

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
SOUTHERN ZONE AT CHENNAI  
APPEAL No. 57 of 2022**

**T. Prabakaran**  
Karur District

.... Appellant

/Versus/

- 1. Union of India**  
Rep by its Secretary to Government,  
Ministry of Environment, Forest & Climate Change,  
Indira Paryavaran Bhawan, Jor Bagh Road,  
New Delhi – 110 003.
- 2. State Environment Impact  
Assessment Authority – Tamilnadu**  
Rep. by its Member Secretary  
3<sup>rd</sup> Floor, Panagal Maligai,  
No. 1, Jeenis Maligai, Saidapet,  
Chennai – 600 015.
- 3. Government of Tamil Nadu**  
Rep by its Principal Secretary to Government,  
Department of Environment, Secretariat,  
Fort St. George, Chennai – 600 009.
- 4. The Directorate**  
Department of Geology and Mining  
Karur District.
- 5. Assistant Director**  
Department of Geology and Mining  
District Collector Office Building  
Karur District.
- 6. The District Collector**  
Office of the District Collector,  
Karur.
- 7. Tamil Nadu Pollution Control Board**  
Rep. by its Member Secretary  
No.76, Anna Salai, Guindy,  
Chennai – 600 032.

  
**Member Secretary**

STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
Panagal Maligai, No.1, Jeenis Road,  
Saidapet, Chennai - 15

8. **The Tahsildar**  
Karur District.


9. **M/s. Sri Venkatramana Swamy Blue Metals**  
Rep. by its Managing Director  
Karur District.

.... Respondent(s)

**COUNTER AFFIDAVIT FILED ON BEHALF OF SEIAA – Tamilnadu, THE**  
**SECOND RESPONDENT**

I, Deepak S. Bilgi, I.F.S., S/o Mr. Siddappa, aged about 43 years, working as Member Secretary, State Level Environment Impact Assessment Authority, Tamil Nadu (SEIAA-TN) having office at Third Floor, Panagal Building, Saidapet, Chennai - 600 015, solemnly affirm and sincerely state as follows:

1. I am filing this counter affidavit on behalf of the Second Respondent/SEIAA-TN herein and as such I am well acquainted with the facts and the circumstances of the case from the records available in this office.
2. At the outset, I deny the averments and allegations stated in this original application except those that are specifically admitted hereunder and put the applicant to strict proof of the same.
3. It is respectfully submitted that, the project proponent, M/s. Sri Venkatramana Swamy Blue Metals / Ninth Respondent, submitted their application for obtaining grant of Terms of Reference (ToR) through Form-I, Pre-Feasibility report vide Proposal No. SIA/TN/MIN/53847/2020, dated 12.06.2020 for Rough Stone & Gravel Quarry in S.F.Nos. 195/1 (Part) & 198/1 (Part) of Thennilai (East) Village, Pugalur Taluk, Karur District, Tamil Nadu.
4. It is respectfully submitted that, the proposal was placed in the 169<sup>th</sup> SEAC Meeting held on 07.08.2020. The project proponent gave detailed presentation. The details of the project furnished by the proponent are available in the website (Parivesh). The SEAC noted the following:
  - The Proponent, M/s. Venkatramana Swamy Blue Metals, has applied for Terms of Reference for the proposed Rough Stone (9.92.015m<sup>3</sup>) and Gravel (72.176m<sup>3</sup>) Quarry lease over an Extent of 4.90.0ha of Patta Land in S.F.No's.195/1 (P) & 198/1 (P) of Thennilai (East) Village, Pugalur Taluk, Karur District. Tamil Nadu.
  - The project/activity is covered under Category "B" of Item 1(a) "Mining of Minerals Projects" of the Schedule to the EIA Notification, 2006.

