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AUTHORITY LETTER

I, Pranav Chaudhary, Managing Director of ADANI PETRONET (DAHEJ) PORT LIMITED, a Company incorporated under the Companies Act, 1956 and having its registered office at Adani Corporate House, Adani-Shantigram, Ahmedabad-382421, in exercise of my power to sub-delegate as per Board Resolution dated 30 April 2024, do hereby authorize Mr. Pankaj Kumar Sinha or Mr. Rohil Vashist or Mr. Arjun Doshi or Ms. Ayushi Mishra, to sign, execute, file and institute all applications, affidavits, plaints, petitions, suits, appeal, written statements, rejoinders etc. in the matter of suit/ complaint filed/ litigation to be filed by or against ADANI PETRONET (DAHEJ) PORT LIMITED before any Court of Law or any other Authority including Appellate Authorities or Courts and for that purpose the above mentioned are authorized to engage, appoint or remove any Pleader/s or Advocates and sign Vakalatnama, Power of Attorney for such engagement or appointment and to file and defend the interest of ADANI PETRONET (DAHEJ) PORT LIMITED and to do all necessary acts, deeds and things as may be required in connection thereof.

Date: 22 May 2024

Place: Ahmedabad

For Adani Petronet (Dahej) Port Limited



Pranav Chaudhary

Managing Director

Adani Petronet (Dahej) Port Limited
Adani Corporate House, Shantigram,
Nr. Vaishno Devi Circle, S. G. Highway,
Khodiyar, Ahmedabad - 382421
Gujarat, India

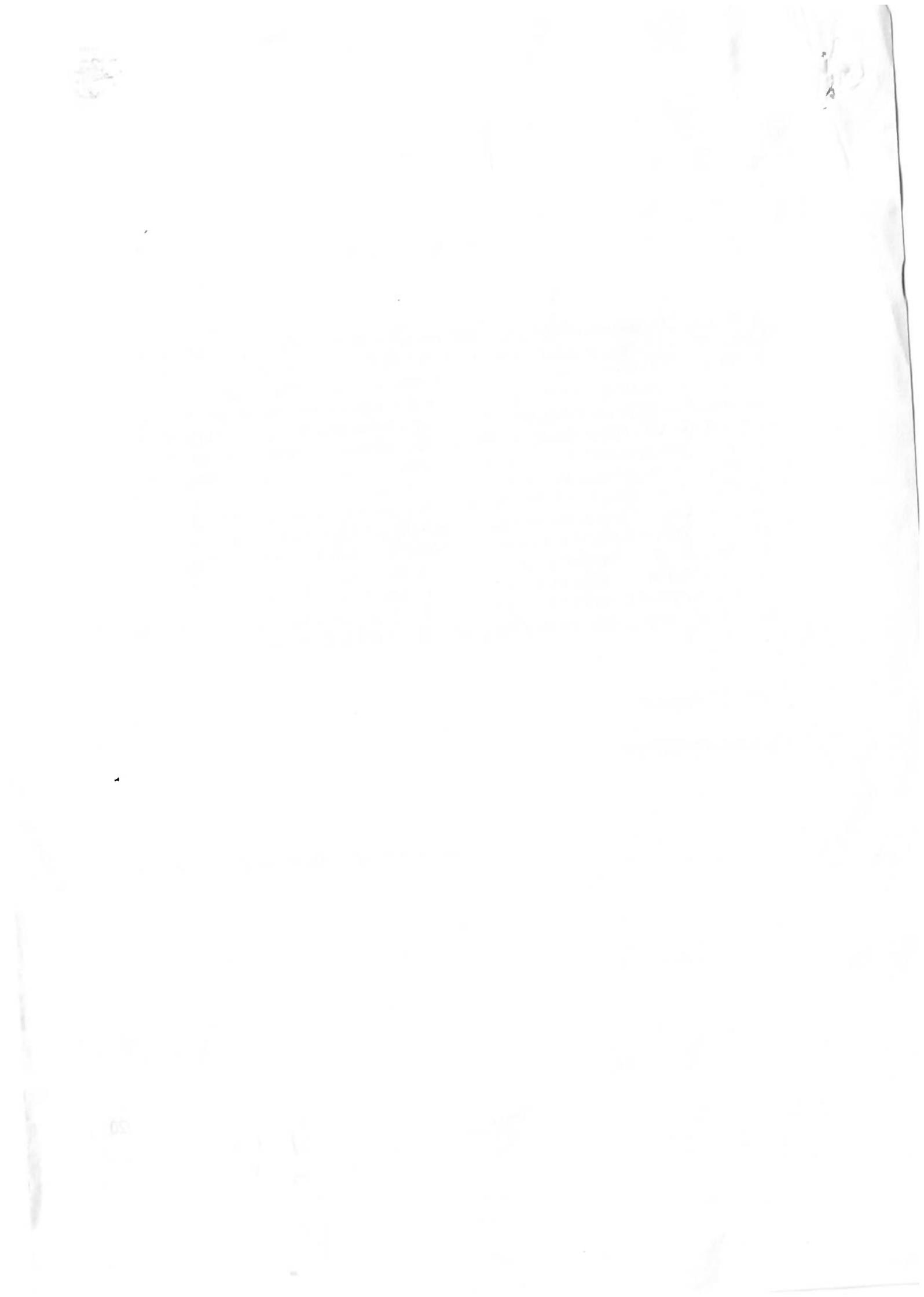
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NGT/WZ/PUNE/INWARD/ 808/2025

Date 08/08/25

Sign _____

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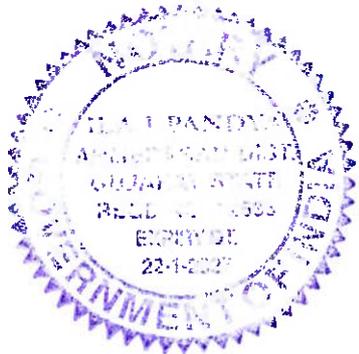
**BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH AT PUNE
MISC. APPLICATION NO. 3 OF 2025
IN
APPEAL NO. 74 OF 2016 (WZ)**

Conservation Action Trust & Anr. ... Applicants
Union of India & Ors. Versus ... Respondents

AFFIDAVIT IN REPLY OF RESPONDENT NO. 6 TO THE APPLICATION

I, Ayushi Mishra, adult, Indian Inhabitant having my office at Adani Corporate House, Shantigram, S.G. Highway, Ahmedabad - 382421, Gujarat, India, do hereby solemnly affirm and state on oath as under:

1. I am the authorised signatory of Adani Petronet (Dahej) Port Limited (Formerly, Adani Petronet (Dahej) Port Pvt. Limited) - the Respondent No. 6. I have perused the captioned Misc. application No. 3 of 2025 ("Application"). Being conversant with the facts of the present case, I am filing the- present Affidavit in Reply to oppose the grant of any reliefs as sought in the Application.
2. I deny all and singular contentions, statements and allegations contained in the Application to the extent they are contrary to and or inconsistent with what is stated herein below. Nothing contained in the Application should be deemed to be admitted merely for want of specific traverse unless the same is specifically admitted by me hereinunder. I state that the present Application is devoid of any merit and is replete with incorrect facts and unsubstantiated allegations as enumerated below.



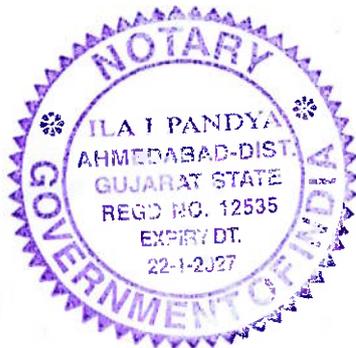
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3. By the present Application, the Applicants seek directions from this Hon'ble Tribunal *inter alia* to restrain Respondent No. 6 from undertaking any further reclamation activities, to restore the project area to its original condition, and to undertake compensatory afforestation. The Application is premised on the alleged deficiencies in the Impact Assessment Report prepared by National Institute of Oceanography ("NIO") for the project site, located at Dahej, Bharuch, Gujarat. This Application is liable to be dismissed as not maintainable for the reasons set out hereinbelow.

4. At the outset, the limited liberty granted by this Hon'ble Tribunal to the Applicants under the judgment of 23 November 2023 was strictly confined to pointing out specific lacunae, if any, in the report submitted by the NIO. The present Application not only fails to identify a single lacuna but also seeks to reintroduce allegations and contentions that have already been fully considered and conclusively adjudicated by this Hon'ble Tribunal. The judgment of 23 November 2023 (*vide which the Appeal filed by the Applicants was rejected*) ("**final judgment**") along with the order dated 22 July 2024 (*whereby the submission of the NIO Report by Respondent No.6 was recorded*), have attained finality. By virtue of the final judgment and aforementioned order, the appeal preferred by the Applicants has been finally disposed of. The present Application is, in substance, a veiled attempt to reopen and reargue issues that have already been conclusively adjudicated. Such an attempt is impermissible in law, devoid of legal merit, and amounts to a blatant abuse of the process of this Hon'ble Tribunal.



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5. Even otherwise, for the foregoing reasons, the present Application is squarely barred by the well-established principle of *res judicata*. The Applicants are, therefore, precluded from seeking any reconsideration or re-adjudication of matters that have attained finality. Given the above, this Application is not maintainable and ought to be disposed of at the threshold.

6. Without prejudice to the above, the mandate given to NIO by this Hon'ble Tribunal under the judgment of 23 November 2023 was limited to assessing environmental damage and proposing remedial measures in accordance with the principles of sustainable development. The Applicants' present attempt to stretch the scope of these directions so as to seek restoration of the project site or to interdict reclamation activities is entirely beyond the purview of the judgment of 23 November 2023. In light of the above, it is submitted that the present Application deserves to be dismissed in limine, with costs.

