

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

CHENNAI

O.A. No. 221 of 2015 (SZ)

Isanaka Vedavathi

... Applicant

Versus

Union of India
And others

... Respondents

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RESPONDENT TO THE ACTION TAKEN REPORT OF THE 4TH
RESPONDENT ALONG WITH ANNEXURES**

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Dated at Chennai this the 20th day of January, 2022.

C. Sathya

Counsel for 5th Respondent

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

SOUTHERN ZONE, CHENNAI

O.A. No.221 of 2015

Isanaka Vedavathi,
H. No. 16-4-966, Pinakini
Avenue, Near Apollo Hospital,
Nellore - 524003

S. No. 410/2022

VIJAY C. SHAH
NOTARY
GOVT. OF INDIA

8 JAN 2022

....Applicant

Versus

1. Union of India
(Represented by its Secretary),
Ministry of Environment, Forest
and Climate Change III Floor,
Prithivi Wing, Indira Paryavaran
Bhavan, Jor Bagh,
New Delhi-110 003

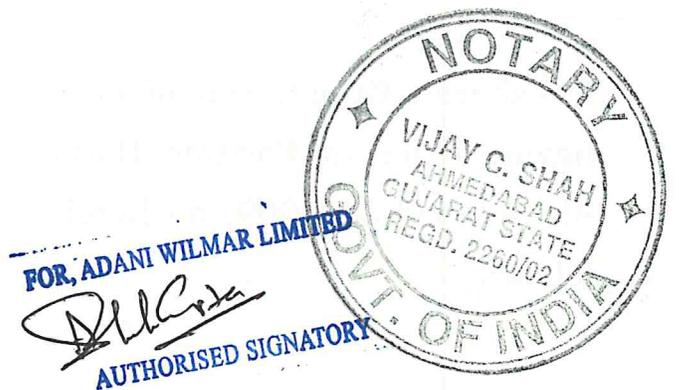
2. Andhra Pradesh Pollution
Control Board
(Represented by its Member
Secretary)
A-3, Parayavaran Bhavan,
Sanath Nagar, Industrial Estate,
Hyderabad,
Telangana State-500 018

3. The District Collector/ District
Executive Magistrate
Collectorate Buildings,
Nellore Town -524 002 SPS
Nellore District, Andhra Pradesh

4. Andhra Pradesh Pollution
Control Board(Represented by its
Regional Officer)
Regional Office, 1st Floor,
A.P.S.F.C Building, A.K. Nagar,
Nellore Town & District - 524
004, Andhra Pradesh

5. M/s. Adani Wilmar Limited
(Unit-I)
(Formerly M/s. Krishnapatnam
Oils & Fats Pvt. Ltd.),
Sy. No.292, 317, Pantapalem (V)
(Epur 1B), Muthukur (M), SPSR
Nellore Dist.,
Andhra Pradesh- 524 323

6. M/s. Saraiwwalaa AGRI



Refineries Ltd.
Pantapalem Village & Post (Via)
Niduguntapalem, Muthkur
Mandal, SPS Nellore
District, Andhra Pradesh- 524
323

7. M/s. Gemini Edibles & Fats
India Pvt Ltd.
Pantapalem Village & Post, (Via)
Niduguntapalem, Muthkur
Mandal, SPS Nellore District,
Andhra Pradesh- 524 323

8. M/s. South India Krishna Oil
& Fats (P) Ltd.
Pantapalem Village & Post, (Via)
Niduguntapalem, Muthkur
Mandal, SPS Nellore District,
Andhra Pradesh- 524 323

9. M/s. Emami Biotech Ltd
Pantapalem Village & Post (Via)
Niduguntapalem, Muthkur
Mandal, SPS Nellore District,
Andhra Pradesh- 524 323

11. M/s. 3F Industries Ltd
Pantapalem Village & Post, (Via)
Niduguntapalem Muthkur
Mandal, SPS
Nellore District,
Andhra Pradesh- 524 323

12. M/s. Adani Wilmar Limited -
(Unit-II) (Previously M/s. Louis
Dreyfus Commodities India Pvt.
Ltd.)
Sy. No.1601, Epuru Bit-1B,
APIIC, Pantapalem (V), Muthukur
(M), SPSR Nellore Dist
Andhra Pradesh- 524 323

...Respondents

REPLY AFFIDAVIT FILED ON BEHALF OF THE 5th RESPONDENT TO
THE ACTION TAKEN REPORT OF THE 4th RESPONDENT FILED BEFORE
THIS HON'BLE TRIBUNAL (DATED 13.12.2021)

I, Asheesh Gupta, son of Late Dr. M.L. Gupta, aged about 38 years,
having office at Fortune House, Near Navrangpura Railway Crossing,
Ahmedabad-380 009, do hereby solemnly affirm and sincerely state as
follows:

FOR ADANI WILMAR LIMITED
AUTHORISED SIGNATORY

FOR, ADANI WILMAR LIMITED
AUTHORISED SIGNATORY

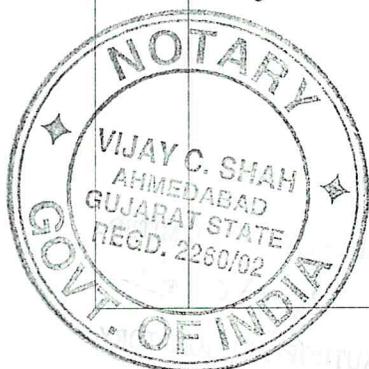


1. I am the Senior Manager, Legal of M/s. Adani Wilmar Ltd. (Unit-I), viz. the 5th Respondent herein. I am well acquainted with the facts and circumstances of the case and I am authorised to swear to this affidavit on behalf of the 4th Respondent by virtue of the Resolution of the Management Committee of the Board of Directors, dated 11.07.2018.

2. I respectfully state that the 4th Respondent has filed an Action Taken Report before this Hon'ble Tribunal (dated 13.12.2021), in the above Original Application and has stated therein that most of the directions have been complied with by the 5th Respondent.

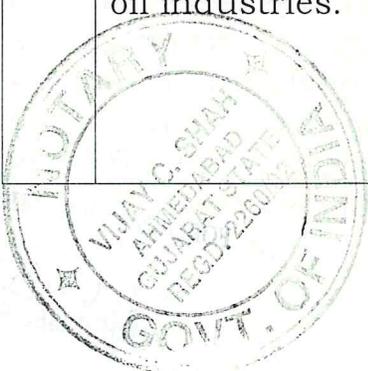
3. I humbly submit that for the remaining few allegations alone, I respectfully place the following objections for the kind consideration of this Hon'ble Tribunal. The Serial Nos. in parenthesis refer to the Serial Numbers in the table pertaining to the 5th Respondent as found in the aforementioned Action Taken Report (in pages 11, 12 & 13 therein):

