pollutant for NO₂ and SO₂ was found minimum at Village Nuapali and maximum at Town Jharsuguda.

Similarly, the value of PM_{2.5} and PM₁₀ were found minimum at Village Nuapali and maximum at Town Jharsuguda. CO concentration was not detected at the three of the monitoring locations & observed maximum of 0.97 mg/m³ at Town Jharsuguda and minimum of 0.52 mg/m³ at Village Arda. The PAH concentration was not detected at other monitoring locations except Jharsuguda & observed 0.60 ng/m³ at Town Jharsuguda.

Interpretation:

Based on the primary and secondary data collection the ambient air quality monitoring results were analyzed and interpret that the anthropogenic source of air pollution within the 10 km study area were mainly due to point sources and line sources. The major cause for the point sources, line sources and area sources within the 10 km radius of study area were as follows:

- **Point source:** Presence of Large, Medium and Small-Scale Industrial activities etc.
- **Line Source:** Movement of heavy-duty vehicles used for raw material and finished product transportation on NH – 49. Movement of the private and public vehicles / as well as trucks and trailers movement for agricultural and construction activities.
- **Area source:** Incomplete combustion practice for domestic/cooking/ heating at few villages.

The concentration of the dust pollutants assessed (i.e., PM_{2.5} and PM₁₀) and gaseous pollutant NO₂ and SO₂ was found maximum at Town Jharsuguda. The reason for such a high concentration of air pollutant at Town Jharsuguda is due to its distance from the plant site along with associated anthropogenic sources such as commercial activities, Transportation, vehicular movement. The minimum value of Dust (PM_{2.5} and PM₁₀) was observed at Village Nuapali. Similarly, Gaseous pollutant (NO₂ and SO₂) were observed to be minimum at Village Nuapali. The reason of minimum PM_{2.5} and PM₁₀ and gaseous pollutants is minimum anthropogenic activities in this area and absence of any major road nearby the area.

Conclusion:

All the parameters at the monitoring locations were found within the prescribed NAAQ standards. It is expected from the proposed expansion activities of the plant, that the increased transportation during the operation phase as well as construction phase will increase the pollutant concentration (but within the prescribed limits) in the nearby villages, primarily in the villages falling in the downwind direction, but proper mitigation measures will be adopted by M/s. UltraTech Cement Limited (Unit: Jharsuguda Cement Works) to control the air emissions are given in Chapter- 4 of the EIA/EMP report.

3.5.6 NOISE ENVIRONMENT

Noise often defined as unwanted sound, interferes with speech communication, causes annoyance, distracts from work, and disturbs sleep, thus deteriorating quality of human environment.

Extract from EC

		CFL/LED (3.0 TPA)	
--	--	-------------------	--

➤ Storage Facilities:

Type of Materials	Type of Storage	Capacity (in Tonnes)		Total Capacity (in Tonnes)
		Existing	Proposed	
Clinker	Silo	60000 & 30000	55000	1,45,000
Slag & Gypsum	Shed	15000 & 8000	40000	63000
Fly ash	Silo	12000 & 5000	7500	24500
Coal	Shed	-	4000	4000
Cement	Silo	1 X 10500, 1 X 5000 & 1 X 11000	1 x 10000, 1 X 7500	44000

- xx) Baseline study conducted details: The baseline data is generated within 10 km radius for air, water, soil, noise & ecological studies. The baseline environmental data were generated for winter season i.e., during December 2024 to February 2025 and the monitoring data is mentioned below table.

Parameters	Description	Standards
Ambient Air Quality Monitoring at 8 Locations	PM _{2.5} - 22.1 to 62.5 µg/m ³ (Maximum at Town Jharsuguda)	60 µg/m ³ (24 hours)
	PM ₁₀ - 40.1 to 96.2 µg/m ³ (Maximum at Town Jharsuguda)	100 µg/m ³ (24 hours)
	SO ₂ - 4.8 to 15.7 µg/m ³	80 µg/m ³ (24 hours)
	NO ₂ - 9.7 to 31.8 µg/m ³	80 µg/m ³ (24 hours)
	CO - BDL to 0.97 mg/m ³	4 mg/m ³
✓ AAQ modeling (Incremental GLC)	PM _{2.5} : 0.62 µg/m ³ at 275 m away from stack in South direction	-
	PM ₁₀ : 0.91 µg/m ³ at 275 m away from stack in South direction	-
Noise Level Monitoring at 8 Locations	During Day Time - 50.3 to 59.4 Leq dB(A)	75 Leq dB (A) Industrial/55 Leq dB(A) Residential

No HC

Then, Environmental Clearance was obtained for Expansion of Grinding Unit from 2.0 MTPA to 4.0

✓ MTPA with 2 x 6 MW D.G. Set at Jharsuguda Cement Works, Near Dhutra Railway Station, Tehsil Kirmira, Post Arda, District Jharsuguda, Orissa from MoEFCC, New Delhi vide letter no. J-11011/212/2011 IA-II (I) dated 25th October, 2011.

Thereafter, NIPL (No Increase in Pollution Load) Certificate was obtained from SPCB, Odisha for Expansion of the Standalone Grinding Unit from 4.0 to 5.1 Million TPA by debottlenecking and process optimization by reducing the retention time of throughput raw material grinding in cement mill vide letter no. 19724/IND-II-NOC-MISC-NIPL/70 dated 13th December, 2023.

{Copy of last Environmental Clearance Letter along with NIPL Letter enclosed as **Annexure - 1(a)** along with this EIA/EMP Report}

Consent to Establish for expansion capacity of 4.0 to 5.1 Million TPA has been obtained from SPCB, Odisha vide consent no. 3801/IND-II-CTE-7148 dated 18th March, 2024. Consent to Operate for cement production of 5.1 Million TPA has been obtained from SPCB, Odisha vide consent no. 6665/IND-I-CON-1272 dated 29th March, 2025 (valid up to 31st March, 2027).

Details of different units & their production capacity at existing plant premises along with the necessary clearances are given in below Table - 1.1:

Table - 1.1
Details of the Existing Clearance and Consents

S. No.	Project Activity	Clearance/ Consent details
A	Environmental Clearances	
1.	Expansion of Cement Grinding Plant (from 0.7 MTPA to 2.0 MTPA) at Jharsuguda Cement Works, Near Dhutra Railway Station, Post Arda, District Jharsuguda, Orissa by MoEFCC	Vide letter no. J-11011/983/2007-IA-II(I) dated 05 th February, 2008.
2.	Expansion of Clinker Grinding Unit from 2.0 MTPA to 4.0 MTPA with 2 x 6 MW D.G. Set at Jharsuguda Cement Works, Near Dhutra Railway Station, Tehsil Kirmira, Post Arda, District Jharsuguda, Orissa by MoEFCC	Vide letter no. J-11011/212/2011-IA-II (I) dated 25 th October, 2011
3.	NIPL (No Increase in Pollution Load) Certificate was obtained from SPCB, Odisha for Expansion of the Standalone Grinding Unit from 4.0 to 5.1 Million TPA by debottlenecking and process optimization by reducing the retention time of throughput raw material grinding in cement mill	Vide letter no. 19724/IND-II-NOC-MISC-NIPL/70 dated 13 th December, 2023
B	Consent to Establish by OSPCB	
1.	Consent to Establish was obtained from SPCB, Odisha for enhancement in Cement production Capacity of 5.1 Million TPA (issued under NIPL)	Vide consent no. 3801/IND-II-CTE-7148 dated 18 th March, 2024
C	Consent to Operate by OSPCB	
1.	Consent to Operate obtained from SPCB, Odisha for Cement of 5.1 Million TPA	Vide letter no. 6665/IND-I-CON-1272 dated 29 th March, 2025; (valid up to 31 st March, 2027)

Source: Pre-Feasibility Report

Expansion in Cement Production Capacity from 5.1 Million TPA to 8.1 Million TPA of Existing Standalone Grinding Unit by installation of New Line (3.0 Million TPA)

At Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha)

Chapter - 1 of Final EIA/EMP Report

Table - 1.2
Existing capacities and its Implementation Status

S. No.	Particulars	✓ Capacity as per EC granted on 13 th Dec., 2023	✓ Installed Capacity as per Consent to Operate	Implementation status as on date
1.	Cement	5.1 Million TPA	5.1 Million TPA	Implemented
2.	D.G. Set (2 Nos.)	2 x 6 MW	1.0 MW & 1.2 MW	Partially Implemented ✓

Source: Pre-Feasibility Report

B. Project Proposal

M/s. UltraTech Cement Ltd. (Unit: Jharsuguda Cement Works) is now proposing an expansion in cement production capacity from 5.1 Million TPA to 8.1 Million TPA of existing standalone grinding unit by installation of New Line (3.0 Million TPA) at Village Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha).

Details of the production capacities before and after expansion are as given in Table -1.3.

Table - 1.3
Production Capacities Before and After Expansion

S. No.	Particulars	Unit	Existing Capacity	Additional Capacity	Total Capacity after Expansion
1.	Cement (OPC, PPC, PSC & PCC)	Million TPA	5.1	3.0	8.1
2.	D.G Set	MW	2 x 6	Nil	12

Source: Pre-Feasibility Report

C. Screening Category

As per EIA Notification dated 14th Sept., 2006, as amended thereof; the project falls under Category "B1", Project or Activity '3(b)' - Cement Plants.

Note: At project initiation stage, Common area of SPA of IB Valley and Jharsuguda was found at a distance of ~2.50 km in the West direction from the plant site; and accordingly, the company had applied the expansion proposal at Parivesh 2.0 considering the applicability of General Condition - "Any project or activity specified in category B1 will be appraised at the central level, if located in whole or in part within 5.0 km from the boundary of Critically Polluted Areas or Severely Polluted Areas".

The project was appraised as Category "A" Project at Central Level (MoEFCC, New Delhi). Standard ToR Letter for the project was issued by MoEFCC, New Delhi vide Letter no. J-11011/212/2011-IA-II (I) dated 27th March, 2025; Baseline monitoring & data collection was done for the project during Winter Season (December, 2024 to February, 2025) and Public Hearing for the proposed expansion project was conducted on 14th Aug., 2025.

Now, the company had received clarification letter from State Pollution Control Board, Odisha regarding the location and distance from the SPA vide Letter No. 17024/VI-SC (I & PR)-03/16-17 dated 13th September, 2025, confirming that the SPA of IB Valley is at a distance of ~22.8 km, and the OPA of Jharsuguda is ~5.0 km away from the plant site. Accordingly, the project is now being applied

Expansion in Cement Production Capacity from 5.1 Million TPA to 8.1 Million TPA of Existing Standalone Grinding Unit by installation of New Line (3.0 Million TPA)

At Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha)

Chapter - 11 of Final EIA/EMP Report

Table - 11.2

Raw Material Requirement

S. No.	Raw Material	Requirement (Million TPA)			Source	Mode of Transportation & Approx. Distance
		Existing	Additional	Total		
1.	Clinker	3.57	2.1	5.67	Rawan Cement Works, Kukurdih Cement Works, Hirni Cement Works, Andhra Pradesh Cement Works & Other UTCL Units.	~200-700 km by Rail / Road
2.	Gypsum (Mineral/Chemical / FGD)	0.255	0.145	0.4	IFFCO, Paradeep, NTPC, Darlipalli	~1000 - 1200 km by Rail/ Road
3.	Fly Ash/ Pond Ash	1.785	1.015	2.8	Orrisa Power Corporation. Hindalco. Hirakud & OPGC. and IB	~30 - 50 km by Road
4.	Slag	1.53	0.9	2.43	Jindal Steel and Power, Raigarh, JSW Bhushan Steel, Sambalpur, SMC Power, Jharsuguda and Orissa Metallics, Jharsuguda	~85 - 100 km by Rail/ Road

Source: Pre-feasibility Report

11.3.2.2 Fuel Requirement

Details regarding quantity of fuel required, their source along with mode of transportation for expansion project are given in Table - 11.3.

Table - 11.3

Fuel Requirement

S. No.	Name of Fuel	Quantity Required			Source	Distance & Mode of transportation
		Existing	Additional	Total		
1.	Diesel (KLD) for DG Set	30	Nil	30	Local Nearby Area	10 km; By Road
2.	Coal (TPD) for HAG	60	60	120	Nearby mines	100 km; By Road

Source: Pre-feasibility Report

11.3.2.3 Other Basic Requirement

Other basic requirements for the proposed expansion project are given in Table - 11.4.

Table - 11.4

Basic Requirements for the Project

S. No.	Purpose	Requirement (KLD)			Source
		Existing	Additional	Total	
1.	Water Requirement (KLD)	350	50	400	Groundwater & Recycled water
2.	Power Requirement (MW)	16	11	27	State Grid OPTCL, Solar power Plant of (2 MW) and DG sets for backup
3.	Manpower Requirement	Construction Phase	Nil	2000	Preference is being / will be given to local villager based on Skills, qualification and requirement.
		Operational Phase	594	105	

Source: Pre-feasibility Report

Hydrogeological Report

Expansion in Cement Production Capacity from 5.1 Million TPA to 8.1 Million TPA of Existing Standalone Grinding Unit by installation of New Line (3.0 Million TPA) At Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda (Odisha)

7. WATER BALANCE, RECYCLE AND REUSE

The total existing water requirement is 350 KLD and additional requirement for the proposed expansion will be 50 KLD; thus, the total water requirement after expansion will be 400 KLD.

Source: Ground water & Recycled water.

Status of Approval: Permission for withdrawal of 350 KLD Groundwater has been obtained for from the CGWA wide letter no. CGWA/NOC/IND/REN/2/2022/7318 which was valid upto 04th March 2025. Now, the company will apply for additional 50 KLD groundwater permission in CGWA.

Table 16: Total Water Requirement

S. No.	Purpose	Requirement (KLD)			Source
		Existing	Additional	Total	
1.	Plant Process /cooling	255	30	285	Groundwater & Recycled water
2.	Dust Suppression	17	2	19	
3.	Drinking & Domestic	25	5	30	
4.	Greenbelt	46	10	56	
5.	Others (Fire hydrant and Misc.)	7	3	10	
Total		350	50	400	

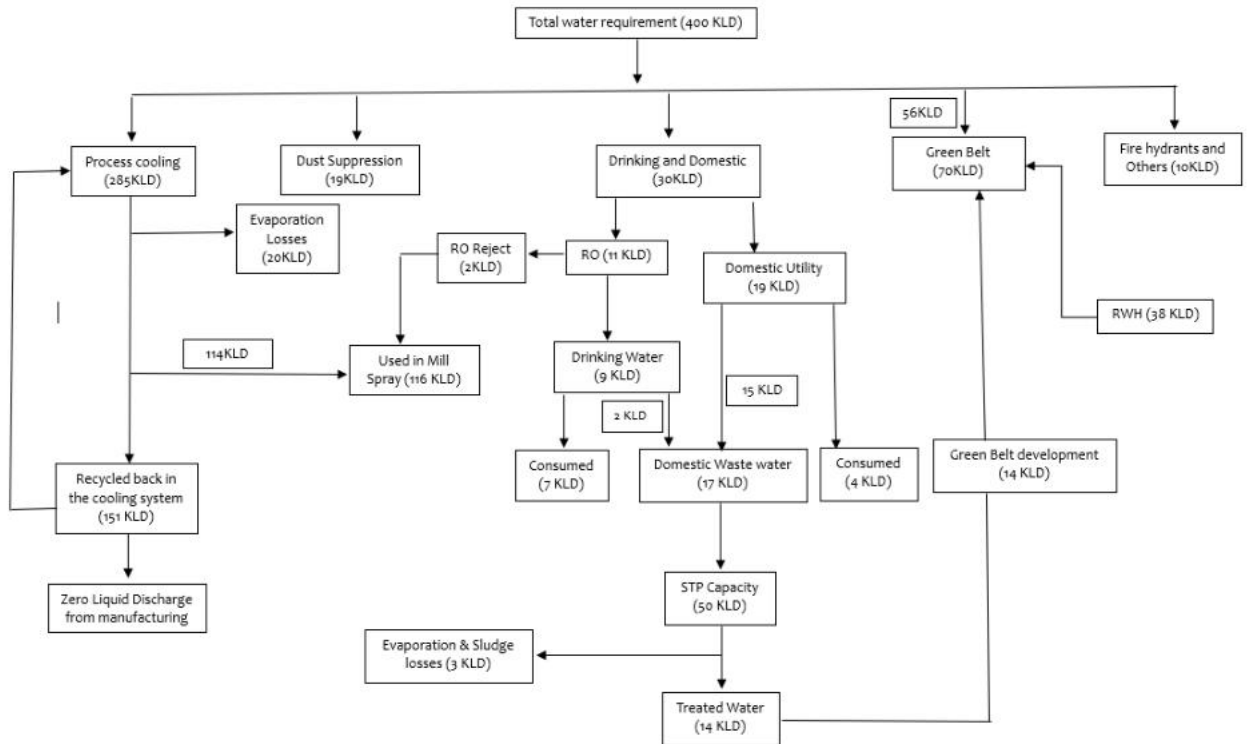


Figure 25: Water balance

characteristics, water level conditions (April – May and November), estimate of ground water resources, predicted impact of the project on ground water regime and detailed remedial / conservation measures such as artificial recharge of ground water etc. The report should be based on actual field inventory out of existing wells, at least 30 observation wells in the buffer zone with supplementary information from secondary sources (mention name). For estimation** of ground water resource (refer question no. 28 above) be designated study area of the buffer zone may be sub-divided into command and non-command areas, watershed-wise (in case of hard rock / consolidated formations) / block-wise / mandal-wise in case of alluvial / unconsolidated formations]

[**For estimating ground water resources in the area follow the Ground Water Estimation Committee recommendations of 1997]

Details regarding water intersection given in Chapter 4 and Hydrogeology Report of this EIA/EMP Report.

