

FORM -I  
[See Rule 8(1)]  
**BEFORE THE NATIONAL GREEN  
TRIBUNAL, SOUTHERN ZONE,  
CHENNAI**

(Under Section 18(1) read with  
Section 14 of National Green  
Tribunal Act,2010)

**APPLICATION No. 153 of 2016 (SZ)**

**In the Matter of**

1.PARYAVARANA PARIRAKSHANA  
SANGHAM,Through its President  
Mr.Y.Krishnamurthy,  
Sompeta, Srikakulam District,  
Andhra Pradesh and another

Applicants

Vs

1. UNION OF INDIA  
Through Secretary  
Ministry of Environment &  
Forest Paryavaran Bhawan,  
CGO Complex, Lodhi Road,  
New Delhi- 110 003  
and 3 others

Respondents

**ADDITIONAL REPLY  
STATEMENT FILED BY  
4<sup>TH</sup> RESPONDENT**

**M/s L.G.SAHADEVAN1102/93  
T-8, 4<sup>th</sup> FLOOR, SINGAPORE PLAZA,  
164/337, LINGHI CHETTY STREET,  
CHENNAI- 600 001: PH: 9841016152  
COUNSEL FOR RESPONDENT-4  
saha666@gmail.com**

**BEFORE THE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE,  
CHENNAI**

(Under Section 18 (1)) read with Section 14 of National Green Tribunal Act,  
2010)

**Application No.153/2016 (SZ)**

In the matter of

1. PARYAVARANA PARIRAKSHANA SANGHAM  
Through its President Mr.Y.Krishnamurthy,  
Sompeta, Srikakulam District,  
Andhra Pradesh.
2. E.A.S.Sarma  
14-40-4/1, Gokhale Road,  
Maharanipeta,  
Visakhapatnam – 530002.

... Applicants

Versus

1. UNION OF INDIA  
Through Secretary  
Ministry of Environment & Forest  
ParyavaranaBhawan, CGO Complex,  
Lodhi Road,  
New Delhi – 110 003.
2. CENTRAL WETLANDS REGULATORY AUTHORITY,  
Through its Chairman  
Ministry of Environment and Forests  
And Climate Change,  
Indira ParayavaranaBhawan,  
Jorbagh Road, Aliguni,  
New Delhi.
3. STATE OF ANDHRA PRADESH,  
Through its Chief Secretary,  
Government of Andhra Pradesh,  
Secretariat, Hyderabad – 500 022.
4. M/s NCC Ltd.  
(formerly known asNagarjuna Construction Company Ltd).  
Nagarjuna Hills, Punjagutta,  
Hyderabad, Andhra Pradesh.  
  
(Now at NCC House,  
Madhapur,  
Hyderabad)

Also at:-

M/S NAGARJUNA CONSTRUCTION COMPANY LTD.  
Project office at: - Sompeta Town,  
Sompeta Mandal, District, Srikakulam,  
Andhra Pradesh  
Rep by its G.M-Admin & Co-ordination,  
Sri.Badari Narayana N.

... Respondents



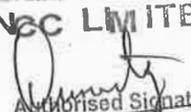
For **NGC LIMITED**

*[Signature]*  
Authorized Signatory

**ADDITIONAL REPLY STATEMENT FILED BY THE 4<sup>TH</sup> RESPONDENT**

1. It is submitted that the Applicants in the Original Application has filed the application for following reliefs:
  - a. Direct the Respondent No.1 & 2 to consider the SACON Report and notify the wetlands in Srikakulam District, including the Sompeta land as "Wetlands" in terms of the Wetland (Conversion and Management) Rules, 2010 for Conservation.
  - b. Quash the G.O.Ms.No.329(Revenue Assn.I Dept.) dated 09.09.2015 whereby the Respondent No.4 – Nagarjuna Construction Company Ltd., (known NCC Limited) has been allowed to set up Multi Product Industry Zone in Sompeta Wetland Area identified in the SACON Report as it violates the Wetland (Conversion and Management) Rules, 2010.
  - c. Direct the Respondents to ensure that effective methods are taken the Wetlands and Wetland complexes against the pressures of anthropogenic activities as per the Wetland Rules, the principle of Sustainable Development and commitment under the Ramsar Convention.
  - d. Pass Orders for further Orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the Case.
2. This Respondent has already filed his Reply Statement challenging the maintainability of the said application. However, as directed by this Hon'ble Tribunal vide its Order dated 28.01.2021 this Respondent craves leave of this Hon'ble Tribunal to file the detailed reply on merits which may be read as part and parcel of the reply already filed.

