

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

APPEAL NO. 33 OF 2022

IN THE MATTER OF:

MEENAVA THANTHAI K.R. SELVARAJ KUMAR
MEENAVAR NALA SANGAM
Represented by its President,

..APPELLANT

VERSUS

UNION OF INDIA & OTHERS

...RESPONDENTS

MEMO OF EXPLANATION ON BEHALF OF RESPONDENT NO.5

I, Joy, aged about 52 years, Factory Manager of M/s Sun Pharmaceutical Industries Ltd, having its factory at survey no. 90/2, 90/3, 90/4, 99/1, 99/2, 99/3, 99/4, 99/5, 100/2A, 100/2B, 100/3, Sathammai Village, Karunkuzhi Po, Madhuranthagam TK, Chengalpattu Dist., do hereby humbly submit as follows:

1. I am the Factory Manager of the 5th Respondent Company and as such I am well acquainted with the facts and circumstances of the case.
2. I have read the Hon'ble Tribunals order dated 10-04-23 and we would like to submit and clarify the following in respect with the order as follows our Replies filed earlier may be treated as part of this Memo of Clarification:-
3. It is humbly submitted that the plant was established in 1992-93 and the Vedanthangal Bird sanctuary was notified in July 1998 and the ESZ guidelines were framed in 2011.

For SUN PHARMACEUTICAL INDUSTRIES LTD.



Authorized Signatory

4. It is humbly submitted that we have diligently relied upon the official information posted on TN Forest department website available in Public domain, showing Vedanthangal Bird Sanctuary area as 73.06 acres, apart from, Google Maps and Parivesh Portal of the Union Of India. The mandated list of approvals as notified in the MOEF&CC website (Parivesh Portal), specific to this project was diligently followed for this project. The Portal states that the project requires only Environmental Clearance. Along with Form -1 and PFR, as a mandatory requirement, we had relied on the location of our plant based on the Google Maps and the same was submitted in Pre-Feasibility Report (PFR), clearly showing 5 Kms radius of the plant on the Google maps (page 47 of PFR) as part of the EC application, wherein the location of the project is shown at 3.72 Kms from the Lake Boundary. We humbly like to clarify and submit that we have not submitted any incorrect/False information to the best of our knowledge but relied upon the available Official documents/Information in the Public Domain.
5. We have applied and submitted the information and documents in line with procedures defined by the Competent authority, MOEF vide para 4 (iii) of OM dated 08.08.2009.
6. We further like to clarify and submit that we have not violated any of the EC conditions.

Dated at Chennai this 9th Day of May 2023

For SUN PHARMACEUTICAL INDUSTRIES LTD.



Authorized Signatory

5th Respondent

**BEFORE THE NATIONAL GREEN
TRIBUNAL AT CHENNAI
Appeal NO.33 of 2022 (SZ)**

Meenava Thanthai K. R. Selvaraj Kumar

Meenava Nala Sangam

..... Applicant

-Vs-

The Union of India & 5 Others

..... Respondents

Memo of Explanation

M/S.A.RAMESH KUMAR MS 320/93

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Counsel For R5