

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

OA. NO. 20 of 2016 (SZ)

IN THE MATTER

BETWEEN

1. Santo P.L., aged 44 Years,
S/o. P.D. Lois,
Pellishery House, Thaikkattusherry P.O., Edaknni,
Ollur, Thrissur - 680306
2. UnniKrishnan, aged 70 Years,
S/o. Karthiyayani Amma,
Ottapath House, Ollur P.O., Edakkunni, Thrissur - 680306.
3. Joy P.G., Aged About 45 Years,
S/o. P.A. George,
Perincheri House, Edakunni,
Ollur, Thrissur - 680306
4. K.C. Narayanankutty, aged 72 Years, S/o. Ammu Amma,
Chittatti House, Thaikkattusherry P.O., Edakunni.,
Ollur, Thrissur - 680306
5. Bharathi aged 58 Years, D/o. Late Narayanan Nair,
Ottapath Hose, Thaikkattusherry P.O., Edakunni,

For HONEST ELECTRO COLLECTORS


Proprietor

Ollur, Thrissur - 680306

6. Kenchana Vijayan , aged 60 Years , D/o. Late Velayudhan,
Vadikkeveetti House, Thaikkattusherry P.O., Edakunni, Ollur,
Thrissur - 680 306.

... Applicants

AND

1. The State of Kerala represented by the Chief Secretary,
Government Secretariat,
Thiruvananthapuram - 695001.
2. Kerala State Pollution Control Board,
Represented by its Member Secretary,
Pattom P.O., Thiruvananthapuram - 695004
3. The Chairman,
Kerala State Pollution Control Board,
Pattom P.O., Thiruvananthapuram, Kerala - 695 004.
4. The Environmental Engineer,
District Office, Kerala State Pollution Control Board,
Kovilakathumpadom, Chembukkavu, Thrissur - 680005
5. The District Collector,
Civil Station, Thrissur

For HONEST ELECTRO COLOURING


Proprietor

6. Thrissur Municipal Corporation, Thrissur.
represented by its secretary.

7. M/s. Bee Pee Gold Imitations,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri. Joby AP.

8. M/s. Indu Ornaments,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Smt. Usha Sasi

9. M/s. Mini Job Works,
XI/840/1, Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Smt. Mini Sjan.

10. M/s. Renu Gold Covering,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri. Renson C.R.

11. M/s. Dot Engineers, Major Industrial Estate,
Ollur, Thrissur - 680306
Represented by its Proprietor Sr. M.J. Melvin

12. M/ s. Rajesh Kumar Electroplating,
Major Industrial Estate,
Ollur, Thrissur - 680306
Represented by its Proprietor Sri. KG. Karuppu Swami

13. Golden View Plating,
Major Industrial Estate,
Ollur, Thrissur - 680306
Represented by its Proprietor Smt. Shiji Geevar
14. M/S. Two Stars Designs Gold Covering,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri. P.V. Sunil
15. M/s. Pee Gee Gold Covering,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri. Paulson P.G.
16. M/s. St. Joseph Engineering and Gold Works,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri. Paul Vazhakkala.
17. M/s. Anna Plastics Electroplating Works,
Major Industrial Estate, Ollur , Thrissur - 680306
Represented by its Proprietor Sri. Benny
18. M/s. Dash Machinerles,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri. M.J. Obrin
19. M/s. Pradeeksha Aluminum Polishing Electro Coloring Unit,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri. Joby Francis

20. M/s. St. Joseph Colour Coats,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri.Niju Jose
21. M/s. United Aluminium Company,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri PV. Sathyan
22. M/s. Honest Electro Colouring,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri Anto Rappai.
23. M/s. Three Star Electroplating,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri I.J. Raphy
24. M/s. Bright & Company,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri T.A. Davi
25. M/s. Bright Procured System,
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri T.A. Davi.
26. M/s. Bright Procured System No.2
Major Industrial Estate, Ollur, Thrissur - 680306
Represented by its Proprietor Sri T.A. George.

