

Filed on: 10.08.2023

**BEFORE THE NATIONAL GREEN TRIBUNAL (SZ), CHENNAI
MEMORANDUM OF APPEAL**

(Under Section 18(1) read with Section 16 of the National Green Tribunal
Act, 2010)

APPEAL No. 55 of 2022

LUKOSE K T ALIAS LUKA & ANR : **APPELLANTS**

Versus

MINISTRY OF ENVIRONMENT, FOREST AND
CLIMATE CHANGE & ORS : **RESPONDENTS**

**REJOINDER AGAINST THE COUNTER AFFIDAVIT FILED BY THE 5TH
RESPONDENT**

HARISH VASUDEVAN (H-253) [K/779/2013]
RAJAN VISHNURAJ (R-1268) [K/653/2010]

Counsel for the appellant

Amicus Advocates

II Floor, Chundanal Monarch, K.K Padmanabhan Road, Kochi-18



**BEFORE THE NATIONAL GREEN TRIBUNAL (SZ), CHENNAI
MEMORANDUM OF APPEAL**

(Under Section 18(1) read with Section 16 of the National Green Tribunal
Act, 2010)

APPEAL No. 55 of 2022

LUKOSE K T ALIAS LUKA & ANR : **APPELLANTS**

Versus

MINISTRY OF ENVIRONMENT, FOREST AND
CLIMATE CHANGE & ORS : **RESPONDENTS**

INDEX

SL NO.	DATES	PARTICULARS	PAGE NOS
1.	10.08.2023	Rejoinder to the Counter Affidavit filed by the 5 th Respondent.	1 – 6
2.	19.04.2023	ANNEXURE A17: A true photocopy of the order issued by the ADM, Kannur.	7 – 8
3.	12.12.2018	ANNEXURE A18: A true photocopy of the Office Memorandum issued by the 1 st respondent.	9 – 12



RAJAN VISHNURAJ



HARISH VASUDEVAN

Advocates

COUNSEL FOR THE APPELLANTS

Amicus Advocates

II Floor, Chundanal Monarch, K.K Padmanabhan Road, Kochi-18

Email: legalfriend@gmail.com / amicusadvocates@gmail.com

Mobile No: +91-9447755896



**BEFORE THE NATIONAL GREEN TRIBUNAL (SZ), CHENNAI
MEMORANDUM OF APPEAL**

(Under Section 18(1) read with Section 16 of the National Green Tribunal
Act, 2010)

APPEAL No. 55 of 2022

LUKOSE K T ALIAS LUKA & ANR : **APPELLANTS**
Versus

MINISTRY OF ENVIRONMENT, FOREST AND
CLIMATE CHANGE & ORS : **RESPONDENTS**

**REJOINDER AGAINST THE COUNTER AFFIDAVIT FILED BY THE 5TH
RESPONDENT**

I Lukose K T Alias Luka, aged 75 years, S/o Thomas, Kurijirappally House, Eruvatty PO, Thimiri, Chapparapadavu, Kannur - 670581, do hereby solemnly affirm and state as follows:

1. I am the 1st appellant in the memorandum of appeal and as such I am conversant with the facts of the case. I am competent to swear this affidavit on behalf of the 2nd appellant also.
2. In this Appeal, the 5th Respondent has filed a Counter Affidavit on 26.03.2023. Averments in the said Counter Affidavit is not fully true and hence this rejoinder.
3. It is respectfully submitted that all the averments and allegations raised by the 5th respondent in paragraphs 2 - 4 of the counter affidavit are not true and hence stoutly denied. The appellants herein are exercising their statutory right of appeal against the impugned EC, and the appellants are having a right to be heard as per the NGT Act. The locus



standi of the appellant in an appeal under Section 16 of NGT Act is well settled by this Hon'ble Tribunal in the judgment in **Appeal No. 3 of 2019**. Appellants are the persons aggrieved as per Section 2 (J) of the NGT Act. The judgment of this Hon'ble Tribunal in **Appeal No.5 of 2011** by the Principal Bench of NGT in **Vimal Bhai and ors Vs. MoEF and ors**, this Hon'ble Tribunal has categorically held that every citizen of India is having a right to file appeal against any EC illegally granted. It is more so when the constitution imposes a duty upon every citizen to protect and improve the environment. In the judgment of this Hon'ble Tribunal in **Appeal No.56 of 2012(SZ)** in **Janagarithy Samity Vs. Karnataka State Pollution Control Board** that any person aggrieved in the act would cover any citizen of India. It is an admitted fact by the 5th respondent that the 1st appellant is having property in the area.