7. Without prejudice to the foregoing preliminary objections, even on merits, this application deserves to be dismissed. To appreciate the same, it is necessary to set out briefly the facts leading up to the filing of the present Application as under:

a. The Applicants had earlier filed an appeal (Appeal No.74 of 2016) before this Hon'ble Tribunal, assailing the combined Environment Clearance and Coastal Regulation Zone Clearance dated 14 October 2016, granted by the Ministry of Environment, Forests & Climate Change ("**MoEF&CC**") to the Applicant herein, for expansion of the



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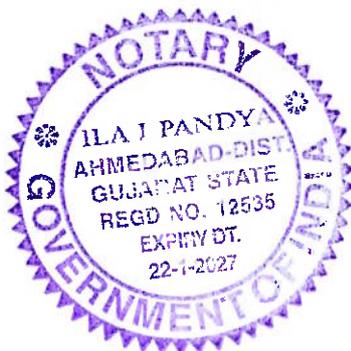
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Respondent No.6's port. The Appellant had assailed the environment clearance *inter alia* on the following grounds:

- i. Incorrect classification of project site as per CRZ Notification, 2011
- ii. Presence of mangroves and mudflats at the footprint of project site

b. This Hon'ble Tribunal, after hearing the appeal at length, was pleased to reject the same vide the final judgment holding that the in terms of the CRZ Notification, 2011, the project site is to be classified as CRZ-1B, save and except the specific area where sparse and dwarf mangroves are located, which shall fall under the classification of CRZ-1A. The Tribunal also recognized the national importance of the project and observed that the development and operational activities of the port ought not to be impeded. The relevant para of the final judgment is reproduced below:

*" 107. We may also have to take into consideration the point, as to whether the existence of mudflats in the area in question would render this area to fall in CRZ- IA and consequently, would lead to the consequence that no developmental work can be permitted in that area. **In this regard, our view is that in that area not only the Project Proponent is proceeding with the expansion of its project but other projects are also going on side by side.** Even if we get it studied by some expert body that the mudflats, which are argued to be biologically active by the appellants, is the correct position, and consequently, the said area should be placed in the category of CRZ IA, **we should not stop the activity of development/expansion, which***



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has been permitted to the Project Proponent because we have already held that the project is of national importance and that the same should not be interfered with at this advance stage."

(emphasis supplied)

- c. This Hon'ble Tribunal, while observing as above and upholding the environment clearance given to Respondent No.6 for the project site, directed Respondent No.6 to have an impact assessment study conducted by National Institute of Oceanography ("NIO")/ National Institute of Ocean Technology ("NIOT")/ National Centre for Sustainable Coastal Management ("NCSCM") for the project site and directed Respondent No.6 to implement any recommendations given within a period of six months. The relevant para of the final judgment is reproduced below:

"111. As regards Issue No.(iv): We reject this appeal with the directions that the Project Proponent shall get study done from NIO/NIOT/NCSCM in regard to the adverse impact of expansion of the project upon the mudflats and the mangroves in the area in question and in case any suggestion/recommendations are made by the expert body, the same shall be implemented within next six months. This study shall be got completed within a period of six months from the date of uploading of this Judgment."

- d. Pursuant to the direction given in the final judgment, Respondent No.6 reached out to NIO, NIOT and NCSCM for the impact assessment study to be carried out at the project site. While NCSCM and NIOT declined participation citing prior commitments and workload



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constraints, NIO accepted the mandate. Subsequently, the NIO officials subsequently conducted a field study on 29 January 2024. Following the field study, NIO undertook a comprehensive analysis of the data collected. Respondent No. 6 maintained regular correspondence with NIO throughout the assessment, extending all necessary assistance to ensure smooth execution and timely completion of the study.

e. On 01 July 2024, the final report titled "*Impact Assessment Study on Mudflats & Mangroves in the Area Due to the Expansion Project of Phase III at Adani Petronet (Dahej) Port Limited*" was given to Respondent No.6 and subsequently filed before this Hon'ble Tribunal on 15 July 2024. This Hon'ble Tribunal duly recorded the submission of the report in its order dated 22 July 2024. A copy of the order dated 22 July 2024 is annexed herewith as **Exhibit A**.

8. It is pertinent to state Respondent No.6 has carried out the remedial measures / suggestions mentioned in the NIO Report, to the extent as per the reclaimed area of the project. It is necessary to mention that the project covers 23 hectares of approved reclaimed land, of which 16 hectares have already been reclaimed, with the remaining 7 hectares to be developed as per future business needs. The actions undertaken by Respondent No.6 in adherence to the said recommendations are set out hereinbelow:

a. **Half yearly EC & CRZ Clearance compliance reports**- Respondent No.6 regularly submits half yearly compliance report to concerned regulatory authorities through email as well as on the Parivesh portal.



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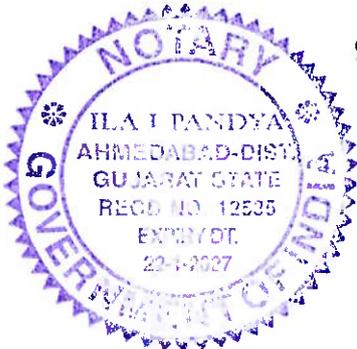
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In this regard, Respondent No. 6 has submitted the latest report dated 24 May 2025 for the period between October 2024 to March 2025. A copy of the latest report dated 24 May 2025 along with the acknowledgement is hereto annexed as **Exhibit B**. Respondent No.6 craves leave to rely on the other reports and correspondences with the authorities as and when required before this Hon'ble Tribunal.

b. **Greenbelt Development**- Respondent No. 6 has facilitated in the development of 25.94 Ha. of greenbelt area within the port premises, which includes the periphery of the project boundary, for 16 Ha. of the reclaimed land. As regards the remaining 7 Ha. of land, Respondent No.6 undertakes to continue and expand the greenbelt area, as feasible. A copy of the latest photographs for the greenbelt area developed is hereto annexed as **Exhibit C**.

c. **Shoreline change studies**- For shoreline change studies, Respondent No. 6 undertakes and affirms that once the full 23 hectares of reclamation is completed (with 16 hectares completed to date), a shoreline change study will be conducted by a reputed organization and the subsequent findings will be submitted to the concerned authorities for scrutiny.

9. Furthermore, Respondent No.6 has undertaken mangrove plantation over an area of 50 hectares at Village Devjagan, Jambusar Taluka, in consultation with M/s. Saline Area Vitalization Enterprise Limited ("**SAVE Ltd**"). A report detailing the said 50-hectare mangrove plantation was submitted as part of the



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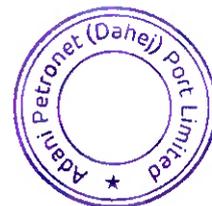
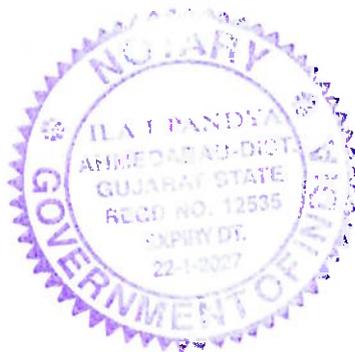
half-yearly compliance report, vide letter bearing reference no. APPPL-EHS/MOEF RO/EC Comp (III) dated 29.05.2019. Additionally, in the year 2022, Respondent No.6 carried out an additional 10 hectares of mangrove plantation at Malpur Village, also in consultation with SAVE Ltd in line with the recommendation of the Gujarat Coastal Zone Management Authority ("GCZMA"), Respondent No. 3 herein. A copy of the report evidencing the mangrove plantation in the year 2022 is hereto annexed as **Exhibit D**.

10. In light of what is stated above and considering that Respondent No. 6 has fully complied with the directions of this Hon'ble Tribunal, namely- the conduct of the impact assessment study, submission of the study report, and implementation of the recommendations made in the report, the Applicants have no justifiable cause of action to invoke the jurisdiction of this Hon'ble Tribunal.

11. Respondent No.6 will now deal with the contents of the Application paragraph wise.

PARAGRAPH WISE REPLY:

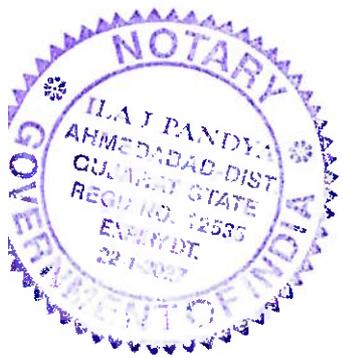
12. With respect to the contents of paragraph nos. 1 and 2 of the Application, the contents of the same are a matter of record and do not warrant any response. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.



13. With respect to the contents of paragraph no. 3 of the Application, Respondent No.6 categorically and unequivocally denies the allegations levelled and submits that the same are wholly devoid of merit and made without any basis in fact or law. The Applicants are seeking to cast unsubstantiated and baseless aspersions on the conduct and actions of Respondent No.6, which are wholly unwarranted, mala fide, and intended solely to prejudice this Hon'ble Tribunal. The Applicants are put to strict proof with respect to their allegations pertaining to the alleged submission of false and misleading information by Respondent No.6.

14. Without prejudice to the foregoing, the issues sought to be raised stand conclusively adjudicated by this Hon'ble Tribunal in its final judgment dated 23 November 2023, and the Applicants are barred from reagitating the same issues under the guise of the present proceedings. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.

15. With respect to the contents of paragraph no. 4 of the Application, Respondent No.6 denies the allegations made therein in toto. All relevant information regarding the mudflats, mangroves, and ecological features was disclosed in the Environmental Impact Assessment ("EIA") Report dated 28 March 2015, prepared by Cholamandalam MS Risk Services Ltd. The report recorded the presence of 12 dwarf mangroves and included a mudflat sensitivity assessment by the National Centre for Earth Science Studies ("NCESS"), an accredited agency under the CRZ Notification, 2011. The area was classified as CRZ-IB and IV—not CRZ-IA—by NCESS, and this categorization formed the basis of



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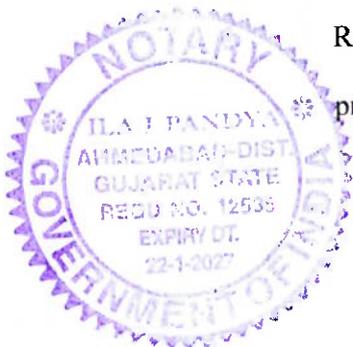
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all statutory clearances. The EIA applied accepted scientific methods, and the classification of the mudflats as biologically insensitive followed field inspections and established protocols. Thus, the allegations of suppression are baseless and unsupported.

16. Furthermore, it is important to note that the NIO report itself acknowledges the following- "6....scanty halophytic vegetation and a few saplings belonging to *Avicennia marina* have been observed near the proposed project site...." and it does not in fact identify the project site as a patch of dense mangroves. As per Section 6 of the report on "Remedial measures and recommendations" the field observations based on a survey conducted on 29 January 2024 for the proposed reclamation area only mention 'scanty halophytic vegetation'. It further notes that the mudflats at the present vicinity site were found internally laminated with tidal clays, which are generally referred to as paleo/inactive mudflats and are classified as CRZ IB as per the CRZ classification. NIO's observations are consistent with the EIA Report and do not establish a case of falsehood or willful concealment. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.