Sl.	Direction in Action Taken Report	Compliance	5 th Respondent's response
1. (1)	The industry shall stop procurement of water from the outside agencies which was tapped in illegal manner. They shall meet water requirement from government authorized sources only.	Not complied. The industry is still procuring the water from the outside agencies which was tapped in illegal manner. The APPCB vide lr. dated. 18.11.2021 requested the Collector & District Magistrate, SPSR Nellore district to direct the concerned officials / Departments to stop illegal drawl of water from bore wells, who are supplying water to the edible oil industries in Muthukur Mandal, SPSR Nellore	The allegations are vague and without any basis. The 5 th Respondent is not involved in any procurement of water which is tapped in an illegal manner. Local villagers supply water at the doorstep of the factories (including the 5 th Respondent's factory) through water tankers. The industries have no mechanism to check and ensure the source. As acknowledged in the earlier reports, the industry is meeting its water requirements through water tankers provided by the villagers. APPCB has acknowledged in earlier reports that all

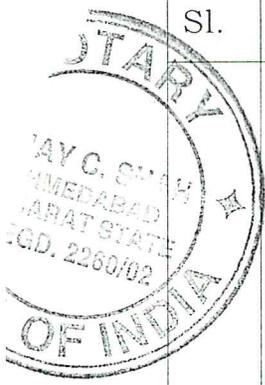


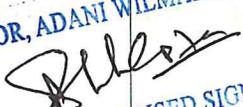
FOR ADANI WILMAR LIMITED
 [Signature]
 AUTHORISED SIGNATORY

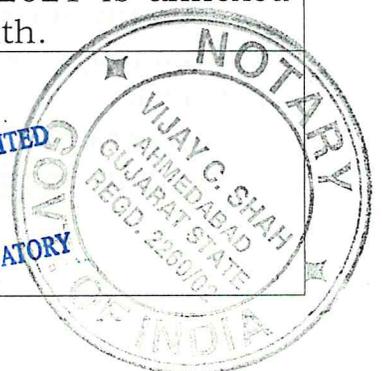
Sl.	Direction in Action Taken Report	Compliance	5 th Respondent's response
		<p>district to prevent ground water depletion in the area.</p> <p>The Collector & District Magistrate strictly directed to the Revenue and Panchayath-raj departments to take immediate action.</p> <p>Subsequently, the industries requested the Nellore Municipal Corporation to provide water. The edible oil industries association Vide Ir. Dated 07.12.2021 issued consent to the Corporation to prepare DPR for laying of pipeline for supply of water.</p>	<p>industries have been facing issues with sourcing of water.</p> <p>The 4th Respondent has the necessary permission from the Ground Water Department of the Government of A.P., vide Letter dated 23.01.2015 as has been stated earlier.</p> <p>All the industries are currently exploring possibilities for sourcing water through the Nellore Municipal Corporation and Sarvepalli reservoir by laying pipelines and are acting earnestly towards the same.</p> <p>(Copies of various letters are annexed herewith)</p>
2. (6)	<p>The industry shall provide online AAQ monitoring station to continuously monitor PM10, SO2 & other critical pollutants in the upward and cross wind directions at surrounding villages, in network with other edible oil industries.</p>	<p>Not complied.</p>	<p>This is a common point for all the industries and the Krishnapatnam Edible Oils Refiners' Association is working on it for proper closure. As far as the 5th Respondent is concerned, it has an online stack monitoring system for monitoring SPM. This has been raised for the very first time in the Action Taken Report. In the earlier reports filed by the Joint Committee and the APPCB, this point</p>



Sl.	Direction in Action Taken Report	Compliance	5 th Respondent's response
			<p>was never raised. In any case, the 5th Respondent would ensure continued compliance. In this regard, it is stated that all the industries have come together to install one common AAQ monitoring station at a common place designated by APPCB. The 5th Respondent will extend its full cooperation for commissioning the common AAQ monitoring station along with the other industries. A Letter of the Association in this regard is annexed herewith</p>
3. (10)	<p>The industry shall develop green belt all along the boundary and in vacant spaces and ensure that the 33% of total area is covered with green belt. In addition as part of CSR activity the units can take up compensatory green belt in public lands.</p>	<p>Not Complied. The industry is supposed to develop about 4.95 acres of green belt to achieve 33% of the total area. At present, the industry has developed green belt in an extent of about 4.0 acres.</p>	<p>This has been complied with and the same was communicated to the 4th respondent <i>vide</i> letter dated 30.12.2021 while enclosing photographs. The 4th Respondent had <i>inter alia</i> purchased 5.38 acres of adjacent land and developed an additional green belt. It has also been observing both World Environment Day and World Pollution Day and embarked on plantation drives. A copy of the letter dated 30.12.2021 is annexed herewith.</p>
4. (12)	<p>The industry shall ensure that the storm water drainage system as below:</p>		



FOR, ADANI WILMAR LIMITED

 AUTHORIZED SIGNATORY



Sl.	Direction in Action Taken Report	Compliance	5 th Respondent's response
	<p>i. Entire effluent, including floor washings, spillages etc. shall be sent to the ETP through permanent pipeline network laid above the ground level with appropriate colour coding.</p> <p>ii. The first flush of storm water for the first 15 minutes shall be collected and routed to the ETP. Implementation plan of action shall be furnished to the Board within 15 days.</p> <p>iii. There shall not be any entry of contaminated wastewater into the storm water drains.</p>	<p>i) Complied</p> <p>ii) The industry is routing the 1st flush of the storm water into the storm water drains and provided pumps in the storm water drain to transfer to the ETP.</p> <p>iii) The industry is maintaining dry condition in storm water drains during non-rainy days.</p>	<p>A water collection system and pumping to ETP has been put in place and implemented. The 4th respondent was addressed in this regard <i>vide</i> letter dated 19.10.2021 wherein photographs were also enclosed. A copy of the said letter is annexed hereto.</p> <p>The 5th Respondent is in compliance. During rainy days, the storm water drain carries only rainwater and contaminated waste water does not enter the storm water drain.</p>
5. (13)	The industry shall scrupulously comply with all other recommendations made by the Joint	Partially Complied. The industry complied with the issues pertaining to the individual industry but not yet	Joint and concerted action with the other industries is being taken by the 5 th Respondent. As far as Fly Ash is concerned a



FOR, ADANI WILMAR LIMITED

 AUTHORIZED SIGNATORY

Sl.	Direction in Action Taken Report	Compliance	5 th Respondent's response
	Committee in its reports dt: 01.12.2020 and 10.08.2021	complied with the directions pertaining to the all units such as raw water, clay / soil cover over the ash dumped in the vacant area, CAAQM station in the nearby village.	Purchase Order dated 22.11.2021 was placed by the Krishnapatnam Edible Oils Refiners' Association for filling of sand. The 5 th Respondent has also addressed the 4 th Respondent in this regard <i>vide</i> letter dated 23.11.2021. The work related to fly ash is almost completed. A letter by the Association confirming the same is enclosed herewith. A CAAQM station will be installed (common to all industries) at a place designated by APPCB. A letter confirming the same by the Association is enclosed herewith. The issue relating to water has already been dealt with <i>supra</i> .

4. I respectfully state that the 4th Respondent is filing annexures with these objections which may kindly be treated as part and parcel of these objections.