  
**Member Secretary**  
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
Panagal Maligai, No.1, Jeemis Road,  
Saidapet, Chennai - 15


**Based on the presentation given by the project proponent and document furnished by the project proponent, the SEAC decided to recommend the proposal for the grant of Terms of Reference (TOR) to SEIAA with Public Hearing, subject to the following specific conditions in addition to the points mentioned in the standard terms of reference for conducting environment impact assessment study for non-coal mining projects and information to be included in EIA/EMP report issued by the MoEF&CC.**

- I. The proponent shall furnish the contour map of the water table detailing the number of wells located around the site and impacts on the wells due to mining activity.
- II. The proponent shall conduct the hydro-geological study to evaluate the impact of proposed mining activity on the groundwater table, agriculture activity, and water bodies such as rivers, tanks, canals, ponds etc. located nearby by the proposed mining area.
- III. The proponent shall furnish the details on number of groundwater pumping wells, open wells within the radius of 1 km along with the water levels in both monsoon and non-monsoon seasons. The proponent would also collect the data of water table level in this area during both monsoon and non-monsoon seasons from the PWD/TWAD.
- IV. The Proponent shall conduct the Cumulative impact study on the agricultural area due to Mining. Crushers and other activities around the site area.
- V. The details of surrounding well and the cumulative impact on the ground water shall be part of EIA study.
- VI. The Socio-economic impact assessment due to the project needs to be carried out within 10 km buffer zone from the mines.
- VII. A detailed report on the green belt development already undertaken is to be furnished. They also need to submit the proposal for green belt activities for the proposed mine(s).
- VIII. CER activities should be carried out taking into consideration the requirement of the local habitants available within the buffer zone as per Office Memorandum of MoEF&CC dated 01.05.2018.
- IX. A Detailed mining closure plan for the proposed project shall be submitted.


  
Member Secretary

STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
Panagal Malligal, No.1, Jeeris Road,  
Saidapet, Chennai - 15

- X. A detail report on the safety and health aspects of the workers and for the surrounding habitans during operation of mining for drilling and blasting shall be submitted.
- XI. The recommendation for the issue Terms of Reference is subject to the outcome of the Hon'ble NGT. Principal Bench, New Delhi in O.A No.186 of 2016 (M.A.No.350/2016) and O.A. No.200/2016 and O.A.No.580/2016 (M.A.No.1182/2016) and O.A.No.102/2017 and O.A.No.404/2016(M.A.No.758/2016.M.A.No.920/2016.M.A.No.1122/2016,M.A.No.12/2017 & M.A. No. 843/2017) and O.A.No.405/2016 and O.A.No.520 of 2016 (M.A.No. 981 /2016. M.A.No.982/2016 & M.A.No.384/2017).
- XII. Detail of the lithology of the mining lease area shall be furnished.
- XIII. A study shall be conducted on the number of trees (name of the species, age) present in the mining lease applied area and how, it will be managed during mining activity.
- XIV. Safety distance of 50m should be given from the boundary of the project site, as there is an ODAI passing in the Southeast direction from the proposed mine lease area.
- XV. The ultimate depth of the mining is restricted from 52m to 40m below ground level considering the hydrogeological regime of the surrounding area.
5. It is respectfully submitted that, the proposal was placed in the 399<sup>th</sup> SEIAA-TN Meeting held on 24.09.2020. After detailed discussion the authority decided to grant Terms of Reference with Public Hearing for the preparation of EIA Report with additional ToR as recommended by SEAC and subject to General conditions to the following conditions:
- The depth of mining is restricted from 52m to 40m below ground level.
  - Details of study on social impact, including livelihood of local people.
  - A specific study should include impact on flora & fauna, disturbance to migratory pattern of animals.
  - Reserve funds should be earmarked for proper closure plan.
  - A detailed plan on plastic waste management shall be furnished. Further, the proponent should strictly comply with, Tamil Nadu Government Order (Ms) No.84 Environment and Forests (EC.2) Department dated 25.06.2018 regarding ban on one time use and throw away plastics irrespective of thickness with effect from 01.01.2019 under Environment (Protection) Act, 1986. In this connection, the project proponent has to furnish the action plan.