17. With respect to the contents of paragraph no. 5 of the Application, the same do not pertain to Respondent No.6 and thus does not warrant any response.

18. With respect to the contents of paragraph no. 6 and 7 of the Application, Respondent No.6 denies the contents stated therein and reiterates that the project area's CRZ classification was established by maps prepared by NCESS



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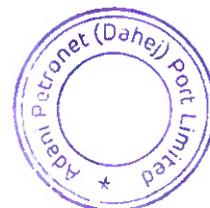
and validated by Respondent No.3 during its decision-making process. This is also evidenced in the reply filed by Respondent No.3 to the Appeal filed by the Applicants, in which Respondent No.3 has categorically averred that the project area, as per NCESS maps, was identified as CRZ 1B and IV. The relevant excerpt from the reply of Respondent No.3 in this regard is reproduced hereinbelow:

"I say and submit that the answering respondent is concerned with the recommendation for grant of Coastal Zone Regulation. I say that for the said purpose, the Respondent No.6 approached the answering respondent on 30.03.2015, by submitting Form 1 and various documents as prescribed under the Coastal Zone Management Regulation 2011 (hereinafter referred to as the "Regulation of 2011"). I say and submit the Respondent No.6 had submitted, inter alia, a map prepared by the National Center for Earth Science Studies (NCESS) which identified the Phase III for the project. I say and submit that the NCESS is an agency approved by the Central Government for the purpose of mapping and the maps prepared by the said agency are accepted and relied on by the Central Government. I say and submit that as per the said map, the project area of Phase III of the Respondent No.6 was identified and located in CRZ 1B and IV category....."

(emphasis supplied)

Till date, no authority has approved a contrary classification of the project area. The concerned authorities considered the site as falling under permissible CRZ categories, with conditions imposed to regulate protection of any scattered mangroves. Furthermore, this precise issue of site classification and regulatory compliance was comprehensively adjudicated by this Hon'ble Tribunal in its final judgement. The relevant extract from the final judgment is reproduced below for ready reference:

"102. We are convinced from the argument made by the learned counsel for respondent No.6/Project Proponent and the respondent No.3/GCZMA that the area in question would lie in CRZ-IB, which is the area falling between LTL and HTL, except the patch of mangrove,



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which is said to contain 12 dwarf mangroves, the said area having patch of 12 dwarf mangroves would be treated to be CRZ-IA area where no construction or any kind of developmental activity is permissible as per CRZ Notification, 2011."



19. Bearing in mind the above, the Applicants' assertion in paragraph no. 7 that the site "must" be classified and demarcated as CRZ-IA is unfounded both factually and legally, overlooks the aforesaid findings by this Hon'ble Tribunal. Additionally, the Applicants' claim that mudflats and associated vegetation are "necessarily" biologically active is overbroad and contrary to site-specific scientific findings and the Applicants are put to strict proof thereof. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.

20. With respect to the contents of paragraph no. 8 of the Application, the Applicants' categorical assertion that the proposed expansion of the Port "will" have environmental impacts is speculative, exaggerated, and devoid of any cogent material or evidentiary basis. The NIO Report while acknowledging that the expansion *may potentially have* certain environmental effects, clearly states that such impacts can be effectively mitigated through appropriate planning, implementation of recommended safeguards, and adherence to established environmental norms. Respondent No.6 reiterates that it has already complied with the recommendations made by the NIO, as elaborated hereinabove, and further undertakes to abide by any directions or compliances that may be stipulated by this Hon'ble Tribunal in due course. Respondent No.6 repeats and reiterates the contents of the aforesaid

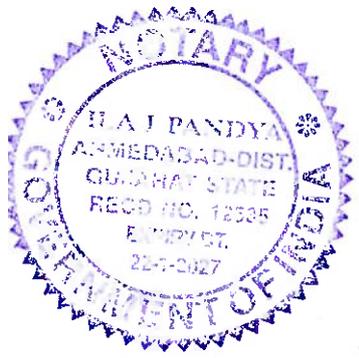


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submissions and denies anything that is contrary to and/or inconsistent therewith.



21. With respect to the contents of paragraph no.9 of the Application, Respondent No.6 asserts that Phase III of Port expansion was proposed only in 2015, pursuant to which the Project area was studied, and images were procured. It is submitted that when the Phase III expansion plan came into existence, all the research, studies and compliances were considered by Respondent No.6 for the Project Area. Hence, the images procured by Respondent No.6 from the Sentinel 2 Multispectral Instruments (MSI) for the project area pertain to the period of 2015-2024. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.



22. With respect to the contents of paragraph nos. 10 and 11 of the Application, Respondent No. 6 vehemently denies the allegation of "illegal reclamation" made by the Applicants and states that the decrease in mudflat area and the increase in built-up area reflect the approved reclamation and phased port expansion as sanctioned under clearances and monitored by the Respondent authorities, and other statutory bodies. The NIO report confirms that, of the 23 hectares approved, all reclamation was strictly limited to project approvals. There is not an iota of evidence of any unauthorized or 'illegal' reclamation and the said assertion is unfounded, baseless and the Applicants are put to strict proof thereof. In addition thereto, it is evident that the Applicant is seeking to re-litigate issues already settled by the final judgment, without any valid basis. Respondent No.6 repeats and reiterates the contents of the aforesaid



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submissions and denies anything that is contrary to and/or inconsistent therewith.

23. With respect to the contents of paragraph no. 12 of the Application, the contents of the said paragraph are denied in toto, and Respondent No.6 repeats and reiterates what has already been stated in this regard. The NIO report mentions presence of "scanty mangrove plants" and does not indicate anything to adduce to the nature of the mudflats as being "biologically active" as claimed by the Applicant. To the contrary, Section 6.4 titled "Intertidal Mudflats" at page 42 of the NIO report states "*The proposed site is intertidal/mudflats, which were found to be saline and barren during the study and not biologically active under the current conditions. Since there is very little vegetation on the site now, significant vegetation removal is not required to develop the proposed reclamation.*" Respondent No.6 had in fact never denied the presence of mangroves as noted in the final judgement. The Applicants' inference is grossly misconceived, exaggerated and unsubstantiated by findings of the NIO report and/or any other credible documentary evidence. The loss of 1.89 hectares coastal vegetation (including scanty mangrove plants) was not an unknown or concealed event, but rather a dimension well anticipated, mitigated, and accounted for in the EIA and clearance conditions, which include 50-ha compensatory mangrove plantation and continual environmental monitoring. Furthermore, as stated above, Respondent No. 6 in the year 2022 compensated with additional 10 Ha. mangrove plantation as part of compliance as per recommendation of Respondent No.3 herein.



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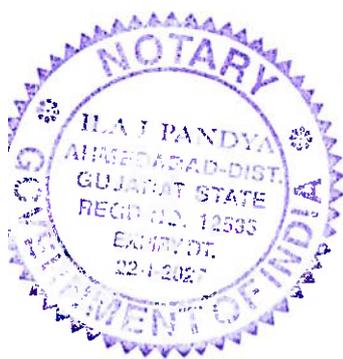
24. With respect to paragraph nos. 13 and 14 of the Application, Respondent No.6 categorically denies the contents of the said paragraph in their entirety. It is submitted that the mere presence of mudflats or sparse dwarf mangroves cannot be co-related with or equated to their biologically active nature. It is apposite to mention that Respondent No.3, in their affidavit in reply to the appeal filed by the Applicants, categorically stated that the mudflats were biologically inactive. The relevant excerpt of the final judgment recording the pleadings of Respondent No.3 in this regard are reproduced below:

*“44. It is further submitted in this affidavit by the respondent No.3/GCZMA that no corals or coral reefs and associated biodiversity were found in the project area; no sand dunes existed in the said area; **the mud flats were biologically inactive;** and there were no national parks, marine parks, sanctuaries, reserve forest or other protected areas under the provisions of Wild Life (Protection) Act, 1972, Forest (Conservation) Act, 1980 or Environment (Protection) Act, 1983 or **any other categories specified the said Notification of 2011. Therefore, it was found that the project area was correctly categorized as CRZ 1B and CRZ- III.**”*

(emphasis supplied)

Thus, the claims by the Applicants are baseless, overbroad and unfounded. Respondent No. 6 denies all and singular statements and submissions as are contrary to what is stated hereinunder and further repeats and reiterates what is stated hereinabove.

25. With respect to the contents in paragraph nos. 15 and 16 of the Application, Respondent No. 6 denies the contents in toto apart from what has been reproduced from the NIO Report. With regard to the baseline year for the impact assessment study being 2015, Respondent No. 6 submits that since the EC & CRZ clearance for Phase III expansion was granted by Respondent No.1



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only on 14 October 2016 in line with EIA notification, 2006 & CRZ notification, 2011. The developmental activities have been undertaken after this date and there was no requirement to take the study period from 1991. Respondent No. 6 denies all and singular statements and submissions as are contrary to what is stated hereinunder and further repeats and reiterates what is stated hereinabove.



26. With respect to the contents in paragraph nos. 17 and 18 of the Application, Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith. Respondent No. 6 craves leave to refer to and rely upon the relevant research records pertaining to mangroves as and when required before this Hon'ble Tribunal.

27. With respect to the contents of paragraph nos. 19 and 20 of the Application, Respondent No. 6 denies the contents entirely. The Applicants' inferences of the NIO report particularly in paragraph 19 are misleading and grossly misconceived. Furthermore, The Applicants' purported visit to the project site on 09 February 2022 and the photographs annexed as "Annexure 2" pertain to a period prior to the pronouncement of the final judgment and were not placed on record before this Hon'ble Tribunal at the relevant time. In view thereof, the Applicants are now estopped from referring to or placing reliance upon the said material in the present proceedings. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.



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28. With respect to the contents of paragraphs 21 of the Application, the contents thereof are denied in toto and Respondent No. 6 repeats and reiterates what has already been stated in this regard. As stated hereinabove, Respondent No.6 has already undertaken greenbelt plantation along the periphery of the project boundary in accordance with the applicable environmental clearance conditions and in consultation with the statutory authorities. Therefore, the allegations made by the Applicants suggesting non-compliance in this regard are misconceived, baseless, and devoid of merit. The same appear to be an attempt to mislead this Hon'ble Tribunal and are liable to be rejected at the threshold. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.