5. I humbly submit that all the earlier submissions of the 5th Respondent, including the objections of the 5th Respondent to the report dated 01.12.2020 of the Joint Committee, may kindly be considered and treated as part and parcel of this Reply Affidavit for the sake of better understanding of the facts and circumstances of the case and brevity.

6. It is hence respectfully submitted that the 5th Respondent is in compliance with the directions of the 4th respondent.

7. It is therefore respectfully prayed that the above objections of the 5th Respondent may kindly be accepted and this Hon'ble Tribunal may be

FOR, ADANI LIMITED

 AUTHORISED SIGNATORY

pleased to pass such further or other orders as deemed fit and proper in the nature and circumstances of the case and thus render justice.

Solemnly affirmed at]
Ahmedabadon this]
the 18th day of January]
2022 and signed his]
name in my presence.]



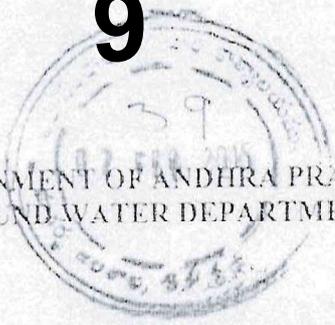
FOR, ADANI WILMAR LIMITED
[Signature]
AUTHORISED SIGNATORY

Before me.

Notary Public.



SOLEMNLY AFFIRMED
BEFORE ME
~ ~
VIJAY C. SHAH
NOTARY
GOVT. OF INDIA
[8 JAN 2022



GOVERNMENT OF ANDHRA PRADESH
GROUND WATER DEPARTMENT

Memo No:4318/Hg-II /2014.

Dated: 23.01.2015.

Sub:- Andhra Pradesh Ground Water Department – State Level Single Window Clearance Committee – M/s. Krishnapatnam Oils & Fats Pvt. Ltd., Pantapalem Village, Muthukur Mandal, SPSR Nellore District – Report approved – Communicated - Regarding.

Ref:- Lr.Rc.No.428/Hg/Single Window/2014, dated: 20.01.2015 of Deputy Director, Ground Water Department, SPSR Nellore.

Handwritten notes:
Refer
M. Comd to the
Party
2-2-14

@@@

Attention of the Deputy Director, Ground Water Department, Nellore is invited to the subject and reference cited, it is informed that the "Report on Groundwater Surveys conducted in the premises of "M/s. Krishnapatnam Oils & Fats Pvt. Ltd., Pantapalem Village, EPURU – 18, Muthukur Mandal, SPSR Nellore District" is approved

The firm is permitted to draw 264 kld of water from 3 filter points @ 8 hrs of pumping in a day.

The Deputy Director, Ground Water Department, Nellore is advised to communicate the same to firm along with terms and conditions under intimation to Commissioner of Industries and Head Office, Ground Water Department, Hyderabad.

Sd/- Dr.K.VENU GOPAL
DIRECTOR.

To
The Deputy Director, Ground Water Department, Nellore.
Copy submitted to Commissioner of Industries for Information.

///t.c.f.b.o///

9180 Kanna
SUPERINTENDENT

Handwritten signature

GOVERNMENT OF ANDHRA PRADESH
GROUND WATER DEPARTMENT

FROM

Sri. K.Ramesh Kumar, M.Sc.,
Deputy Director,
Ground Water Department,
Nellore.

TO

M/s.Krishnapatnam
Oils & Fats Pvt. Ltd.,
Pantapalem Village,
Muthukur Mandal,
SPSR Nellore Dist.

Lr. Rc. No. 428/Hg /Single window/2014, dt. 3-022015.

Sir,

Sub:-Ground Water Department, Nellore - Single Window programme –
Ground Water Investigations for M/s.Krishnapatnam Oils & Fats
Pvt. Ltd., Pantapalem Village, Muthukur Mandal, SPSR Nellore District
Detailed Ground Water Investigation Report – Furnished – Reg.

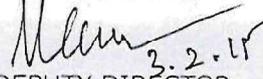
- Ref:- 1) Lr.No.12-3-10-Krishnapatnam-ID, dated 09-10-2014 of the
Commissioner of Industries, Government of Andhra Pradesh,
Chirag Ali Lane, Hyderabad.
2) Lr.Rc.No.428/Hg./Single window/2014, dt.20-01-2015 of the
Deputy Director, Ground Water Department, Nellore.
3) Memo.No.4318/Hg.II/2014, dt.23-01-2015 of the Director,
Ground Water Department, A.P., Hyderabad.

&&&

I am herewith furnishing the detailed report on Ground Water
surveys conducted under single window programme in the premises of
M/s.Krishnapatnam Oils & Fats Pvt. Ltd., Pantapalem Village, Epuru IB,
Muthukur Mandal, Sri Potti Sreeramulu Nellore District.

Encl:- Detailed Report with map.

Yours faithfully,


3.2.15
DEPUTY DIRECTOR

Copy Submitted to the Director, Ground Water Department, Andhra Pradesh,
Hyderabad for favour of information.

Copy to the General Manager, District Industries Centre, A.K Nagar, Nellore for
information

**REPORT ON GROUND WATER SURVEY CONDUCTED IN THE PREMISES OF
M/S KRISHNAPATNAM OILS AND FATS PRIVATE LIMITED , PANTAPALEM
VILLAGE, EPURU - 1B, MUTTUKUR MANDAL, SPSR NELLORE DISTRICT**

Introduction: At the instance of the Commissioner of Industries, Government of Andhrapradesh vide Lr.No. 12-3-10 krishnapatnam-1D dated 09-10-2014 the detailed ground water survey was conducted by the Ground Water Department, to delineate the ground water potential zones for drilling bore wells to meet the requirement of water 264 kilolitres per day for the M/s Krishnapatnam Oils & Fats Private Limited, Pantapalem village. Muttukur mandal, SPSR Nellore district the survey was carried out on 06-01-2015 under single window scheme.

Location: The investigated area with an extent of 10.52 acres bearing survey nos. 292 & 317 situated 1.5km south from the Pantapalem village. The surveyed area lies around the Geo co-ordinates $14^{\circ}15'26.2''$ North latitude and $80^{\circ}03'19.5''$ East longitude which are falls in the survey of India toposheet No. 66 B/3. Location in toposheet and layout map enclosed.

Physiography: The surveyed area is almost plain which lies on height of 5m above mean sea level. The general slope of the area is towards east.

Drainage: The area is having parallel drainage and it is drained by local streams which are joined to the Bay of Bengal. It is a command area through Pantapalem canal.

Climate and Rainfall: The area is under tropical climate conditions. The normal annual rainfall of the area is 1216mm. Most of the rainfall occurs during the

North-East monsoon. The maximum and minimum temperatures in the district are 45° and 18° respectively.

Hydrogeology: The investigated area is covered by coastal alluvium consisting of limited productive sand zone and followed by clay. The area is feasible for shallow Filter points. Many Filter point are functioning in the surrounding area one Single Filter point, one double Filter point and one Tri-filter point in premises of Factory are functioning successfully which are fitted with 3Hp mono block motors. The depth range of the existing Filter points is 8m to 10m. The depth to water level varies from 2 to 4m.bgl. Geophysical survey was not done because of sufficient vacant place is not available in the Factory premises.