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Respondents

COMMON OBJECTIONS FILED BY
THE RESPONDENT NOS. 7 TO 15, 22 AND 23

The Respondent Nos.7 to 15, 22 and 23 beg to submit as follows:

1. That the present Original Application has been filed by the Applicants for the following reliefs:

"A. Direct the Respondents Nos. 1 to 6 to take effective and immediate steps to close down the industrial units of the respondents No. 7 to 26 in Major Industrial Estate in Ollur.

B. Direct the Respondents No. 1 to 6 that no industrial units of the respondents No. 7 to 26 or any other similar unit for electroplating, anodizing or powder coating shall be permitted in major industrial estate in Ollur, until a proper Common Effluent Treatment Plant is established.

C. Direct the respondents No.1 to 5 to make Respondents No.7 to 26 to take effective steps to restore the quality of the water and environment around Major Industrial Estate in Ollur.

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D. Direct the respondents No.5 and 6 to provide 800 litres of clean and sufficient drinking water to each of the applicants with immediate effect, until the quality of water in the wells is restored.

E. Direct the 2nd respondent to take immediate and appropriate action against the PCB officials concerned for failing to comply with the directions in Annexure A38(a) with regard to the pollution caused by the respondents No.7 to 26.

F. Issue a direction or order directing the respondents No.7 to 26 to pay a compensation of Rs.2,00,000/- (Rupees two lakh only) to each of the applicants.

G. Pass such any other order, direction or reliefs as this Hon'ble Tribunal may deem fit in the interest of justice, equity and good conscience."

2. That these Respondents and the Official Respondents have filed their Respective Reply Statements / Reports before this Hon'ble Tribunal, along with supporting documents, which may be treated as part and parcel of the present objections.

3. That the Respondents are Electro-Plating units and the micro scale enterprises covered under the Micro, Small and Medium Enterprises Development Act, 2006 (MSMED, Act 2006) and established in the year between 2008 to 2012, at Ollur industrial estate, and had obtained all the requisite approvals, licenses and permissions

to operate the unit, from the statutory authorities without any default till date.

4. That the respondents are law abiding citizens with a bonafide intention of running the said unit in compliance with all applicable legal and regulatory requirements. Further, the units are aware of its responsibilities towards maintaining a pollution free environment.

5. That the Respondents units have taken all precautionary measures as mandated under the Environment (Protection) Act 1986 and also under the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981, to dispose the trade effluent which is being generated everyday.

6. That the Respondents units has installed adequate safety measures in the units including Effluent Treatment Plant (ETP) with prior Consent of the KSPCB, and is compliant with all the requisite pollution control measures and has not caused any pollution or environmental damage till date.

7. That in the meantime, a complaint dated 16.07.2012, regarding pollution of water in the wells in the Ollur industrial estate, pursuant to which, an enquiry was conducted on all the units located therein, by the District Collector (District Magistrate) on 23.07.2012.

8. That the District Magistrate constituted a subcommittee on 26.04.2013 consisting of a Councillor, Thrissur Corporation, Environmental Engineer, KSPCB, Technical Assistant, Office of DMO,

Junior Health Inspector, Thrissur Corporation, two representatives from Poura Samithi and two representatives of Industrial Association. Subsequently, a stop memo was issued to all the units on 27.04.2013 based on the recommendation of the Environmental Engineer dated 27.04.2013.

9. That thereafter the subcommittee found that all the industries had provided a tank for storage of treated water and permanent facility for the reuse of treated effluent and hence recommended to revoke closure order pertaining to the units. Subsequently, the District Magistrate in its orders dated 03.05.2013 and 30.07.2013, permitted the industrial units to operate subject to various conditions.

10. That the above said orders of the District Magistrate were challenged before the Hon'ble High Court of Kerala and the Hon'ble Court inter alia held that the industries shall be allowed to function on a trial basis and that the District Magistrate shall evaluate the situation before final disposal of the matter.

