

BEFORE THE NATIONAL GREEN TRIBUNAL WESTERN
ZONE, PUNE

Appeal No. 26 of 2025 (WZ)



IN THE MATTER OF:

Go Green Foundation Trust

... Appellant(s)

Versus

Union of India & Ors.

... Respondent(s)

ADDITIONAL AFFIDAVIT ON BEHALF OF RESPONDENT NO. 01, MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE

I, Yogesh Kumar, son of Mr. N.K. Prasad, aged 36 years, presently employed as Scientist 'C' at the Regional Office of the Ministry of Environment, Forest, and Climate Change (MoEF&CC), Gandhinagar, solemnly affirm and declare the following:

1.

1. That I, the above-named Deponent, am authorized and well conversant with the facts and circumstances of the present case and thus competent to swear the present Affidavit.
2. That I have read and understood the contents of the present Affidavit. The contents thereof are true and correct.
3. That it is most respectfully submitted that, the Hon'ble Tribunal *vide* its order dated 12.01.2026 directed that: "*Respondent No. 1- MoEF&CC may also file reply as to what was the role of Hon'ble Expert Member- Dr. Sujit Kumar Bajpayee in grant of the EC, for the sake of assistance, within a week.*"
4. That it is most respectfully submitted that, in compliance with the above direction of the Hon'ble Tribunal, the relevant facts and the chronological developments w.r.t. grant of the impugned environmental clearance, along with the role of the Ld. Expert Member, are as follows:
 - i. Ld. Expert Member Joined MoEF&CC as a Joint Secretary on 13th September, 2019 and has served till 12th September 2024.
 - ii. The Application for the grant of Environmental Clearance was submitted by "M/S GHCL Greenfield Chemical Complex Ltd", Respondent No. 13 on 27th December, 2023 as per provisions of EIA Notification, 2006 as amended from time to time.

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- iii. As per EIA Notification, 2006 the proposal submitted by Respondent No. 13 "M/S GHCL Greenfield Chemical Complex Ltd" was placed before the Expert Appraisal Committee (EAC) in its **80th meeting held on 07th June, 2024** and the committee recommend the project proposal for grant of EC.
- iv. Further, the matter was examined in the Ministry and it was observed that a large number of written representations received in the ministry and the issues involved. Accordingly, the Ministry decided to undertake site visit by the sub-committee of EAC (Industry -3) to understand the ground situation. **It is respectfully submitted that the role of Ld. Expert member was involved in the matter up to this stage.**
- v. The Expert Appraisal Committee (EAC), in its **84th meeting held on 21st – 22nd August, 2024** and based on the recommendation of MoEFCC, constituted a **sub-committee** to further examine the proposal. On 9th October, 2024 a site inspection was conducted by the sub-committee along with officials from the Regional Office, Gandhinagar, and representatives of the Gujarat Pollution Control Board (GPCB), Kutch (West). The Sub-committee submitted its site visit report to Expert Appraisal Committee (EAC).
- vi. It is further respectfully submitted that on 23rd September, 2024 Ld. Expert Member was appointed as a full-time Member of the Commission for Air Quality Management in the National Capital Region (NCR) and Adjoining Areas with and continued as a full-time member until the appointment of the Expert Member of the Hon'ble NGT. Furthermore, during the said period Ld. Expert Member being full-time Member of the Commission for Air Quality Management in the National Capital Region (NCR) and Adjoining Areas was not involved in the process of grant of Environmental Clearance.
- vii. The site visit report of the sub-committee of the EAC(Industry-III) placed before the EAC in its **87th meeting held on 21st October, 2024**, wherein the EAC examined and deliberated upon the site visit report. Upon due consideration, the EAC recommended the proposal for grant of Environmental Clearance and CRZ Clearance for the proposed greenfield chemical complex of M/s GHCL at Bada Village, Mandvi, Kutch, Gujarat.

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Based on the recommendations of the EAC, the MoEF&CC granted the Environmental and CRZ Clearance vide letter No. IAJ-11011/293/2021-IA-II(I) dated 12.12.2024, subject to specific and general conditions prescribed as environmental safeguards.

5. In view of the foregoing, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to pass any Order as it deems fit in the interest of justice:

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DEPONENT
24/01/26

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डॉ. योगेश कुमार / Dr. Yogesh Kumar
वैज्ञानिक 'सी' / Scientist 'C'
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,
Ministry of Environment, Forest & Climate Change,
भारत सरकार / Govt. of India
ए. क्षे. का., गाँधीनगर (गुजरात) / IRO, Gandhinagar (Gujarat)



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VERIFICATION

Verified at Gandhinagar on this 24th day of January, 2026 that the contents of this affidavit are true and correct to my knowledge and as per official records maintained in the routine course of business. No part of the above affidavit is false and nothing material has been concealed there from.

योगेश कुमार
DEPONENT
24/01/26

डॉ. योगेश कुमार / Dr. Yogesh Kumar
वैज्ञानिक 'सी' / Scientist 'C'
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,
Ministry of Environment, Forest & Climate Change,
भारत सरकार / Govt. of India
ए. क्षेत्र. का., गाँधीनगर (गुजरात) / IRO, Gandhinagar (Gujarat)



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PAGE NO. 31
DATE: 24 JAN 2026

Alpa A. Prajapati
ALPA A. PRAJAPATI
NOTARY
GOVT. OF INDIA



SOLEMNLY AFFIRMED
BEFORE ME

Alpa A. Prajapati
ALPA A. PRAJAPATI
NOTARY
GOVT OF INDIA

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