Yield test was conducted to know the discharge of the existing Filter points. After calibration of yield test the Filter points discharges in the range from 10,000 to 12,000 LPH. One water sample was analyzed chemically in the laboratory. The PH of the sample is 7.34 , the Electrical conductivity 1,491 micro mhos and the total dissolved solids 1,044mg/litre resulted that the water is potable. The quality analysis data enclosed.

GEC Status:- The Pantapalem village, Muthukur mandal falls in the basin NLR-c-73 Muthukur. As per GEC 2008-09 calculations the stage of development of the basin is 51% and falls in safe category.

Conclusion and Recommendations: The hydrogeological conditions reveal that the area is covered by coastal alluvium consisting of limited productive sand zone followed by clay. It is a command area having good recharge conditions. During well inventory it is observed that the existing filter points in and around the industry area functioning with good yield.

Based on the integrated survey results, the existing 3 Filter points in the factory premises are recommended for exploitation of ground water to meet the requirement of water 264KL per day. Brake up of the yield from each Filter point is given below.

Yield per Day:

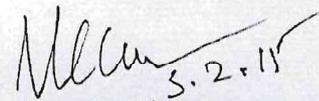
At Filter point no.1: 8,000lph X 8 hours = 64,000 LPD
(Single point)

At Filter point no.2: 11,000lph X 8 hours = 88,000 LPD
(Double point)

At Filter point no.3: 14,000lph X 8 hours = 1,12,000 LPD
(Triple point)