30.

WASTE WATER MANAGEMENT

- (a) Daily average discharge (m³/day) from different sources Nil
- i. Mine water discharge during
- Lean Period Nil
- Monsoon Period Nil
- ii. Workshop 6
- iii. Domestic mine site 13
- iv. Beneficiation / Washeries Nil
- v. Coal Handling Plant Nil
- vi. Tailings pond Nil
- vii. Others (specify) Nil
- Total 19 KLD
- (b) Waste water treatment plant; flow sheet for treatment process attached. Yes No
- (c) Quantity of water recycled/ reused/to be recycled in
- i. Percentage: - ~89%
- ii. m³/day: - 17
- (d) **Point of final discharge**

Final Point	Quantity discharged (in m ³ /day)
1. Surface	
(i) Agricultural land	
(ii) Waste land	Nil
(iii) Forest land	
(iv) Green belt	

2. River / nallah	-
3. Lake	-
4. Sea	-
5. Others	No waste water will be discharged outside ML Area. Waste water will be treated and reused within Mine.
Total	-

(e) **Users of discharge water**

Yes No

i. **Human** Yes No

ii. **Livestock** Yes No

iii. **Irrigation** Yes No

iv. **Industry** Yes No

v. **Others (specify)**

(f) **Details of the river / nalla, if final effluent is / will be discharged (cumecs)** No Waste water will be discharged outside the mining lease

i. **Average flow rate**

ii. **Lean season flow rate**

iii. **Aquatic life**

iv. **Analysis of river water 100 meters upstream and 100 meters downstream of discharge point submitted.** Yes No

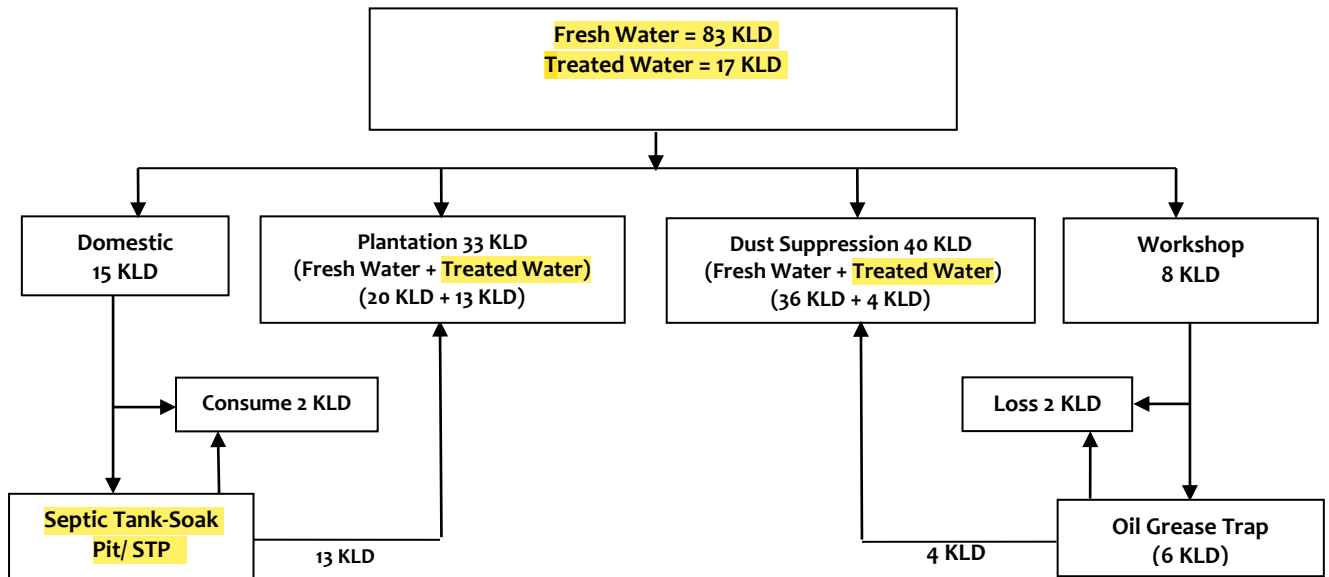
Township - There will be no township area within the mine area.

a. **Waste water generation from township (m³/day)**

b. **Are you planning to provide sewage treatment plant?** Yes No

c. **Usage of treated water** -

31. ATTACH WATER BALANCE STATEMENT IN THE FORM OF A FLOW DIAGRAM INDICATING SOURCE (S), CONSUMPTION (SECTION-WISE) AND OUTPUT.



32. Ambient noise level leq dB(A) :

S. No.	Sampling Locations	Noise Levels dB Leq (A)			
		Day Time (6:00 AM to 10:00 PM)		Night Time (10:00 PM to 6:00 AM)	
		Result	Prescribed limit	Result	Prescribed limit
SN1	Kotamateru Village	53.6	55	43.1	45
SN2	Kosabander Village	52.8	55	41.2	45
SN3	Uskalbag Village	53.4	55	43.8	45
SN4	Puspalli Village	53.7	55	43.3	45
SN5	Sukma Village	53.9	55	42.7	45
SN6	Borguda Village	54.0	55	43.8	45
SN7	Nandiwada Village	53.3	55	43.6	45

33. SOLID WASTE

(a) Solid waste quantity and quality details are given in Final EIA/EMP Report, Chapter – 2.

Name (Lump/fines/slurry/ Sludge/others)	Composition	Quantity (cum/month)	Method of disposal
Soil	Reddish brown sandy and lateritic	48,387	It will be used for greenbelt/plantation.
OB Waste	Waste consists of Phyllite and Siliceous Limestone	3,96,774	Phyllite: It will be backfilled and will be used for road development or can be sold to outside parties for road making etc, after obtaining necessary permission. Siliceous Limestone: Sorting and selectively blending with usable limestone. If not found suitable then lessee may sell these rocks on 'as is where is' basis to outside agencies, after

COMPREHENSIVE HYDROGEOLOGICAL REPORT ON GROUND WATER WITHDRAWAL FOR BOTH CORE AND BUFFER ZONES

Kottameta Limestone Mine (Auctioned Block) (ML Area: 802.25 ha) with total excavation of 7.6 million TPA (Limestone Production Capacity – 3.0 million TPA, Soil 0.5 million TPA and Waste 4.1 million TPA) along with 1000 TPH Crusher located at Village – Katamater, Tehsil & District – Malkangiri, Odisha.

Rainwater accumulation (Cum/annum) = Area Under mining * Rainfall

Net water available in pit (cum /annum) = Total Water – (Evaporation Loss -Recharge from Mine Pit)

The parameter used for the calculations area as follows:

Parameter	Value	Source
Rainfall in mm/day	5.45	WRIS
Rainfall in meters/day	0.00545	
Rainy Days	146	
Evaporation Loss (mm)	250	Water Resources Systems Division National Institute of Hydrology
Rainfall infiltration Factor	4%	GEC 2015

The detailed summary of mine seepage is given below point-wise:

1. There is negligible vertical seepage of groundwater from the bottom of the pit.
2. Total Dewatering will be 189 KLD Where Seepage is 109 KLD. And Rainwater is 80 KLD (including Evaporation Loss and Recharge)

There is no mining activity in the initial two years. Therefore, there is no groundwater intersection in the first two years of the proposed plan. The total groundwater requirement of the proposed limestone mine is 83 KLD which will be fulfilled through borewell in these initial years. The NOC for this groundwater abstraction from borewell will be taken from CGWA/CGWB. M/s Dalmia Cement (Bharat) Ltd. Kottameta Limestone Mine (Auctioned Block) (ML Area: 802.25 ha) will seek NOC for dewatering the mines once groundwater seepage starts which will be in next renewal period of NOC.

5.2 ADVANCED DEWATERING PLAN IN CASE OF COAL/LIGNITE MINES

This section is not applicable as this is a proposed limestone mine.

5.3 GROUNDWATER MODELLING

The Mine Site and its 10 Km study area fall in hard rock terrain and total ground water abstraction occurs in the tune of 83 KLD and dewatering of water occurs in the range of 189 KLD. Therefore, the total ground water abstraction of the mine is 272 KLD which is less than 500 KLD, therefore detailed modelling is not applicable for the project as per CGWA Format for preparation of the Comprehensive Hydrogeological Report.

CHAPTER 6- MINE WATER MANAGEMENT

6.1 PROPOSED USAGE OF PUMPED WATER IN CASE OF MINE DEWATERING PROJECTS.

There is no mining activity in the initial two years (i.e., till 2024-25). Therefore, there is no groundwater intersection in the first two years of the proposed plan. The total groundwater requirement of the proposed limestone mine is 83 KLD which will be fulfilled through borewell in these initial years. The NOC for this groundwater abstraction from borewell will be taken from CGWA/CGWB. M/s Dalmia Cement (Bharat) Ltd. Kottameta Limestone Mine (Auctioned Block) (ML Area: 802.25 ha) will seek NOC for dewatering the mines once groundwater seepage starts which will be in next renewal period of NOC (i.e., 2025-26).

The total water requirement for mining operations is 83 KLD which will be met from ground water. The total volume of water available in excavated mine pits during the plan period shall be about 189 KLD. Out of 189 KLD of pumped-out water through dewatering about 68 KLD will be utilized for Mine requirements. Therefore, with successive mining, ground water consumption will be reduced. The pumped water through dewatering will be utilized in Greenbelt/Plantation, Dust Suppression. Details have been elaborated on below.

Table 21: Water Requirement details.

Sl. No.	Particular	Before Groundwater Seepage (till 2024-25)	After Groundwater seepage	
			Groundwater Abstraction	Mine Seepage
1.	Drinking/Domestic	15	15	
2.	Dust Suppression	40	-	40
3.	Greenbelt Development and Plantation	20	-	20
4.	Work Shop	8	-	8
5.	Agriculture/Other uses for villagers	-	-	121
Total		83	15	189

Kottameta Limestone Mine (Auctioned Block) (ML Area: 802.25 ha) with total excavation of 7.6 million TPA (Limestone Production Capacity – 3.0 million TPA, Soil 0.5 million TPA and Waste 4.1 million TPA) along with 1000 TPH Crusher located at Village – Katamater, Tehsil & District – Malkangiri, Odisha.

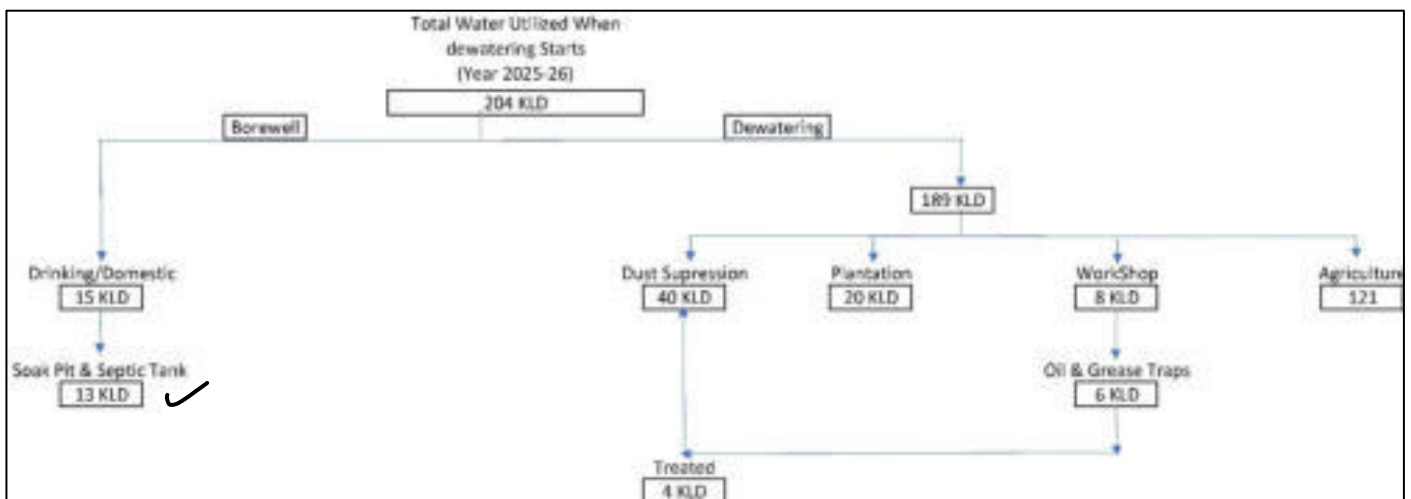
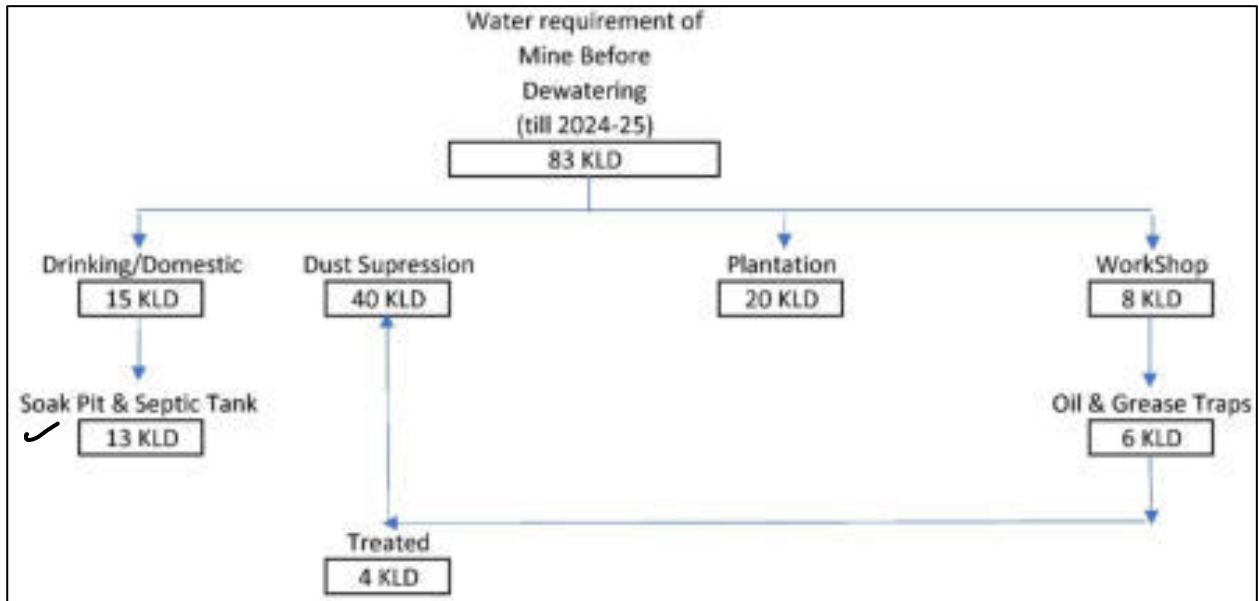


Figure 27: Water Balance Chart before and after groundwater seepage starts in the mine.