4. All the averments and allegations raised by the 5th respondent in paragraphs 2 - 4 of the counter affidavit are not true and hence stoutly denied. There is no quarry run by any other person in the nearby vicinity of the proposed quarry site of the 5th respondent. Appellants are unknown about a quarry run by Mr. Anoop as alleged in the counter. There is no EC granted by the authorities to anyone including Mr. Anoop to conduct quarrying operation in the near vicinity of the area in question. There is no such name in the list of beneficiaries of EC in the SEIAA website. The allegations in paragraph No. 5 are whims and fantasies of the 5th respondent, without any proof and hence denied by the appellants.
5. The fact that the proposed quarrying activity will violate the peaceful life



and property of the appellants and the nearby residents is a fact well known to the 5th respondent as well. The Additional District Magistrate, Kannur has considered all the factual aspects in this case and rejected the application of the 5th respondent for obtaining explosive license under the Explosives Act. Vide order dated 19.04.2023, the ADM, Kannur has considered all the factual aspects including the factual reports from District Police Chief, District Fire Officer, Tahasildar Taliparamba, Secretary of Chapparappadavu Grama Panchayat and categorically found that the operation of the proposed quarry may create security issues and drinking water problems and the width of the road to the proposed quarry site and the distance of the water source from the quarry site etc. are against the conditions of the quarry related rules. Considering all these aspects, the permission for starting explosive magazine at Re.Sy.No.5 of Thimiri village was rejected by the ADM, Kannur to the 5th respondent through order dated 19.04.2023. A true photocopy of the order dated 19.04.2023 issued by the ADM, Kannur is produced herewith and marked as **Annexure A17**.

6. All the averments and allegations raised by the 5th respondent in paragraphs 7 - 9 are not true and hence stoutly denied. It is clear from Annexure A17 that there is a pond and spring just near to the proposed site and the site was used for Munnoorkulam Hydro Power Project. The water sources near to the quarry is well stated in the order. The narrow access road is also a fact admitted by the authorities. The impact of the mineral transportation through the narrow village road would cause heavy impact on the life of individuals who are residing near the quarry site. These material facts were not submitted by the project proponent



in the Annexures A2(a) and A2(b). It can be seen from Item No.12 of Annexure A2(b) that the nearby pond, water bodies and streams are not shown in the application. A river which is 1.37 Km away alone is shown to mislead the 2nd respondent and therefore the entire procedure is vitiated. There was no consideration of any of such material facts by the respondents No.2 and 3 in Annexures A6, A7 and A8 decisions. Therefore, the issuance of Annexure A2 was without considering the relevant facts. The project site falls in the landslide susceptible area in the Hazard Zonation Map approved by the State Disaster Management Authority. It is evident from the order of the Chairman of the District Disaster Management Authority, Kannur on 19.06.2017 that the Thimiry Village is prone to landslide disaster. It is a clear case of the appellants that the DSR was not prepared after considering the relevant risk assessment and environmental sensitivity factors as mandated in the EIA Notification and therefore relying on a faulty DSR is untenable. Annexure A2 does not contain the details of the EIA Consultant. No certificate issued by Quality Council of India or NABET to prove that Annexures A2, A2(a) and A2(b) are prepared by an accredited EIA Consultant and therefore in absence of such proof, the argument of the appellants should be upheld.

7. All the averments and allegations raised by the 5th respondent in paragraphs No.10 - 15 are not true and hence stoutly denied. The Form 1M application was not prepared by an accredited agency. As per the Office Memorandum dated 12.12.2018 issued by the 1st respondent, the Form 1M application is not acceptable and it should be comprehensive. This was not followed in the case of the 5th respondent. A true

Gulder

photocopy of the Office Memorandum dated 12.12.2018 issued by the 1st respondent is produced herewith and marked as **Annexure A18.**