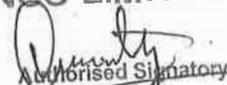


For NCC LIMITED  
  
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3. It is submitted that apart from the contentions raised by this Respondent in its earlier reply, it is submitted that the entire case of the applicant and the reliefs sought there under, is based on SACON Report submitted to the Central Government with regards to the status of the wetlands in the District of Srikakulam, keeping in view the establishment of Thermal Power Project over the said lands, which as per the subsequent development, has been withdrawn by the State Government and keeping in view the sentiments of the local people has been converted for establishment of eco-friendly "Multi Product Industry Zone" vide impugned G.O.Ms.No.571,Revenue, dated 14.09.2012. Thus, it is respectfully submitted that the contention of the Applicant, which is based on SACON Report pertaining to ecological impact on establishing a Thermal Power Project on the proposed lands, cannot be a ground to challenge the establishment of Multi Product Industry in the said lands.
4. It is respectfully submitted that the SACON Report is based on hypothetical presumptions and assumptions without any authoritative statistics and study. On the contrary various studies carried out by this Respondent, for establishing Thermal Power Plant, through recognized Government Agencies and Authorities, specifically enumerates that there will not be any ecological impact and there would not be any threat to the animal and plant species. It is further submitted that the Annual Report of Ministry of Environment and Forests, Govt. of India and the Forest Department of Government of Andhra Pradesh, do not mention the Sompeta lands as wet lands. The detailed observations and conclusions of various surveys and studies carried out for establishing Thermal Power Plant, which were carried out by recognized Government Agencies and Authorities, are enumerated hereunder:



For NCC LIMITED

  
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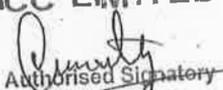
**A. Studies on the determination of Coastal Regulation Zone and setbacks by National Institute of Oceanography, Goa, Govt. Of India** has specifically observed that

- a. The project lands are away from the marine environment and does not fall under CRZ area.
- b. The land use of the proposed project area is either barren or waste land.
- c. The land does not fall or contain in its vicinity, any environmentally sensitive and important ecosystem
- d. Only off- site facilitates such as Sea water intake & out fall pipe lines and closed conveyor from Jetty to Project site will be in the CRZ -III area.

**B. A study on Bio-diversity and water quality in regard to these lands and downstream drainage up to sea by Prof.Seshagiri Rao (University of Hyderabad) and Prof. V S Raju (Kakatiya University Warangal)** has concluded that

- a. The proposed project site has no Ecologically Sensitive Areas (ESA) or factors like- (1) Mangroves (2) Coral reefs (3) Sand dunes (4) Mud flats (5) Protected Marine Wildlife Parks and Sanctuaries (6) Coastal Forests and Wildlife (7) Salt Marshes (8) Turtle nesting grounds (9) Horse-shoe Crab's habitats (10) Sea weed beds (11) Sea grass beds, and (12) Nesting grounds for migratory birds.
- b. The site has no connection from the sea. It is completely devoid of marine environment.



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- c. There are no threatened categories of plant and animals' species in the Red Data Lists (IUCN Categories) which occur as natural inhabitants.
- d. The Chemical analysis indicated that the shallow water logged area, which forms a small part of the project site, is a freshwater body and has no indication of any salinity interference.
- e. The Species diversity and indices analysis of the area indicates that the aquatic species are inhabitants of freshwaters. Many of them are weeds and are of no major economic value.
- f. The diversity indices also reveal the diversity is minimum, while there is more equitability of species and there are also biological invasions.

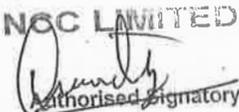
**C. Study by Survey of India on the Topo survey of the entire project site and identification of the physiographic units which shows that the site is waste land with grass.**

**D. National Hydrographic Map published by Chief Hydrographer to the Govt. of India showing that the project site is not a mudflat, not a marshy land and not connected to sea.**

**E. Land use/ Land cover obtained from remote sensing studies carried out by Andhra Pradesh State Remote Sensing Applications Centre, Hyderabad**

- a. The vegetative cover present in the plant site is dominated by



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weed/grass of fresh water environment

- b. The North east corner of the plant site constitutes shallow water logged area of nearly 86 acres with no indication of marine environment.
- c. The water from this area gets drained to the 'IduvanipalemBela' through 'ManikyapuramBela' by a small channel.
- d. "IduvanipalemBela" is at about 8 Km away from proposed site and is connected to sea.