Plan For Reduction of Ground Water.

- The water accumulated in the mine pit will be utilized in various mining activities. 8 KLD will be utilized in the workshop
- During the conceptual stage, the water accumulated in the mining pits will be distributed to villagers for agricultural usage as the main occupation of the area is agriculture.
- Therefore, the consumption of ground water within the mine will be reduced, and later on, ground water will be abstracted only for drinking purposes (15 KLD).

Kottameta Limestone Mine (Auctioned Block) with Total Excavation of 7.6 Million TPA (Limestone: 3.0 Million TPA, Soil: 0.5 Million TPA and Waste: 4.1 Million TPA) along with 1000 TPH Capacity Crusher
At Village: Katamater, Tehsil & District: Malkangiri, State: Odisha

Final EIA/EMP Report

- 6 KLD of waste water will be generated from the workshop which will be treated and used for dust suppression.
- Domestic waste water (13 KLD) generated from mine office, rest shelters etc. will be treated in modular STP and treated water will be used for greenbelt/plantation.
- Ground water level & quality will be carried out regularly.

D. PROTECTION MEASURES FOR SABRI/KOLAB RIVER

- At least 50 m safety zone will be left from the edge of Sabari river.
- Bunds with size of 2*1.5 m will be developed along with lease boundary parallel to the Sabari River.
- 3-tier thick Greenbelt will be developed in 7.5 m safety barrier.

E. GREENBELT/ PLANTATION

- Total Green belt development / Plantation will be done on 71.739 ha includes 33.177 ha on safety zone along ML boundary and magazine, 34.27 ha on upper two benches of excavated area, 4.292 ha along the mine infrastructure.
- The plantation will be done @2500 tress per ha with the survival rate of 90%.
- Sapling of more than 2 m height will be planted. 3-tier plantation will be done in greenbelt area towards habitation which includes the floral components viz. grasses, bushes and trees.
- Local and fruit bearing species will be planted after consultation with local forest officer and as per CPCB Guideline.

2.13 ASSESSMENT OF NEW AND TESTED TECHNOLOGY FOR THE RISK OF TECHNOLOGICAL FAILURE

From the nature and extent of the deposit, the reserves and the quality have been proved with adequate degree of reliability. Therefore, opencast mechanized method is the most feasible method for mining in the proposed mining lease area. Since the mining machineries are rapidly upgrading, project proponent would act fast to adopt more advancee equipment and automation for safer environment friendly mining technology.



CHAPTER 9- SUMMARY AND CONCLUSION

- M/s. Dalmia Cement (Bharat) Limited (DCBL), has been successfully declared as the “Successful Bidder” for the grant of a mining lease for Kottameta Limestone Block over an area of 802.25 Ha in Malkangiri district, Odisha through the e-auction conducted by the Government of Odisha. DCBL has proposed the Kottameta Limestone Mine with a total excavation of 7.6 million TPA (Limestone Production Capacity– 3.0 million TPA, Soil 0.5 million TPA, and Waste 4.1 million TPA) along with 1000 TPH Crusher located at Village – Katamater, Tehsil & District – Malkangiri, Odisha.
- Total study area including core and buffer zone (44063.3285 ha) of Proposed Limestone Mine (ML Area: 802.25 ha.) The Study area mainly comprises open scrubland (41.46%), Forest land (32.80%), and agricultural Land (21.36%).
- The climate of the district generally has a subtropical climate. South west monsoon is the principal source of rainfall. The rainfall pattern is uneven and erratic. The average annual rainfall gradually increases from South Western to North-Eastern parts of the district. The annual average rainfall in the region is around 1608.23 mm (average of last ten years rainfall data from 2012-to 2021) varying from a minimum of 1366.26 mm in 2021 to a maximum of 1750.56 mm in 2015.
- The area represents a part of the Jeypore-Jagdulpur plateau and exhibits slightly undulating to plain topography. The maximum and minimum elevations in the mining lease area are 218 MRL towards the South-Central part and 188 MRL towards the South-West part respectively resulting in ground relief of 30 m.
- The general drainage pattern in the district is dendritic to sub-parallel. The Sabari/Kolab River along with its tributaries, the Potter, Sileru, and Sabari Rivers is the most prominent in the region.
- As per Ramsar Site, there are two Wetlands in Odisha namely Bhitarkanika Mangroves and Chilka Lake. The nearest wetland is Chilka Lake located at a distance of about 382Km in the North-East direction from the Proposed Mine Site.
- The mining lease area is within the Jeypore – Bastar basin of Puranas age and comprises limestone. Outcrops of limestone are seen extensively in the area from the Inter-State boundary on the north to WNW of Dharampali on the south over a strike length of about 7.5 km. Across the strike, it occurs from Sabari River on the west, to the west of Kottameta on the east.
- Kottameta Limestone Mine lies in the Chhattisgarh supergroup. The limestone and shale of Sabari Group are principal aquifers in the area having yields in the range of 30-50 LPM. Groundwater in these units occurs at a relatively shallow depth.
- **The flow of groundwater from the aquifer is towards the river. Hence groundwater seepage due to mining activity does not affect the flow of water in the river. The topographic elevation ranges from 188m to 218m above mean sea level. The general gradient of the area is towards the West. Protective measures will be taken to safeguard the natural flowing streams.**
- The Mine Site and its 10 Km study area fall in hard rock terrain and total groundwater abstraction and dewatering occurs in the range of 272 KLD which is less than 500 KLD, therefore detailed



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J.M. ENVIROLAB PVT. LTD.

Approved from MoEF&CC & Certified - ISO 9001:2015, ISO 14001:2015, ISO 45001:2018

TEST REPORT

Issued to: J. M. EnviroNet Pvt. Ltd.
Emaar Digital Greens, Tower- B,
Unit No. 1517, Golf Course Ext. Road,
Sector-61, Gurugram- 122001 (Haryana)

Project: M/s. Dalmia Cement (Bharat) Ltd.
Kottameta Limestone Mine (Auctioned Block)
(ML Area: 801.171 ha) with total excavation of 7.6 million TPA
(Limestone Production Capacity – 3.0 Million TPA, Soil 0.5
Million TPA and Waste 4.1 Million TPA) along with 1000 TPH
Crusher located at Village – Katamater, Tehsil & District –
Malkangiri, Odisha.

Sample Description: Soil
Sampled by: JMELPL TEAM
Contact Person: Mr. Ajay Gautam

Report No.: JME/S/230517023-025
Date of Reporting : 24/05/2023

Date of Receipt: 17/05/2023
Sampling Date: 15/05/2023

Sampling Type: Grab
Protocol Used: APHA/IS 3025

SOIL ANALYSIS REPORT

S. No.	Parameters	Unit	Sampling Locations		
			Cherguda Village	Kosabander Village	Borguda Village
1.	pH (at 25°C) (1:2.5 soil water sus.)	-	7.25	7.40	7.45
2.	Conductivity(1:2 soil water sus.)	mS/cm	0.55	0.62	0.55
3.	Soil Texture	-	Silt Loam	Silt Loam	Silt Loam
4.	Colour	-	Reddish Brown	Grayish	Blackish Brown
5.	Water holding capacity	%	43.11	42.54	44.92
6.	Bulk density	gm/cc	1.37	1.36	1.24
7.	Chloride	mg/kg	145.80	132.35	159.04
8.	Calcium	mg/kg	1194.72	990.41	1302.63
9.	Sodium	mg/kg	124.56	115.73	132.52
10.	Potassium	kg/ha	452.15	351.00	287.65
11.	Organic matter	%	0.80	0.88	0.84
12.	Magnesium as Mg	mg/kg	355.90	375.80	390.12
13.	Available Nitrogen as N	kg/ha.	342.87	285.10	260.10
14.	Available Phosphorus	kg/ha.	22.30	17.80	14.75
15.	Total Zinc as Zn	mg/kg	34.39	23.95	26.00
16.	Manganese as Mn	mg/kg	369.55	401.65	350.70
17.	Chromium as Cr	mg/kg	BDL (DL 5.0)	BDL (DL 5.0)	10.43
18.	Cadmium as Cd	mg/kg	16.65	18.30	18.21
19.	Total Lead as Pb	mg/kg	BDL (DL 5.0)	BDL (DL 5.0)	BDL (DL 5.0)
20.	Total Copper as Cu	mg/kg	30.14	26.98	13.87
21.	Organic Carbon	%	0.46	0.51	0.49
22.	SAR Value	-	0.81	0.79	0.83

Note: BDL- Below Detection Limit, DL- Detection Limit

Page 1 of 1

Ritika Saini
Ritika Saini

Tested by

Abhishek Tiwari
Abhishek Tiwari

Checked by

Rajkumar Yadav
Rajkumar Yadav

Authorized Signatory

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Corporate Office

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TEST REPORT

Issued to: J. M. EnviroNet Pvt. Ltd.
Emaar Digital Greens, Tower- B,
Unit No. 1517, Golf Course Ext. Road,
Sector-61, Gurugram- 122001 (Haryana)

Project: M/s. Dalmia Cement (Bharat) Ltd.
Kottameta Limestone Mine (Auctioned Block) (ML Area 802.25)
with total excavation of 7.6 MTPA (Limestone Capacity – 3.0
MTPA, Soil 0.5 MTPA and Waste 4.1 MTPA) along with 1000
TPH Crusher located at Village Katamater, Tehsil & District –
Malkangiri, Odisha

Sample Description: AMBIENT AIR QUALITY MONITORING
Sampled by: JMELPL TEAM
Contact Person: Mr. Ajay Gautam

Report No.: JME/A/230309044-051
Date of Reporting: 07/06/2023
P.O. No. JMEPL/LAB/Baseline/2023-
05/27 Dated: 31.05.2023
Monitoring Period: March to May, 2023
Equipment Used: RDS & FPS
Protocol Used: CPCB Guidelines/IS-5182

AIR QUALITY MONITORING RESULTS

S. No.	Sampling Location	Parameters									
		PM _{2.5} (µg/m ³)		PM ₁₀ (µg/m ³)		Nitrogen Oxide (NO ₂) (µg/m ³)		Sulphur Dioxide (SO ₂) (µg/m ³)		Carbon Monoxide (CO) (mg/m ³)	
		Max.	Min.	Max.	Min.	Max.	Min.	Max.	Min.	Max.	Min.
1.	Sampling Station (0.5 Km NE Direction)	30.6	20.9	56.9	44.5	16.3	10.1	8.3	4.7	BDL	BDL
2.	Village Kottamateru	37.8	29.5	70.4	56.4	15.8	11.7	7.2	4.3	BDL	BDL
3.	Village Kosabander	35.0	26.8	65.7	53.7	16.7	12.3	8.5	5.9	BDL	BDL
4.	Village Uskalbag	37.2	30.8	71.8	60.4	20.7	13.2	12.5	6.6	BDL	BDL
5.	Village Kurukras	33.2	23.8	56.6	46.9	17.0	11.2	9.1	5.8	BDL	BDL
6.	Village Sukma	45.6	32.7	78.4	70.5	23.3	18.3	10.0	7.2	0.75	0.55
7.	Village Borguda	42.4	30.4	75.5	63.4	20.9	16.3	11.4	7.8	0.67	0.54
8.	Village Nandiwada	40.1	33.8	77.4	66.8	20.6	14.9	10.8	8.4	BDL	BDL
Detection Limit											
NAAQS*		60		100		80		80		4	

S. No.	Sampling Location	Parameters						
		Ozone (O ₃) (µg/m ³)	Lead (Pb) (µg/m ³)	Ammonia (NH ₃) (µg/m ³)	Benzene (C ₆ H ₆) (µg/m ³)	Benzo(a)pyrene (BaP)-Particulate phase only (ng/m ³)	Arsenic (As) (ng/m ³)	Nickel (Ni) (ng/m ³)
1.	Sampling Station (0.5 Km NE Direction)	7.6	BDL	BDL	BDL	BDL	BDL	BDL
2.	Village Kottamateru	10.5	BDL	BDL	BDL	BDL	BDL	BDL
3.	Village Kosabander	14.0	BDL	12.3	BDL	BDL	BDL	BDL
4.	Village Uskalbag	5.8	BDL	15.8	BDL	BDL	BDL	BDL
5.	Village Kurukras	10.5	BDL	8.8	BDL	BDL	BDL	BDL
6.	Village Sukma	17.7	BDL	20.7	BDL	BDL	BDL	BDL
7.	Village Borguda	9.4	BDL	13.3	BDL	BDL	BDL	BDL
8.	Village Nandiwada	12.0	BDL	16.8	BDL	BDL	BDL	BDL
Detection Limit		1.0	0.02	1.0	1.0	0.5	0.5	1.0
NAAQS*		180	1	400	5	1	6	20

*NAAQS – National Ambient Air Quality Standards; Schedule-VII, [Rule 3 (3B)], [Part-II-sec.-3(i)] 16.11.2009

Kirti Sharma
Tested by

Sita Ram Yadav
Checked by

Rajkumar Yadav
Authorized Signatory

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Corporate Office

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TEST REPORT

Issued to: **J. M. EnviroNet Pvt. Ltd.** Report No. : **JME/S/250110011-014**
Emaar Digital Greens, Tower- B, Reporting Date: **17/01/2025**
Unit No. 1517, Golf Course Ext. Road, Analysis Completion Date: **17/01/2025**
Sector-61, Gurugram- 122001 (Haryana)

Project: **M/s. UltraTech Cement Limited** Analysis Start Date: **10/01/2025**
Expansion in Cement Production Capacity from 5.1 million Receipt Date: **10/01/2025**
TPA to 8.1 million TPA of Existing Standalone Grinding Unit Sampling Date: **08/01/2025**
by installation of New Line - II (3.0 million TPA) at Village:
Dhutra, PO: Arda, Tehsil: Kirmira, District: Jharsuguda Sampling Type: **Composite**
(Odisha).

Sample Description: **SOIL**

Sample Collected by: **JMELPL TEAM**

Contact Person: **Mr. Chandra Shekhar Achary (Asst. Manager)** Protocol Used: **IS-2720/USDA**

SOIL ANALYSIS REPORT

S. No.	Parameters	Unit	Sample Locations			
			Plant Site	Village- Arda	Village- Bhusimal	Village - Bandhapali
1.	pH (at 25°C) (1:2.5 soil water sus.)	-	5.45	6.12	6.13	5.32
2.	Conductivity (1:2 soil water sus)	mS/cm	0.20	0.23	0.17	0.15
3.	Soil Texture	-	Sandy Loam	Sandy Loam	Sandy Loam	Sandy Loam
a)	Sand	%	63.0	62.0	61.0	65.0
b)	Silt	%	28.0	28.0	29.0	26.0
c)	Clay	%	9.0	10.0	10.0	9.0
4.	Colour	-	Brownish Gray	Light Gray	Dull Yellowish Gray	Brownish Gray
5.	Water Holding Capacity	%	40.25	38.16	36.74	27.34
6.	Porosity	%	43.02	40.77	43.19	41.67
7.	Bulk Density	gm/cc	1.47	1.60	1.46	1.56
8.	Chloride	mg/kg	479.95	665.34	259.06	179.29
9.	Calcium	mg/kg	2536.10	1662.70	625.79	538.30
10.	Sodium	mg/kg	119.05	106.88	73.90	49.65
11.	Potassium	kg/hect	303.69	224.70	251.30	156.48
12.	Organic Matter	%	0.65	0.51	0.70	0.55
13.	Magnesium as Mg	mg/kg	336.27	320.09	264.41	223.24
14.	Available Nitrogen as N	kg/hect	224.12	194.56	234.12	192.72
15.	Available Phosphorus	kg/hect	31.46	18.65	26.20	19.68
16.	Zinc as Zn	mg/kg	42.37	38.68	35.39	38.78
17.	Manganese as Mn	mg/kg	301.89	284.77	115.91	232.67
18.	Chromium as Cr	mg/kg	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)
19.	Lead as Pb	mg/kg	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)
20.	Cadmium as Cd	mg/kg	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)
21.	Copper as Cu	mg/kg	22.11	8.93	BDL(DL-5.0)	BDL(DL-5.0)
22.	Organic Carbon	%	0.38	0.30	0.41	0.23
23.	SAR Value	-	0.59	0.63	0.62	0.45

BDL- Below Detection Limit, DL- Detection Limit

Page 1 of 1

Srishti
Srishti Menta
Tested by

Abhishek
Abhishek Tiwari
Checked by

ENVIROLAB PVT. LTD.
Authorized Signatory
Rajkumar Yadav

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TEST REPORT

Issued to: **J. M. EnviroNet Pvt. Ltd.** Report No. : **JME/S/250110015-018**
Emaar Digital Greens, Tower- B, Reporting Date: **17/01/2025**
Unit No. 1517, Golf Course Ext. Road, Analysis Completion Date: **17/01/2025**
Sector-61, Gurugram- 122001 (Haryana)

Project: **M/s. UltraTech Cement Limited** Analysis Start Date: **10/01/2025**
Expansion in Cement Production Capacity from 5.1 million Receipt Date: **10/01/2025**
TPA to 8.1 million TPA of Existing Standalone Grinding Sampling Date: **08/01/2025**
Unit by installation of New Line - II (3.0 million TPA) at
Village: Dhutra, PO: Arda, Tehsil: Kirmira, District: Sampling Type: **Composite**
Jharsuguda (Odisha).