8. It is pertinent to note that it is admitted in paragraph No.12 of the counter affidavit that there is a pond and natural water source available within 150 meters of the project site. This fact is deliberately suppressed in Annexures A2, A2(a), A2(b) and A2(c). It can be seen from Annexure A2(a) in item "**Environmental Sensitivity**" that the project proponent had a statutory duty to reveal ground water resources, surface resources within an aerial distance of proposed project location boundary. The presence of river which is 1.37 Km away from the project site alone was shown by the 5th respondent as if there are no other such natural water resources in the area. It is now admitted by the 5th respondent in paragraph No.12 that there is a well and pond within 150 meters of the project site and that the pond is in the residential property of the 1st appellant. There is no mentioning of the impact of mining on the nearby natural water sources. No safeguards are put in place by the SEAC because there was no appraisal on the factual aspects. This admission of fact and suppression / misleading of information in Form-1M alone is sufficient to allow this appeal on the ground of Paragraph 8(vi) of the EIA Notification 2006. The distance criteria fixed by KMMC Rule, 2015 is not applicable to the procedure mandated under the EIA Notification 2006 issued under the provisions of EP Act. The provisions of a state rule cannot override the provisions of the EP Act especially when there is an overriding provision in the EP Act. The ground 'S' in the appeal is squarely applicable in this case.
9. The counter filed by the 5th respondent did not specifically denied the

Gulder

legal Grounds stated in the Appeal, regarding the legal procedure to be followed in preparing the DSR and PFA. On that ground also the appeal is to be allowed.

Therefore, it is most humbly requested and prayed that, having regard to the above mentioned and other grounds that may be urged at the time of hearing, this Hon'ble Tribunal may be pleased to accept this rejoinder and allow this appeal, with cost to the 5th respondent, in the interest of justice.

All the facts stated above are true to the best of my knowledge, belief & information.

Dated this the 10th day of August, 2023



DEPONENT

Solemnly affirmed and signed before me by the deponent whom I know on this the 10th day of August, 2023 in my office at Ernakulam.



ADVOCATE

VERIFICATION

I, Lukose K T Alias Luka, aged 75 years, S/o Thomas, Kurijirappally House, Eruvatty PO, Thimiri, Chapparapadavu, Kannur - 670581, do hereby verifies that the contents of the above paragraphs 1 to 9 are true to the best of my knowledge and I have not suppressed any material facts.

DATE : 10.08.2023

PLACE : Ernakulam



SIGNATURE OF THE APPELLANT



I/238639/2023

PROCEEDINGS OF THE ADDITIONAL DISTRICT MAGISTRATE, KANNUR
(Present : Sri.Divakaran K.K)

Sub : Explosives Act and Rules – Request for NOC - license in Form LE-3 -
rejected- Orders - issued.

Read: 1). Application of Sri.Rajeevan P.V, Puthiyaveetil House, Kooveri P.O,
Dtd.08.11.2018.
2). A/E/SE/KL/22/375(E114473), Dtd15.10.2018, Deputy Chief Controller
of Explosives, Ernakulam.
3). D2(b)-79206/2018/C, Dtd.29.04.2019, Dist. Police Chief, Kannur
4). G.799/2019, Dtd.02.02.2019, District Fire Officer, Kannur.
5). K.1-19750/18, Dtd.29.07.2019. Tahsildar, Taliparamba.
6). A7-5252/18, Dtd.01.02.23, Sec., Chapparapadavu Grama Panchayath.

Order No.DCKNR/12326/2018-D4, Dtd. 19-04-2023

1. Sri.Rajeevan P.V, Puthiyaveetil House, Kooveri P.O, vide paper 1st read above, has requested for a license in Form LE-3 from the Deputy Chief Controller of Explosives, Ernakulam. The application has been enquired into by the Tahsildar Taliparamba, the District Police Chief Kannur, the District Fire Officer, Fire & Rescue Services, Kannur and the Secretary, Chapparapadavu Grama Panchayath.