29. With respect to the contents of paragraph nos. 22 to 25, the Respondent denies the allegations contained therein in toto and repeats and reiterates what has been stated above in this regard. It is reiterated that the allegations of illegal reclamation as made by the Applicants are wholly misconceived and without basis. The allegations made against the NIO Report are unwarranted and devoid of merit. Respondent No.6 further states that it has at all times remained in compliance with the conditions stipulated by the concerned Respondent Authorities at the time of grant of environmental clearance for the project area, and affirms its continued adherence to such conditions, as well as to the measures and recommendations set out by the NIO.



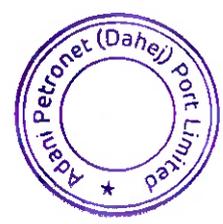
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30. With respect to the contents of paragraph nos. 26-29 of the Application, Respondent No.6 denies the same in toto and repeats and reiterates what has already been stated in this regard as above. The Applicants' contentions are misconceived and pertain to issues already adjudicated by this Hon'ble Tribunal in its final judgment, which remains in force and unchallenged before any appellate forum. Having failed to pursue the proper legal remedy, the Applicants now seek to reopen settled issues under the guise of the present proceedings—an attempt that is legally untenable and constitutes an abuse of process. This veiled attempt to seek a review of a final judgment must be rejected. It is respectfully submitted that the present application be dismissed with exemplary costs.

31. With respect to the contents in paragraph nos. 30-32 of the Application, the contents do not pertain to Respondent No.6 and thus do not warrant any comment. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.

32. With respect to contents of paragraph no. 33 of the Application, apart from what forms part of the record, the rest of the contents are denied entirely. It is imperative to draw the attention of this Hon'ble Tribunal to a material inconsistency in the Applicants' pleadings which casts serious doubt on the bona fides and veracity of their claims. While the Applicants allege that they undertook a site visit on 06 February 2025 and have based their present allegations and observations on such visit, the application has been duly



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affirmed and notarised before a Notary Public on 26 November 2024 i.e., more than two months prior to the date of the alleged site visit. This contradiction is inexplicable and reveals a deliberate attempt to mislead the Tribunal through fabricated and afterthought assertions. The deliberate reliance on facts and observations which could not possibly have been known to the Applicants at the time of affirming the application amounts to a gross abuse of the process of law. Such conduct amounts to an abuse of process and undermines the integrity of these proceedings. The claim of a site visit and the alleged observations are ex facie false and devoid of credibility. Without prejudice, the Applicants are put to strict proof of the site visit and the authenticity of the observations allegedly made. Respondent No.6 repeats and reiterates the contents of the aforesaid submissions and denies anything that is contrary to and/or inconsistent therewith.



33. For the reasons aforesaid, the present Application is devoid of any merit, the Applicants are not entitled to grant of any reliefs as sought for in this Application and the same ought to be dismissed with exemplary costs.



Solemnly affirmed at Ahmedabad

Dated this ___ of August 2025)

1 AUG 2025

Kirti

**Economic Laws Practice
Advocates for Respondent No. 6**

Ayubhai

Respondent No.6



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VERIFICATION

I, Ayushi Mishra, being the authorized representative of Adani Petronet (Dahej) Port Limited (Formerly, Adani Petronet (Dahej) Port Pvt. Limited), having my office at Adani Corporate House, Shantigram, S.G. Highway, Ahmedabad - 382421, Gujarat, India, do hereby state on solemn affirmation that the contents of paragraph nos. 1, 2, 3 to 1-9 of the reply are based on records of the company, maintained in the ordinary course of business and the contents of paragraph nos. 4-6, 10 to 33 are based on legal advice which I believe to be true.



Verified at Ahmedabad, on this 01 day of August 2025

Kirti

Advocates for Respondent No.6

Ayushi Mishra

Deponent



Sr. No. 1355 / 2025

ILA I. PANDYA
ILA I. PANDYA
NOTARY
GOVT. OF INDIA

01 AUG 2025

SOLEMNLY AFFIRMED
BEFORE ME

ILA I. PANDYA
ILA I. PANDYA
NOTARY
GOVT. OF INDIA

1 AUG 2025



भारत सरकार
GOVERNMENT OF INDIA

आयुषी मिश्रा
Ayushi Mishra

जन्म तिथि/DOB: 19/09/1995

महिला/FEMALE

8206 3083 2466

मेरा आधार, मेरी पहचान

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Item No.1

(Pune Bench)

**BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE**

THROUGH PHYSICAL HEARING (WITH HYBRID OPTION)

**M.A. No.12/2024(WZ)
In
Appeal No.74/2016(WZ)**

Adani Petronet (Dahej) Port Ltd.

.....Applicant

Versus

Conservation Action Trust & Ors.

....Respondent(s)

Date of hearing: 22.07.2024

**CORAM: HON'BLE MR. JUSTICE SHEO KUMAR SINGH, JUDICIAL MEMBER
HON'BLE DR. VIJAY KULKARNI, EXPERT MEMBER**

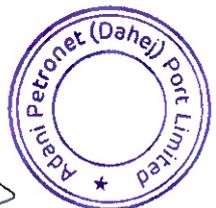
Applicant : Ms. Kirti Bhoite, Advocate
Respondent(s) : Mr. Prasad Khale, Advocate for R-1/Orig. Appellant
Mr. Maulik Nanavati, Advocate for GPCB

ORDER

1. This Tribunal, on 23.11.2023, had passed an order in Appeal No.74/2016(WZ) as follows:

"As regards Issue No.(iv) : We reject this appeal with the directions that the Project Proponent shall get study done from NIO/NIOT/NCSCM in regard to the adverse impact of expansion of the project upon the mudflats and the mangroves in the area in question and in case any suggestion/recommendations are made by the expert body, the same shall be implemented within next six months. This study shall be got completed within a period of six months from the date of uploading of this Judgment"

2. By filing this Misc. Application, the applicant has submitted that the report, as directed in the aforesaid Judgment/Order, is complete and has sought some time for filing it before this Tribunal. But now during the course of the argument, learned counsel Ms. Kirti Bhoite representing the applicant has submitted before us that the aforesaid report is



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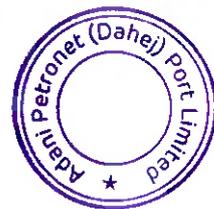
complete and the same has been filed on record. In view of that, she states that she does not want to press this Misc. Application.

3. Accordingly, this Misc. Application stands disposed of as not pressed.

Sheo Kumar Singh, JM

Dr. Vijay Kulkarni, EM

July 22, 2024
M.A. No.12/2024(WZ) In
Appeal No.74/2016(WZ)
P.Kr & NPJ



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Your (Half Yearly Compliance Report) has been Submitted with following details

Proposal No	IA/GJ/MIS/30886/2013
Compliance ID	127587873
Compliance Number(For Tracking)	EC/M/COMPLIANCE/127587873/2025
Reporting Year	2025
Reporting Period	01 Jun(01 Oct - 31 Mar)
Submission Date	24-05-2025
RO/SRO Name	Shrawan Kumar Verma
RO/SRO Email	kr099.ifs@nic.in
State	GUJARAT
RO/SRO Office Address	Integrated Regional Offices, Gandhi Nagar

Note:- SMS and E-Mail has been sent to Shrawan Kumar Verma, GUJARAT with Notification to Project Proponent.



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**Half Yearly Compliance Report
2025
01 Jun(01 Oct - 31 Mar)**

Acknowledgement

Proposal Name	Expansion of Adani Petronet Dahej Port Pvt. Ltd., Bharuch		
Name of Entity / Corporate Office	Adani Petronet Dahej Port Ltd.		
Village(s)	N/A		
District			
Proposal No.	IA/GJ/MIS/30886/2013	Category	INFRA-1
Plot / Survey / Khasra No.	N/A	Sub-District	N/A
State	GUJARAT	Entity's PAN	*****5046R
MoEF File No.	11-37/2007-IA-III	Entity name as per PAN	ADANI PETRONET (DAHEJ) PORT LIMITED

Compliance Reporting Details

Reporting Year	2025
Remarks (if any)	Half yearly compliance report of Phase I for the period October 2024 to March 2025.
Reporting Period	01 Jun(01 Oct - 31 Mar)

Details of Production and Project Area

Name of Entity / Corporate Office Adani Petronet Dahej Port Ltd.

	Project Area as per EC Granted	Actual Project Area in Possession
Private	0	0
Revenue Land	0	0
Forest	0	0
Others	23	23
Total	23	23

Production Capacity

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	Handling of Solid Cargo	Million Tons per Annum (MTPA)	16/07/2025	23	10.32	16



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Conditions

Specific Conditions

Sr.No.	Condition Type	Condition Details
1	MISCELLANEOUS	Consent for Establish' shall be obtained from State Pollution Control Board under the Air (Prevention and Control of Pollution) Act, 1981 and the Water (Prevention and Control of Pollution) Act, 1974. (F No. 11-37/2007-IA.III Dated 14th October, 2016).
PPs Submission: Complied Consent to Establish was obtained from Gujarat Pollution Control Board vide no CTE amendment 71696 dated 08/09/2015 and its amendment CTE 129384 dated 15.03.2024, valid up to 13.10.2027.		Date: 23/05/2025
2	Marine/Coastal	Construction activity shall be carried out strictly according to the provisions of CRZ Notification, 2011. No construction work other than those permitted in Coastal Regulation Zone Notification shall be carried out in Coastal Regulation Zone area.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
PPs Submission: Complied All the construction activities have been done in line with the provisions of CRZ Notification, 2011 and the same will be followed for balance activities.		Date: 23/05/2025
3	Marine/Coastal	The Project proponent shall ensure that there shall be no damage to the existing mangroves patches near site and also ensure the free flow of water to avoid damage to the mangroves.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
PPs Submission: Being Complied There is no damage to Mangrove due to project activity and the same will be ensured during balance activity to be carried out in future.		Date: 23/05/2025
4	Marine/Coastal	The Project proponent shall ensure that no creeks or rivers are blocked due to any activities at the project site and free flow of water is maintained(F No. 11-37/2007-IA.III Dated 14th October, 2016)
PPs Submission: Complied APDPL ensures no creeks or rivers are blocked due to any activities at the project site and free flow of water is being maintained.		Date: 23/05/2025
5	LAND RECLAMATION	Shoreline should not be disturbed due to dumping. Periodical study on shore line changes shall be conducted and mitigation carried out, if necessary. The details shall be submitted along with the six monthly monitoring reports(F No. 11-37/2007-IA.III Dated 14th October, 2016)
PPs Submission: Complied No marine construction activities are carried out on marine front after September 2019. Reclamation of the area is being done as per the approval received. There is no dumping of any material outside the project area towards the shore. National Institute of Ocean Technology, Chennai has carried out study on shoreline changes in the vicinity of Dahej Port. As per the report on shoreline change analysis using high-resolution satellite images. Since 2011 deposition along the northern sector, erosion along southern sector and almost stable along the southeastern sector is observed. The seasonal and yearly shoreline changes indicate the dynamic nature of the coastline. Report of shoreline change analysis was submitted along with half yearly compliance report vide letter no. APPPL-EHS/MOEF RO/EC Comp (III) dated 23.11.2019. As per the report no additional mitigation measure is required for shoreline protection. National Institute of Oceanography (NIO), Goa has		Date: 23/05/2025

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carried out Impact assessment study on near-by mangroves and mudflats due to Phase-III expansion. As per the recommendation given in the said report, shoreline change study will also be carried out after completion of reclamation activity over an area of 23 Ha.