  
**Member Secretary**  
 STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
 Panagal Maligai, No.1, Jeeris Road,  
 Saidapet, Chennai - 15

- A detailed post-COVID health management plan for workers as per ICMR and MHA guidelines or the State Government guideline may be followed and report shall be furnished.
6. It is respectfully submitted that, as per the EIA Notification, 2006 – III. Stage (3) – Public Consultation para (iii) ***“the public hearing at, or in close proximity to, the site(s) in all cases shall be conducted by the State Pollution Control Board (SPCB) or the Union Territory Pollution Control Committee (UTPCC) concerned in the specified manner and forward the proceedings to the regulatory authority within 45 (Forty-five) of a request to the effect from the applicant”***.
  7. It is respectfully submitted that, as per the EIA Notification, 2006, (Stage-III) Public Hearing which was conducted by the TNPCB in V.P. Kalyana Mahal, No.762/2 Covai Road, Kattu Munnur, K. Paramathi via Pugalur Taluk, Karur District on 26.08.2021. In this regard, the advertisements were circulated in the newspapers such as Indian Express and Dinakaran dated 24.07.2021.
  8. It is respectfully submitted that, the prepared mining plan was approved by the competent authority vide Lr. Rc.No.535/Mines/2019 with the following conditions:
    - I. The mining plan is approved without prejudice to any other Law applicable to the quarry lease from time to time whether such laws are made by the Central Government, State Government or any other authority.
    - II. This approval of the mining plan does not in any way imply the approval of the Government in terms or any other provisions of the Mines and Minerals (Development and Regulation) Act, 1957, or any other connected laws including Forest (Conservation) Act, 1980, Forest Conservation Rules, 1981, Environment Protection Act, 1980, Explosives Act, 1884 (Central Act IV of 1884) Minor Mineral Concession and Development Rules, 2010 and the Rules made there under and the Tamil Nadu Minor Mineral Concession Rules, 1959.
    - III. The mining plan is approved without prejudice to any other order or direction from any court of competent jurisdiction.
    - IV. As per the District Collector, Karur notice in Rc.No.535/Mines/2019, Dated:29.11.2019 the following conditions incorporated in the Mining Plan (IV) plates.
      - a. குத்தகைக்காலத்தில் புலத்தின் தெற்கே அமைந்துள்ள நொய்யல் வாய்க்காலிற்கு 50 மீட்டர் பாதுகாப்பு

  
 Member Secretary  
 STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
 Panagal Malignai, No.1, Jeonis Road,  
 Sakdapat, Chennai - 15


இடைவெளி விட்டு எவ்வித சேதமும் ஏற்படுத்தாமல் குவாரி பணி மேற்கொள்ள வேண்டும்.