2. The report on the matter has been made available from all concerned officers, vide paper 3rd to 6th read above. All the officers have recommended granting the licence applied for to the applicant, except the Secretary, Chapparapadavu Grama Panchayath. The secretary, Chapparapadavu Grama Panchayath, has reported the following anomalies:

a). Not Submitted a copy of Explosive License.

b). A site plan with clearly demarcated boundaries where the explosive magazine is proposed to be installed has not been submitted.

c). The land proposed to be used for the quarry belongs to Sri.Illimuttill Antony and Sri.Arpathanath Lijo John. Out of this, Sri. Antony's land was registered as a plantation, and Lijo's land was registered by way of pattayam, and as per the judgement in WP (C) 11/249/2010, Dtd. 25.05.2022, mining activities are prohibited on the land allotted for agricultural purposes and plantations.

d). There is a pond and spring just near the sites of Sri.Arpathanath Lijo John and Sri.Illimuttill Antony, which are used for the Munnurkulam hydropower project and will be disrupted due to the operation of the proposed quarry. In addition to the nearby residents, about seven families depend on this water source for drinking water. More over, as per the Kerala Minor Mineral Concessions Rules 2015, quarry operations should be carried out only 100 metres away from water sources.

e). Currently, there is no road with sufficient width for the said purpose from Ervatty Junction to the proposed quarry site, which is against the conditions laid down by Rule 61(4) of the KPBR. In case of any emergencies, this road is not adequate to reach the firefighting vehicles and other government disaster management vehicles at the proposed quarry site.

f). Panchayath has received several petitions against the proposed quarry from the

I/238639/2023

nearby residents; also, one Mr.Looocka has filed an appeal petition (Appeal No. 55 of 2022 (SZ)) before the Green Tribunal against the environmental clearance received by Sri.Rajeevan, which is under the consideration of the Tribunal.

3. Also, the Panchayath Council decided to grant the permission only after obtaining clarification on the above-mentioned matters and after receiving the legal advise and expert opinions of the state Disaster Management Authority in this regard, and therefore, they cannot recommend the NOC to the applicant. Hence decided to hear the applicant, Sri.P.V.Rajeevan on 29.03.2023, 11.30 AM, as per rules.

4. Heard the applicant on the same date (29.03.2023 at 11.30AM). He argued that all of the authorities, except the panchayath, have recommended this quarry; it has also acquired an environmental clearance and a pollution certificate; and the report of the panchayath council is not true to the facts; hence, he is eligible for this NOC as applied for.

5. The matter was verified in detail, the report of the Panchayath Council revealed that there are protests from the local residents against the proposed quarry and that the operation of the quarry at this location may create security issues and drinking water problems. Also, the width of the road to the proposed quarry site and the distance of the water source from the quarry site, etc., are against the conditions of related rules.

6. In the above circumstances, the application submitted by Sri.Rajeevan P.V. for a licence in Form LE-3 from the Deputy Chief Controller of Explosives, Ernakulam, to possess and store 100 kg of nitrate mixture, 2000 no. of ordinary detonators, 2000 no. of electric detonators, and 2000 metres of safety fuse wire in an explosive magazine at R.S. No. 5 of Thimiri Ansom Thalavil Desom of Thaliparamba Taluk, is hereby rejected.

Additional District Magistrate, Kannur.

To,

Sri.Rajeevan P.V, Puthiyaveettil House, Kooveri P.O, Kannur

Signed by

Divakaran K K

Date: 19-04-2023 10:47:28

Copy to

1. The Deputy Chief Controller of Explosives, Kakkanad,Ernakulam-682 037.
2. The District Police Chief , Kannur Rural
3. The Tahsildar, Thaliparamba
4. The District Fire Officer, Kannur.
5. The Secretary, Chapparapadavu Grama Panchayath.

100

Court Matter/Time Bound

F. No. L-11011/175/2018-IA-II (M)

Government of India
Ministry of Environment, Forest & Climate Change
Impact Assessment Division

3rd Floor, Vayu Wing,
Indira Paryavaran Bhawan,
Jorbagh Road, Aliganj,
New Delhi-110 003
Email: rb.lal@nic.in
Phone/Fax: 011-24695362

Dated: 12th December 2018

Office Memorandum

Sub: Order dated 04th September, 2018 & 13th September, 2018 passed by the Hon'ble National Green Tribunal, New Delhi in O.A. No. 173 of 2018 & O.A. No. 186 of 2016 in the matters titled "Sudarsan Das Vs State of West Bengal & Ors" & "Satendra Pandey Vs Ministry of Environment Forest & Climate Change & Anr." respectively- regarding.

This is with reference to the recent orders of the Hon'ble NGT dated 04th September, 2018 in the matter titled *Sudarsan Das Vs State of West Bengal & Ors* & and order dated 13th September, 2018 in the matter *Satendra Pandey Vs Ministry of Environment Forest & Climate Change & Anr.* Copies of the orders are enclosed herewith for ready reference.