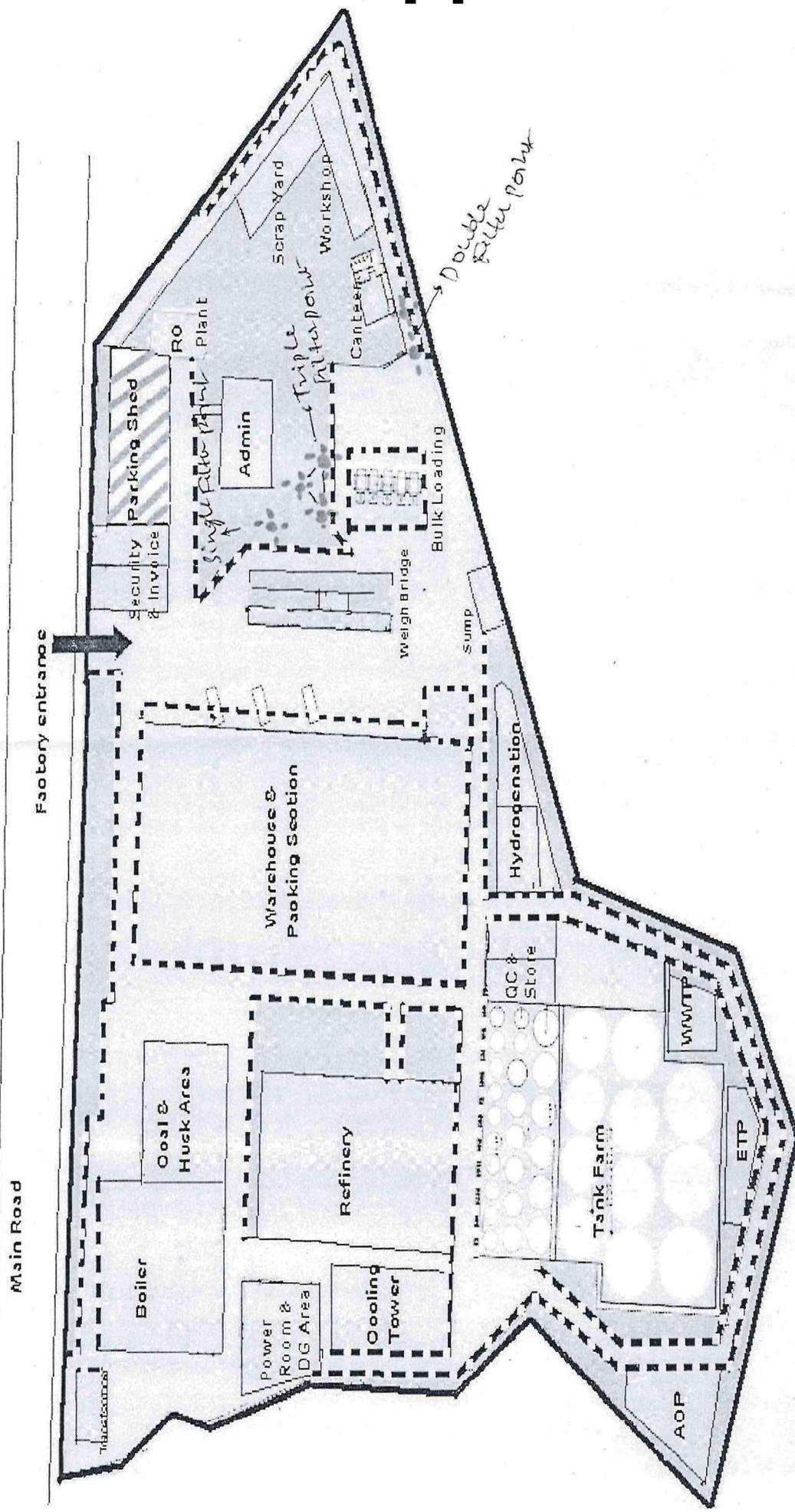
TOTAL -----
2,64,000 LPD

(Or) 264 KL/Day


3.2.15
Deputy Director

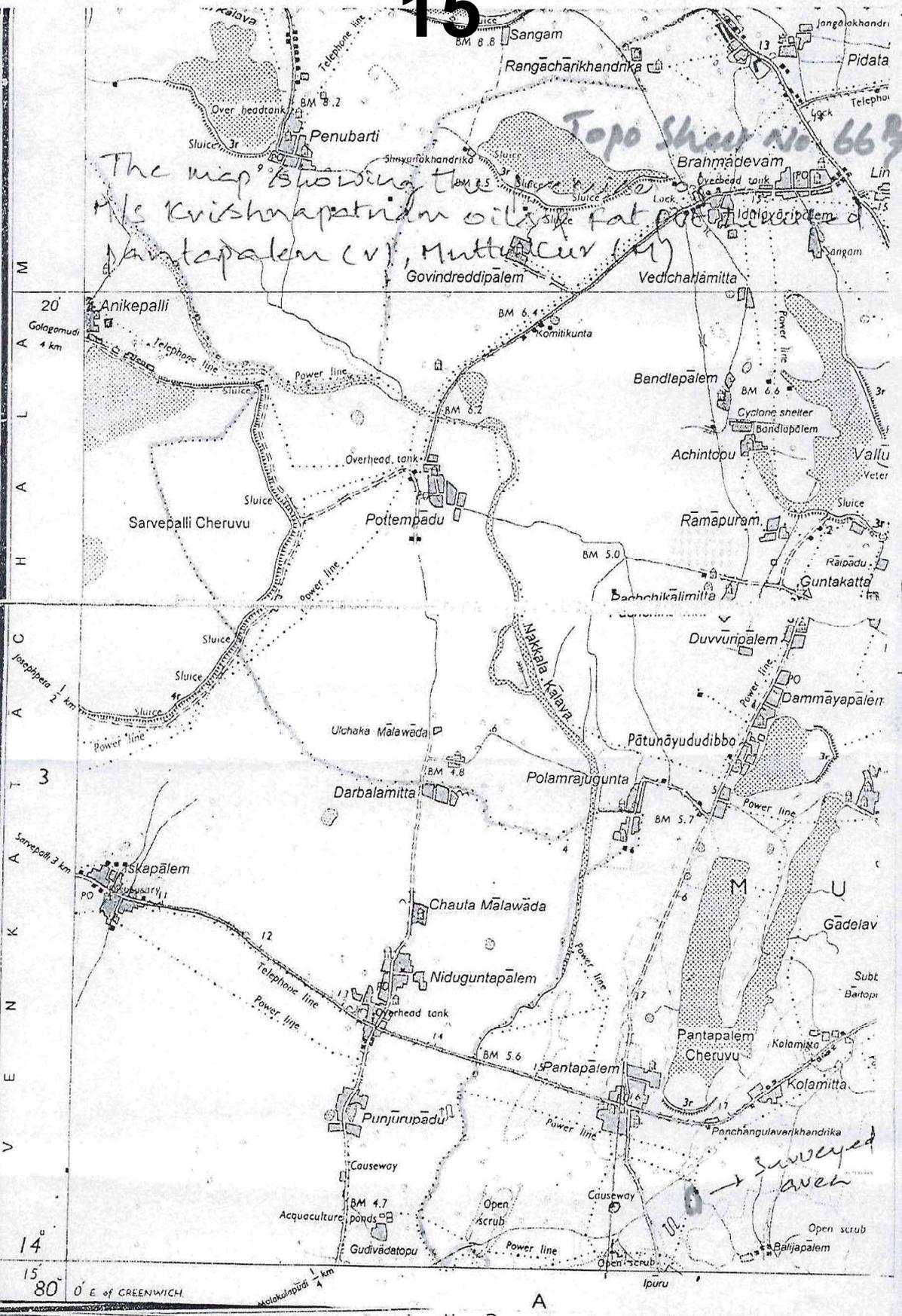
Ground Water Department
Nellore


3/2/15



Topo Sheet No 664

The map showing the
Ks Krishnapatnam oil & fat
plantations (V), Nutta Cur (V)





ANDHRA PRADESH POLLUTION CONTROL BOARD
Paryavarana Bhavan, A.P.C.B. E, Sanathnagar, Hyderabad-18.

Phone: 040 – 23887500
Fax: 040 – 23815631

Grams: “Kalushya Nivarana”
Website: www.appcb.ap.nic.in
e-mail: uh3_jcee@pcb.ap.gov.in

Lr. No.3/ APPCB/Legal/2015- 638.

Date: 14.09.2015.

To
The Secretary,
Department of Industries and Commerce,
Govt. of Andhra Pradesh,
A.P. Secretariat,
Hyderabad.

Sir,

Sub: Edible Oil Refineries located in Nellore District – Complaint received from the public on Environmental Problems – Providing of surface water– Requested – Reg.

Ref: Review meeting held with Managements of Edible Oil Refineries on 06.07.2015.

@@@

It is to inform that the Board has received several complaints from the local villagers on environmental problems due to operations of Edible Oil Refineries located in Muthukur Mandal of Nellore District. Officials of the Board have verified the complaints and observed that one of the major concern is usage of huge quantity of ground water by edible oil refineries.

Seven Edible Oil Refineries are operating in the area and new edible oil refineries also coming up in the area. These are large scale Edible Oil Port Based Refineries having capacity of around 1000 TPD. These refiners consume water in the range of 1000 to 1500 KLD by each refinery. At present these refineries are meeting water requirement from the ground water sources within outside the premises. Due to proximity to the coast, fresh water is available only at shallow depths in the area. Drawl of huge quantity of ground water by refineries is leading depletion of fresh water and also contamination of fresh water due to intrusion of saline water, supply of surface water and avoiding of usage of ground water is only way out for sustainable development of edible oil refineries in the area.

In view of the above, it is requested to arrange supply of surface water on cost basis to the edible oil refineries to over come sever environmental problems associate with present mode of usage of huge quantity of ground water by the refineries.

Encl: As above.

Yours faithfully,

MEMBER SECRETARY

Copy to the Vice Chairman and Managing Director, APIIC, Hyderabad for favour of information and necessary action.

Copy to the President, Krishnapatnam Edible Oil Refiners' Association, # 203, Diamond House Behind Topaz Building, Panjagutta, Hyderabad – 500082 for information and with a request to take up the issue with Authorities of the Government.

17

KRISHNAPTANAM EDIBLE OILS REFINER'S ASSOCIATION PANTAPALEM, KRISHNAPATNAM PORT

Date: 24th June 2016

To
The Honourable Collector,
Nellore,
SPSR Nellore Dist.



CE / TAP - P.P. process
SE / Irrigation
Jun 24/6

Respected Madam,

SUB: TO DRAW WATER FROM SURVEPALLI RESERVOIR THROUGH PIPE LINE.

REG: Memo No : CE/TGS/TS/T4/Irrigation/water supply of oil Refineries , Date:16.04.2016.

Krishnapatnam Edible Oils Refiners' Association would like to thank you for your kind support towards sanctioning of the water from Survepalli reservoir for the Industrial consumption. The quantities confirmed initially to draw water of 7.65MLD through road tankers temporarily to meet the immediate requirement and later on to draw 12.650MLD through pipe line with prior approval.

This is really going to help all the industries operating in the port area to sustain against all the odds relating to water for industrial usage.

After reviewing thoroughly and as per the opinions of local authorities it will be a difficult task and a cumbersome operation for drawing the water through road tankers due to the local problems, as well as the approach road towards the reservoir is slender and congested as it is only murrum road developed on the bund of the canal.

Due to all these problems we now strongly apprehend and propose to draw water through pipe line rather than road tankers, therefore we are putting forward our proposal for laying the pipe line and submitting the detailed project report, which was already got it prepared by a private agency for your kind perusal

Kindly request you permit us to draw water through pipeline and to develop the necessary infrastructure as per the detailed survey report enclosed. We solicit your kind cooperation and help for giving your consent approval for going ahead and to approach other departments for laying the pipe line.