- b. குத்தகைக்காலத்தில் புலத்தின் வடக்கே அமைந்துள்ள தென்வடலாக செல்லும் வண்டிப்பாதைக்கு 10 மீட்டர் பாதுகாப்பு இடைவெளி விட்டு எவ்வித இடையூறும் ஏற்படுத்தாமல் குவாரி பணி மேற்கொள்ள வேண்டும்.
- c. குத்தகைக்காலத்தில் அருகில் உள்ள பட்டா நிலங்களுக்கு 7.5 மீட்டர் பாதுகாப்பு இடைவெளி விட்டு யாதொரு சேதமுமின்றி முறையாக குவாரிப்பணி செய்ய வேண்டும்.
- d. குத்தகை ஒப்பந்தம் நிறைவேற்றுவதற்கு முன்னர் குவாரி புலத்திலிருந்து கனிமங்களை எடுத்துச்செல்ல பாதைவசதி ஏற்படுத்தப்பட்ட விவரத்தை மாவட்ட ஆட்சியருக்கு எழுத்து மூலம் புகைப்பட ஆதாரத்துடன் தெரிவிக்க வேண்டும்.
- e. குத்தகைக்காலத்தில் கைத்துளைப்பான் கருவி கொண்டு பாறைகளை துளையிட்டும், மிதமான பயன்படுத்தியும், பொதுமக்களுக்கோ, பொது சொத்துக்களுக்கோ யாதொரு சேதமுமின்றி விதிமுறைகளின்படி குவாரிப்பணி செய்ய வேண்டும்.
- f. குவாரித் தொழிலாளர்களின் பாதுகாப்பினை உறுதி செய்ய Mettalliferous Mines, விதிகளின்படி அகலமானதும், பாதுகாப்பானதுமான Benches அமைத்து பாதுகாப்பான முறையில் குவாரிக்குள் வாகனங்கள் சென்றுவரவும் மற்றும் குவாரி தொழிலாளர்களின் பாதுகாப்பினை உறுதி செய்தும் குவாரிப்பணி செய்ய வேண்டும்.
- g. குவாரி குத்தகை வழங்க ஏதுவாக உதவி இயக்குநர் (சுரங்கம்) அவர்களால் ஏற்பளிக்கப்பட்ட சுரங்கத்திட்டத்தினையும், தமிழ்நாடு மாநில அளவிலான சுற்றுச்சூழல் செயல் மதிப்பீட்டு அதிகார அமைப்பு (SEIAA) மற்றும் தமிழ்நாடு மாசுக்கட்டுப்பாட்டு வாரிய துறை (TNPCB) ஆகியவற்றின் தடையின்மை சான்று பெற்றும், மாவட்ட நிர்வாகத்திற்கு மனுதாரரால் சமர்ப்பிக்கப்பட வேண்டும்.




- V. Quarrying shall be done as per the approved Mining Plan and that the mining plan is approved without prejudice to any other law applicable to the quarry lease from time to time whether such laws are made by the Central Government, State Government or any other authority.
- VI. If anything is found to be concealed as required by the Mines Act in the contents of the Mining Plan and the proposal for rectification has not been made, the approval shall be deemed to have been withdrawn with immediate effect.
9. It is respectfully submitted that, the approved Mining plan, Form-I, Pre-feasibility report, EIA report along with Public Hearing Minutes were placed in the 292<sup>nd</sup> SEAC Meeting held on 07.07.2022. The details of the project furnished by the proponent are available in the website (Parivesh). The SEAC noted the following:
- The Project Proponent. Tvl. Sri Venkatramana Swamy Blue Metals has applied for Environmental Clearance for the proposed rough stone and Gravel quarry lease over an extent of 4.90.0 Ha at S.F. No. 195/1 (P) & 198/1 (P) of Thennilai (East) Village, Pugalur Taluk, Karur District, Tamil Nadu.
  - The project/activity is covered under category “B1” of Item 1(a) “Mining Projects” of the Schedule to the EIA Notification, 2006.
  - As per mining plan, the lease period is for 5 years, the total quantity of recoverable should not exceed 8,62,582cu.m. of Rough Stone and 72,176cu.m. of Gravel with an ultimate depth of mining is 40m [5m AGL 35m BGL (2m Gravel + 38m Rough stone)] as per approved ToR. The annual peak production as per mining plan is 2.78.965 cu.m of rough stone & 32.760 cu.m of gravel.
  - TOR was issued in Lr. No. SELAA-TN/F.No.7702/SEAC/TOR-773/2020, Dated:06.10.2020.
  - Public hearing was conducted on 26.08.2021.
  - The VAO letter dated 31.10.2019, which states as follows; “there is no approved habitation, schools, colleges, worship places etc. located within 300 metres from the proposed site.”
  - The KML file submitted by the proponent in the PARIVESH portal was verified during the meeting. It was found that the existence of temple and structures are located at 300 metres away from the proposed mine lease area.