2. The Hon'ble NGT vide order dated 13th September, 2018 in O.A. No. 186 of 2016 (*Satendra Pandey Vs Ministry of Environment Forest & Climate Change & Anr*) has inter-alia directed as follows:-

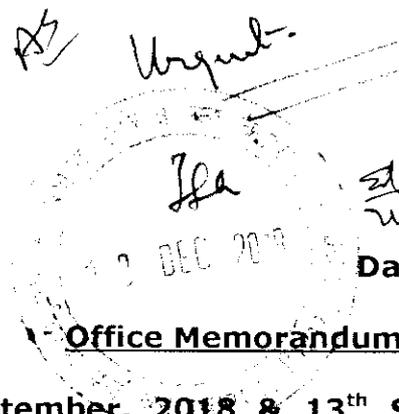
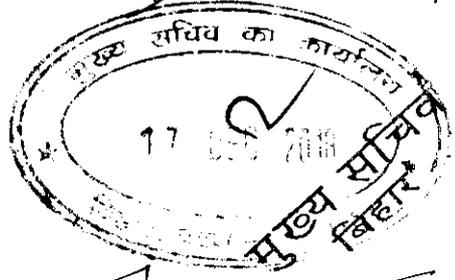
"(i) Providing for EIA, EMP and therefore, Public Consultation for all areas from 5 to 25 ha falling member Category B-2 at par with Category B-1 by SEAC/ SIEAA as well as for cluster situation wherever it is not provided;

(ii) Form-1M be made more comprehensive for areas of 0 to 5 ha by dispensing with the requirement for Public Consultation to be evaluated by SEAC for recommendation of grant EC by SEIAA instead of DEAC/DEIAA;

(iii) if a cluster or an individual lease size exceeds 5 ha the EIA/EMP be made applicable in the process of grant of prior environmental clearance;

(iv) EIA and/or EMP be prepared for the entire cluster in terms of recommendation 5 (supra) of the Guidelines for the purpose of recommendations 6, 7 and 8 thereof;

Acc. Com. Rmt.



शुभम / सुवि

*5-451
20/12/18*

20/12/18

प्रधान सचिव
पर्यावरण एवं वन विभाग
विहार, सरकार, पटना
दिनांक 12/12/18

मुख्य सचिव
पर्यावरण एवं वन विभाग
पटना

(v) revise the procedure to also incorporate procedure with respect to annual rate of replenishment and timeframe for replenishment after mining closure in an area;

(vi) the MoEF&CC to prepare guidelines for calculation of the cost of restitution of damage caused to mined-out areas along with the Net Present Value of Ecological Services forgone because of illegal or unscientific mining."

3. In view of the above, the undersigned is directed to forward the copy of the aforementioned order for necessary compliance and inform the Ministry about the action taken.

4. This issues with the approval of the Competent Authority.

Yours faithfully,

Encl: As above


(Dr. R.B. Lal)
Scientist 'E'

To,

1. The Chief Secretary, 1st Block, 1st Floor A.P Secretariat Office, Andhra Pradesh, Velagapudi - 522503
2. The Chief Secretary, Government of Arunachal Pradesh, Civil Secretariat, Itanagar - 791111
3. The Chief Secretary, Government of Assam, Block-C, 3rd Floor, Assam Sachivalaya, Guwahati-781006
4. The Chief Secretary, Government of Bihar, Main Secretariat Building, Patna-800015
5. The Chief Secretary, Government of Chhattisgarh, Mahanadi Bhawan, Mantralaya, Naya Raipur-492002
6. The Chief Secretary, Government of Gujarat, Block No.1, 5th Floor, Sardar Bhawan, Sachivalaya, Gandhinagar-382010
7. The Chief Secretary, Government of Goa, Secretariat, Porviroim, Bardez, Goa - 403521
8. The Chief Secretary, 4th Floor, Haryana Civil Secretariat Sector-I, Chandigarh - 160019
9. The Chief Secretary, Government of Himachal Pradesh Secretariat, Shimla - 171002
10. The Chief Secretary, R. No. 2/7, 2nd, Floor Main Building Civil Secretariat, Jammu - 180001 R. No. 307, 3rd Floor Civil Secretariat, Srinagar - 190001
11. The Chief Secretary, Government of Jharkhand 1st Floor, Project Building, Dhurwa, Ranchi-834004
12. The Chief Secretary, Govt of Karnataka, Room No.321, Vidhana Soudha, Bengaluru- 560 001
13. The Chief Secretary, Government of Kerala Secretariat, Thiruvananthapuram - 695001
14. The Chief Secretary, Government of Madhya Pradesh MP Mantralaya, Vallabh Bhavan Bhopal - 462004