11. That pursuant to which, the District Magistrate, in its orders dated 06.03.2014 and 05.06.2014, allowed the functioning of the industrial units including the respondent units, on satisfaction that the units were compliant with the pollution control measures.

12. That from the above narrated facts, it is clear that the respondent units as well as other units were allowed to function only after a detailed monitoring to ensure that the units have put in place

necessary measures to prevent any pollution and that the units are not indulging in any polluting activity.

13. That in the meantime, the present Original Application was filed before this Hon'ble Tribunal, and on 20.02.2022, after several hearings and inconclusive reports with respect to the veracity of the allegation, the Principal Bench of the Hon'ble National Green Tribunal, New Delhi, had passed a final order, inter alia holding as follows :

"7. Accordingly, we constitute a Joint Committee of Senior Officer of CPCB, Member Secretary, State PCB, Director Environment, State of Kerala and District Magistrate, Thrissur to ascertain the compliance status in respect of each of the units within three months and take action to close the polluting units, as per law. If the units are found compliance, the Committee may ascertain the period of past violations, atleast from the date of filing of this application till compliance..."

14. That pursuant to which, the Joint Committee constituted for this purpose submitted its report dated 08.02.2023 before this Hon'ble Tribunal, it was observed by the Joint Committee as follows;

"At Page No. 4 of the Report

2.0 Background of OA 20/2016

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From the verification of files of the District Office of the Board at Thrissur, it was observed that in the analysis of well water samples conducted by the State Pollution Control Board on 22.02.2016 and 15.11.2018 the pH of the well water was in the acidic range and heavy metals were observed in some wells. These were also submitted to the Hon'ble NGT vide reports from the District Office of the Board at Thrissur, dated 03.11.2016, 8.02.2020 and 11.12.2020. Copies of the reports are submitted herewith as Annexure 5, Annexure 6 and Annexure 7 respectively. The State Board had co-opted the Ground Water Department to conduct hydrogeological study in and around the Ollur Industrial Estate and to probe the reason for groundwater contamination in the area. Copy of the report is submitted as Annexure 8. The report concludes as follows: "The samples collected from the wells of the industrial estate close to the electroplating units are showing higher pH value i.e. of lesser acidic nature. Whereas the samples collected from the open wells outside the industrial area and close to the boundary of the estate are showing higher acidic nature. Hence sampling during peak summer season and also the study of heavy metal concentration in the ground water source will provide much more refined information on the ground water in order to arrive at a realistic conclusion on the pollution caused by the electroplating related industries in the estate and also to establish base flow direction from industrial area, a 5 detailed study using tracer techniques or similar advanced methods have to be engaged through competent agencies". Accordingly, the State Board has engaged Center for Water Resources Development and Management (CWRDM) vide order No. PCB/HO/SEE-1/TSR□TSGWC/09/2021 dated 22.12.2021, to conduct study using tracer techniques. The investigation aims at studying the

quality of ground water in and around the Ollur industrial estate, groundwater flow characteristics prevailing in the area and to identify the cause of groundwater contamination in the area. The methodology of study includes adding stable isotopes tracers to the newly constructed boreholes for the study and water samples will be collected from the boreholes along with existing wells for analysis. Periodic monitoring of the wells will be done to identify the hydrological connectivity between industrial areas and surrounding wells. Stable isotopes in the water samples will be analyzed using the IRMS facility available at CWRDM. The study is envisaged to end by August 2023 and it is considered that the cause for the low pH in the open wells surrounding the industrial estate could be identified. The State Pollution Control Board has signed a MoU with CWRDM and they have initiated the study.

At Page No. 5 of the Report

2.1 Compliance of Hon'ble NGT Order

Pursuant to the Order of the Hon'ble NGT dated 20.04.2022, the first meeting of the committee was held on 7.06.2022 and had a preliminary discussion about the matter and charted out a plan for inspecting the units in question. The 13 units presently engaged in the electroplating activities are the respondent units in the original application. In the initial phase, it was decided to inspect the units on 16th and 17th of June 2022. Discussion on the large number of such unauthorized electroplating units working in the district and general acidic nature of the ground water of Thrissur district were also

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discussed in the initial meeting. In the meeting it was also decided to analyze the water sample from the well which are alleged to be contaminated. Minute of the meeting is attached as Annexure 9.