10. It is respectfully submitted that, as per Tamilnadu Minor Mineral Concession Rules, 1959 under Section V – Miscellaneous in para 36. General exceptions in respect of quarrying operations; “(c) No new layout, building plans falling within 300 metres from any quarry should be given approval by any agency unless prior clearance of the Director of Geology and mining is obtained. On receipt of proposals for according clearance, Director of Geology and mining shall decide upon the continuance or closure, as the case may be of any quarry which is situated within 300 metres from the now layout, building sought for such clearance.”
11. It is respectfully submitted that, the canal exists at 50 meters from the proposed area – “...as per the District Collector, Karur notice n Rc.No.535/Mines/2019 dated 29.11.2019 the following conditions incorporated in the mining plan (IV) plates.  
*“குத்தகைக்காலத்தில் புலத்தின் தெற்கே அமைந்துள்ள நொய்யல் வாய்க்காலிற்கு 50 மீட்டர் பாதுகாப்பு இடைவெளி விட்டு எவ்வித சேதமும் ஏற்படுத்தாமல் குவாரி பணி மேற்கொள்ள வேண்டும்..”*
12. It is respectfully submitted that, as per G.O. (Ms). No.244 dated 14.12.2022 – *Para 1 (iii)*  
*“To amend the prohibited area for the grant of lease from the archaeological sites and remains/ancient monuments within the safety distance of 500 metres from the boundary of such site by reducing the radial safety distance of 300 meter in consonance with the Ancient Monuments and Archaeological Sites and Remains Act, 1958 by making necessary amendments to the Rule 36 (1-A) (d) of the said rules”.*
13. It is respectfully submitted that, based on the presentation and above said documents furnished by the project proponent, SEAC decided to recommend the proposal for the grant of Environmental Clearance for an Annual peak production of 2,78,965 cu.m of rough stone & 32,760cu.m of gravel, subject to the standard conditions as per the Annexure of this minutes & normal conditions stipulated by MOEF&CC, in addition to the following specific conditions:
- I. The prior Environmental Clearance granted for this mining project shall be valid for the project life including production value as laid down in the mining plan approved and renewed by competent authority, from time to time, subject to a maximum of thirty years, whichever is earlier, vide MoEF&CC notification No. S.O. 1807(E) Dt:12.4.2022.
  - II. The mine manager and other statutory competent persons such as blaster (or) mine mate shall be appointed before the commencement of mining operation as per the provisions of Mines Act 1952 and Metalliferous Mines Regulations, 1961. 2. The PP shall furnish slope stability action plan to the AD/Mines-DGM Incorporating haul road along with benches, for the planned working as the depth of the proposed quarry is exceeding 30m, before obtaining CTO from TNPCB.

  
**Member Secretary**  
 STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
 Panagal Maligai, No.1, Jeeris Road,  
 Saidapet, Chennai - 15