6 PUBLIC HEARING

The commitments made during the Public Hearing and recorded in the Minutes shall be complied with letter and spirit. A hard copy of the action taken shall be submitted to the Ministry.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
All the commitments made during the public hearing have been complied with. An action taken report is enclosed.

Date:
23/05/2025

7 Risk Mitigation and Disaster Management

All the conditions stipulated in the earlier Clearance including the recommendations of Environment Management Plan, Disaster management Plan shall be strictly complied with.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
All conditions stipulated in the EC and CRZ clearances are being complied with. A separate six-monthly compliance report is being submitted to MoEFCC and other authorities. All the recommendations and suggestions given by NIO; M/s Cholamandalam in the EIA are being complied. APDPL has a well-defined DMP, and regular mock drills are being conducted. Mock drill is being conducted as per plan. Last Mock drill was conducted on 21.03.2025. Report attached. Last revision in the DMP was done on 01.08.2024 (Rev. 11).

Date:
23/05/2025

8 MISCELLANEOUS

The material for reclamation shall be sourced only through Government approved quarry. The quarried material shall be free from all kinds of contamination and high organic carbon contents. The same should be tested prior to reclamation.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Being Complied
All the material for reclamation has been procured through an approved agency. It has been ensured that Material used for reclamation is free from high organic carbon contents. The same activity will also be continued for balanced reclamation activity.

Date:
23/05/2025

9 AIR QUALITY MONITORING AND PRESERVATION

The coal shall be stored only in designated stock yard with dust control measures viz. wind screen of height at least 2 m above the coal stock, made of fabric/HDPE, water sprinkler arrangement, green belt of at least three layers of suitable trees and scrubs.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Being Complied
Coal being stored at designated stock yard with dust control measures viz. wind screen made of steel of height at least 2 m above the coal stock, water sprinkler arrangement, green belt of suitable trees and scrubs. Dust control measures details: - APDPL has installed wind breaking wall for dust pollution control in the open coal yard. The wind breaker wall is a porous perforated barrier. At the back of the wall, a low-velocity zone is formed. It effectively reduces the average wind speed, thereby prevents dust from moving, and achieves the purpose of dust suppression. The benefits include. Reduction of coal losses in open yard Saves water for dust suppression Improves the living conditions of local residents. Improves the working conditions of the on-site staff Wind break walls have been erected around the coal stockpile area at a height of 14 m from the ground level. The length, width and thickness of each galvanized sheet-based wind break metal shield are about 2950 mm, 1250 mm and 0.7 mm respectively. The aperture is round shaped, and diameter of each aperture is about 3.5 to 4 mm. The aperture occupies 30 - 40 percent of a wind break sheet. Several wind break metal sheets are connected and have been fitted in structural beams to control the wind carryover of the dust from the stockpiles. An amount of 58 crore is spent by APDPL in erecting and marinating the wind breaking wall around the coal yard. APDPL has constructed 10 KM long fully mechanized closed conveyor belt with water sprinkling facility for transfer of coal from North Jetty

Date:
23/05/2025

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to coal yard and also from coal yard to the rail wagon loading area at a cost of 150 crore. This closed conveyor system reduces the coal dust generation significantly. APDPL has installed a truck tyre washing system within the port premises, which washes the tyre of trucks exiting the port area. Green belt has been developed in an area of 25.94 Ha. including periphery of the project boundary. The green belt has been developed with plantation of native species and species which helps in creating a barrier for coal dust movement

10 MISCELLANEOUS The coal from the ships shall be conveyed through closed conveyor to the coal stock yard. The conveyor shall be seamless without joints/transfer points(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Agreed to Comply
Mechanization of South Berth is yet to be implemented. After project completion coal will be transported through closed conveyor to the coal stock yard from south berth also. The alignment of the conveyor will be based on the engineering requirement to meet the objectives. Date: 23/05/2025

11 AIR QUALITY MONITORING AND PRESERVATION The dust from the roads shall be periodically cleaned and dust suppression by water spray be carried out.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Being Complied
Regular road cleaning both inside and outside the port premises is a continuous activity carried out by below two methods. The road sweeping by both methods is carried out till 3 Km from the port main gate on the main road leading to Dahej by APDPL. Road cleaning by sweeping machine: APDPL, have 02 nos. of road sweeping machine and one tractor sweeping machine. Truck mounted Industrial Vacuum Cleaning Machines have road cleaning capacity substantially as the storage capacity of the chassis mounted vacuum machine are 04 tone/ hour each which allow rapid collection of spillage, dust and subsequent disposal. Regular water sprinkling is carried out by two mobile water tankers. Photographs of Air pollution Control measures is attached. Date: 23/05/2025

12 Marine/Coastal The mangrove plantation of 50 ha shall be under taken in consultation with Gujarat Ecology Commission / State Forest Department.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
Mangrove afforestation has been carried out in an area 50 Ha. for Phase - III. Details of the same are given below. 50 Ha. Devjagan/Nada, Ta. Jambusar.2017 - 18 (Done as compliance to Phase - III EC and CRZ clearance) The mangrove plantation (Phase - III) of 50 Ha. has been completed at Village Devjagan, Jambusar taluka in consultation with M/s. Saline Area Vitalization Enterprise Limited (SAVE). Report of 50 Ha. Mangrove Plantation was submitted along with half yearly compliance report vide letter no. APPPL-EHS/MOEF RO/EC Comp (III) dated 29/05/2019. Date: 23/05/2025

13 AIR QUALITY MONITORING AND PRESERVATION Cargo shall be unloaded directly into hopper from the ship and transported to the stack yards through closed conveyor system only. Inbuilt dust suppression systems shall be provided at hoppers and all the transfer points / storage yards. Cargo shall not be unloaded directly onto the berth. Water meters shall be provided at different locations to record the consumption of water used for dust suppression and daily log shall be maintained.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

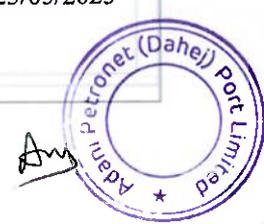
PPs Submission: Complied
At mechanized berth of APDPL, cargo is handled through conveyor system. Material handling system is equipped with Dry Fog Dust Suppression System. Coal storage yard is equipped with dust suppression system. After mechanization of south berth, desired pollution control measures shall made as a part of material handling system. Date: 23/05/2025

14 MISCELLANEOUS Disposal sites for excavated material should be so designed that the revised land use after dumping and changes in the land use pattern do

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		not interfere with the natural drainage(F No. 11-37/2007-IA.III Dated 14th October, 2016)	
		PPs Submission: Being Complied All the construction activities are as per the approval received under CRZ notification 2011 and EIA notification 2006. During Project (Phase III) implementation, it will be ensured that there shall not be any interference with the natural drainage of the area.	Date: 23/05/2025
15	WATER QUALITY MONITORING AND PRESERVATION	The ground water shall not be tapped within the CRZ areas by the PP to meet with the water requirement in any case.(F No. 11-37/2007-IA.III Dated 14th October, 2016)	
		PPs Submission: Complied Ground water is not tapped in CRZ area for the project. Water requirement is being met through GIDC water supply only.	Date: 23/05/2025
16	WATER QUALITY MONITORING AND PRESERVATION	Necessary arrangements for the treatment of the effluents and solid wastes must be made and it must be ensured that they conform to the standards laid down by the competent authorities including the Central or State Pollution Control Board and under the Environment (Protection) Act, 1986.(F No. 11-37/2007-IA.III Dated 14th October, 2016)	
		PPs Submission: Complied Sewage generated from port is being treated in designated STP of 50KL/Day Capacity. Treated water is used for horticultural purposes. Quality of treated water confirm to the standard laid down by Gujarat Pollution Control Board. We have been granted CtO for operation of STP having 80 KLD (50 KLD and 30 KLD) Capacities. However, at present, domestic sewage generation is averaging 30 KLD and to treat and handle the same we are required to operate 50 KLD STP only. Due to the same, the 30 KLD capacity STP is not required to operate, and it remains in idle condition always. Considering the sewage load at present and after future port expansion, the operation of 30 KLD STP would not require us to continue furthermore. Hence, we submitted the letter for dismantling of 30 KLD STP and regularize the STP of 50 KLD. After dismantling of said STP, total capacity of STP would remain at 50 KLD only, which will be adequate to treat and handle the total sewage load of 50 KLD. The treated water from STP is being utilized on land for horticulture purposes within port premises after achieving permissible norms prescribed in CCA order. Report attached	Date: 23/05/2025
17	MISCELLANEOUS	All the operational areas will be connected with the network of liquid waste collection corridor comprising of storm water, oily waste and sewage collection pipelines.(F No. 11-37/2007-IA.III Dated 14th October, 2016)	
		PPs Submission: Complied There is no liquid effluent generation during construction and operation of project. Separate storm water drain network has been provided. Domestic effluent is being transported from generation point to STP in close type Gully Men vehicle. Dedicated Hazardous waste storage area has been provided for collection and storage of Hazardous waste. Dump Pond is constructed to collect the coal wash water from yards and reuse it for washing.	Date: 23/05/2025
18	MISCELLANEOUS	Marine ecology shall be monitored regularly also in terms of sea weeds, sea grasses, mudflats, sand dunes, fisheries, echinoderms, shrimps, turtles, corals, coastal vegetation , mangroves and other marine biodiversity components as part of the management plan.(F No. 11-37/2007-IA.III Dated 14th October, 2016)	
		PPs Submission: Complied Marine ecology is being monitored through NABL accredited and MoEFCC recognized laboratory M/s. Kadam Environment Consultant. Reports show that there are no significant changes in the marine ecology indicators. Reports for the period of October 2024 to March 2025 are enclosed.	Date: 23/05/2025



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19 Marine/Coastal

The marine ecology management plan being drawn up with regards to the environmental impacts of natural disasters, oil spills and other wastes, dredging and dumping on marine ecology (all micro, macro and mega biotic components) shall be scrupulously implemented. It shall be ensured that the marine ecology in the area of influence is not adversely affected.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Being Complied

No waste or dredged material is dumped so as to disturb the marine ecology. Marine ecology is being monitored through NABL accredited and MoEFCC recognized laboratory M/s. Kadam environment Consultant. Reports show that there are no significant changes in the marine ecology indicators. Reports for the period of October 2024 to March 2025 are enclosed

Date:
23/05/2025

20 Marine/Coastal

Marine ecology shall be monitored regularly also in terms of all micro, macro and mega floral and faunal components of marine biodiversity.