At Page No. 11 of the Report

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3.2. Assessment of well water quality

As decided the water samples from the open wells alleged to have been contaminated were collected. There were 18 wells and this includes a well in the premises of the industrial estate also. It was observed that most of the wells are being used for domestic purposes except two open wells in the premises of Sri. R. K. Nair and Sri, Tony Thottan. During the inspection it was observed that there is a service center of earth movers functioning adjacent to the plot owned by Sri Tony Thottan. The samples of well water were analyzed for pH, heavy metals and cyanide and the results were compared with the drinking water standards IS 10500:2012. The results and the limit are furnished in Table 2. The location coordinates of the open well and industries inspected are furnished in Table 3.

At Page No. 19 of the Report

5.0 Observations of the Joint Committee

A) Industry operations and compliance status *All the respondent industries are small scale industrial units operating within the Ollur Industrial Estate, managed and promoted by Kerala Small Industries*

Development Corporation (SIDCO) an undertaking of Government of Kerala. All the member units in the estate are relying on their captive wastewater treatment facilities and at present there are no common wastewater treatment facilities provided in the Ollur industrial estate.

All the respondent units are undertaking batch processes based on the work orders and hence wastewater management is also carried out in batch process. Since the ETPs are operated in batch mode, there are lacunas/ flaws in the ETP operation and this is reflected in the treated effluent quality. The ETPs are operated by the unit staff as per the protocol suggested by the consultant without the basic understanding of the treatment system, which leads to below par ETP performance. Being a batch process, the raw effluents are conveyed through makeshift arrangements like flexible hoses and this may lead to spillage pilferages and diversions in the unit premises. Provisions for collecting the spillage to the effluent treatment plant are not adequate in most of the electroplating units and there are no proper chemical resistant floor lining in the process area.

The units which are found non-compliant with the conditions of consent are served with notices dated 28.09.2022. Copies of the notices issued to M/s Aishwarya Gold Covering, M/s Bright Precured System 2, M/s Three Star Electroplating, M/s Two Star Designs Gold Covering are attached herewith as Annexure 10, 11, 12 and 13. The units were again inspected on 29.12.2022 by the officials of the District Office of the State Pollution Control Board, Thrissur and the functioning of the units was found satisfactory.

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However, at this stage of inspection it cannot be concluded that the reasons for the concentration of heavy metals such as nickel, zinc, copper in excess of the permissible limits in well water is 20 solely due to the electroplating units, as other type of units with activities such as pickling were observed working near the premises of these wells. The presence of iron and manganese in excess of the permissible limit of drinking water standards can be due to geogenic reasons.

At Page No. 21 of the Report

B) Assessment of water quality of open wells in the vicinity

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As per the analysis results all the well water samples registered a pH value of 5.69 and below, which are not in compliance with the prescribed pH range of 6.5-8.5 in the IS 10500-2012 drinking water standard. Such low pH values are reported in groundwater samples in Thrissur and could be attributed to peculiar geomorphological conditions.

Usually, presence of iron, manganese and zinc in groundwater are often reported and is attributed to the peculiar geology of the State of Kerala. Several well water samples collected for this assessment indicated the presence of iron, manganese and zinc. Manganese values exceeded the limit in all six reported well samples, iron and zinc exceeded their respective limits in one open well each. Though, presence

of iron, manganese and zinc in Kerala is linked to the geogenic attributes, presence of manganese, nickel and unusually higher zinc in a particular open well in the premises of A. A Paulose indicates specific pollution from other sources. Similarly, the open well in the premise of Tony Thottan registered the presence of copper, nickel, manganese and zinc. During the visit it was observed that an automobile workshop exclusively for heavy earth movers was operating near to this well.