**F. Assessment of soil type and quality of water from the Regional Agriculture Research Station (Acharya N G Ranga Agricultural university, Bapatla) Andhra Pradesh**

- a. The proposed main plant site consists of waste and barren land without any cultivation and habitation.
- b. Analysis of soil and water from the site indicates that
  - i. Soil & Water are neutral
  - ii. Water is of fresh water origin
  - iii. No sea water incursion into the site
  - iv. Vegetation is of fresh water origin commonly found in the North coastal districts of A.P
- c. No signs of any tidal features like mudflats or marshy lands in and around the site.

**G. Studies on Regional Geology of site environs by Prof M Jagannadha Rao, Principal Investigator, Department of Geology,**



For NGC LIMITED

*[Signature]*  
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**Andhra University, Visakhapatnam**

- a. The geological evidence indicates that the area is characterized by rocks such as Khondalites and Charnockites. The rock bed in the study area lies underneath about 10m deep Silty sand deposits.
- b. The water quality in the study area is characterized by the fresh water supplied by rivulets from its catchment area.

**H. Certification by Dist. Collector, Srikakulam, Andhra Pradesh about the classification of land as per revenue records as Poramboaku (waste) land.**

**I. Certification from DFO, Srikakulam District, Andhra Pradesh – The animal species reported in 10 Km radius from the plant site are common in nature to the region and there are no endangered, protected, threatened animal and plant species in the study area.**

**J. Studies of WAPCOS (public sector undertaking under the Ministry of Jal Shakti of the Government of India) on area drainage system in consultation with the Department of Irrigation, Govt of Andhra Pradesh.**

The objectives of Area drainage study covered flood control; non-disturbance of existing irrigation schemes; rain water harvesting structures; ground water recharge measures steps necessary to avoid flooding of neighboring villages etc. It is submitted that the recommendations made by WAPCOS, which are essential and condition precedent and forms primary phase of the entire project will



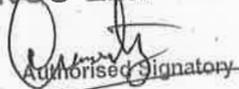
For **NGCL LIMITED**

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be implemented the Respondent No.4 for effective management of drainage system at the site for providing comprehensive drainage facility for maximum utilization of fresh water and also to enhance the quality of the water available in and around the project site.

5. It is submitted that a comparative study of the above Reports and SACON Report clearly elicits that the Project Land area is a Poramboku Govt. Land with no much of agricultural activities. The above study also enumerates in detail that the said lands do not fall under the category of wet lands.
  
6. The above studies and reports also indicates that putting up of any industry will not affect the livelihood of any of the inland fishermen within the vicinity of the Beela area. **A detailed report submitted by the Collector, Srikakulam submitted to the Human Rights Commission** states that, there are 3690 fishermen families in Sompeta Mandal as per 2001 Census. The fishermen villages around the proposed site are Isakalapalem, RamayyaPatnam and Chepala Gollagandi. The fishermen families in the above three villages are marine fishermen, who make out their livelihood by going to sea for fishing. However, 168 fishermen families who are resident of Manikyapuram village in Kaviti Mandal, were enjoying lease of fishing rights in Sompeta beela. They are formed into a society known as Inland Fishermen Cooperative Society, Manikyapuram.
  
7. It is submitted that on representation of these fishermen to the Collector, Srikakulam to provide alternative means of livelihood, these 168 fishermen families were given alternate land by the District Collector,



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Srikakulam. These inland fishermen were satisfied with alternate means of livelihood.

8. It is submitted that as part of R & R Policy, this Respondent has provided an amount of Rs.50,000/- to each of these fishermen, towards construction of a house and has also provided an area of 4.6 acres to locate the houses of these 168 families at Manikyapuram, Kaviti mandal, Srikakulam district. That apart this Respondent has paid an amount of Rs.62 lakhs towards deepening of the alternate beela.