- III. The PP shall ensure that only NONEL Initiation bound controlled blasting technique Involving line drilling and muffle blasting is carried out in the quarry such that no fly rock travel beyond 20 m from the blast site and the blast- Induced ground vibration (PPV) measured in the structures not belonging to the owner, located at a distance of 365 m shall not exceed 2 mm/s.
- IV. The PP shall carry out the scientific studies for controlling the blast-induced ground/air vibrations and reducing the fly rock within two years after the commencement of quarrying operation, by involving a reputed Research and Academic Institution such as NIRM, IITs, NIT-Dept of Mining Engg. Surathkal, Anna University Chennai-CEG Campus, and any CSIR Laboratories etc. A copy of such scientific study report shall be submitted to the SEIAA, MOEF, TNPCB, AD/Mines-DGM and DMS, Chennai as a part of Environmental Compliance without any deviation.
- V. The PP shall carry out the scientific studies to assess the slope stability of the benches and quarry wall when the depth of the quarry touches 40 m (or) after the completion of 4 years of operation whichever is earlier, by involving at reputed Research and Academic Institution such as NIRM, IITs, NIT-Dept of Mining Engg. Surathkal, Anna University Chennai-CEG Campus, and any CSIR Laboratories etc. A copy of such scientific study report shall be submitted to the SEIAA, MOEF, TNPCB, AD/Mines-DGM and DMS, Chennai as a part of Environmental Compliance without any deviation.
- VI. The PP shall form a Disaster Management Cell for carrying out the quarrying operations with a view to ensure the safety of workmen and surrounding habitations.
- VII. The Project Proponent shall carryout plantation/ afforestation around water body, along the roadsides, in community areas etc. by planting the native species in consultation with the State Forest Department/ Agriculture Department/ Rural development department/ Tribal Welfare Department/ Gram Panchayat such that only those species be selected which are of use to the local people.
- VIII. As per the MoEF&CC Office Memorandum F.No. 22-65/2017-IA.III dated: 30.09.2020 and 20.10.2020 the proponent shall adhere to the EMP as committed.
- IX. As accepted by the Project Proponent the CER cost is Rs. 5 lakhs and the amount shall be spent to the committed activities for Panchayath Union Primary School. Irakkiyagoundanur Village before obtaining CTO from TNPCB.
14. It is respectfully submitted that, the proposal was placed in the 537<sup>th</sup> SEIAA-TN Meeting held on 29.07.2022. SEAC has furnished its recommendations to the Authority for granting Environmental Clearance to the project subject to the conditions stated therein. After detailed discussion, SEIAA decided to grant EC for the quantity as per the mine plan for a

  
 Member Secretary  
 STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
 Panagal Maligai, No.1, Jeonis Road,  
 Saldapet, Chennai - 15

period of 5 years approved by the department of Geology & Mining subject to the conditioned as recommended by SEAC in addition to the following conditions:

1. Restricting the ultimate depth of mining up to 32m (5m AGL+ 27m BGL) and quantity of 7,41,085 cu.m of rough stone & 72,176 cu.m of Gravel are permitted for mining over a period of five years considering the environmental impacts due to the mining, safety precautionary measures of the working personnel and following the principle of the sustainable mining.
2. As accepted by the Project proponent the revised CER cost is Rs. 5 lakhs and the amount shall be spent for the Panchayath Union Primary School, Irakkiyagoundanur village as committed, before obtaining CTO from TNPCB.
3. The proponent shall shift (or) shall leave safety distance for the low/high tension line in the proposed mining area accordingly as recommended in precise area communication & Mine plan approval before executing mine lease and obtaining CTO from the TNPCB.
4. No trees in the area should be removed and all the trees numbered and protected. In case trees fall within the proposed quarry site the trees may be transplanted in the Greenbelt zone.
5. The proponent shall ensure that the activities should in no way result in disturbance to forest and trees in vicinity.
6. The proponent shall ensure that the operations shall not result in loss of soil biological properties and nutrients.
7. The activity should not result in Co<sub>2</sub> release and temperature rise and add to micro climate alternations.
8. The mining closure plan should be strictly adhered with appropriate soil rehabilitation measures to ensure ecological stability of the area.
9. Reclamation/Restoration of the mine site should ensure that the Geotechnical, physical, chemical properties are sustainable that the soil structure composition is build-up, during the process of restoration.
10. The proponent shall ensure that the activity does not disturb the movement of grazing animals and free ranging wildlife.
11. The proponent shall ensure that the activity does not disturb the biodiversity, the flora & fauna in the ecosystem.