Sample Description: **SOIL**

Sample Collected by: **JMELPL TEAM**

Contact Person: **Mr. Chandra Shekhar Achary (Asst. Manager)** Protocol Used: **IS-2720/USDA**

SOIL ANALYSIS REPORT

S. No.	Parameters	Unit	Sample Locations			
			Village- Jamakani	Village - Gaurhapanapali	Village- Talmal	Village- Junapali
1.	pH (at 25°C) (1:2.5 soil water sus.)	-	5.01	5.23	5.26	5.12
2.	Conductivity (1:2 soil water sus)	mS/cm	0.24	0.19	0.25	0.28
3.	Soil Texture	-	Sandy Loam	Sandy Loam	Sandy Loam	Sandy Loam
	a) Sand	%	62.0	66.0	65.0	63.0
	b) Silt	%	30.0	25.0	26.0	29.0
	c) Clay	%	8.0	9.0	9.0	8.0
4.	Colour	-	Dull Yellow Orange	Orange	Pale Yellow	Dull Yellowish Gray
5.	Water Holding Capacity	%	33.34	28.28	32.44	38.27
6.	Porosity	%	40.46	40.15	42.64	44.91
7.	Bulk Density	gm/cc	1.56	1.58	1.48	1.46
8.	Chloride	mg/kg	279.02	140.79	70.98	124.03
9.	Calcium	mg/kg	519.73	478.06	645.83	529.47
10.	Sodium	mg/kg	60.06	49.84	54.53	69.64
11.	Potassium	kg/hect	112.65	144.07	108.46	172.72
12.	Organic Matter	%	0.49	0.43	0.47	0.77
13.	Magnesium as Mg	mg/kg	248.43	247.37	209.89	242.82
14.	Available Nitrogen as N	kg/hect	166.25	179.68	194.12	228.65
15.	Available Phosphorus	kg/hect	17.59	14.52	15.66	20.18
16.	Zinc as Zn	mg/kg	17.78	8.26	14.77	9.68
17.	Manganese as Mn	mg/kg	188.04	248.66	130.29	100.69
18.	Chromium as Cr	mg/kg	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)
19.	Lead as Pb	mg/kg	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)
20.	Cadmium as Cd	mg/kg	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)
21.	Copper as Cu	mg/kg	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)	BDL(DL-5.0)
22.	Organic Carbon	%	0.28	0.13	0.16	0.45
23.	SAR Value	-	0.54	0.46	0.48	0.63

BDL- Below Detection Limit, DL- Detection Limit

Page 1 of 1

Srishti
Srishti
Tested by

Abhishek Tiwari
Abhishek Tiwari
Checked by

Rajendra Yadav
Rajendra Yadav
Authorized Signatory

Note:

1. This test report has been at your request and test results pertain to the tested sample received.
2. This reports is for your reference only and not to be used for any legal purpose.
3. Any discrepancy in the test report or any remarks regarding the test results shall be brought to our knowledge within 7 days of the issue of this report.
4. Total liability or any claim in case of dispute is limited to the invoice raised by the laboratory.
5. The sample will be destroyed after retention time unless otherwise specified specially.
6. Endorsement of the product tested by the laboratory is neither inferred nor implied.
7. Report shall not be reproduce except in full without approval of the laboratory.
8. All disputes are subject to exclusive jurisdiction of Jaipur court only.

Reg. Office & Lab.

424, Ground Floor, Udyog Vihar,
Phase-IV, Gurugram-122015 (Haryana)
E-mail: jmenvirolab@hotmail.com | www.jmenvironet.org

Corporate Office

Emaar Digital Greens, Tower-B, Unit No.1517,
Golf Course Ext. Road, Sector-61,
Gurugram-122011(Haryana)

/// TRUE COPY ///

MINISTRY OF ENVIRONMENT, FORESTS AND CLIMATE CHANGE**NOTIFICATION**

New Delhi, the 16th June, 2021

S.O. 2340(E).—In exercise of the powers conferred by section 23 of the Environment (Protection) Act, 1986 (29 of 1986) (hereinafter referred to as the Act.) and in supersession of the notification of the Government of India, in the erstwhile Ministry of Environment, Forests and Wildlife number S.O 145 (E), dated 21st February, 1991, except as respects things done or omitted to be done before such supersession, the Central Government hereby makes the following orders, namely: -

1. Recognition of private laboratories under clause (b) of sub-section (1) of section 12 of the said Act, as well as recognition of their Analysts as Government Analysts under section 13 of the Environment (Protection) Act, 1986, shall be done by the Central Pollution Control Board.
2. All environmental laboratories shall obtain accreditation from the National Accreditation Board for Testing and Calibration Laboratories Accreditation (ISO17025:2017) for all criteria testing parameters as defined by Central Pollution Control Board along with certification for Occupational Health and Safety Management System (ISO 45001:2018) before submission of application to the Central Pollution Control Board for consideration of the said application under the provisions of the said Act, for-
 - (i) fresh or renewal of recognition of laboratory;
 - (ii) changes in the name of Government Analysts; and
 - (iii) shifting of laboratory premises.
3. The recognition of laboratory shall be granted for the validity period of accreditation under ISO17025:2017 and for the testing parameters accredited therein.
4. The recognition of laboratory shall be granted for the validity period of ISO45001:2018 certification from a recognised agency and shall be valid for the same premises of its operation for which the application is made.
5. The Central Pollution Control Board shall ensure that a web based portal, for processing of application including disseminating the information on status of applications for recognition of environmental laboratories or Government Analysts, is made operational within three months from the date of publication of this notification, and the provision for online submission of compliance report submitted by the recognised laboratory shall be also made through this portal.
6. The recognition of laboratory or Government Analyst shall be based on self-declaration of compliance of the requirements and submission of supporting documents for all requisite information as stipulated by the Central Pollution Control Board for grant of recognition by the Central Pollution Control Board, and Compliance report as defined by Central Pollution Control Board shall be submitted by the recognised laboratory bi-annually on designated web-portal.
7. The Central Pollution Control Board shall conduct proficiency test and inter-laboratory comparison exercise either of its own or in collaboration with National Environmental Engineering Research Institute or such research institutes having proven capabilities for undertaking such exercise, for all recognised laboratory bi-annually, covering all parameters annually, and the cost associated in conducting such exercise shall be borne by the participating laboratories, and records and reports of such exercise shall made available in public domain.
8. The Central Pollution Control Board shall make provision for surprise inspection for verification of conditions imposed on the environmental laboratories recognised under the Environment (Protection) Act, 1986 by constituting a joint committee comprising members of the Ministry of Environment, Forest and Climate Change (MoEFCC), the Central Pollution Control Board and concerned State Pollution Control Boards or Pollution Control Committees, and the inspection reports shall be made available in public domain.



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Direction issued u/s 18(1)(b)/31-A

Direction issued u/s 5 EP Act (after 01-01-2021)

Direction issued u/s 5 EP Act (before 01-01-2021)

Letters issued to SPCBs/PCCs

Letter issued to Industries & Others

Direction issued under Section 5 EP Act

Updated On : 15 M

To view All Directions on or before 01 August, 2017 [click here](#)

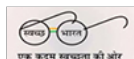
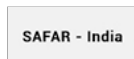
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S No.	Subject	Direction Issued to	Name of industry/ Body	Direction type	Category	State	Date
11	Recognition of Environmental Labs	Environmental Labs	M/s AGSS Analytical and Research Lab Pvt. Ltd.	Revoked Direction	Others	Delhi	12-05-2026
12	Recognition of Environmental Labs	Environmental Labs	M/s Spectro Analytical Labs Pvt. Ltd.	Show cause Direction	Others	Uttar Pradesh	12-05-2026
13	Recognition of Environmental Labs	Environmental Labs	M/s J. M. Envirolab Pvt. Ltd.	Show cause Direction	Others	Haryana	12-05-2026
14	Recognition of Environmental Labs	Environmental Labs	M/s HTH Laboratories Private Limited	Show cause Direction	Others	Haryana	12-05-2026
15	Recognition of Environmental Labs	Environmental Labs	M/s Eureka Analytical Services Pvt. Ltd.	Show cause Direction	Others	Haryana	12-05-2026
16	Recognition of Environmental Labs	Environmental Labs	M/s Catts Labs and Research Pvt. Ltd	Show cause Direction	Others	Delhi	12-05-2026
17	Recognition of Environmental Labs	Environmental Labs	M/s Sophisticated Industrial Materials Analytic Labs Pvt. Ltd	Show cause Direction	Others	Delhi	12-05-2026



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Gentle Reminder on Complaint Dated 09.12.2024 Regarding Non-Conformity with Terms of Reference by J.M. EnviroNet Pvt. Ltd. and Non-Adherence to Procedural Standards in Environmental Appraisal by the EAC (Coal Mining Sector)

From Sanjaya K. Mishra <sanjayakmishra@hotmail.com>

✓ Date Mon 2024-12-23 9:00 AM

To secy-moef@nic.in <secy-moef@nic.in>

Cc sharadnegi1957@gmail.com <sharadnegi1957@gmail.com>; r.sundar@nic.in <r.sundar@nic.in>; jmenviron@hotmail.com <jmenviron@hotmail.com>

📎 1 attachment (15 MB)

20241209 MoEF&CC Complaint JME-NALCO.pdf;

From:

Sanjaya Kumar Mishra

Maszid Chowk, Tikrapara

Balangir 767001 (Odisha)

Mobile No. 9818326647

Email: sanjayakmishra@hotmail.com

To:

1. Hon'ble Secretary,
Ministry of Environment, Forest and Climate Change
Government of India,
Indira Paryavaran Bhawan, Jor Bagh
New Delhi - 110003
Email: secy-moef@nic.in
2. Dr. Sharad Singh Negi (I.F.S. Retd.)
Chairman, Expert Appraisal Committee (EAC) for Coal Mining Projects
Ministry of Environment, Forest, and Climate Change
Government of India,
Indira Paryavaran Bhawan, Jor Bagh
New Delhi - 110003
Email: sharadnegi1957@gmail.com
3. Shri Sundar Ramanathan
Member Secretary. Expert Appraisal Committee (EAC) for Coal Mining Projects
Ministry of Environment, Forest, and Climate Change
Government of India,
Indira Paryavaran Bhawan, Jor Bagh
New Delhi - 110003
Email: r.sundar@nic.in
4. National Aluminium Company Limited (NALCO)
Through General Manager (Mines)
Coal Mines Division

/// TRUE COPY ///

S&P Complex, Angul (Odisha)
NALCO Bhawan, P/1 Nayapalli, Bhubaneswar - 751013, Dist. Khordha (Odisha)
Email: gm_uecb@nalcindia.co.in

5. J.M. EnviroNet Pvt. Ltd.
EIA Consultant Through Managing Director
Emaar Digital Greens, Tower-B, Unit No. 1517
Golf Course Extension Road, Sector 61
Gurugram 122011 (Haryana)
Email: jmenviron@hotmail.com

References:

My Email dated 09.12.2024

Minutes of 17th EAC (Coal Sector) meeting Coal Mining held from 21/10/2024 to 22/10/2024

MoM ID: EC/MOM/EAC/493155/10/2024

Agenda Item No: 17.4

Project Details: Modification of existing Environmental Clearances (ECs) for Utkal D and Utkal E Coal Blocks by amalgamating both into a total lease area of 824.316 ha and a production capacity of 4 MTPA by M/s National Aluminium Company Limited (NALCO).

Location: Nandichhod (Gopiballavpur), Gopinathpur Jungle, Kosala, Kundajhari Jungle, Korada, Raijharan, Similisahi in Chhendipada Tehsil, Angul District, Odisha.

Proposal ID: IA/OR/CMIN/500323/2024; File No. J-11015-31-2007-IA-II-M

Subject:

Complaint Regarding Non-Conformity with Terms of Reference by J.M. EnviroNet Pvt. Ltd. and Non-Adherence to Procedural Standards in Environmental Appraisal by the Expert Appraisal Committee Due to Absence of Requisite Scientific Data in the EIA Report

Respected Madam,

This submission is made in reference to my emails dated 09.12.2024, sent to your esteemed office, as well as to the emails dated 08.11.2024 and 25.11.2024, which were sent to Dr. Sharad Singh Negi (I.F.S. Retd.), Chairman of the Expert Appraisal Committee (EAC) for Coal Mining Projects, and Shri Sundar Ramanathan, Member Secretary of the EAC for Coal Mining Projects, Ministry of Environment, Forest, and Climate Change. A copy was also sent to the General Manager of NALCO (Project Proponent) via the email addresses available on the PARIVESH Portal. Since no response has been received, this application is being submitted.

Your immediate attention is urgently requested on the following critical matters concerning NALCO's coal mining projects as outlined above::

1. In the referenced meeting, the Expert Appraisal Committee (Henceforth "EAC") recommended the proposal submitted by M/s National Aluminium Company Limited (Henceforth "NALCO") for the modification of the existing Environmental Clearances (ECs) pertaining to the Utkal D and Utkal E Coal Blocks. The proposal involves the amalgamation of both coal blocks into a single lease area encompassing a total of 824.316 hectares, with a consolidated production capacity of 4 million tonnes per annum (MTPA). Henceforth referred to as "proposal". [Please refer Page No. 7]
2. During the appraisal process, the EAC disregarded the non-conformity with the Terms of Reference (ToR) applicable to the proposal. As highlighted on page 20 of the attachment, under paragraph 17.4.8, it is expressly stated:

"ToR has not been accorded for the instant proposal under consideration since it is an amalgamation proposal for existing ECs. However, the Project Proponent (PP) has submitted the EIA/EMP report for the amalgamated D&E block as per the standard ToR available on the Parivesh portal."

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3. Furthermore, as highlighted on page 35 under the heading "Deliberations and Observations of the Committee," paragraph 17.4.23(ii), it is reiterated: *"EIA/EMP report based on the standard ToR along with the certified compliance report has been submitted by the proponent."*
4. Kindly refer to page No. 52 of the attachment "Page 156 of 17th EAC MoM (Coal) enclosed ANNEXURE-II: GENERIC TOR FOR AN OPEN CAST COAL MINE PROJECT". The paragraph states *"(xiv) One-season (other than monsoon) primary baseline data on environmental quality - air (PM10, PM2.5, SOx, NOx and heavy metals such as Hg, Pb, Cr, As, etc.), noise, water (surface and groundwater), soil - along with one-season met data coinciding with the same season for AAQ collection period should be provided."* Further, the paragraph (xxxiii) mentions *"Occupational health issues. Baseline data on the health of the population in the impact zone and measures for occupational health and safety of the personnel and manpower in the mine should be given."*
5. Please refer to page No. 68 of the attachment. The "Undertaking" submitted by NALCO representative *"I, Dr. A. Roul General Manager (Mines) of M/s. Nalco Aluminium Company Ltd. gave this undertaking to the effect that the Standard ToR available on Parivesh is considered for "Modification in existing ECs of Utkal D Coal Block ..."*
6. At page No. 71 of the attachment. The Managing Director of J.M. EnviroNet Pvt. Ltd. has submitted the undertaking to the effect that this Final EIA/EMP Report has been prepared as per the Standard ToR Letter available on PARIVESH and as per data/details provided by the Project Proponent, and the data submitted are factually correct.