Due to the higher elevation in the industrial estate, the surface runoff and water table gradient shall be towards the low lying fields in east and south eastern directions. A railway line at a lower elevation passes along the western boundary of the estate. The majority of wells in the south eastern direction have not registered the presence of specific heavy metals except for iron and manganese. The two wells monitored in the western side, beyond the railway line also registered manganese and zinc respectively. The open well (A A Paulose) which registered nickel, manganese, unusually higher zinc and pH of 4.14 is north to the estate and very near to a brick manufacturing unit in the western side. The other open well which registered copper, manganese, nickel, zinc and the lowest pH (3.56) is located in the eastern side of the estate across the Thalure. Thrissur road. In the vicinity of this well there is a petrol station, automobile service center for heavy earth movers, other commercial establishments and residences. **The unusual presence of heavy metals like nickel, copper, manganese and zinc needs further investigation.** With the available monitoring data and observations, it is indicated that presence of specific heavy metals like nickel, copper, chromium used in electroplating/ electro colouring

industries are not detected 22 in the downstream wells. The two wells in which copper and nickel were detected have several other potential sources near to them. The unusual presence of zinc in the open well needs to be probed further as there is a clay brick kiln near to the premise. Usually fine textured soil/clay will be richer in zinc and it could be possibly from the clay or zinc bearing soil used for brick manufacturing.

Though there are possibilities of spillage pilferage in many respondent industries, with this assessment it is not possible to link the presence of heavy metals in well water with the unauthorized discharge from the respondent units. Moreover, metals like iron, manganese and zinc are detected in a few wells which could be from geogenic sources. Ollur is also known for its traditional clay bricks/ tile industries due to the abundant clay soil in the low lying fields and the clay soil is usually rich in manganese and zinc.

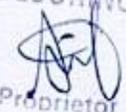
At page No. 22 of the Report

6.0 Finding and suggestions of the Joint Committee

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IV. From the assessment carried out, nickel and copper contamination in two of the open wells cannot be linked to the respondent SSI units as there are many other small units processing metals and alloys. There are several service centers and other commercial units in the vicinity.

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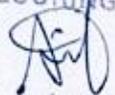

Proprietor

V. *In compliance with the orders of the NGT environmental compensation has to be calculated for the period of past violation. The period of past violation was verified from the file records of District Office of State Pollution Control Board at Thrissur. It is observed that discharging of effluents to outside by these industries except that from M/s. Bright and Company was noted in the complaint enquiry conducted on 23.07.2012 by the State Pollution Control Board. Later due to the mounting complaints, the District Collector constituted a committee for verification of the complaint and on recommendation of the committee issued an order on 27.04.2013 to close down these units except M/s. Bright and Company. These details have already been stated in this report under the heading 'Background of OA 20/2016. The order of the District Collector dated 27.04.2013 has already been produced herewith as Annexure 1. So the period of past violation is taken from 23.07.2012 to 27.04.2013... .."*

15. That in view of the above findings, it is clear that the violations as alleged in the said Original Application regarding the discharge of effluents, could not be linked to the unit as observed by the Joint Committee Report. However, the Joint Committee, in its report has grossly failed to appreciate the fact that there is no cogent evidence to show that the unit has caused harm to the environment.

16. That despite the above observation, without any comprehensive impact study, the Kerala State Pollution Control Board had issued a

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show cause notice dated 04.04.2023 to the respondents Unit as to why Environmental Compensation should not be imposed.

17. That immediately after the receipt of the above show cause notice, these Respondents sent a detailed reply dated 12.05.2023 to KSPCB and requested to provide with an opportunity for personal hearing and to produce additional documents, in the event of the said reply not found satisfactory.

18. That based on the request of the respondents, personal hearing was conducted by KSPCB wherein it was clearly explained that during the alleged violation period from 23.07.2012 to 06.02.2013, there is no iota of evidence to show that the respondent units had caused damage to the Environment and there was no such assessment.