15. The Chief Secretary, Government of Maharashtra CS Office Main Building, Mantralaya 6th Floor, Madame Cama Road, Mumbai - 400032
16. The Chief Secretary, Government of Manipur South Block, Old Secretariat Imphal-795001
17. The Chief Secretary, Government of Meghalaya Main Secretariat Building Rilang Building, Room No. 321 Meghalaya Secretariat, Shillong - 793001
18. The Chief Secretary, Government of Mizoram New Secretariat Complex, Aizwal - 796001
19. The Chief Secretary, Government of Nagaland Civil Secretariat, Kohima-797004
20. The Chief Secretary, Government of Odisha General Administration Department, Odisha Secretariat, Bhubaneswar - 751001
21. The Chief Secretary, Government of Punjab, Chandigarh - 160001
22. The Chief Secretary, Government of Rajasthan Secretariat, Jaipur - 302005
23. The Chief Secretary, Government of Sikkim New Secretariat, Gangtok - 737101
24. The Chief Secretary, Government of Tamil Nadu Secretariat, Chennai - 600009
25. The Chief Secretary, Government of Telangana Block C, 3rd Floor, Telangana Secretariat Khairatabad, Hyderabad, Telangana
26. The Chief Secretary, Government of Uttar Pradesh 1st Floor, Room No. 110 LalbahadurSastri Bhawan Uttar Pradesh Secretariat, Lucknow - 226 001
27. The Chief Secretary, Government of Tripura New Secretariat Complex, Secretariat-799010, Agartala West Tripura
28. The Chief Secretary, Government of Uttarakhand 4 Subhash Road, Uttarakhand Secretariat, Dehradun - 248001
29. The Chief Secretary, Government of West Bengal Nabanna, 13th Floor, 325, Sarat Chatterjee Road, MandirtalaShibpur, Howrah - 711102
30. The Chief Secretary, Andaman and Nicobar Administration Secretariat, Port Blair - 744101
31. The Chief Secretary, Secretariat, Moti, Silvasa, Daman - 396220
32. The Chief Secretary, Secretariat, Moti, Daman - 396 220
33. The Chief Secretary, Raj Bhawan, Chandigarh-160019
34. The Chief Secretary, Lakshadweep, Kavaratti - 682555
35. The Chief Secretary, Chief Secretariat, Goubert Avenue, Puducherry - 605001
36. The Chief Secretary, Delhi Secretariat, Ip Estate, Delhi - 110002, Near Indra Gandhi Indoor Stadium

Copy to:

1. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (SZ), Kendriya Sadan, 4th Floor, E&F Wings, 17th Main Road, Koramangala II Block, Bangalore-560034
2. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (WZ), E-5, Kendriya Paryavaran Bhawan, E-5 Area Colony, Link Road-3, Ravishankar Nagar, Bhopal-462016
3. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (EZ), A/3, Chandrasekharpur, Bhubaneswar-751023

4. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (SEZ), 1st and 2nd Floor, Handloom Export Promotion Council, 34, Cathedral Garden Road, Nungambakkam, Chennai-34
5. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (NZ), Bays No. 24-25, Sector 31 A, Dakshin Marg, Chandigarh-160030
6. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (NCZ), Pearson Road, P.P. New Forest, Forest Research Institute (FRI) Campus Dehradun-248006
7. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (CZ), Kendriya Bhawan, 5th Floor Sector "H", Aliganj, Lucknow-226020
8. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (WCZ), Ground Floor, East Wing, New Secretariat Building, Civil Lines, Nagpur-440001
9. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (ECZ), Bungalow No. A-2, Shyamali Colony Ranchi-834002
10. Addl. Principal Chief Conservator of Forests (C), Ministry of Environment, Forest & Climate Change, Regional Office (NEZ) Law-U-Sib, Lumbatngen, Near MTC Workshop, Shillong, Meghalaya-793021


(Dr. R.B. Lal)
Scientist 'E'