This clearly shows the EIA consultant J.M. EnviroNet Pvt. Ltd. and the Project Proponent (PP) NALCO were aware of the baseline data requirements.

Under the heading of "TOR Compliance" [Page 77 of the attachment] at serial No. 14 under the column bearing header "ToR Point" the EIA consultant has mentioned *"One-season (other than monsoon) primary baseline data on environmental quality - air (PM10, PM2.5, SOx, NOx and heavy metals such as Hg, Pb, Cr, As, etc), noise..."* However, under the column bearing header "Compliance" it has stated *"One season primary baseline data for ambient air quality, (as per NAAQS, 2009), water quality..."*

7. In the "Summary on the Baseline Situation: Table - 1 Baseline Data Collection Baseline Season: Summer Season (March to May 2024) [Page No. 60]," under serial No. 3, for the environmental component "Air," it is stated that monitoring was conducted for PM10, PM2.5, SO2, and NO2 (24-hourly, twice a week), and for O3, Pb, CO, NH3, C6H6, BaP, As, and Ni (once per season) in accordance with CPCB Guidelines, NAAQS, and IS 5182. **The inclusion of parameters such as O3, CO, NH3, C6H6, BaP and Ni appears to be a direct copy/paste from other reports and constitutes a significant non-conformity with the Undertaking dated 09.10.2024 submitted by the EIA consultant J.M. EnviroNet Pvt. Ltd.**
8. Further, under the "OBSERVATION & INTERPRETATION OF AAQM RESULTS" [Page No. 61] Ambient Air Quality Monitoring reveals that *"the concentrations of PM10 and PM2.5 for all the 8 AAQM stations were found between 39.1 to 86.8 microgram/m3 and 20.5 to 51.5 microgram/m3 respectively. As far as the gaseous pollutants SO2 and NO2 are concerned, the prescribed CPCB limit of 80 microgram/m3 has never surpassed at any station. The concentrations of SO2 and NO2 were found to be in range of 4.6 to 19.4 microgram/m3 and 10.6 to 31.2 microgram/m3 respectively. The concentration of CO were found in range of 0.54 to 0.98 mg/m3. It was observed that CO is within the NAAQS standard i.e. 4 mg/m3. Maximum concentration of PM10 & PM2.5 as well as SO2 & NO2 were found at Village Kankara (Near Monnet Power Plant) due to Industrial and transportation activities whereas minimum concentration was found at Village Chakradharpur as there is no major source of pollution. Concentrations of AAQ parameters were found well within the*

prescribed limits of NAAQS." Thus, there is no statement on the findings of O₃, Pb, NH₃, C₆H₆, BaP, As, and Ni in the provided section of the report.

9. In Section 3.4, "BASELINE DATA COLLECTION" [Page No. 79 of the attachment], Table 3, row number 3, the environmental component "Air" lists the parameters as PM₁₀, PM_{2.5}, SO₂, NO₂, and CO (24-hourly/8-hourly, twice a week), and Hg, Pb, Cr, and As (once per season) at 8 locations, with the methodology based on CPCB Guidelines, NAAQS, and IS 5182.
10. Under paragraph 3.12, "AMBIENT AIR ENVIRONMENT" [Page No. 80 of the attachment], it is stated that monitoring for the remaining parameters, namely Hg, Pb, Cr, and As, was conducted once during the season.
11. Additionally, under Table 3.9: "Details of Test Procedures" [Page No. 81 of the attachment], nine parameters are listed, including Hg, Pb, Cr, and As. It is also noted that there is a discrepancy in the serial numbering within Table 3.9.
12. Whereas, under Table 3.11: "Ambient Air Quality Monitoring Results (Study Period: Summer Season, March to May 2024)" [Page No. 83 of the attachment], the report provides data for PM_{2.5}, PM₁₀, NO₂, SO₂, CO, and PAH, yet the EIA/EMP report fails to specify the test methods and procedures used for measuring the PAH concentration in ambient air. Furthermore, the report omits the results for critical heavy metals such as Hg, Pb, Cr, and As. The EIA/EMP report not only fails to justify the rationale behind monitoring PAH but also does not explain the omission of heavy metal parameters, which are explicitly mandated in the Terms of Reference and are essential components of baseline environmental monitoring. This omission constitutes a serious failure to meet the required standards and undermines the integrity of the baseline data.
13. Effective monitoring and evaluation require the collection of baseline data for selected indicators. The baseline data for heavy metals such as Hg, Pb, Cr, and As is particularly significant, as the EAC, in its recommendations, has specified a general condition [Page 43 of the attachment] that mandates "*Air quality monitoring and preservation (i) Continuous ambient air quality monitoring stations as prescribed in the statute be established in the core zone as well as in the buffer zone for monitoring of pollutants, namely PM₁₀, PM_{2.5}, SO₂ and NO_x. Location of the stations shall be decided based on the meteorological data, topographical features and environmentally and ecologically sensitive targets in consultation with the State Pollution Control Board. Online ambient air quality monitoring stations may also be installed in addition to the regular monitoring stations as per the requirement and/or in consultation with the SPCB. Monitoring of heavy metals such as Hg, As, Ni, Cd, Cr, etc to be carried out at least once in six months. (ii) The Ambient Air Quality monitoring in the core zone shall be carried out to ensure the Coal Industry Standards notified vide GSR 742 (E) dated 25th September, 2000 and as amended from time to time by the Central Pollution Control Board. Data on ambient air quality and heavy metals such as Hg, As, Ni, Cd, Cr and other monitoring data shall be regularly reported to the Ministry/Regional Office and to the CPCB/SPCB.*" The failure to provide the baseline data constitutes a material breach of these obligations and will adversely impact the monitoring process, thereby compromising the reliability and validity of the environmental assessment.
14. In terms of baseline data on the health of the population within the impact zone, both the EIA Consultant, J.M. EnviroNet, and the Project Proponent (PP) have failed to provide any data. The EIA report, merely to fulfill a formal requirement, has included a headline titled "Health" at section 3.18.17 [Page No. 86 of the attachment]. Under paragraph 4.5.7, titled "PUBLIC HEALTH IMPLICATIONS," the EIA report claims, "*The most common diseases in the region are viral fever, common cold and cough, stomach disorders, etc., which are prevalent among the villagers. None of these can be related to the project and allied activities of the project.*" However, this statement is contradicted by reports available on the internet, which indicate that cancer, respiratory diseases

- (other than TB), neurological diseases, including strokes, heart disease/hypertension-related conditions, as well as chronic and acute diseases, are major causes of death among individuals over 6 years of age in the region [Pages 151-152 of the attachment]. This glaring omission and misrepresentation of public health data raises serious concerns regarding the accuracy and completeness of the EIA report.
15. An article titled *“IMPACT OF MINING ACTIVITIES ON THE HEALTH AND NUTRITIONAL STATUS OF LOCAL COMMUNITIES IN TALCHER COALFIELD, ANGUL DISTRICT, ODISHA”* by Dr. Acharya Ratan Kumar, Assistant Professor in Geography, Government of Odisha (DHE) [Page No. 154 of the attachment], explicitly highlights the severe health impacts of mining activities in the region. The article states: *“If airborne diseases are taken into consideration, tuberculosis, respiratory diseases, black lung disease, pox, asthma, and other airborne diseases are very common in the study area. Out of the total surveyed population, 28.43% of people are suffering from it. The rate of this disease is very high in the core zone, i.e., 36.62%.”* **This statement directly contradicts the EIA report’s assertion that none of the common diseases in the area are related to the project’s activities.** Moreover, the article is based on reliable data collected from various authoritative sources, including successive census enumerations, mining offices, MCL, CIL, OMC, as well as the District Commissioner’s office, mining office, land and revenue office, and different journal books and publications. In its concluding remarks, the article emphasizes: *“Health impacts of mining can’t be eradicated completely, but the impacts can be lessened by using scientific mining, sustainable mining, or green mining methods.”* This further underscores the pressing need for effective mitigation strategies, which have been inadequately addressed in the EIA report.
 16. An article titled *“Kidney Disease Rising in Athmallik Area of Angul District,”* dated 22.02.2024, in *Kalinga* [Page No. 161], reports that local villagers have raised concerns that the primary cause of the disease is contaminated drinking water. According to the villagers, fine mineral particles are present in the water from tube wells at the foot of the hill, with some even reporting the presence of oily substances in the water.
 17. Similarly, a media report titled *“Odisha’s Industrial Town Turns Into Death Bed Due to Pollution,”* published by ETV Bharat English Team on 24.12.2023 [Page No. 163], highlights the severe environmental and health hazards posed by industrial pollution in the region. The report states: *“The dust particles and ash residues floating in the air due to emissions from trucks and heavy vehicles ended up settling on water bodies, agricultural fields, and houses, causing a health hazard for local residents.”* The news report further underscores that the growing air pollution in the region exposes the local population to serious health risks, including cardio-respiratory ailments, bronchitis, pneumonia, and other cardiovascular diseases.

These reports highlight the critical public health concerns arising from industrial activities in the region, further emphasizing the inadequacies of the EIA/EMP report in addressing these urgent issues. This oversight reflects a lack of rigor in both the baseline data collection and the preparation of the EIA/EMP report, suggesting a rather casual approach to a matter of such significance.

18. In the matter of Hanuman Laxman Aroskar vs. Union of India, Hon’ble Supreme Court held: *“56. The 2006 Notification embodies the notion that the development agenda of the nation must be carried out in compliance with norms stipulated for the protection of the environment and its complexities. It serves as a balance between development and protection of the environment: there is no trade-off between the two. The protection of the environment is an essential facet of development. It cannot be reduced to a technical formula. The notification demonstrates an increasing awareness of the complexities of the environment and the heightened scrutiny required to ensure its continued sustenance, for today and for generations to come. It embodies a commitment to sustainable development. In laying down a detailed procedure for the grant of an EC, the 2006 Notification attempts to bridge the perceived gap between the environment and development.”*

19. This is not the first instance in which J.M. EnviroNet Pvt. Ltd. has demonstrated gross negligence with respect to baseline data. It is important to note that the expansion project of 'DLF Cyber Park' in Udyog Vihar, Sector 20, Gurgaon, Haryana, undertaken by M/s DLF Cyber City Developers Limited, received Environmental Clearance (EC) from the MoEF&CC via letter No. F.No.21-275/2017-IA-III, dated 27.08.2018. The EIA Report for this project was also prepared by J.M. EnviroNet Pvt. Ltd. Upon review, the ambient air quality monitoring images indicate clear non-compliance with established standards, specifically the requirement for samplers to be placed at a minimum height of 3 meters above ground level, as stipulated by Bureau of Indian Standards (IS 5182). This was highlighted in the "Enviro Annotations" in the issue dated 29th May – 4th June 2019 [Page No. 166 of the attachment]. As per IS 5182 (Part 14): 2000, "Methods for Measurement of Air Pollution," Part 14 – Guidelines for Planning the Sampling of Atmosphere, 8.1.3 states: *"The sampler should be located 4 to 12 meters above ground level. No permanent physical obstacles like buildings or trees should be wholly or partially situated within the space bounded by the right circular cone with its vertex at the collector and opening upwards at a 120° angle. The collector should be located at least 1 meter above its supporting surface."* In stark contradiction, certain air sampling devices appeared to have been inadequately and unscientifically modified, with attachments added to PM10 samplers. Additionally, the requirement of maintaining a minimum distance of 2 meters between two samplers in cases of collocated sampling, as mandated in the "Guidelines for the Measurement of Ambient Air Pollutants" by CPCB (May 2011), was flagrantly disregarded. As a NABET-accredited consultant, J.M. EnviroNet Pvt. Ltd. is expected to adhere to the highest standards of environmental consultancy. However, the report submitted in this case falls significantly short of these expectations. The lack of rigor and attention to detail in both environmental monitoring and reporting should prompt a comprehensive review by NABET. Furthermore, the quality and validity of the monitoring procedures should be subjected to immediate scrutiny by the MoEF&CC's division responsible for laboratory approvals.
20. The omission of baseline data for heavy metals in the ambient air quality and health assessment in the EIA report, coupled with the complete absence of any justification or explanation from the Project Proponent NALCO, the EIA Consultant J.M. EnviroNet Pvt. Ltd., or the EAC, constitutes a flagrant and substantial violation of the Terms of Reference (ToR) prescribed by the Ministry of Environment, Forest and Climate Change. This deliberate omission is not merely an oversight but an intentional, egregious, and notorious breach of statutory obligations, demonstrating a reckless disregard for the principles of environmental protection and sustainable development. Such conduct undermines the very foundation of the EIA process and reflects a disregard for the paramount importance of comprehensive and accurate baseline data in environmental assessments. The failure to include these critical parameters, without due explanation or justification, is tantamount to a dereliction of duty by the EIA Consultant, J.M. EnviroNet Pvt. Ltd., and signifies a deliberate attempt to obscure key environmental risks. By approving and accepting such reports, the EAC not only condones this blatant disregard for environmental safeguards but also sets a dangerous and deleterious precedent in the environmental appraisal process, thereby undermining the integrity and transparency of future environmental assessments. This conduct, if left unchallenged, would pave the way for further violations of environmental norms and jeopardize the public interest, which must not be allowed to prevail in any lawful jurisdiction.
21. Further, the EAC MoM at section 17.4.20 states: *"Undertaking/Affidavit: The Project Proponent (PP) has submitted an undertaking confirming that the information provided in Form 1 in PARIVESH, to the Ministry/EAC members, and in the PowerPoint presentation during the EAC meeting, is consistent with the proposal for Environmental Clearance (EC) modification for the amalgamation of Utkal D and Utkal E Coal Blocks. It is asserted that there are no data entry errors in the information uploaded to the PARIVESH system, and that all supporting documents uploaded to the PARIVESH portal are correct and duly authenticated by the Authorized Signatory. Should any discrepancies be found in the documents, the authorized signatory shall bear responsibility, and the project in question will be rejected."*

22. In light of the foregoing, this is a clear case for the rejection of the proposal and immediate annulment of the EC. Given the project's significance and the EIA consultant's negligence in ensuring the accuracy of critical environmental data, it is imperative that disciplinary measures be taken against J.M. EnviroNet Pvt. Ltd. This should include a minimum three (3) year ban on participating in all mining projects requiring environmental clearance at both the central and state levels. Such action is essential to preserve the integrity of the EIA process and ensure that future environmental assessments are conducted with the requisite diligence, accuracy, and compliance with established standards.
23. The EAC's role in failing to point out significant gaps in the baseline data is equally condemnable. It is essential to highlight that the EAC has consistently demonstrated a non-serious approach to these matters. As previously raised in my grievance dated 18.01.2024 regarding "EACs Recommending ECs Based on EIA Consultants' Expired Accreditation," it was noted that, as per MoM ID: EC/MOM/EAC/591545/10/2023, the EAC for Industry-2 sector projects approved the proposal of Globus Spirits Limited during its **meeting on 01.11.2023, based on a presentation made by EIA consultant J.M. EnviroNet Pvt. Ltd., whose accreditation had expired on 31.10.2023.** Furthermore, in MoM ID: EC/MOM/EAC/591545/10/2023, the EAC for Industry-1 sector projects acknowledged that the accreditation of the consultant had expired on 31.10.2023, as per the QCI website. The consultant, however, claimed an extension of accreditation for three months. The EAC Industry-1, instead of verifying the validity of this claim, allowed the presentation on the consultant's mere assertion, raising serious concerns about the adequacy of its scrutiny. Moreover, the EAC did not question why J.M. EnviroNet Pvt. Ltd. failed to produce an official letter from NABET confirming the extension, especially if it was issued post dated, as no such letter was presented [Page No. 175 of the attachment].