19. That to the sudden shock and surprise, the respondent units have received a letter on 02.12.2023 through India Post vide Proceedings in KSPCB/977/2023-EE-1 dated 28.11.2023, issued by the Chairman of the KSPCB under Section 5 of the Environment (Protection) Act, 1986, based on the recommendation of the Chief Environmental Engineer of KSPCB and assessed by the District Environmental Engineer of KPSCB, for the **period from 23.07.2012 to 06.02.2013**, wherein these respondents were erroneously directed to pay an amount of Rs 5,41,427/- (Rupees Five Lakhs Forty One Thousand Four Hundred and Twenty Seven Only) as environmental compensation, despite there is no evidence/proof adduced against the units in the Joint Committee Report.

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20. That it is very interesting to note that till date, there was no expert reports to prove that the Respondent units has caused damage to the environment, since they are not able to find out the actual cause of the pollution as there are various other units / industries are in operation in and around the said Industrial Estate.

21. That KSPCB had engaged Center for Water Resourced Development and Management (CWRDM) to conduct study using tracer techniques to identify the cause of groundwater contamination in the area. However, till this date, no such report was made available which establishes that these respondents units are the cause of such pollution, which itself prove the predetermined mind of the KSPCB in imposing environmental compensation.

22. That the formula/methodology adopted by the KSPCB for the assessment of environmental compensation was formed only in the year 2019, which applies prospectively and not retrospectively as the assessment was made for the period between 2012 and 2013, that too without any proper study.

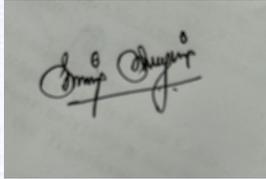
23. That the Report of the Joint Committee is without any proper study and basis, hence the same is liable to be rejected. Further, the Respondent units are in compliance with the conditions imposed by the KSPCB which was also affirmed by them in their report, hence it can be construed that there are no violations committed by the Respondent units.

24. That the Respondents are ready to comply with any conditions imposed by this Hon'ble Tribunal or the Authorities.

Under the above circumstanced, it is respectfully prayed that this Hon'ble Tribunal may be pleased to record the above objections and reject the Joint Committee Report with respect to imposition of Compensation at Page Nos. 24 to 26 in Paragraph No. 6.0 - Clauses V to VII, and close the above Application, and thus render justice.

Dated at Thrissur / Kerala on this the 18th day of January, 2024

For HONEST ELECTRO COLOURING




Proprietor

RESPONDENT NO. 22.

(On behalf of Respondent No. 7 to 15 and 23)

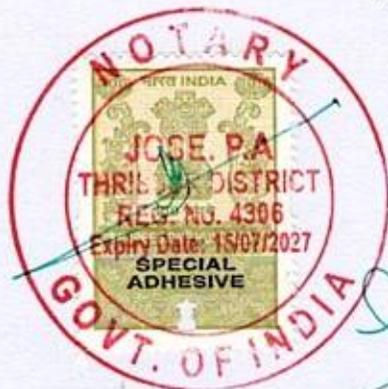
**COUNSEL FOR RESPONDENT
NOS. 7 TO 15, 22 AND 23**

VERIFICATION

I, Anto Rappai, Son of Shri. Rappai, aged about 54 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby verify **on my behalf and on behalf of the Respondent No. 7 to 15 and 23**, that the contents of the above paragraphs are true to the best of my personal knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Verified at Thrissur / Kerala on this the 18th day of January, 2024

For HONEST ELECTRO COLOURING




Proprietor

RESPONDENT NO. 22.

Solemnly affirmed and signed before me
by the deponent at Thrissur on 18.1.24

JOSE. P.A

Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

Handwritten signature and date: 18.1.24

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

.....