Thanking You,
Yours Faithfully

P. Civan

Office of the Chief Engineer,
NTRTGP: Tirupati

Proceedings No.CE/TGP/TPT/DW/EE1/DEE1/AEE2/Industrial Water- M/s Adani Wilmar limited (formerly Krishnapatnam Oils & Fats Pvt Limited)/172 /Dt:28.02.2019

Present: Sri. R. Muralinatha Reddy., M.Tech.
Chief Engineer,
NTRTGP: Tirupati

Sub:-Water resources Department- Single Desk Policy- M/s Adani wilmar limited(formerly Krishnapatnam Oils & Fats Pvt Limited), Pantapalem Village, SPSR Nellore District- Establishing a new factory for manufacturing Distilled fatty Acuds & Bakery fat - Allocation of 264 KLD (3.400 Mcft/year) of water from Survepalli Reservoir for industrial Purpose- Permission Accorded-Communication- Regarding.

- Ref: - 1. Govt.Memo.No.2772/Reforms/A2/2015-1, dt-30.09.2015.
2. G.O.Ms.No.116, Industries and Commerce (P&I) Department, dtd:-31.08.2017.
- 3.ENC(I)/WRD/VJD Lr.No.ENC(I)/EE/DEE1/AEE2/IWS(NATEMS SUGAR Pvt Ltd)
Dt:-17.07.2018.
- 4.ENC(I),WRD,VJD, Lr.No:ENC(I) /EE/ DEE1/ AEE2/ IWS(Adani Wilmar ltd) dt:- 12.02.2019 communicated vide T/O Endt.No.SE(D&QC)/TGP/TPT/DW/ EE1/ DEE1/ AEE2/ Industrial Water Supply/ M/s Adani wilmar limited(formerly Krishnapatnam Oils & Fats Pvt Limited) /126/ Dt:-15.02.2019.
5. SE/IC/NLR,Lr.No.50^{CETGP}, Dt: 26.02.2019.

Considering the request of the M/s Adani wilmar limited(formerly Krishnapatnam Oils & Fats Pvt Limited), Pantapalem Village, SPSR Nellore District for Establishing a new factory vide reference 4th cited and based on Govt. Memo.No.2772/Reforms/A2/2015, dt-30.09.2015, permission is hereby accorded to draw water to a maximum of 264 KLD or 3.400 Mcft per year from Survepalli reservoir. The agency shall make their own arrangement for drawl and storage of 3.400 Mcft of water since water releases may not be available throughout the year.

This water allocation is accorded subject to proportional share of availability of water and releases in to Survepalli Reservoir. Measuring arrangements, cost of construction of OT sluice, pipe lines, Storage arrangements etc., if any, shall be born by the establishing authority itself. Release of water would be done only after fulfilling all the conditions stipulated while giving allocation and a proper agreement is entered between the industry and Water Resources Department for O & M as well as realization of royalty from the industry. The water royalty charges shall be levied @ Rs.5.50 per 1000 Gallons or at the rates prescribed by the Government from time to time.

To

M/s Adani wilmar limited (formerly Krishnapatnam Oils & Fats Pvt Limited),
Pantapalem Village,
SPSR Nellore District.

Sd/-(Dt:-28.02.2019)
Chief engineer,
NTR TGP: Tirupati.

//t c f//

Executive Engineer (Designs)

O/o Chief Engineer

28/2/19 NTR TGP: Tirupati.

NELLORE MUNICIPAL CORPORATION

From
Sri.K.Dinesh Kumar,I.A.S,
Commissioner
Municipal Corporation,
Nellore.

To
The General Manager,
Aadaani Willmar Unit - I,
Muthukur,
SPSR Nellore District.

Roc No: 54-4/MAE/NMC/2020-21 Dt: .07.2021

Sub: Nellore Municipal Corporation – Water Supply – Permission to obtain potable water from Sundaraiah Colony ELSR through tankers – Accorded – Regarding.

Ref: Review meeting held in the chambers of Commissioner, Nellore Municipal Corporation on 29.01.2021

@@@@@

It is to inform that, during the review meeting held in the reference cited, you have requested this office to provide potable water for operating the refineries, for running boilers, cooling the towers top-up, gardening and drinking purposes of your industry located in Pantapalem Panchayathy.

This office after comprehensive study accepted in principle to provide the water as required and in compliance with the rates stipulated in the by-laws of Nellore Municipal Corporation and on par with the G.O.MS.No: 159 Dt: 17.05.2018 by MA&UD department i.e Rs.60/- per Kilo Litre.

During the review meeting, the group of companies situated in Pantapalem Panchayathy have agreed to bare the cost for laying of pipe line from the existing source under the supervision of Nellore Municipal Corporation authorities.

Since, the laying of pipeline will take time, permission is here by accorded to draw the required water from Sundaraiah Colony ELSR, which shall be transported to the end point by making your own filling and transportation arrangements. The concerned parties shall ensure that the premises is maintained upto the satisfaction of Nellore Municipal Corporation. Nellore Municipal Corporation reserves the right to revoke the permission to supply of water. The concerned companies shall pay advance for 30 days, only after settling for 30 days, NMC provides water for the next period.

Your's Faithfully,

Commissioner

Nellore Municipal Corporation

Signed by Kothamasu
Dinesh Kumar I A S
Date: 23-07-2021 12:40:06
Reason: Approved

adani
wilmar

To,
The Environmental Engineer,
A.P. Pollution Control Board, Regional Office,
A. P. Pollution Control Board,
1st Floor, A P S F C Building,
A K Nagar Nellore – 524 004

19th October, 2021

Respected Sir,

Subject: Submission of action plan for storm water first 15 minutes collected and routed to ETP.

Reference: 1. Order No. 149/APPCB/UH-II/TF/NLR/2018 dated 23/09/2021, a copy of which was received by email on 29/09/2021.
2. Our reply letter dated 12th October 2021

With reference to the above your Office Direction 12 (ii) for first flush of storm water for the first 15 minutes collected and routed to ETP. We have arranged water collection system and pump to ETP, submitting herewith photographs of the storm water collection pumps.

Thank you,
Sincerely,
For Adani Wilmar Limited (Unit-I)

10/10/21
Authorized Signatory



Adani Wilmar Ltd
Survey No 292 & 317
Village Pantapalem (Epuru1B)
Sripottisriramulu, Nellore 524 323
Andhra Pradesh, India
CIN: U15146GJ1999PLC035320

Tel +91 88860 60270/271
Fax +91 40 6666 1850
www.adaniwilmar.com



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TO ETP







To,
The Environmental Engineer,
A.P. Pollution Control Board, Regional Office,
A. P. Pollution Control Board,
1st Floor, A P S F C Building,
A K Nagar Nellore – 524 004

23rd November, 2021

Respected Sir,

Subject: Submission of details of Purchase Order for compact the fly ash with clay / soil .

Reference: 1. Order No. 149/APPCB/UH-II/TF/NLR/2018 dated 23/09/2021, a copy of which was received by email on 29/09/2021.
2. Our reply letter dated 12th October 2021.

With reference to the above your Office Directions, Sl.No. 8; “All the 7 no’s of edible oil industries directed to jointly compact the fly ash and to cover with minimum 10 cm clay / soil cover, North side of M/s.Emami Agrotech Limited”. We, Krishnapatnam Edible Oils Refiners ‘Association has given Purchase Order dated 22/11/2021 to Mr Isanaka Ravinder Reddy for filling of Sand/GSB of said land.