This laxity in verification and acceptance of claims without due diligence raises critical questions about the EAC's effectiveness. It highlights a disturbing pattern of failing to undertake the rigorous, heightened scrutiny that is required, as emphasized by the Hon'ble Supreme Court in the matter of *Hanuman Laxman Aroskar vs. Union of India*.

24. **The EAC's deliberation on the groundwater environment in the NALCO EC matter is equally lacking in rigor, despite the fact that Utkal-D Coal Mines submitted an application for NOC renewal on 11.09.2024, well after the NOC had expired on 20.10.2023, resulting in a delay of 328 days.** According to NOC condition No. 9, "Application for renewal can be submitted online from 90 days before the expiry of NOC. Groundwater withdrawal, if any, after expiry of NOC shall be illegal & liable for legal action as per provisions of the Environment (Protection) Act, 1986." However, NALCO failed to comply with this provision. Moreover, Section 11(vii) of the Gazette Notification S.O. 3289(E), dated 24th September 2020, issued by the Ministry of Jal Shakti, explicitly states that Environmental Compensation is applicable if the renewal application is not submitted within three months following the expiry of the NOC. The delayed submission of NALCO's application thus invites potential Environmental Compensation under this provision. However, the Utkal D Coal block had an NOC for 3682 KLD of dewatering and 770 KLD of fresh water abstraction, which expired on 19.10.2023. NALCO has now applied for the renewal of the CGWA NOC for 770 KLD of water abstraction for domestic use and 2245.8 KLD for dewatering/mine seepage. **The EAC has failed to ensure whether NALCO continued groundwater abstraction without a valid NOC.** This is a critical issue, particularly considering the 'CONCLUSION AND SUMMARY of Hydrogeological Assessment' [Page No. 124 of the attachment], which states: (1) groundwater monitoring revealed variations in water levels across different locations, influenced by geological formations and proximity to water sources, and (2) *aquifer characteristics indicate potential for groundwater extraction, with permeable formations identified at depths ranging from 36.7 to 140 meters.* Additionally, Table 4, titled 'Water Level Monitoring Data of Feb 2024' on page 624 of the EIA report, shows water levels ranging from 2.26 to 10.3 meters below ground level (mgb). Table 5, 'Water Level Monitoring Data of May 2024,' shows levels ranging from 2.31 to 10.66 mgb. On page 626, under the heading 'Spatial Distribution and Observations,' the report states that the highest groundwater levels were observed at

Mines Site A-39 (10.66 meters) and Kosala-2 (8.49 meters). These sites may be associated with deeper aquifers or significant groundwater withdrawal, possibly due to industrial activities at the mining sites.

This lax stance by the EAC, a crucial government body, could embolden large-scale industries like NALCO, already found to be in violation of environmental norms, potentially leading to severe environmental degradation.

In view of the foregoing, I respectfully request that your esteemed authority issue an order barring J.M. EnviroNet Pvt. Ltd. from participating in all mining projects requiring environmental clearance at both the central and state levels for a minimum period of three (3) years. Such action is crucial to uphold the integrity of the Environmental Impact Assessment (EIA) process and to ensure that future environmental assessments are carried out with the necessary diligence, accuracy, and adherence to legal standards. Furthermore, I request that the effectiveness and capacity of the Expert Appraisal Committees (EACs) be thoroughly reviewed to prevent such gross negligence in the future, thereby *levare onus* on the Hon'ble NGT and Courts.

An immediate action is kindly requested, and I would appreciate it if a copy of the action taken could be forwarded to me for reference.

Yours faithfully,

Sanjaya Kumar Mishra

AIBE Certified Lawyer, Legal Advisor for Environmental Matters

Priya Nilayam, Masjid Chowk, Tikrapara, Balangir 767001 (Odisha)

Mobile: 9310326647 | 9818326647

CONFIDENTIALITY NOTE

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Sanjaya Kumar Mishra <sanjayakmishra@gmail.com>

Formal Complaint Regarding EC Amendment Dated 23.07.2025 to NALCO (Utkal D & E Coal Blocks) with reference to earlier complaints dated 08.11.2024, 25.11.2024, 09.12.2024, 23.12.2024, 08.01.2025 & RTI Follow-ups

1 message

Sanjaya Kumar Mishra <sanjayakmishra@gmail.com>

28 August 2025 at 07:30

To: secy-moef@nic.in, ceo.nabet@qcin.org

Cc: gm_uecb@nalcoindia.co.in, jmenviron@hotmail.com

From:

Sanjaya Kumar Mishra
Maszid Chowk, Tikrapara
Balangir 767001 (Odisha)
Mobile No. 9818326647

To:

The Secretary,
Ministry of Environment, Forest and Climate Change
Government of India,
Indira Paryavaran Bhawan,
Jor Bagh New Delhi - 110003
Telephone: +91-11-20819308
Email: secy-moef@nic.in

CEO

National Accreditation Board for Education and Training (NABET)
Quality Council of India
World Trade Centre, K-100, Block K, Nauroji Nagar
New Delhi – 110029
Phone: 011 – 42600800
Email: ceo.nabet@qcin.org

National Aluminium Company Limited (NALCO)
Through General Manager (Mines) Coal Mines Division
S&P Complex, Angul (Odisha)
NALCO Bhawan, P/1 Nayapalli
Bhubaneswar - 751013, Dist. Khordha (Odisha)
Email: gm_uecb@nalcoindia.co.in

J.M. EnviroNet Pvt. Ltd.

EIA Consultant Through Managing Director
Emaar Digital Greens, Tower-B, Unit No. 1517
Golf Course Extension Road, Sector 61
Gurugram 122011 (Haryana)
Email: jmenviron@hotmail.com

Sir,

Despite my complaint titled "Regarding Discrepancies and Omission of Key Environmental Data in EIA Report for Utkal D & E Coal Blocks – Request for Immediate Withdrawal of Re-Appraisal Recommendation", dated 08.11.2024 and 25.11.2024, and a subsequent complaint titled "Non-Conformity with Terms of Reference by J.M. EnviroNet Pvt. Ltd. and Non-Adherence to Procedural Standards in Environmental Appraisal by the Expert Appraisal Committee Due to Absence of Requisite Scientific Data in the EIA Report", dated 09.12.2024, followed by reminders on 23.12.2024 and 08.01.2025, the Ministry of Environment, Forest and Climate Change, on 23.07.2025, granted an Amendment in Environmental Clearance to National Aluminium Company Limited (NALCO).

This amendment pertains to the modification of existing Environment Clearances (ECs) for:

- Utkal D Coal Block (ML area: 301.28 ha; production capacity: 2.0 MTPA) and
- Utkal E Coal Block (ML area: 523.036 ha; production capacity: 2.0 MTPA),

/// TRUE COPY ///

by amalgamating the D & E blocks into a single project with a total coal production capacity of 4 MTPA and a total lease area of 824.316 ha.

The project is located at:

Village: Nandichhod (Gopiballavpur), Gopinathpur Jungle, Kosala, Kundajhari Jungle, Korada, Rajjharan, Similisahi
Tehsil: Chhendipada
District: Angul, Odisha.

It is also important to note that on 05.06.2025, the concerned Ministry official executed the First Appellate Authority's Order dated 16.04.2025, under the RTI Act, 2005, after a reminder by the Complainant dated 02.06.2025.

In the reply, the CPIO stated:

"It is further reiterated that redressal of grievance, reasons for non-compliance of rule/contesting the actions of the respondent public authority are outside the purview of the Act."

However, it remains unclear whether the CPIO is referring to the RTI Act, 2005, or some other Act.

It is also notable that the 23.07.2025 Amended EC is based on the same EIA/EMP, which was under complaint review and publicly uploaded on the PARIVESH Portal.

In the EDS, the Expert Appraisal Committee categorically stated:

"Kindly make sure that the factual data mentioned in Form, Mine plan and EIA/ EMP Report are in the same order and do not mismatch. All the documents provided by your good self must be legible. Also, along with the corrections mentioned above, please ensure the completeness of the Form and all the documents."

Furthermore, the [document](#) "Scheme for Accreditation of EIA Consultant Organizations: Version 3", under Section 9.3 – Suspension/Cancellation/Debarment of Accreditation, clearly states:

"NABET may suspend or cancel an accreditation or even debar an organization on account of any or more grounds during the accreditation process or after, but not limited to, the following: In case of concealment of facts or misrepresenting facts in EIA reports by an ACO that has been confirmed by statutory bodies, courts, National Green Tribunal (NGT) and other such authorities, appropriate action is taken against the ACO by the accreditation committee. Same applies if any feedback/complaint is received by a stakeholder about work related to an EIA project carried out by an ACO and is brought to the notice of NABET. A clarification may be sought and put up to the accreditation committee for final decision on the matter."

I hereby submit this formal complaint for your consideration and appropriate action in view of the developments that have transpired between 08.11.2024 and 23.07.2025. It is requested that necessary steps be taken in this matter on or before **27.09.2025**.

In the event of inaction or lack of redressal within the aforementioned timeline, the undersigned shall be constrained to pursue appropriate legal remedies available under the law.

Respectfully submitted,

Sanjaya Kumar Mishra
Advocate | NGT Litigator | Environmental Lawyer | Legal Advisor
Mobile No. 9818326647

Odisha Communication: West Wing, 1st Floor, Priya Nilayam, Masjid Chowk, Tikrapara, Balangir 767001

NCR Communication: 115, Sagar Enclave, Sector - 104, Near Daulatabad Road MGF Toyota,

Gurugram (Gurgaon) 122006, Delhi NCR

Alternate Email: sanjaykmishra@hotmail.com



JM Env Complaint Set.pdf

1418K



**STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY,
ODISHA**

5RF-2/1, Unit-IX, Bhubaneswar-751022, Tel: 0674-3512840, Email:
seiaaodisha@gmail.com

*(A statutory body constituted by Ministry of Environment, Forest & Climate Change
under Environment (Protection) Act, 1986)*

Letter No. 6710/SEIAA

Dated 03.09.2025

To

M/s. NENO Technical Services
At-Ananta Niwas, Plot No.-576/4502,
Jagannath Vihar, Airfield, Sundarpada,
Bhubaneswar, Pin-751002,
Dist-Khordha, Odisha

Sub: Debarment of M/s. NENO Technical Services from submitting any reports, documents to SEIAA, Odisha for obtaining Environmental Clearance-regarding.

Ref: (i). Our Show Cause Notice letter no. 6609/SEIAA dated 24.07.2025 and subsequent letter no. 6662/SEIAA dated 19.08.2025
(ii). Reply of Show Cause Notice submitted by M/s. NENO Technical Services dated 05.08.2025 and 25.08.2025 received through email.

Sir,

In above cited subject, I herewith to inform you that the explanation/clarification furnished by you in respect of Show Cause Notice dated 27.07.2025 & 19.08.2025 issued by SEIAA, Odisha is not specific and does not give proper justification for such misleading reports with respect to Annual Rate of Replenishment Study (ARRS) report. From your submission it is very clear that you have doing such unrealistic assessment of replenishment of sand in the past favoring to the project proponent/lessee/lease holder for unsustainable sand mining therefore, consequent scenario is entitled damage to the river.

Therefore, for the best intension for the intervention flow of river, protection in river embankment and encouraging un-sustainable sand mining by furnishing such false report. The Authority **hereby debarred M/s. NENO Technical Services** for submitting any Mining Plan, ARRS report and any other reports, documents

SEIAA, Odisha for obtaining Environment Clearance (EC) in terms of provision of EIA Notification, 2006 **for a period of Twelve Months (12 Months) from the date of issue of this letter.**

By order and Authority of SEIAA, Odisha,

Encl: As above


Member Secretary

Copy forwarded to

1. The Chief Executive Odisha Space Applications Centre (ORSAC), Bhubaneswar for delisting the consultant M/s. Nano Technical Service for further empanel.
2. The Director of Mines, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
3. The Director Minor Mineral, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
4. The Secretary, State Expert Appraisal Committee, (SEAC), Odisha for information and necessary action.
5. The All Collector & District Magistrates of Odisha for necessary action.
6. The All Deputy Director of Mines of Different District of Odisha and All the Mining Officers of Different District of Odisha for necessary action.


Member Secretary



STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY, ODISHA

5RF-2/1, Unit-IX, Bhubaneswar-751022, Tel: 0674-3512840, Email: seiaaodisha@gmail.com

(A statutory body constituted by Ministry of Environment, Forest & Climate Change under Environment (Protection) Act, 1986)

File No. SEIAA-103/12-2023

Dated: 28th December, 2023
Bhubaneswar

To

Sri Amresh Rath, RQP
Bima Nagar, 1st Lane, Near Ambapua,
Brahmapur, Dist-Ganjam

Sub: Debarment of Sri Amresh Rath, RQP/OD/076/2017 from submitting any reports, documents to SEIAA, Odisha for obtaining Environmental Clearance- reg.

WHEREAS, Government of India vide EIA Notification No. S.O. 1533 (E) dated the 14th September, 2006 of the erstwhile Ministry of Environment and Forests has constituted the State Environment Impact Assessment Authority, Odisha (hereinafter referred to as SEIAA, Odisha) as an Authority under the provisions of sub-section (3) of section 3 of the Environment (Protection) Act, 1986, and

WHEREAS, Tahasildar, Kukudakhandi, (hereinafter referred to as Project Proponent in short) through RQP had applied for grant of Environmental Clearance to the project proposal for EC of Kusumi & Mohuda Stone Quarries Cluster over an area of 27.258 Acres or 11.139 hectares in village Kusumi & Mohuda, Tahasil Kukudakhandi in District Ganjam, State Odisha submitted under cluster approach with total cluster area 11.139 Hectares with consisting of 5 stone quarries, and

WHEREAS, the Authority observed that there are 7 quarries in cluster, out of which EC has been granted by SEIAA to 2 (two) quarries based on the wrong information submitted by PP through RQP that only two out of the seven quarries are coming in the cluster, and

WHEREAS, show cause notice has been issued to the RQP vide SEIAA dated 14th November, 2023 wherein it has been alleged that false information in regard to cluster for filing EC application and also in the preparation of cluster EIA/EMP with NABET consultant. EC was granted by SEIAA, Odisha based on the information furnished in the EC application, and

WHEREAS, the RQP has submitted response vide letter no.AR/JDG/MP/33/2023 dated 13.12.2023 to the show cause notice, stating, there was lack of clear guidance regarding the inclusion of existing cluster and your role is limited to providing assistance to the NABET consultant and to the Tahasildar. You have also stated that your role primarily involves preparation of mining plan and you do not have direct involvement in EC application.

/// TRUE COPY ///

WHEREAS, the matter was placed in the 148th meeting of SEIAA, Odisha held on 21.12.2023. The Authority perused the reply dated 13.12.2023 of Sri Amresh Rath, RQP/OD/076/2017 in response to the show cause notice dated 14.11.2023 of SEIAA, Odisha and concluded that the explanation furnished by the RQP stating lack of clear guidance and limited role of RQP, which is not acceptable. In fact, RQP must have a clear understanding of the guidelines and instructions issued under EIA Notification, 2006 and RQP cannot shift responsibility by stating that he does not have direct involvement in EC application filing / process.

WHEREAS, after detailed deliberation in the matter, the Authority decided that **Sri Amresh Rath, RQP/OD/076/2017 shall be debarred** from submitting any reports, documents to SEIAA, Odisha for obtaining Environmental Clearance in terms of provision of EIA Notification, 2006 for a period of Six Months from the date of issue.

Yours faithfully,


28/12/23
Member Secretary

Copy forwarded to

1. The Director of Mines, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
2. The Director Minor Mineral, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
3. The Secretary, State Expert Appraisal Committee, (SEAC), Odisha for information and necessary action.


28/12/23
Member Secretary



STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY, ODISHA
5RF-2/1, Unit-IX, Bhubaneswar-751022, Tel: 0674-3512840, Email: seiaaodisha@gmail.com
(A statutory body constituted by Ministry of Environment, Forest & Climate Change under
Environment (Protection) Act, 1986)

File No. SEIAA-103/12-2023

Dated: 06th April, 2024
Bhubaneswar

To

Smt. Pratima Kumari Rai,
Partner, P & M Solution
NABET Accredited Consultant,
C-88, Sector-65, Noida-201301
State-Uttar Pradesh

Sub: Debarment of P & M Solution, the NABET Accredited Consultant having certificate no. NABET/EIA/2326/RA0298 for submitting any EIA & EMP reports & documents to SEIAA, Odisha for obtaining Environmental Clearance- reg.