9. It is submitted that the Respondent herein has agreed for and is always ready to provide the following to ensure zero ecological impact

- **An efficient area drainage system designed by WAPCOS** and as approved by MoEF, Govt. of India and Govt. of AP will be implemented. This will facilitate that the ground water table does not deplete, lift irrigation schemes would not suffer and flooding of villages will not take place. Plant elevation will be lower than that of all surrounding villages and hence, there is no threat of inundation to villages.
- Appropriate rain water harvesting system as approved by Central Ground Water Board, Govt. of India will be established for recharging the ground water table.
- Creation and maintenance of 200 acres of Eco-Conservation Pond will ensure availability of water and water balance in the area.
- Usage of Sea Water diverting the seasonal rain water to Eco Conservation Pond and the downstream beela (Manikyapurambeela) thru Anicut.



For **NCC LIMITED**

*[Signature]*  
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- This Respondent intends to render the operation of existing 3 Lift Irrigation Schemes, which as per the Collector's Report are not operational due to lack of sufficient water.

10. It is submitted that as per the revenue records these lands are categorized as Poramboke Waste Lands and the Beela area is not a breeding place for migratory birds. The same has been stated by the District Collector in their reply to SHRC as filed before SHRC in Case No.6251 of 2009 reads as follows:

*"As per the report of the Tahsildar, Sompeta and extent of Ac 1125.08 cts of Swamp lands available in Sompeta Mandal and locally called it as Beela and all the Lands are Government lands situated in low lying area and receiving excess water from MukundaSagaram in Kachilimandal, Pydigam reservoir, Mahendratanya river and floodwater during the rainy season and due to stagnation of the excess water in the swamp lands, the paddy fields of nearby areas are submerged and adversely affected. After completion of survey of the entire extent of Ac.1125.89 in Barupeta, Benkili, Gollagandi, Rushikudda village of Sompetamandal, an extent of Ac.972.69 cents was proposed for alienation of establishment of thermal power plant in Sompeta Mandal.*

*It is submitted that the proposed swamp lands are locally called as "BEELA". According to revenue records there is no ayacut under the "Beela". The said lands are not useful for agricultural purpose total of Bella land is Ac1125.00 cts only, but not Ac 4000.00 cents of wetland as alleged by the petitioner, in their petition. Water of beela land is not notified as any irrigation sources of Government and the water is not applicable for the double crop. If the beela is useful for Agriculture purpose, the land would have been distributed to the*



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*landless poor in Massive Assignment Programme of four phases. Beela is almost waste land, as the land is not fit for agriculture purpose except little extent. If it is actually agricultural land it could have been occupied by the people and they would have claimed D Pattas. But this was not done since several years, showing that the land is not fit for cultivation."*

11. **It is submitted that even the Divisional Forest Officer, Srikakulam** has stated that there are no endangered protected, threatened animal and plant species in the area in question.

**12. THE OBJECTIONS TO THE SACON REPORT ARE AS FOLLOWS:**

Pursuant to the Orders of the Ministry of Environment, Salim Ali Center for Ornithology and Natural History (Sacon) was asked to prepare a report with regards to the wet land status in the District of Srikakulam, Andhra Pradesh. Sacon has, in a hurried manner, conducted a study over the status of the wet lands in the District of Srikakulam and has submitted to the same to the concerned State and Central Authorities.

The study conducted by SACON, as can be seen, is carried out without any proper authority and purely based on circumstantial facts, unauthenticated statistics and unconventional and unrealistic methodologies followed conducted hurriedly within a span of four to six months.

The said Report cannot be relied upon for the following reasons:

**A. REPORT IS BIASED AND PRE-DETERMINED:**

The report is biased and pre determined in nature, as the same is prepared keeping in view of the establishment of Thermal Power Plant.

The relevant extracts of the Report which elicits that the same was prepared keeping in view the STPP are:



For **NCC LIMITED**

*[Signature]*  
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a. Page 5&6,

The integrity of XXXXXXXXXXXXXXXX. **Proposals for setting up two super thermal power plants (STPP) one at Sompeta and another at Bhavanapadu, a part of the Naupada swamps, are in advance stage. Despite intense opposition from the local communities, NGOs, Environmentalists and Scientists, permission was granted for both the proposals. However, , both places have seen 3 human causalities each while protesting against the projects, forcing the authorities to suspend permissions of the projects till further studies are taken up on ecological status of all the wetlands of Srkakulam District.**