Respondents

AFFIDAVIT

I, Raphy IJ, Son of Late Shri. Jose, aged about 53 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

1. That I am the Proprietor of M/s. Three Star Electro Plating, the 23rd Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala
on this the 18th day of January, 2024
and put his name as signature in my presence

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*
*

for Three Star Electro Plating Works

[Signature]
Proprietor

Before Me

Advocate : Thrissur

JOSE. P.A
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997



[Signature]
28.1.24

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
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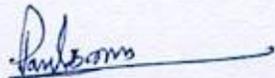
Respondents

AFFIDAVIT

I, Paulson PG, Son of Late Shri.George PL, aged about 60 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

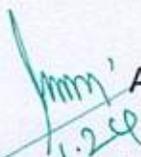
1. That I am the Proprietor of M/s. Pee Gee Gold Covering, the 15th Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala
on this the 18th day of January, 2024
and put his name as signature in my presence


PEEGEE GOLD COVERING
* * TMC - 29/2275,
* MAJOR INDUSTRIAL ESTATE,
* P. O. OLLUR, THRISSUR - 680 003

Before Me




Advocate : Thrissur
JOSE. P.A.
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

Respondents

AFFIDAVIT

I, Karuppuswamy KG, Son of Shri. Govindhaswamy aged about 49 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

- 1. That I am the Proprietor of M/s. Rajesh Kumar Electro Plating, the 12th Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
- 2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala on this the 18th day of January, 2024 and put his name as signature in my presence

for RAJESH KUMAR
ELECTROPLATING

[Handwritten Signature]
Proprietor

*
*
*

Before Me



[Handwritten Signature]
Advocate : Thrissur
JOSE. P.A
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

Respondents

VERIFICATION AFFIDAVIT

I, Melvin MJ, Son of Shri. Jose MI, aged about 52 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

- 1. That I am the Proprietor of M/s. Dot Engineering, the 11th Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
- 2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala
on this the 18th day of January, 2024
and put his name as signature in my presence

* *
* *
* *

For DOT Engineers
M.J.
M.J.MELVIN

Before Me



Joe P.A.
18.1.24

Advocate : Thrissur

JOSE. P.A
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years, S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary, Government Secretariat, and 25 Others.

.....

Respondents

AFFIDAVIT

I, Renson CR, Son of Shri. Raphy Chirayath, aged about 32 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

- 1. That I am the Proprietor of M/s. Renu Gold Covering, the 10th Respondent, herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala on this the 18th day of January, 2024 and put his name as signature in my presence

* *
* *
* *

or RENU GOLD COVERING

[Signature]
Proprietor, C.R. RENSON

Before Me



[Signature]
18-1-24
Advocate : Thrissur

JOSE. P.A
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

.....

Respondents

AFFIDAVIT

I, Joby AP, Son of Shri. Poulouse AO, aged about 50 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

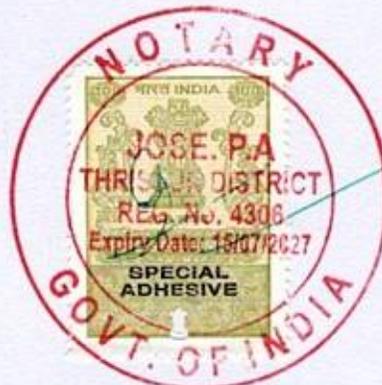
1. That I am the Proprietor of M/s. Bee Pee Gold Imitations, the 7th Respondent, herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala
on this the 18th day of January, 2024
and put his name as signature in my presence

*
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*

Joby A.P.
**JOBY A.P.
BEEPEE GOLD IMITATIONS
MAJOR INDUSTRIAL ESTATE (SIDCO)
OLLUR, THRISSUR-680 306**

Before Me



Joby A.P.
Advocate : Thrissur

JOSE. P.A.
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years, S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary, Government Secretariat, and 25 Others.

.....