WHEREAS, Government of India vide EIA Notification No. S.O. 1533 (E) dated the 14th September, 2006 of the erstwhile Ministry of Environment and Forests has constituted the State Environment Impact Assessment Authority, Odisha (hereinafter referred to as SEIAA, Odisha) as an Authority under the provisions of sub-section (3) of section 3 of the Environment (Protection) Act, 1986, and

WHEREAS, Tahasildar, Kukudakhandi, (hereinafter referred to as Project Proponent in short) through RQP & P & M Solution, is the NABET consultant had applied project proposal vide application no. SIA/OR/MIN/417345/2023 dt. 21.02.2023 for grant of Environmental Clearance to the project proposal of Kusumi & Mohuda Stone Quarries coming under cluster over an area of 27.258 Acres or 11.139 hectares in village Kusumi & Mohuda, Tahasil Kukudakhandi in District Ganjam. The application was submitted under cluster approach with total cluster area 11.139 Hectares consisting of 5 stone quarries, and

WHEREAS, the said proposal was put up in the SEIAA, Odisha meeting held on 29.09.2023 for consideration of approval of cluster EIA & EMP, and

WHEREAS, the Authority observed that there are 7 quarries in cluster, out of which EC has been granted by SEIAA for 2 (two) quarries based on the wrong information submitted by PP that only five out of the seven quarries are coming in the cluster excluding the two quarries are in operating condition, and

WHEREAS, a show cause notice has been issued to the consultant P & M Solution vide SEIAA, Odisha letter dated 07th December, 2023 wherein it has been alleged that false

/// TRUE COPY ///

information in regard to cluster for filing EC application and also in the preparation of cluster EIA/EMP.

WHEREAS, Mr. Subhash Kumar, CEO of P & M Solution consultant has submitted response vide letter Nil dated 06.01.2024 through email to the show cause notice, stating, the two projects for which EC has been already accorded by SEIAA to Sri Balaji Reddy and Sri Tushar Kanta Dash respectively are situated at village Mohuda. M/s. P & M Solution had not been involved in any kind of capacity in the application and pursual of EC for two operated stone quarries. Neither their organization has any direct or indirect association of any kind in the EC grant process of both of the cases.

WHEREAS, the matter was placed in the 158th meeting of SEIAA, Odisha held on 01.03.2024 & 02.03.2024. The Authority perused the reply dated 06.01.2024 of Mr. Subhash Kumar, CEO of P & M Solution consultant in response to the show cause notice dated 07.12.2023 of SEIAA, Odisha and concluded that the explanation furnished by the consultant stating that the organization has no direct or indirect association of any kind in the EC grant process of both of the cases is not acceptable. The Authority also observed in similar types of cases during preparation of EIA & EMP report by the same Consultant are not in proper standard and lack of quality as per the guidelines as excepted from a certified consultant.

WHEREAS, after detailed deliberation in the matter, the Authority decided that the consultant **M/s. P & M Solution shall be debarred from submitting any reports, documents to SEIAA, Odisha for obtaining Environmental Clearance** in terms of provision of EIA Notification, 2006 for a period of Six Months from the date of issue of this letter.

Yours faithfully,



Member Secretary

Copy forwarded to

1. The Director of Mines, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
2. The Director Minor Mineral, Steel & Mines Dept, Govt. of Odisha Bhubaneswar for information and necessary action.
3. The Secretary, State Expert Appraisal Committee, (SEAC), Odisha for information and necessary action.
4. The CEO/Director, National Accreditation Board for Education and Training (NABET) for information and necessary action.



Member Secretary

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THE TIMES OF INDIA

Ramky Enviro debarred as consultant for 6 months

TNN | Mar 30, 2022, 03.21 AM IST

Hyderabad: In a big jolt to Ramky Enviro Services, the Union ministry has debarred it from appearing before the expert appraisal committee of Environment Impact Assessment (EIA) authority for six months. Ramky Enviro has allegedly given the wrong EIA report regarding Maharashtra projects for which it was a consultant.

Lalita Bakolia, senior official of Ministry of Forests and Environment, said that a showcause notice was issued to Ramky Enviro Services Pvt. Ltd by the ministry on 21st October, 2020. The notice was issued in connection with appraisal of a project in Karnataka. The project was taken up by Mardi Eco Industries Private Limited.

The ministry had issued another showcause notice to Ramky Enviro Services in January 2021 for a project titled 'Gare Palma II Coal Mine Project of Maharashtra State Power Generation Company Limited in Raigarh, Chhattisgarh.' Ramky Enviro Services had submitted its reply in the case of the project on August 12, 2021. However, it didn't give a reply regarding the October 2020 showcause notice.

"As the response of the consultant was found to be non-satisfactory, it has been concluded that the consultant has not complied with the terms and conditions of projects and prepared wrong EIA. Ramky Enviro Service Pvt. Ltd should be debarred from appearing before EAC NABET for 6 months from the date of issuance of this letter," said the ministry in a letter to National Accreditation Board for Education and Training.

F. No. J-11013/77/2004- IA II (I)
Government of India
Ministry of Environment and Forests
(I.A. Division)

Paryavaran Bhawan
CGO Complex, Lodhi Road
New Delhi – 110 003

Dated 2nd December, 2009

OFFICE MEMORANDUM

**Subject: Accreditation of the EIA Consultants with Quality Council of India (QCI)/
National Accreditation Board of Education and Training (NABET)**

The Environmental appraisal of Development Projects is undertaken as per the provisions of the Environmental Impact Assessment (EIA) Notification, 2006 based on the EIA and EMP Reports prepared by the project proponents in assistance with their Consultants. It has been felt in the Ministry that there is a need to enhance the quality of EIA Reports as the Consultants generally, undertake preparation of EIA / EMP Reports in many sectors and in some instances without requisite expertise and supporting facilities like laboratories for testing of samples, qualified staff etc. The good quality EIA Reports are pre-requisite for improved decision making.

2. In view of the above, a series of discussions were held with the National Accreditation Board of Education and Training (NABET) and the Quality Council of India (QCI) to evolve a framework for registration of the Consultants including those working in Public Sector Undertakings/Laboratories.

3. After detailed consideration of the issues relating to accreditation of the Consultants, following decisions have been taken:

- All the Consultants/Public Sector Undertaking (PSUs) working in the area of Environmental Impact Assessment would be required to get themselves registered under the scheme of Accreditation and Registration of the NABET/QCI.
- Consultant would be confined in the consultancy only to the accredited sectors and parameters for bringing in more specificity in the EIA document.
- The QCI would put in place detailed procedure for registration of Consultants for taking up the assignments in category 'A' and 'B' projects as detailed in EIA Notification, 2006. The QCI would maintain full transparency on accredited Consultants, procedure followed for accreditation, feed back and evaluation mechanism for Consultants for quality of EIA / EMP Reports.

F. No. J-11013/77/2004- IA II (I)

- After accreditation, the Consultants would need to include a Certificate in this regard in the EIA/EMP Reports prepared by them and data provided by other Organizations/Laboratories including their status of approvals etc.
- The EIA Consultants may like to see further clarification on the subject through the website of NABET/QCI (www.qcin.org).
- All the Member Secretaries of various Expert Appraisal Committee (EACs) would inform the Consultants in their respective meetings, the need to get accredited with NABET/QCI.

4. It is decided, in the above factual matrix that no EIA/EMP Reports prepared by such Consultants who are not registered with NABET/QCI shall be considered by the Ministry after 30th June, 2010.

This issues with the approval of the Competent Authority.

P. B. Rastogi
21/12/09
(Dr. P.B. Rastogi)
Director

2. In view of the above, a series of discussions were held with the National Accreditation Board of Education and Training (NABET) and the Quality Council of India (QCI) to evolve a framework for registration of the Consultants including those working in Public Sector Undertakings/Laboratories.

3. After detailed consideration of the issues relating to accreditation of the Consultants, following decisions have been taken:

- All the Consultants/Public Sector Undertaking (PSUs) working in the area of Environmental Impact Assessment would be required to get themselves registered under the scheme of Accreditation and Registration of the NABET/QCI.
- Consultant would be confined in the consultancy only to the accredited sectors and parameters for bringing in more specificity in the EIA document.
- The QCI would put in place detailed procedure for registration of Consultants for taking up the assignments in category 'A' and 'B' projects as detailed in EIA Notification, 2006. The QCI would maintain full transparency on accredited Consultants, procedure followed for accreditation, test track and evaluation mechanism for Consultants for quality of EIA / EMP Reports.

A new candidate may be proposed as an EC or a FAE for assessment at any time. However, for a person already assessed and not approved may be proposed only after a gap of 3 months enabling her/him to address the shortfall.

Applications (as per **Annexure IE**) proposing replacement or new candidates should accompany requisite application fee as per **Appendix D**.

9.2.2 Change in scope of accreditation:

Requests for modification/expansion in scope of accreditation may be included with the applications of SA or RA. No additional fee is to be paid for the purpose apart from the applicable application fee for SA or RA as mentioned in **Appendix D**.

Separate applications may also be made at any point of time accompanied with the requisite fees as detailed in **Appendix D**.

Assessment fees for expansion/modification in the scope, if made in a separate application, are as per the initial assessment process. All necessary documents, as required for initial assessment, are to be submitted along with the application for change in scope.

9.3 Suspension/cancellation/debarment of accreditation

NABET may suspend or cancel an accreditation or even debar an organization on account of any or more grounds during accreditation process or after, but not limited, to the following:

- a. **Non-compliance or violation of the NABET's requirements** and conditions of accreditation and deviation from facts as stated in application and enclosures
- b. In case an approved expert leaves the organization, the ACO is required to inform NABET of the same within one month and get a replacement approved within the next two months, if s/he was the only expert in that sector or functional area. In case of EC, if the replacement expert fails to get approved, accreditation to specific sector/sectors is cancelled.
- c. Submission of false or misleading information in the application or in subsequent submissions
- d. Improper use of NABET's accreditation mark, letter of accreditation from NABET or the QCI/NABET logo
- e. Carrying out changes in EIA coordinators/experts for accredited sectors without NABET's approval
- f. Failure to report any major legal (mandatory compliance) changes and evident conflict of interest
- g. Using fraudulent practices by the ACO in respect of its submission/interaction with NABET which include, but not limited to, deliberate concealment and/or submission of false or misleading information, suppression of information, falsification of records or

data, unauthorized use of accreditation, and non-reporting of completed EIAs to NABET. The fraudulent practices covering the above aspects would also include the consultant organization's interaction with the project proponent and the EIA reports prepared by them.

- h. Non- payment of applicable fees.
- i. Violation of the Code of Conduct for the consultant organizations (see Section 12.0)
- j. Any other condition deemed appropriate by NABET.

The decision for the suspension/cancellation/debarment is taken by the NABET accreditation committee.

In case of concealment of facts or misrepresenting facts in EIA reports by an ACO that has been confirmed by statutory bodies, courts, National Green Tribunal (NGT) and other such authorities, appropriate action is taken against the ACO by accreditation committee. Same applies if any feedback/complaint is received by a stakeholder about work related to an EIA project carried out by an ACO is brought to the notice of NABET. A clarification may be sought and put up to the accreditation committee for final decision on the matter.

9.4 Actions for misconduct/fraudulent activities

Submission of false or misleading information or use of fraudulent practices, an AO/ACO may be disqualified for up to one year, to be decided by the accreditation committee depending on the seriousness of the action. Such AO/ACO will be able to re-apply only after expiry of the disqualification period. The application is to be accompanied with an undertaking from the CEO of the organization that, if such practices are repeated, it will render the organization ineligible to participate in the NABET accreditation scheme any further. The same approach is applicable for individual experts (ECs and FAEs) as well.

9.5 Confidentiality

All information, documents and reports submitted by an AO/ACO to NABET are utilized by the NABET, assessors, members of accreditation and technical committees for the purpose of assessment and accreditation. These may also be used for research purpose or shared with MoEFCC, Govt. of India and other members of the International Personnel Certification Association. However, the identity of the accredited EIA consultant organizations would be masked for sensitive information related to business whenever it is called for/appropriate. In case an AO/ACO wants the information to be kept confidential, a communication must be sent to NABET citing reasons for the same. NABET reserves the right to take appropriate decision in this regard. NABET also reserves the right of taking appropriate action against an ACO for deliberate breach of confidentiality.

The ACO is required to have adequate arrangements consistent with applicable laws to safeguard confidentiality of all information provided by its clients. These arrangements are extended to include organizations or individuals acting on its behalf and as its representatives.

Follow-up seeking status/action taken on Complaint dated 27.04.2026 concerning materially deficient and misleading EIA Reports

From: S K Mishra (sanjayakmishra@yahoo.co.in)

To: ceo.nabet@qcin.org; nabet@qcin.org; seiaaodisha@gmail.com; secy-moef@nic.in

Cc: jmenviron@hotmail.com

Date: Tuesday, May 12, 2026 at 11:37 AM GMT+5:30

To:

The Chief Executive Officer
National Accreditation Board for Education and Training (NABET)
World Trade Centre, K-100, Block K, Nauroji Nagar,
New Delhi – 110029
Email: ceo.nabet@qcin.org

The Member Secretary
State Environment Impact Assessment Authority (SEIAA), Odisha
5RF-2/1, Acharya Vihar, Unit-IX, OPTCL Colony,
Anand Bazar, Bhoi Nagar, Bhubaneswar – 751022
Email: seiaaodisha@gmail.com

The Secretary
Ministry of Environment, Forest and Climate Change
Government of India
Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj,
New Delhi – 110003
Email: secy-moef@nic.in

Subject: Follow-up seeking status/action taken on Complaint dated 27.04.2026 concerning materially deficient and misleading EIA Reports

Sir,

This is in continuation of the complaint dated 27.04.2026 submitted before the above authorities concerning serious deficiencies, misrepresentations, and non-compliances in the EIA documentation prepared and submitted by M/s J.M. EnviroNet Pvt. Ltd.

In the said complaint, the undersigned had requested that an Action Taken Report be furnished within fifteen (15) days. The said period expired on 11.05.2026. The undersigned would therefore request that the present status of the complaint, along with copies of any

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proceedings, notices, communications, or actions initiated pursuant thereto, be furnished within three (3) working days.

It was specifically requested that appropriate proceedings be initiated against the concerned NABET-accredited EIA Consultant in accordance with the EIA Notification, 2006 and the applicable regulatory framework governing accredited consultants and environmental appraisal processes.

In this regard, attention is invited to Letter No. 6710/SEIAA dated 03.09.2025 and other similarly situated matters where regulatory action, including debarment of consultants from submission of EIA/EMP reports and related Environmental Clearance documentation, has been considered necessary in cases involving deficient or misleading environmental appraisal documentation.

It is further pertinent to note that SEIAA Odisha, vide File No. SEIAA-103/12-2023 dated 28.12.2023, debarred Sri Amresh Rath, RQP, from submitting reports/documents before SEIAA Odisha for obtaining Environmental Clearance. Further, vide File No. SEIAA-103/12-2023 dated 06.04.2024, SEIAA Odisha debarred Smt. Pratima Kumari Rai, Partner of P & M Solution, a NABET-accredited consultant (Certificate No. NABET/EIA/2326/RA0298), from submitting EIA and EMP reports/documents before SEIAA Odisha for obtaining Environmental Clearance.

Similarly, the Ministry of Environment, Forest and Climate Change had earlier debarred Ramky Enviro Services from appearing before the Expert Appraisal Committee (EAC) for a period of six (6) months in connection with submission of an incorrect EIA report relating to projects for which it acted as consultant.

The undersigned had also requested the Ministry to examine initiation of proceedings, including issuance of an appropriate Show Cause Notice to the concerned consultant, in line with F. No. IA-J-11011/352/2010-IA II (I) dated 30.09.2025 and other comparable matters, so as to ensure regulatory consistency, parity of treatment, and adherence to the EIA Notification, 2006.