PPs Submission: Complied

Marine ecology is being monitored through M/s. Kadam Environment Consultant, a NABL accredited and MoEFCC recognized laboratory. Reports show that there are no significant changes in the marine ecology indicators. Reports for the period of October 2024 to March 2025 are enclosed

Date:
23/05/2025

21 MISCELLANEOUS

Measures should be taken to contain, control and recover the accidental spills of fuel and cargo handle.

PPs Submission: Complied

Oil Spill Contingency plan is prepared and resubmitted Tier 1 OSR Facility Dahej port Terminals on dated 15.09.2022. Request letter for approval of Oil Spill Contingency plan submitted to the chairman, NOS-DCP, Central Coordinating authority, Cost Guard Headquarters, National stadium Complex, New Delhi and Coast Guard, Gandhinagar vide letter dated 16/09/2020. Oil Spill Contingency plan is prepared and resubmitted to The chairman, NOS-DCP, Central Coordinating authority, Cost Guard Headquarters, National stadium Complex, New Delhi and Coast Guard, Gandhinagar for verification vide letter dated 27.07.2018. Oil Spill Contingency Plan is submitted to Coast Guard, Gandhinagar for verification vide letter dated. 10/10/2012. APDPL has a well-defined DMP, and regular mock drills are being conducted. Mock drill is being conducted as per plan. Last Mock drill was conducted on 21.03.2025. Report attached. Last revision in the DMP was done on 01.08.2024 (Rev. 11).

Date:
23/05/2025

22 Statutory compliance

All the mitigation measures submitted in the EIA report shall be prepared in a matrix format and the compliance for each mitigation plan shall be submitted to the RO, MoEF&CC along with half yearly compliance report.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Being Complied

All the recommendations and suggestions given by M/s Cholamandalam in the EIA are being complied.

Date:
23/05/2025

23 MISCELLANEOUS

Ships/barges/vessels shall not be allowed to release any oily bilge waste or ballast water in the sea. Any effluents from the Jetty which have leachable characteristics shall be segregated and recycled/ disposed as per SPCB guidelines. Ships/vessels calling at the jetty shall not dump waste/bilge water during the berthing period.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Being Complied

There is no discharge of oily bilge waste or ballast water in the sea within port limit. APDPL is not accepting any kind of Hazardous Waste from ships/vessels.

Date:
23/05/2025

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24	MISCELLANEOUS	Location of DG sets and other emission generating equipment shall be decided keeping in view the predominant wind direction so that emissions do not effect nearby residential areas. Installation and operation of DG sets shall comply with the guidelines of CPCB.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
<p>PPs Submission: Complied The D.G set are only used in case of power failure DG sets are installed as per the approval. Monitoring of DG set Stack emission and noise is being carried out by M/s. Kadam Environment Consultant, a NABL accredited and MoEFCC recognized laboratory. Test reports of emission from DG sets are enclosed.</p>		<p>Date: 23/05/2025</p>
25	AIR QUALITY MONITORING AND PRESERVATION	All the mechanized handling systems and other associated equipment's such as hoppers, belt conveyors, stacker cum reclaimers shall have integrated dust suppression systems. Dust suppression systems shall be provided at all transfer point.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
<p>PPs Submission: Being Complied APDPL has constructed 10 KM long fully mechanized closed conveyor belt with water sprinkling facility for transfer of coal from North Jetty to coal yard and also from coal yard to the rail wagon loading area at a cost of 150 crore. This closed conveyor system reduces the coal dust generation significantly. After mechanization of south berth, desired pollution control measures shall be made as a part of material handling system.</p>		<p>Date: 23/05/2025</p>
26	MISCELLANEOUS	No product other than permitted under the CRZ Notification, 2011 shall be stored in the CRZ area.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
<p>PPs Submission: Complied APDPL is handling Multi cargo mainly coal, other bulk cargos and project cargo at designated storage areas as per approval and CRZ notification 2011.</p>		<p>Date: 23/05/2025</p>
27	MISCELLANEOUS	The quality of treated effluents, solid wastes, emissions and noise levels and the like, from the project area must conform to the standards laid down by the competent authorities including the Central or State Pollution Control Board and under the Environment (Protection) Act, 1986.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
<p>PPs Submission: Complied Details regarding STP are given in point number- XVI (Refer above point). Monitoring Reports for the period of October 2024 to March 2025 is enclosed</p>		<p>Date: 23/05/2025</p>
28	Statutory compliance	All the mitigation measures suggested in the EIA report and the marine environment study of CWPRS, Pune shall be implemented. The compliance for each of these measures shall be submitted to concerned SPCB and R.O. of this Ministry along with six monthly compliance reports.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
<p>PPs Submission: Complied All the recommendations and suggestions given by M/s Cholamandalam in the EIA are being complied. Copy of the status of EMP recommendations is enclosed</p>		<p>Date: 23/05/2025</p>
29	MISCELLANEOUS	It shall be ensured by the Project Proponent that the activities does not cause disturbance to the fishing activity, movements of fishing boats and destruction to mangroves during the construction and operation phase.(F No. 11-37/2007-IA.III Dated 14th October, 2016)



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PPs Submission: Complied
There is no commercial fishing in the area. Free access to the Pagadiya fishermen is available.
There is no impact on fishermen livelihood due to project activity.

Date: 23/05/2025

30 Corporate Environmental Responsibility
The Project Proponent shall take up and earmark adequate fund for socio economic development and welfare measures as proposed under the CSR Programme. This shall be taken up on priority.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
The CSR activities are executed by Adani Foundation. Adani Foundation is taking care of Social-economic establishment activities. Budget for CSR activities for the year is Rs. 280.80 out of which approx. Rs. 275.74 is utilized. Details of the same for the period of October 2024 to March 2025 is attached .

Date: 23/05/2025

31 MISCELLANEOUS
The project proponent shall set up separate environmental management cell for effective implementation of the stipulated environmental safeguards under the supervision of a Senior Executive.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
APDPL has a well-structured Environment Management Cell, staffed with qualified manpower for implementation of the Environment Management Plan. Detail of the Environment cell is enclosed.

Date: 23/05/2025

32 MISCELLANEOUS
The funds earmarked for environment management plan shall be included in the budget and this shall not be diverted for any other purposes.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
Separate budget is allocated for Environmental Management. Key components of environment budget are environmental Monitoring, STP (Operations and Maintenance), and Closed Conveyor System Maintenance etc. The allocation of budget for Environment Cell for the FY 2024-25 was Rs. 551.11 lacs out of which approx. Rs. 457.17 lacs is utilized. Details of the environmental budget and expenditure for the past 3 years is enclosed.

Date: 23/05/2025

33 MISCELLANEOUS
The proponent shall abide by all the commitments and recommendations made in the EIA/EMP report so also during their presentation to the EAC(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
All the recommendations and suggestions given by M/s Cholamandalam in the EIA are being complied. Copy of the status of EMP recommendations is enclosed.

Date: 23/05/2025

34 MISCELLANEOUS
Company shall prepare operating manual in respect of all activities. It shall cover all safety & environment related issues and system, measures to be taken for protection. One set of environmental manual shall be made available at the project site. Awareness shall be created at each level of the management. All the schedules and results of environmental monitoring shall be available at the project site office.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
APDPL has prepared operating manual for all activities and is certified for ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018, ISO 50001:2018, ISO 28000:2007 and ISO 27001:2013. Complete set of operating manual is available at site. Regular awareness sessions are organized for each level of employee as per the training need identification (TNI) done by HR department. All the schedules and results of environmental monitoring are available at EHS department at project site.

Date: 23/05/2025

35 Corporate Environmental "Corporate Social Responsibility:(F No. 11-37/2007-IA.III Dated

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Responsibility	<p>14th October, 2016) a. The Company shall have a well laid down Environment Policy approved by the Board of Directors. b. The Environment Policy shall prescribe for standard operating process/procedures to bring into focus any infringements/ deviation/violation of the environmental or forest norms/ conditions. c. The hierarchical system or Administrative Order of the company to deal with environmental issues and for ensuring compliance with the environmental clearance conditions shall be furnished. d. To have proper checks and balances, the company shall have a well laid down system of reporting of non-compliances/ violations of environmental norms to the Board of Directors of the company and/or shareholders or stakeholders at large"</p>
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PPs Submission: Being Complied
 The company has an Environment Policy approved by the Board of Directors. All the requirements mention in the condition are being met through Environment Management System (ISO 14001:2015). The hierarchical system or Administrative Order of the company to deal with environmental issues and for ensuring compliance with the environmental clearance conditions (Environment Cell Organogram) is enclosed. APDPL has form a management review committee-comprising of various heads of departments and chaired by site head. This review committee meets once in six months to review and monitor EHS performance of the site. All action items are being recorded and implemented.