The changes in the XXXXXXXXXXXXXXXX release of thousands of tons of **pollutants to the environment during the operation of the STPPs will cause irreparable damage to the coastal ecosystem imperiling not only the rich biodiversity but also the wellbeing of lakhs of inhabitants of the coastal area who depends upon the wet lands directly and indirectly and would effectively marginalize them. The impact of the jetties proposed to be built for bringing in fuel/coal for the STPPs and release of thousands of gallons of water to the sea during the STPP operation on the breeding migration of the Olive Ridley Turtles as on now is little known.**

b. Page No.25

### 1.2.17.1 Coastal Wet Lands of Srikakulam District

The Costal plains XXXXXXXXXXXXXXXX part of the District. **Major corporate were eying the costal area of Srikakulam District**



For NCC LIMITED

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*for setting up Thermal Power Plants due to various reasons such as XXXXXXXXXXXXXXXXXXXX.*

c. Page No.26

**1.2.17.2 Proposal for Thermal Power Plant at Sompeta**

*Nagarjuna Construction Company Limited (NCC) has proposed construct a local based 2640 MW (4 X 660 MW) Thermal Power Plant (TPP) at Gollakandi and Baruva Villages of Sompeta Mandal and procured 2423.599 acres of land from Government and private parties.*

d. Page No.27

**1.2.17.3 Social Issues at Sompeta**

*Local people XXXXXXXXXX Local farmers. Environmental NGOs under the Leadership of Environmental Paryavaran Samrakshna Samathi spearheaded the agitation by the locals against the setting up of Power Project in the area. On the 14<sup>th</sup> of July, 2010 NCC attempted the levelling the land allocated them. Although, there were yet to receive the mandatory consent for the establishment from the A.P. Pollution Control Board (EAS, 2010). The action provoked the local public leading to violence in which three people were shot dead and many others including scribes and police personnel got injured.*

**B. THE REPORT IS BASED ON POSSIBILITIES AND NOT CONCLUSIVE.**

Page No.6

*Our exploratory survey employing participatory tools among the adjoining villages indicate a strong possibility of existence of the*



For NCC LIMITED  
*[Signature]*  
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*critically endangered Pink Headed Duck during November to January in the core area of Sompet Wet land. Any changes XXXXXXXXXXXX.*

C. THE REPORT IS WITHOUT ANY DOCUMENTARY EVIDENCE

Page No.8

***Since our survey using PRA (Participatory Rural Appraisal) tools summarizes the presence of endangered Pink Headed Duck, which has not been cited in the Country for more than half century, in the core area of Somept wet land, pending its confirmation, immediate steps should be taken up to protect the habitat from any disturbance and investigations should be taken up to ascertain the presence of the bird.***

Page 64

***The Pink - Headed Duck is a species not reported from the country for more than half a century. XXXXXX. Pink headed duck was last observed in the wild in 1994.***

Page 65.

***Our research XXXXXXXX survey. During the first visit in order to obtain a preliminary idea about the presence of various birds in the wet land, photographs of several species were shown to many villagers who were intimately related to the wetlands. Along with the photographs of birds species already confirmed from those wetland many villagers firmly reiterated, after seeing he photograph of pink headed duck, that the Bird is available in the area during November to December end and sometimes up to January.***



For NCC LIMITED

*[Signature]*  
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***Due to compelling reasons we could not visit the wet land during possible season.***

Page 133 (Conclusions and recommendations)

*Documentation of other taxa associated with the wetlands in district is very scarce and it need to be done at the earliest.*

**D. REPORT IS MADE HURRIEDLY**

Page No.39

*Birds species such as XXXXXXXXXXXXXXXX were spotted but rarely. Great Crested Grebe XXXXXXXXXXXXXXXX were cited only twice or thrice during the entire study period.*

Page No.65

***Due to compelling reasons we could not visit the wet land during possible season.***

Admittedly pink head duck is not seen in India since, 1944 and Sicon wrongly concluded that there is a possibility of existence of the same in Sompeta. The Methodology adopted by Sicon i.e. taking the opinion of the locals by showing photographs and coming to the conclusion of existence of rare spices of animals and birds is unconventional. No visit has been made by Sacon.