Considering that environmental appraisal and clearance proceedings involve continuing public and ecological implications, it is respectfully submitted that complaints involving material deficiencies in EIA documentation warrant timely examination and appropriate regulatory response.

A copy of this communication is also being forwarded to M/s J.M. EnviroNet Pvt. Ltd. for information and transparency.

[Note: Complaint dated 27.04.2026 attached for reference]

Yours faithfully,

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Sanjaya Kumar Mishra



Email complaint dated 27.04.2026.pdf
229.4 KB

Complaint against NABET Accredited EIA Consultant M/s J.M. EnviroNet Pvt. Ltd. for submission of ToR non-compliant, misleading and materially deficient EIA Reports

From: S K Mishra (sanjayakmishra@yahoo.co.in)

To: ceo.nabet@qcin.org; nabet@qcin.org

Cc: secy-moef@nic.in; cssec.or@nic.in; seiaaodisha@gmail.com; jmenviron@hotmail.com

Date: Monday, April 27, 2026 at 10:00 AM GMT+5:30

To:

**The CEO,
National Accreditation Board for Education and Training
(NABET)**

World Trade Centre, K-100, Block K, Nauroji Nagar,
New Delhi – 110029

Telephone: 011 – 42600800, Email Id: ceo.nabet@qcin.org

Subject: Complaint against NABET Accredited EIA Consultant M/s J.M. EnviroNet Pvt. Ltd. for submission of ToR non-compliant, misleading and materially deficient EIA Reports

Respected Sir/Madam,

The present complaint is being submitted in the public interest of the State of Odisha and in the larger interest of environmental protection. The complaint pertains to the NABET accredited EIA Consultant **M/s J.M. EnviroNet Pvt. Ltd.**, holding Accreditation Certificate No. **NABET/EIA/2326/RA0308 dated 25.07.2025**, valid till **07.08.2026 (Page 1 of Annexure)**.

The details of the present complaint are as follows:

1. The NABET accredited EIA Consultant J.M. EnviroNet Pvt. Ltd. has been found to be submitting ToR non-compliant EIA Reports. The complainant has come across two recent projects situated in Odisha State:

- a. Proposal No. SIA/OR/IND1/555921/2025 and File No. J-11011/212/2011-IA-II (I) pertaining to UltraTech Cement Ltd. (Unit: Jharsuguda Cement Works) in Jharsuguda District of Odisha
 - b. Proposal No. IA/OR/CMIN/500323/2024 and File No. J-11015-31-2007-IA-II-M pertaining to National Aluminium Company Limited (NALCO) located in Angul District of Odisha.
2. The EIA Reports prepared by the said NABET accredited consultant for these projects have been granted Environmental Clearance by the competent authorities.
 3. Both these reports are **ToR non-compliant and falsely claim compliance with ToR requirements**, specifically with respect to **baseline data** with regard to ambient air quality. Further, key pollutants such as Nickel and Mercury in ambient air have not been assessed despite coal usage (**Page 2-16 of Annexure**).
 4. In both the projects, the NABET accredited EIA consultant has failed to declare the status of groundwater abstraction after expiry of validity of the groundwater NOC during environmental appraisal.
 5. In the case of UltraTech Cement Ltd. (Unit: Jharsuguda Cement Works), the air quality modelling is incomplete and based on lower operational capacity, ignoring previously approved DG sets, thereby leading to underestimation of impacts. The water balance presented is scientifically incorrect.
 6. The EIA consultant has used misleading terminology such as **“treated water” instead of “treated sewage”** and does not address sewage management during monsoon in the EIA report of UltraTech Cement Ltd. (Unit: Jharsuguda Cement Works). Such omission has **significant environmental implications** and renders the assessment **incomplete and inadequate (Page 45 of Annexure)**.

7. The complainant has also come across another recent project with Proposal No. IA/OR/MIN/440925/2023, File No. J-11015/80/2018-IA.II (M) pertaining to Dalmia Cement (Bharat) Ltd., Malkangiri, Odisha.
8. In none of these cases has the EIA Report disclosed the **cost of the study**, as required under the NABET Scheme.
9. In all the three cases, the EIA Reports contain test reports issued by **J.M. ENVIROLAB Pvt. Ltd.**, claiming to be “Approved by MoEF&CC” (**Page 17-32 of Annexure**). As per Notification **S.O. 2340(E) dated 16.06.2021**, recognition of private laboratories under clause (b) of sub-section (1) of Section 12 of the Environment (Protection) Act, 1986 is to be granted by the Central Pollution Control Board (**Page 33 of Annexure**). Therefore, the NABET accredited EIA consultant has furnished **false and misleading certification** in the EIA Reports.
10. The Proposal No. IA/OR/MIN/440925/2023, File No. J-11015/80/2018-IA.II (M) pertaining to Dalmia Cement (Bharat) Ltd., Malkangiri, Odisha, was recently granted EC as per EAC [MoM](#). In this project, the EAC document and EIA Report have mentioned that Sabari/Kolab River is flowing at a distance (adjacent to mine site) of nearly 30 m in the North-West direction. In Chapter 2 of the EIA Report (**Page 36 of Annexure**), the NABET accredited consultant has outlined three protection measures for the river; however, it does not specify the distance of the proposed borewell to be constructed for abstraction of 83 KLD groundwater, nor assess its impact on the river.
11. Further to the above paragraph, in the EIA Report (Chapter 9: Summary and Conclusion, **Page 37 of Annexure**), the assertion that groundwater flow is towards the river and therefore mining-induced seepage will not affect river flow is scientifically misconceived. A gaining river system is inherently dependent on groundwater discharge, and any abstraction or interception of groundwater through mining or pumping activities can

reduce such baseflow. The statement fails to consider post-project hydrogeological conditions, drawdown effects, and potential reversal or alteration of hydraulic gradients, thereby rendering the conclusion unsubstantiated.

12. The NOC No. CGWA/NOC/MIN/ORIG/2023/18990 dated 09.08.2023 granted by the Central Ground Water Authority (CGWA) (**Page 38 of Annexure**) has not specified any limit for diameter, depth, or location of borewell. In the absence of such site-specific and operational constraints, the potential impact of groundwater abstraction becomes material and indispensable for assessment, which has not been adequately addressed in the EIA Report prepared by the NABET accredited EIA consultant.
13. In the case of Proposal No. IA/OR/MIN/440925/2023, File No. J-11015/80/2018-IA.II (M) pertaining to Dalmia Cement (Bharat) Ltd., Malkangiri, Odisha, there are significant deficiencies in the **declaration of wastewater discharge**. In Annexure XV (Questionnaire: “Proforma for Environmental Appraisal of Mining Projects”), at Serial No. 30 (**Page 39 of the Annexure**), **“NIL” has been declared against the point of final discharge into surface water/forest/greenbelt**. However, in subsequent sections of the document, including the Water Balance, it is stated that **13 KLD of STP-treated wastewater is proposed to be utilized for plantation and 4 KLD of treated effluent is proposed to be used for dust suppression**. This inconsistency constitutes a **material contradiction within the EIA Report**, indicating improper and misleading disclosure regarding wastewater handling and utilization, thereby **undermining the reliability of the assessment**.
14. The **Water Balance**. In Annexure XV (Questionnaire: “Proforma for Environmental Appraisal of Mining Projects”), at Serial No. 31 (**Page 41 of the Annexure**), it is stated that Septic Tank–Soak Pit / STP, along with 13 KLD for plantation and 4 KLD of treated effluent for dust suppression, have been considered, thereby fixing the freshwater

requirement at 83 KLD. However, in Chapter 6 under Mine Water Management (**Page 44 of the Annexure**), the EIA Report presents a **contradictory position**, wherein the STP is not reflected. Such inconsistency constitutes a **material discrepancy in the water balance assessment** and may lead to **significant adverse environmental impacts**, thereby rendering the assessment unreliable.

- 15. As stated in Paragraph No. 6** above, in Proposal No. IA/OR/MIN/440925/2023, File No. J-11015/80/2018-IA.II (M) pertaining to Dalmia Cement (Bharat) Ltd., Malkangiri, Odisha, the **EIA consultant has again failed to furnish any details regarding the management of treated wastewater during rainy days/monsoon season**. Such omission has **significant environmental implications** and renders the assessment **incomplete and inadequate**.
- 16.** Further, the EIA consultant has inconsistently reported both treated sewage and treated effluent as “treated water”, which is technically incorrect, as highlighted above.
- 17.** Issues pertaining to Proposal No. IA/OR/CMIN/500323/2024 and File No. J-11015-31-2007-IA-II-M were raised by the complainant before MoEF&CC through complaints dated 08.11.2024, 25.11.2024, and 09.12.2024, which remain unaddressed.
- 18.** Issues pertaining to Proposal No. SIA/OR/IND1/555921/2025 and File No. J-11011/212/2011-IA-II (I) were submitted before the State Environment Impact Assessment Authority (SEIAA), Odisha, which also remains unaddressed.
- 19.** In the absence of any regulatory intervention or effective oversight, the EIA Consultant continues to submit reports in a manner that raises serious environmental concerns. Accordingly, the present complaint is being lodged before NABET, the accreditation body, for appropriate action.

In view of the foregoing facts and grounds, immediate action is warranted, including initiation of debarment proceedings against the consultant, to prevent further submission of misleading,

non-compliant, and unreliable Environmental Impact Assessment reports in the State of Odisha, in the larger interest of environmental protection and the public.

An **action taken report** on the present complaint may kindly be furnished to the undersigned **within a period of 15 days**. In the event of failure to take appropriate action within the aforesaid period, the undersigned shall be **constrained to pursue appropriate legal remedies in accordance with law**.

Yours faithfully

Sanjaya Kumar Mishra

Copy to:

1. State of Odisha

(Through Chief Secretary)

Lok Seva Bhawan (Odisha State Secretariat)

Sachivalaya Marg, Unit-2, Bhubaneswar – 751001 (Odisha)

Email Id : cssec.or@nic.in

For taking cognizance of the matter and issuing appropriate directions to SEIAA, Odisha to take action in line with Letter No. 6710/SEIAA dated 03.09.2025, including initiation of debarment proceedings.

2. State Environment Impact Assessment Authority (SEIAA), Odisha

(Through its Member Secretary)

5RF-2/1, Acharya Vihar, Unit – IX, OPTCL Colony, Anand Bazar, Bhoi Nagar, Bhubaneswar, Odisha 751022

Email Id : seiaaodisha@gmail.com

For taking action in line with Letter No. 6710/SEIAA dated 03.09.2025, including debarring the EIA consultant from submitting EIA reports or any related documents for obtaining Environmental Clearance (EC) under the EIA Notification, 2006, for a minimum period of twelve (12) months.

3. Ministry of Environment, Forest and Climate Change

Government of India

(Through Secretary)

Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj,

New Delhi – 110003

Email Id : secy-moef@nic.in

For initiating appropriate action, including issuance of a Show Cause Notice to the concerned NABET-accredited EIA Consultant, in line with F. No. IA-J-11011/352/2010-IA II (I) dated 30.09.2025 and other similar cases, in order to ensure parity, regulatory consistency, and adherence to the EIA Notification, 2006.

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4. J.M. EnviroNet Pvt. Ltd. (NABET Accredited EIA Consultant)

(Through Managing Director)

Emaar Digital Greens, Tower-B, Unit No. 1517, Golf Course Extension Road, Sector 61,
Gurugram 122011 (Haryana)Email Id: jmenviron@hotmail.com

*Note: A compilation of relevant documents extracted from the PARIVESH Portal of the Government of India is annexed herewith as **Annexure**.*

--

Sanjaya Kumar Mishra, Advocate**Mobile No.** 9310326647 | [Linkedin](#)**Odisha Chamber:** West Wing, 1st Floor, Priya Nilayam, Masjid Chowk, Tikrapara, Balangir 767001

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Annexures to Complaint 27.04.26.pdf

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In Furtherance to Emails Dated 18.02.2026 and 19.02.2026 (Unanswered "Except by NABL")

1 message

Sanjaya K. Mishra, Advocate <sanjayakmishra@gmail.com>

10 March 2026 at 09:10

To: seiaaodisha@gmail.com, info@nabl.qcin.org, rdser-cgwb@nic.in, nabet@qcin.org, ceo.nabet@qcin.org, kvijender.reddy@adityabirla.com

To:

1. **State Level Environment Impact Assessment Authority, Odisha**, 5RF-2/1, Acharya Vihar, Unit – IX, OPTCL Colony, Anand Bazar, Bhoi Nagar, Bhubaneswar, Odisha 751022 Email Id : seiaaodisha@gmail.com Telephone No. : 0674 3512840
2. **National Accreditation Board for Testing and Calibration Laboratories (NABL)**, J200, World Trade Centre, Nauroji Nagar, New Delhi, 110029 Talk to us: 011-40050500, 40032400 (30 Lines) Email: info@nabl.qcin.org, complaint@nabl.qcin.org Telephone No.: 18005693002
3. **National Accreditation Board for Education and Training (NABET)**, Quality Council of India, World Trade Centre, K 100, Block K, Nauroji Nagar, New Delhi – 110029 Tel: 011 – 42600800, Email: nabet@qcin.org, ceo.nabet@qcin.org
4. **Regional Director (South Eastern Region, Bhubaneswar), Central Ground Water Board**, South Eastern Region, Bhujal Bhawan, Khandagiri Chowk, Bhubaneswar - 751030 (Odisha) Email id: rdser-cgwb@nic.in Telephone No. 0-674-2350342
5. **UltraTech Cement Limited**, Ahura Centre, 1st Floor, 'A' Wing , Mahakali Caves Road, Andheri (E), Mumbai-400 093 Email id: kvijender.reddy@adityabirla.com Telephone No. 022-66917400

Subject: In Furtherance to Emails Dated 18.02.2026 and 19.02.2026 (Unanswered Except by NABL)

Sir/Madam,

This is in furtherance of my emails dated **18.02.2026 and 19.02.2026** regarding the **Environmental Clearance (EC)** bearing Identification No. **EC25B1103OR5398372N** dated **16.02.2026**, granted to **M/s UltraTech Cement Limited** for expansion of cement production capacity from 5.1 Million TPA to 8.1 Million TPA of the existing standalone grinding unit through installation of New Line-II (3.0 Million TPA) at Village Dhutra, PO Arda, Tehsil Kirmira, District Jharsuguda, Odisha.

Through the aforesaid emails, the concerned authorities were requested to **review the matter in light of the issues and submissions placed on record.**

It was also indicated that **additional points involving substantial questions relating to environmental protection, regulatory compliance, and the precautionary principle** may be raised. In this regard, it is pertinent to note that **several gaps and inconsistencies appear in the EIA Report prepared by the EIA consultant, J.M. EnviroNet Pvt. Ltd. (as available on the PARIVESH portal), including ToR-non-compliant baseline data.** Hence, it is necessary to also bring it to the attention of **National Accreditation Board for Education and Training (NABET).**

Further, as per Section 9.1(g) of the NABET Scheme Document, *"EIA reports prepared by accredited consultants must mention the total cost of the EIA and the cost of monitoring for baseline data in the beginning of the report in Chapter 1."* However, no such information has been provided by J.M. EnviroNet Pvt. Ltd. in the EIA Report in question. This constitutes concealment of material facts and information and requires action under Section 9.3 of the Scheme Document ("Suspension/Cancellation/Debarment of Accreditation") under the Scheme for Accreditation.

It is clarified that NABL need not respond to this communication, as it has already responded to the email dated 18.02.2026 and initiated action; however, no final decision has yet been taken.

The above is brought to the notice of the concerned authorities for appropriate consideration and necessary action. The undersigned reserves the right to raise additional grounds, pursue appropriate legal remedies, and, if necessary,

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prefer an appeal against the EC before the Hon'ble National Green Tribunal within the stipulated period under Section 16 of the National Green Tribunal Act, 2010.

Yours faithfully,

--

Sanjaya Kumar Mishra

Advocate | Environmental & Regulatory Law

Mobile No. 9310326647 | 9818326647

Odisha Communication: West Wing, 1st Floor, Priya Nilayam, Masjid Chowk, Tikrapara, Balangir 767001

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