Date: 23/05/2025

General Conditions

Sr.No.	Condition Type	Condition Details
1	WATER QUALITY MONITORING AND PRESERVATION	Appropriate measures must be taken while undertaking digging activities to avoid any likely degradation of water quality.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Being Complied
 No digging activities carried out during the compliance period. Two Piezometers have been installed at different locations inside port. Regular monitoring of ground water level and quality is being done through M/s. Kadam Environment Consultants, a NABL accredited and MoEFCC recognised laboratory

Date: 23/05/2025

2	MISCELLANEOUS	Full support shall be extended to the officers of this Ministry/ Regional Office at Bhopal by the project proponent during inspection of the project for monitoring purposes by furnishing full details and action plan including action taken reports in respect of mitigation measures and other environmental protection activities.(F No. 11-37/2007-IA.III Dated 14th October, 2016).
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PPs Submission: Being Complied
 APDPL regularly submitting six monthly compliance reports which comprise of Compliance to the conditions stipulated in Environment and CRZ clearance, environment monitoring reports etc. Whenever any authorities such as MoEFCC, GPCB and GMB etc. visit the APDPL full support is extended and APDPL provides all additional information seek by them during the inspection. Inline to the compliance certification process of Environment Clearance condition IRO, MoEFCC Gandhinagar visited the site on 22nd December 2024 for compliance verification. APDPL has provided all the requisite information and documents required by the Regional Officer MoEFCC).

Date: 23/05/2025

3	MISCELLANEOUS	Ministry of Environment, Forest and Climate Change or any other competent authority may stipulate any additional conditions or modify the existing ones, if necessary in the interest of environment and the same shall be complied with. (F No. 11-37/2007-IA.III Dated 14th October, 2016)
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<p>PPs Submission: Complied Noted and Agreed.</p>	<p>Date: 23/05/2025</p>
<p>4 MISCELLANEOUS</p>	<p>The Ministry reserves the right to revoke this clearance if any of the conditions stipulated are not complied with the satisfaction of the Ministry.(F No. 11-37/2007-IA.III Dated 14th October, 2016)</p>
<p>PPs Submission: Complied Noted and agreed</p>	<p>Date: 23/05/2025</p>
<p>5 MISCELLANEOUS</p>	<p>In the event of a change in project profile or change in the implementation agency, a fresh reference shall be made to the Ministry of Environment, Forest and Climate Change.(F No. 11-37/2007-IA.III Dated 14th October, 2016)</p>
<p>PPs Submission: Complied There is no change in the implementation of project profile/agency.</p>	<p>Date: 23/05/2025</p>
<p>6 MISCELLANEOUS</p>	<p>The project proponents shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of land development work.(F No. 11-37/2007-IA.III Dated 14th October, 2016)</p>
<p>PPs Submission: Complied Consent to Establish was obtained from Gujarat Pollution Control Board vide no CTE amendment 71696 dated 08/09/2015 and its amendment CTE 129384 dated 29.09.2023, valid up to 13.10.2027. Start of land development (23 Ha. reclamation) work 17.10.2017. Out of 23 Ha., 16 Ha. is already reclaimed and remaining 7 Ha. to be reclaimed and developed as per business requirement.</p>	<p>Date: 23/05/2025</p>
<p>7 Statutory compliance</p>	<p>A copy of the clearance letter shall be marked to concerned Panchayat/local NGO, if any, from whom any suggestion/ representation has been made received while processing the proposal.(F No. 11-37/2007-IA.III Dated 14th October, 2016)</p>
<p>PPs Submission: Complied Copy of the clearance letter is submitted to concern Panchayat/ local NGO by hand and by register speed post. Copy of the acknowledgement and receipt of speed post were submitted along with half-yearly compliance report vide letter no. APPPL-EHS/MOEF RO/EC Comp (III), dated 28.11.2017.</p>	<p>Date: 23/05/2025</p>
<p>8 Statutory compliance</p>	<p>A copy of the environmental clearance letter shall also be displayed on the website of the concerned State Pollution Control Board. The EC letter shall also be displayed at the Regional Office, District Industries centre and Collector's Office/ Tehsildar's office for 30 days.(F No. 11-37/2007-IA.III Dated 14th October, 2016)</p>
<p>PPs Submission: Complied This condition does not belong the project proponent, however, APDPL has submitted request letter along with a copy of environment clearance letter for display to Gujarat Pollution Control Board, District Industries Centre and Collector Office vide letter dated 27.10.2016.</p>	<p>Date: 23/05/2025</p>
<p>9 MISCELLANEOUS</p>	<p>These stipulations would be enforced among others under the provisions of Water (Prevention and Control of Pollution) Act 1974, the Air (Prevention and Control of Pollution) Act 1981, the Environment (Protection) Act, 1986, the Public Liability (Insurance) Act, 1991 and EIA Notification 1994, including the amendments and rules made thereafter.(F No. 11-37/2007-IA.III Dated 14th October, 2016)</p>

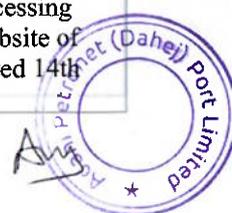


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PPs Submission: Complied Noted and agreed.		Date: 23/05/2025
10	Statutory compliance	All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained, as applicable by project proponents from the respective competent authorities.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
PPs Submission: Complied For storage of HSD approval has been taken from PESO vide letter no P/WC/GJ/14/3668(P221616) and valid up to 31.12.2025 for the Class B Petroleum. Copy of the HSD license submitted along with half-yearly compliance report vide letter no. APPPL-EHS/MOEF RO/EC Comp (III), dated 25.11.2020 and there is no further change. EC Clearance from MOEF was obtained vide letter no. vide letter dated 14/10/2016 bearing F. No.: 11-37/2007-IA-III. Fire NOC: Not Applicable. Civil Aviation: Not Applicable. Permission under Wildlife (Protection) Act, 1972: Not Applicable.		Date: 23/05/2025
11	Statutory compliance	The project proponent shall advertise in at least two local Newspapers widely circulated in the region, one of which shall be in the vernacular language informing that the project has been accorded Environmental and CRZ Clearance and copies of clearance letters are available with the State Pollution Control Board and may also be seen on the website of the Ministry of Environment, Forest and Climate Change at http://www.envfor.nic.in . The advertisement should be made within Seven days from the date of receipt of the Clearance letter and a copy of the same should be forwarded to the Regional office of this Ministry at Bhopal.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
PPs Submission: Complied Environment clearance letter is published in Indian Express and Gujarat Guardian newspapers on dated 25th October 2016 which is within 7 days of from the date of the receipt of clearance letter. Copy of advertisement has been submitted to Regional Office MOEF on 28th October 2016 vide letter no APDPPL/MOEF-RO/01/2016. Copy of the same was submitted along with half-yearly compliance report vide letter no. APPPL-EHS/MOEF/RO/EC Comp (III), dated 28.11.2017.		Date: 23/05/2025
12	Statutory compliance	This Clearance is subject to final order of the Hon'ble Supreme Court of India in the matter of Goa Foundation Vs Union of India in Writ Petition (Civil) No.460 of 2004 as may be applicable to this project.(F No. 11-37/2007-IA.III Dated 14th October, 2016)
PPs Submission: Complied Noted.		Date: 23/05/2025
13	Statutory compliance	Status of compliance to the various stipulated environmental conditions and environmental safeguards will be uploaded by the project proponent in its website.
PPs Submission: Complied The status of environment clearance conditions along with its compliance status is available on company website that i.e., www.adaniports.com/ports-downloads .		Date: 23/05/2025
14	Statutory compliance	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zilla Parisad/Municipal Corporation, Urban Local Body and the Local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the website of the company by the proponent.(F No. 11-37/2007-IA.III Dated 14th



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October, 2016)

PPs Submission: Complied

Copy of the clearance letter is submitted to concerned Panchayat, Zila Parishad, local body and the local NGO by hand and registers speed post. Copy of the acknowledgement and receipt of speed post was submitted along with half-yearly compliance report vide letter no. APPPL-EHS/MOEF RO/EC Comp (III) , dated 28.11.2017.Copy of environment clearance is also available on company website i.e. www.adaniports.com/ports-downloads

Date:
23/05/2025

15 Statutory compliance

The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF&CC, the respective Zonal Office of CPCB and the SPCB.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied

Compliance report of EC conditions is uploaded regularly and Same is being regularly submitted to concerned authorities. Compliance reports along with monitored data are available on company website i.e., www.adaniports.com/ports-downloads.

Date:
23/05/2025

16 Statutory compliance

The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of EC conditions and shall also be sent to the respective Regional Offices of MoEFCC by email.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied

Environment statement regularly being submitted to Gujarat Pollution Control Board. Last statement for FY 2023-24 was submitted dated 26.06.2024 is attached. Copy of environment statement is also available on company website i.e., www.adaniports.com/ports-downloads.

Date:
23/05/2025

17 MISCELLANEOUS

Any appeal against this Clearance shall lie with the National green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of The National Green Tribunal, Act, 2010.(F No. 11-37/2007-IA.III Dated 14th October, 2016)

PPs Submission: Complied
Noted.

Date:
23/05/2025

18 MISCELLANEOUS

A six-Monthly monitoring report shall need to be submitted by the project proponents to the Regional Office of this Ministry at Bhopal regarding the implementation of the stipulated conditions.

PPs Submission: Complied

APDPL is regularly submitting six monthly compliance reports, which comprises of compliance to the conditions stipulated in Environment and CRZ clearance, environment monitoring reports and EMP Status etc. Last compliance report was submitted vide letter no. APDPL-EHS/MOEF RO/EC Comp (I and II)/2024/02 dated 22.11.2024 in soft copy via mail dated 23.11.2024. It is also uploaded in MOEFCC (Parivesh portal) and our website: www.adaniports.com/ports-downloads.