**E. THE REPORT IS BASED ON ASSUMPTIONS AND SUSPICION**

Page No.134 (Conclusions and recommendations)

***The core area of the Sompeta wetland is suspected habitat of the endangered Pink Headed Duck which has not been sighted in country for more than half a century.***



For NCC LIMITED

*[Handwritten Signature]*  
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13. It is submitted that the study carried out by SACON is pertaining to the entire District of Srikakulam and is not confined to the project lands which makes the entire report unreliable. Further, the said report is prepared and submitted keeping in view the establishment of Thermal Power Project, the parameters of which will undoubtedly differ from the one for establishment of Multi Product Zone. Further, the observations and the conclusions arrived in the SACON Report are based on circumstantial evidences and possibilities, unsupported by any authenticated and conclusive studies and statistics. However, the ultimate authority to decide the nature of the land and the ecological impact for establishment of a particular industry vests with the State Governmental Organizations. Hence the applicant cannot ask for a direction to declare a particular land as wet land more particularly on the basis of SACON Report ignoring all other studies and reports carried out submitted by various authenticated Governmental Agencies. Further the relief asked for a direction is beyond the beyond the jurisdiction of this Hon'ble Tribunal.

14. It is further submitted that the SACON also at the instance of the applicant had given a interim report for Sompeta lands in the year 2016 about what activities can be done in the lands like eco-tourism and other incidental activities and also refer about Coir making units. The 2016 report is also one sided one as can be seen from the reports and as such the report of SACON is not a correct one and much less reliable. Hence this respondent prays that this Hon'ble Tribunal not to take the report of the SACON for consideration.

15. It is submitted that this respondent was to set up 2X660 MW Super critical Coal Based Thermal Power Plant on Acs.1672.82 cents of land at



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Sompeta, Srikakulam District. Out of the said lands Ac.972.690 cents of Government land was alienated and Ac.110.250 cents of D-patta land were resumed and alienated to this Respondent. Besides this, this Respondent has purchased private lands admeasuring acs.589.880 cents from various individuals through 749 registered sale transactions.

16. This Respondent has invested huge amounts paid Rs. 9,92,14,380/- towards Government land and Approximatly Rs.5 crores for acquiring private lands. As per the terms of reference dated 14.05.2009 issued by Ministry of Environment and Forest after due deliberations supported by scientific evidences, a revised project layout plan was arrived converting 400 acres of the land into a Eco-Pond which includes Ac.86.00 of water logged area on the eastern side of the Project land.

17. It is submitted that in view of the hindrances raised by the local people and various litigations, this Respondent, respecting the sentiments of the locals has decided, responding to the dynamic New Industrial Policy of Government of Andhra Pradesh has decided to develop Multi Product Industrial Zone in the lands held at Sompeta Mandal in place of Thermal Power Project. This Multi Product Industry will not only bring rich dividends to the state in terms of economic and industrial development but will also generate ample opportunity of employment enhancing the livelihood opportunities to the locals. This proposed project is aimed to encourage chiefly agro based industry apart from small and medium enterprises for manufacturing industry covering all spectrums.

18. It is submitted that appreciating the vision of this Respondent, the Government of Andhra Pradesh permitted this Respondent to develop Multi Product Industry Zone in Sompeta lands vide the impugned G.O. duly



For NCC LIMITED

*[Signature]*  
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22. It is further submitted that there are two writ petitions pending before Hon'ble High Court of Andhra Pradesh. W.P. No.17448 of 2011 filed by one Sri.A.Jagannaylu Achari and others challenging the G.O.Ms.No.1107, Revenue (Assnl) Dept., dated 15.09.2008 and the other one W.P.No.13904 of 2016 wherein the G.O.Ms.No.329 dated 09.09.2015 is challenged which is the subject matter of the present original application.

23. This respondent seeks permission of this Hon'ble Tribunal to place the documents in a separate typed set of papers. This respondent also reserves its right to file additional reply and additional documents at a later stage if necessary.

In view of the submissions made above and in the reply filed earlier, it is prayed that this Hon'ble Tribunal may dismiss the application filed by the applicants with exemplary costs.

#### VERIFICATION

I, V. Rama Murthy, S/o.Late V.N.Deekshitulu, aged about 53 years, working as Joint General Manager (Legal) in NCC Limited, having its office at NCC House, Madhapur, Hyderabad do hereby verify that I have read the contents of paragraphs above which are true and correct to the best of my knowledge, information and belief.

For NCC LIMITED

*V. Rama Murthy*  
Authorised Signatory

Respondent No.4

Date: 05.04.2021

Place: Hyderabad



ATTESTED  
27/06/2021  
KOVURI SREENIVASULU  
ADVOCATE & NOTARY  
H No. 1-1/5, Old Haftzpet, Miyapur  
R R Dist Cell: 9981539468

FORM -I  
[See Rule 8(1)]  
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