Attached Purchase Order copy for your reference

Thank you,
Sincerely,
For Adani Wilmar Limited (Unit-I & II)

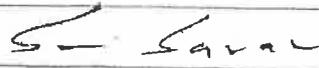
Authorised Signatory



Krishnapatnam Edible Oils Refiners' Association

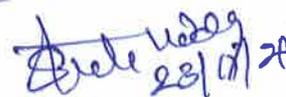
203, Diamond House, Behind Topaz Building, Panjagutta, I-Hyderabad - 500082, Telangana

(Regn. No. 1020 / 2014)

PURCHASE ORDER					
Vendor:			Order NO		
I Ravindra Reddy			Date		22/11/2021
Epuru Balijapalem, Epuru (post)			Your Ref		12.11.2021
Muthukuru Mandal, SPSR Nellore Dist.,			Project		Krishnapatnam project
Andhra Pradesh					
Mobile No: 9000387388					
GST NO					
Bill TO			Shipped to		
EPURU 1B			EPURU 1B		
Pantapalem Village, Muthukuru Mandal, SPSR Nellore Dist.,			Pantapalem Village, Muthukuru Mandal, SPSR Nellore Dist.,		
Andhra Pradesh			Andhra Pradesh		
Sr. NO	Description	Unit	Qty	Rate	Value Rs.
1.	Filling of Sand/GSB with 100 MM thickness uniformly, watering rolling with vibramax roller approx. 10 Acres Land.	CUM	4100	865	3546500
			GST	18%	638370
			Transportation		Including
Amount In Words	Forty one lakhs eighty four and eight hundred seventy rupees		Total Amount		4184870
Terms and Conditions					
1	Please return a copy of PO signed as acceptance.	4.	Vendor shall submit APPCB certification (NOC) before last payment. Work must be completed before 28/2/2022. If any delay, Association can recover 10% each for each week delay from target date.		
2	Safety of the people should be your Scope	5	Payment Terms: 25 % Advance, 25% after completion of 50 % work, 25% after completion of 75% work 25 % after NOC from the APPCB Officials.		
3	Quality of the Sand/GSB filled should be certified by Association committee members.	6	Any dispute arising from the above transaction shall be a subject matter of the courts of Nellore		
For Krishnapatnam Edible Oil Refiners Association			Vendors Acceptance		
					
Authorised Signatory			Authorised Signatory		

Accepted

Received above copy


28/11/21

(I. RAVINDRA REDDY)

KRISHNAPATNAM EDIBLE OILS REFINERS' ASSOCIATION

203, Diamond House, Behind Topaz Building, Panjagutta, Hyderabad – 500 082, Telangana

Regn. No. 1020/2014

To
The Superintending Engineer,
Rural Water Supply and Sanitation Department,
Nellore.

Date: 06-12-2021

Dear Sir

Sub: Distribution of Water from Survepalli Reservoir through your infrastructure for Industrial Purpose - Seeking support to transfer the same from Survepalli Reservoir – Reg.

With reference to the above we bring to your notice that this **KRISHNAPATNAM EDIBLE OILS REFINERS' ASSOCIATION** formed in the year 2015 with membership of Seven Edible Oil Refineries located in the same cluster and in the same business line and some more to be established.

With reference to the above cited subject, we bring you the following:

All these industries have started their operations somewhere in between 2011-12. And as per Industrial Investment Promotion Policy 2005-10 – Andhra Pradesh – Pipe Line Scheme the Government assured Infrastructure like roads, power and water at the door step of the industry, but could not materialized so far.

All the Industries got approval for drawing ground water through borewells from the AP Ground Water but the plants are in the coastal area close to the sea the ground water is completely saline, and the industry can only draw the shallow water from the upper level of ground which is not sufficient.

And later on the Government has allocated permission to draw water from Survepally reservoir which is ten to 14 kilo meters away from the industries. Efforts are on to draw water jointly by all the Edible Oil Industries through a common pipeline. All the Industries for the time being are procuring water through tanker Lorries. Now the District Administration and APPCB is directing us, not to procure the water locally.

KRISHNAPATNAM EDIBLE OILS REFINERS' ASSOCIATION**# 203, Diamond House, Behind Topaz Building, Panjagutta, Hyderabad – 500 082, Telangana****Regn. No. 1020/2014**

There are around eight industries of the same line of manufacturing (Edible Oil Refineries) located at the same location, all industries are facing the same concern and all industries got their allocation of water from the NTRTGP, Tirupathi. We all prepared to bear the total cost involved in preparation of DPR and laying the pipeline to all the industries from your existing set up (Survepalli reservoir).

Since laying of pipe line may take some time, in the meantime, we would like to draw water from your existing infrastructure as per allocation through water tankers for the time being until the pipe line is materialised. We are ready to pay water charges for the estimated quantity in advance as fixed by the Department. We can be part to bear the cost involved in preparation of DPR maintenance of Pump House & infrastructure and laying the pipeline to all the industries.

Hence, we are hereby sincerely requesting you to please transfer the water allocated in our account from Survepally Reservoir as per allocation through water tankers and address our concern at the earliest for which the act of yourself is highly helpful to all industries located in this cluster.

Thanking you.

For Krishnapatnam Edible Oil Refiners Association



Authorised Signatory

c.c to Executive Engineer, RWS, Nellore Division, SPSR Nellore Dist.

Deputy Engineer, RWS, Nellore Division, SPSR Nellore Dist.

S No	Name of the Factory	Water allotment date from Chief Engineer - NTR - TGP	Actual Quantity of Allocation KLD
1	Adani Wilmar Limited Unit 1	28.02.2019	264
2	Adani Wilmar Limited Unit 2	20.03.2019	550
3	EMAMI AGROTECH LIMITED	30.01.2019	400
4	3F Industries Limited	01.04.2019	1500
5	Santhoshimathaa Oils & Fats Pvt Ltd	22.03.2019	151
6	South India Krishna Oils & Fats Pvt Ltd	11.02.2019	520
7	Gemini Edibles & Fats India Ltd	30.01.2019	621

Krishnapatnam Edible Oils Refiners' Association

203, Diamond House, Behind Topaz Building, Panjagutta, I-Hyderabad - 500082, Telangana

(Regn. No. 1020 / 2014)

To,

Date: 07-12-2021

The Municipal Commissioner
SPSR Nellore

Sub: Consent to draw Water from Nellore Municipal Corporation through pipeline for industrial purpose for edible oil refineries and request for initiation of DPR

Dear Sir,

We are the refiners of edible oils at Krishnapatnam port. The edible oil refining industry has developed here since the year 2010 onwards. There are seven refineries operating at Krishnapatnam port. We import crude edible oils at Krishnapatnam port, refine the oil and sell it in packaged or in bulk form, largely across the Southern and Eastern part of India.

To attract industry to set up in the state of Andhra Pradesh, the Andhra Pradesh Industrial Investment Promotion Policy 2010 – 2015, as issued by the Industries and Commerce department had committed delivery of water at the doorstep of the industry. The existing edible oil refineries at Krishnapatnam were all set up under this policy. However, this promise of water delivery at the doorstep of industry has not materialized. Now that our industries have been set up, we are having to fend for ourselves to source water, an essential item to run our industry. For operating our refineries, we require water for running boilers, cooling towers, gardening and drinking purpose.