12. The proponent shall ensure that the activity does not disturb the water bodies and natural flow of surface and ground water, nor cause any pollution, to water sources in the area.
13. The proponent shall ensure that the activities undertaken should not result in carbon emission, and temperature rise, in the area.
14. The proponent shall ensure that the mine closure plan is followed as per mining plan and the mine restoration should be done with native species, and site restored to near original status.
15. The proponent shall ensure that Monitoring be carried out with reference to the quantum of particulate matter during excavation; blasting; material transport and also from cutting waste dumps and haul roads.
16. The proponent shall ensure that the area is ecologically restored to conserve the ecosystems and ensure flow of goods and services.
17. The proponent shall ensure that the activities shall not disturb the agro biodiversity and agro farms.
18. The proponent shall ensure that the activity shall not result in invasion by invasive alien species.
19. Actions to be taken to promote agro forestry, mixed plants to support biodiversity conservation in the mine restoration effort.
20. The proponent shall ensure that activity shall not deplete the indigenous soil seed bank and disturb the mycorrhizal fungi, soil organism, soil community nor result in eutrophication of soils and water.
21. The activities should not disturb the soil properties and seed and plant growth. Soil amendments as required to be carried out, to improve soil health.
22. Bio remediation using an microorganisms should be carried out to restore the soil environment to enable carbon sequestration.
23. The proponent shall ensure that all mitigation measures listed in the EIA/EMP are taken to protect the biodiversity and natural resources in the area.
24. The proponent shall ensure that the activities should not impact the water bodies/wells in the neighbouring open wells and bore wells.



Member Secretary

25. The proponent shall ensure that the activities should not in any way affect the water quantity and quality in the open wells and bore wells in the vicinity, nor impact the water table and levels.
  26. The proponent shall ensure that in the green belt development more indigenous trees species (Appendix as per the SEAC Minutes) to be planted.
  27. The proponent shall ensure that the activities should not disturb the resident and migratory birds.
  28. The proponent shall ensure the area should be restored and rehabilitated with native trees as recommended SEAC Minutes (in Appendix).
  29. The proponent shall ensure that the mine restoration should be done using mycorrhizal VAM, vermicasting. Biofertilizers to ensure soil health and, biodiversity conservation.
  30. The proponent shall ensure that the topsoil should be protected and used in planting activities in the area.
  31. The proponent shall ensure that the activities should not disturb the river flow, nor affect the Odai, Water bodies, Dams in the vicinity.
  32. The proponent shall ensure that the activities should not disturb the vegetation and wildlife in the adjoin reserve forests and areas around.
  33. The proponent should ensure that there is no disturbance to the agriculture plantations, social forestry plantations, waste lands, forests, sanctuary or national parks. There should be no impact on the land, water, soil and biological environment and other natural resources due to the mining activities.
  34. The proponent shall ensure that topsoil to be utilized for site restoration and green belt alone within the proposed area.
  35. The proponent shall ensure that activities should not impact green lands/grazing fields of all types surrounding the mine lease area which are food source for the grazing cattles.
15. It is respectfully submitted that, the Environmental Clearance (EC) was issued EC to the project through vide Lr. No. SEIAA-TN/F.No.7702/1(a)/EC. No:5175/2020 dated:29.07.2022.



**Member Secretary**  
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
Panagal Maligai, No.1, Jeenais Road,  
Saidapet, Chennai - 15

It is therefore humbly prayed that this Hon'ble National Green Tribunal Court, South Zone, may be pleased to record the above-mentioned facts and pass appropriate orders as this Hon'ble NGT(SZ) may deem fit and proper in this case and thus render justice.

*sk*  
*.. 6/2/2023*  
**Member Secretary**

STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN  
Panagal Maligai, No.1, Jeonis Road,  
Saidapet, Chennai - 15

**SECOND RESPONDENT**  
**MEMBER SECRETARY**

Solemnly affirmed at Chennai  
On this 06<sup>th</sup> day of February 2023  
& Signed his name in my presence.

*6/2/23*

**Assistant Environmental Engineer**  
State Level Environment Impact Assessment Authority-Tamilnadu  
Third Floor, Panagal Maligai  
Saidapet, Chennai - 600 015

**BEFORE ME**  
Attested Officer