Date:
23/05/2025

Visit Remarks

Last Site Visit Report Date:

N/A



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Additional Remarks:

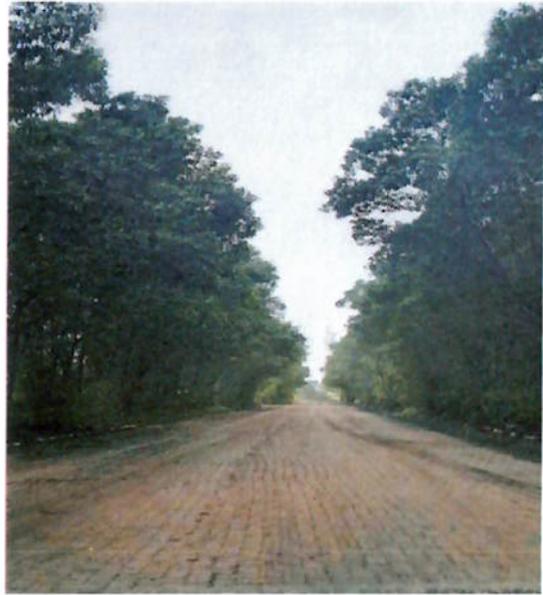
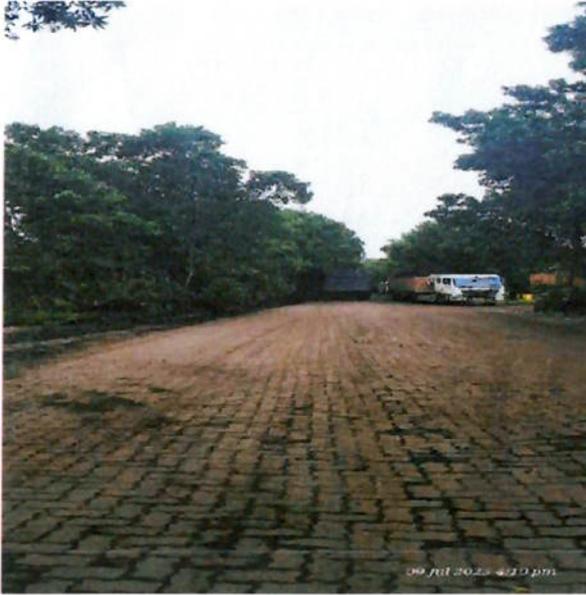
EC and CRZ Compliance of Phase III Mail already sent on 24.05.2025 to concerned authorities.

Note: This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.



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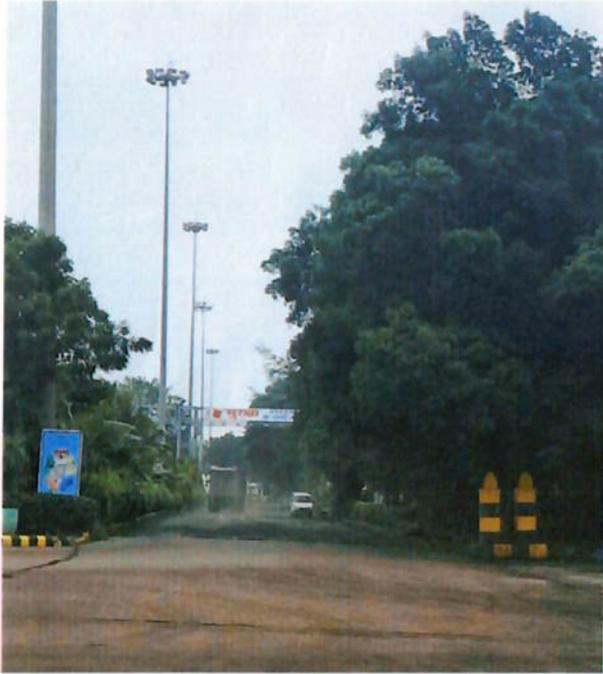
Annexure 2- Green Belt



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Bio-shield

Malpur village, Jambusar taluka, Bharuch district

Service Order No: 5700270907 dated 26.06.2019

Project Period: 1st July, 2019 to 30th June, 2022

Project Supported by: Adani Petronet (Dahej) Port Pvt. Ltd.

Project Implemented by: SAVE – Saline Area Vitalization Enterprise Limited

Reporting Period: 1st July, 2019 to 30th June, 2022



Saline Area Vitalization Enterprise Ltd. (Save) has started a Bioshield project in the year 2019 in Malpur village in Jambusar taluka of Bharuch district in collaboration with Adani Petronet (Dahej) Port Pvt. Ltd. In order to provide employment to the people of Rathod community and deprived community in this village as well as to protect the coastal environment, a committee has been formed to work with the local people for public participation.

SAVE Ltd. has developed a Bio-shield in the 20 hectare Coastal area of Tankari Village and between Malpur and Isanpur Villages in Jambusar Taluka in which Plantation of Mangroves and Pilu (*Salvadora persica*) has been done to prevent soil erosion as well as conserve marine life and to provide fodder to the cattle of this village. Thus SAVE Ltd. works to preserve the environment, prevention of Soil erosion and provide employment to the local community.



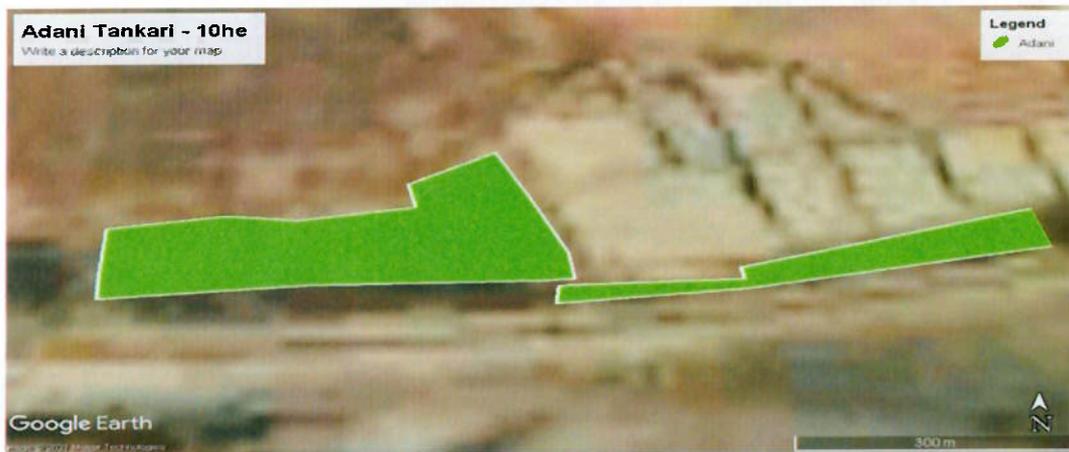
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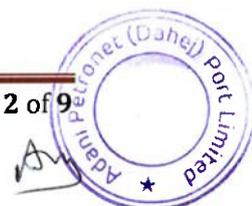
The Bioshield is 1000 mtr in length and 200-300 mtr in width. The Following Plants have been grown:

- Mangroves have been planted on Sea-side in 1000 mtr (L) x 200mtr (W).
- Piludi (Salvadora persica) is being planted towards Land-side in 1000 mtr (L) x 100 mtr (W).
- Pilu Plantation at Village Tankari Site (New Site):
- Pilu Plantation done in a 10 Hectare area, wherein 30,000 Plantation has been done:



Pilu Plantation:

Sr. No.	New Location	Area (Ha)	Total Plantation to be done (target)	Plantation of Pilu done in the year 2021	Total Number of surviving Pilu plants calculated in June 2022
1	Village Tankari	10	30,000	30,000	27,365



Tankari Pilu 10 ha			
No	Code No	N	E
1	A-688	21°57'41.53"N	72°39'40.96"E
2	A-690	21°57'43.03"N	72°39'40.77"E
3	A-692	21°57'45.60"N	72°39'40.54"E
4	A-1869	21°57'42.28"N	72°39'49.59"E
5	A-1871	21°57'42.66"N	72°40'0.53"E
6	A-1872	21°57'44.01"N	72°40'0.21"E
7	A-1873	21°57'47.60"N	72°39'58.53"E
8	A-1874	21°57'50.35"N	72°39'57.06"E
9	A-1875	21°57'48.34"N	72°39'53.24"E
10	A-1876	21°57'46.81"N	72°39'53.74"E
11	A-1877	21°57'46.06"N	72°39'48.60"E
12	A-1878	21°57'46.30"N	72°39'45.55"E
13	A-1885	21°57'43.27"N	72°40'7.46"E
14	A-1886	21°57'42.61"N	72°40'7.53"E
15	A-1887	21°57'42.04"N	72°40'7.64"E
16	A-884	21°57'41.27"N	72°39'59.78"E
17	A-885	21°57'42.24"N	72°39'59.87"E
18	A-887	21°57'44.31"N	72°40'20.67"E
19	A-888	21°57'46.58"N	72°40'20.34"E

Note: In the year 2021-22, total 30,000 Pilu seedlings have been planted in 10 hectares area at the Tankari sea site area. As per the calculation in June-2022, the number of surviving seedlings is 27,365.



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Malpur Bio -1 Mangrove & Pilu 20 ha.			
No	Code No.	N	E
1	AM-1	22° 1'57.10"N	72°31'25.90"E
2	AM-2	22° 1'57.80"N	72°31'22.00"E
3	AM-3	22° 1'26.80"N	72°31'19.50"E
4	AM-4	22° 1'28.20"N	72°31'15.30"E
5	AM-5	22° 1'58.70"N	72°31'19.70"E
6	AM-6	22° 1'28.00"N	72°31'12.50"E
7	AM-9	22° 2'0.90"N	72°31'13.90"E
8	AM-10	22° 2'1.60"N	72°31'11.70"E
9	AM-11	22° 1'27.80"N	72°31'5.30"E
10	AM-12	22° 1'27.90"N	72°31'3.20"E

Mangrove Plantation at Malpur :-

Sr.	Approved area (in hectares)	Total Plantation (Target)	Number of seedlings planted in 2019-20	Plantation done in the year 2021	Final live plants after counting in June 2022
1	5	15,000	15,000	10,120	16,170
2	5	15,000	15,000	0	15,000
Total	10	30,000	30,000	10,120	31,170

Note -

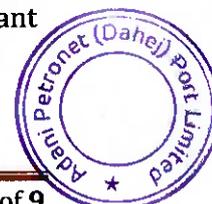
As per the counting done in June-2022

- In Plot No. 1 at Malpur Sea site 05 hectares area the number of surviving plants is 16,170
- In Plot No. 2 gap filling has been carried out in 05 hectares area. The number of surviving plants here is 15,000.

Visit of Plantation area by Adani Team members

A field visit was organized by the Adani Team on 30th June 2022. Mr. Nikhil Kumar and Mr. Kaushal Kumar from Adani had come for the site inspection and Kantibhai and Rameshbhai from SAVE Ltd were present at the site.

On Both the sites, it was observed that the plantation is good. It was observed that plant growth, height and survival rate, etc. are good.



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Photographs

Pilu Plantation



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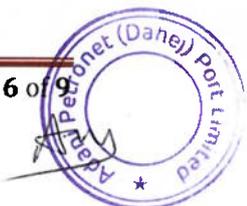


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Mangrove Plantation Area



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Mangrove Gap Filling Area



Pilu Plantation site visit by ADANI Team on 30th June, 2022.



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Mangrove Plantation area site visit



Gap Filling area site visit



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