The Ground Water Department of Andhra Pradesh has periodically given consent to dig borewells in our premises and we ran our units using water from those borewells. Over time as the refineries have expanded and water requirements have increased, with no source of water from the Government, the refineries have been purchasing water from outside vendors.

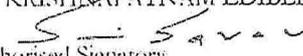
As directed by the District Collector and your recent past discussions we are all interested to take Water from Nellore Municipality through Pipe Line by keeping view of long-term industry interest. Our water requirement will be approx. 6000 KL/Day presently and in future it may go to 8000 to 9000 KL /Day as few more new units are coming up at Krishnapatnam.

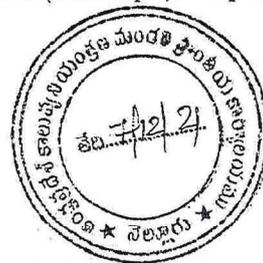
Requesting your good self to kindly treat this as our consent and arrange for a DPR (Detailed project Report) for pipeline laying from Nellore corporation to Edible oil cluster.

Thanking you.

Yours faithfully.

For KRISHNAPATNAM EDIBLE OILS REFINERS' ASSOCIATION


Authorised Signatory



List of operating Edible Oil refineries in Krishnapatnam:

1. South India Krishna Oil and Fats Pvt. Ltd.
2. Finami Agrotech Ltd.
3. Gemini Edibles and Fats Ltd.
4. Adani Wilmar Ltd. (Unit -1)
5. Adani Wilmar Ltd. (Unit -2)
6. 3F Industries Ltd.
7. Santoshimathaa Edible Oil Refinery Pvt. Ltd.



Submitting copy to CC, Nellore, 20, Nellore.

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Krishnapatnam Edible Oils Refiners' Association

203, Diamond House, Behind Topaz Building, Panjagutta, I-Hyderabad - 500082, Telangana

(Regn. No. 1020 / 2014)

14th December 2021

**The District Collector and Magistrate
SPSR Nellore District**

Dear Sir

Sub: Consent to draw water from Nellore Municipal Corporation

**Ref: Memorandum vide ROC No.3656/2021-A6 Dated 20-1102021 from Panchayat Officer,
Muthukur Mandal, SPSR Nellore District**

As directed by your good selves, we have submitted our willingness letter through our edible oil association to the Nellore Municipal Commissioner on 7th Dec 2021 to draw water through the pipeline.

Further, we have also requested NMC to provide the DPR (detailed project report) for laying of pipeline from the nearest point to the edible oil cluster.

In view of the above we humbly request you to allow us to maintain a status quo to draw water till the DPR is made and complete infrastructure is ready.

Thank You.

Yours Sincerely

For KRISHNAPATNAM EDIBLE OILS REFINERS'S ASSOCIATION

Authorised Signatory



**adani
wilmar**

ADANI KP/APPCB/2021 - 22

30th December 2021

To
The Environmental Engineer,
AP Pollution Control Board,
Regional Office, 1st Floor, APSF Building,
A K Nagar, SPSR Nellore District,
Nellore - 542 004

Dear Sir,

Sub: Submission of Compliances on Greenbelt.

With refarence to the above we are here with sumitting compliances on Green belt developed and maintaining at our plant and besede the land of our Plant.

Our plant is constructed in 10.52 acres and developed 4.00 acres greenbelt and maintaining greenery. Also we have purchased 5.38 Acres land Adjucnt to our Plant, we have done plantation, developing green belt in the same vecant land.

We have been observing World environmental day 5th June every year and doing plantation drive. Also done plantion on World Pulution day 2nd December 2021.

We here with enclosed photographs of the greenbelt developed

Thank you
Yours sincerely.

For ADANI WILMAR LIMITED(UNIT-1)

AUTHORISED SIGNATORY



Adani Wilmar Ltd
Survey No 292 & 317
Village Pantapalem (Epuru1B)
Sri Potti Sri Ramulu, Nellore 524 323
Andhra Pradesh, India
CIN: U15146GJ1999PLC035320

Tel +91 88860 60270/271
Fax +91 40 6666 1850
info@adaniwilmar.in
www.adaniwilmar.com

Plantation drive on World Environmental Day 5th June 2021





35 Plantation works at our beside Land







38 Green belt at beside Land Area









Krishnapatnam Edible Oils Refiners' Association

203, Diamond House, Behind Topaz Building, Panjagutta, I-Hyderabad - 500082, Telangana

(Regn. No. 1020 / 2014)

18th January 2022

For the kind attention of NGT Committee

Dear Sirs,

Sub: Status report about mitigation measures undertaken

This is with regards to ongoing discussion with NGT team. We wish to update the status about actions undertaken by edible oil refineries at Krishnapatnam to protect the local environment.

It may kindly be noted that following actions have been taken on war-footing and are in line with suggestions made by NGT team. We hope that following actions will be an important intervention to protect the environment by edible oil refiners at Krishnapatnam.

Water Issue

We are actively perusing following options as suggested by authorities

- We have already applied for Municipal corporation water supply. Recently we all have given our consent to NMC to proceed with preparation of pipeline DPR. We are waiting for the same from their end. We attach herewith the letter sent to NMC and collector to help us in this regard.
- Parallely, we have approached authorities for supply of water from Sarvepalli reservoir. Upon enquiry, we have been given to understand that some of the approvals from government authorities are yet to be completed and are being taken up. Pending such approval, it may not be possible to give firm completion dates. We need help from APPCB for said clearances.

Ash land filling

Refineries Association has taken up this job collectively and almost 80 % work also completed. Recently, NGT committee had visited the site and expressed their satisfaction also. Remaining work also will be completed by 28/2/2022

Road Matter

Emami Agrotech and Adani Wilmar have jointly repaired this road by spending substantial amount. Recent esteemed committee also seen the road condition and have expressed their satisfaction. Simultaneously, refineries are putting all efforts to make a permanent road with the help of District Administration by clearing private parties' objections.

Real Time Monitoring through AAQ Meter

We collectively have already purchased this equipment and have decided to install at Pantapalem by 28/2/2022.

We trust that above measures are in line with what has been discussed and suggested by NGT team.

Thank you.

Yours truly



(Authorised Signatory)

For Krishnapatnam Edible Oil Refiners Association

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

CHENNAI

O.A. No. 221 of 2015 (SZ)

Isanaka Vedavathi

... Applicant

Versus

Union of India

And others

... Respondents

**REPLY AFFIDAVIT FILED ON
BEHALF OF THE 5TH
RESPONDENT TO THE ACTION
TAKEN REPORT OF THE 4TH
RESPONDENT ALONG WITH
ANNEXURES**

M/s. C. Seethapathy (1237/94),
A. Umasankar (311/98),
Gautam S.Raman (1583/13),

**COUNSEL FOR 5TH
RESPONDENT**

98408 85752

seethapathychellam@gmail.com