Respondents

VERIFICATION AFFIDAVIT

I, Anto Rappai, Son of Shri. Rappai, aged about 54 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

- 1. That I am the Proprietor of M/s. Honest electro colouring, the 22nd Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
- 2. That I have read the contents of the accompanying Observation filed by me on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

For HONEST ELECTRO COLOURING

[Signature]
Proprietor

Solemnly affirmed at Thrissur/Kerala on this the 18th day of January, 2024 and put his name as signature in my presence

* *
*
*

Before Me

[Signature] 18.1.24
Advocate : Thrissur



JOSE. P.A
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

Respondents

AFFIDAVIT

I, Shiji Geevar, Son of Shri. Rappai OC, aged about 42 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

- 1. That I am the Proprietor of M/s. Golden View Plating, the 13th Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
- 2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala
on this the 18th day of January, 2024
and put his name as signature in my presence

For GOLDEN VIEW PLATING

Shiji
Proprietrix

* *
* *
* *

Before Me

Advocate : Thrissur



Shiji
18.1.24
JOSE. P.A
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

Respondents

AFFIDAVIT

I, Sunil PV, Son of Late Shri. Velappa Kutti, aged about 55 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

1. That I am the Proprietor of M/s. Two Star Design Gold Covering, the 14th Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala
on this the 18th day of January, 2024
and put his name as signature in my presence

For TWO STARS DESIGNS GOLD COVERING

* *
* *
* *

[Signature]
Proprietor

Before Me



[Signature]
Advocate : Thrissur
JOSE. P.A.
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

Respondents

VERIFICATION AFFIDAVIT

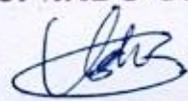
I, Usha Sasi, Son of Shri. Gengadharan, aged about 54 years, having address at Major Industrial Estate, Ollur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

- 1. That I am the Proprietor of M/s. Indu Ornaments, the 8th Respondent herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
- 2. That I have read the contents of the accompanying observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the affidavit.

Solemnly affirmed at Thrissur/Kerala on this the 18th day of January, 2024 and put his name as signature in my presence

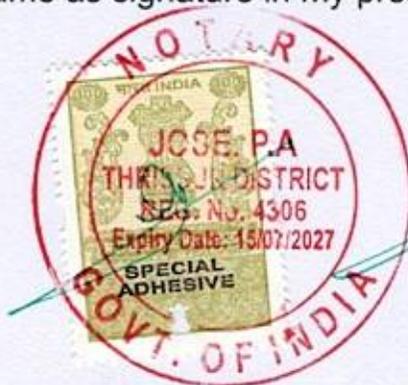
*
*
*

For INDU ORNAMENTS



Proprietor

Before Me



Usha Sasi
18.1.24

JOSE. P.A
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997

Advocate : Thrissur

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

OA. NO. 20 of 2016 (SZ)

BETWEEN

Santo P.L., aged 44 Years,
S/o. P.D. Lois, and 5 Others

... Applicants

AND

The State of Kerala represented by the Chief Secretary,
Government Secretariat, and 25 Others.

Respondents

AFFIDAVIT

I, Santhosh AT, Son of Late Shri. Thangappan AB, aged about 52 years, having address at Major Industrial Estate, Olur P.O, Thrissur, Kerala - 680306, do hereby solemnly affirm and sincerely state as follows:-

1. That I am the Partner of M/s. Aiswarya Gold Covering, the 9th Respondent, herein and as such I am conversant with the facts and circumstances of the case, hence I am competent to swear this affidavit.
2. That I have read the contents of the accompanying Observation filed by the Respondent No.22 on his behalf and on behalf of the Respondent Nos. 7 to 15 and 23, which has been drafted by my counsels under our instructions and that the contents of the same are true as per the Affidavit.

Solemnly affirmed at Thrissur/Kerala
on this the 18th day of January, 2024
and put his name as signature in my presence

AYSWARYA GOLD COVERING
Major Industrial Estate, Olur, Thrissur - 680 306
Mob : 9747276733, 8606776733
* Email : ayswaryagoldcovering@gmail.com

Before Me



Jose P.A.
Advocate : Thrissur
JOSE. P.A.
Advocate, Notary & Commissioner of Oath
Ayyanthole, Thrissur - 680 003, Kerala
Mob: 98952 74480, 88486 53997