

**BEFORE THE NATIONAL GREEN TRIBUNAL (WZ)  
AT PUNE**

**OA NO. 107 OF 2019**

**THE GOA FOUNDATION**

.... APPLICANT

VS.

**DEPARTMENT OF MINES  
AND OTHERS**

.... RESPONDENTS



**AFFIDAVIT OF RESPONDENT NO. 4 IN SUR-REJOINER**

I, Mr. Joseph Coelho, son of late Mr. Santan Coelho, major in age, Indian National, resident of Sesa Apartments, Joefil Nagar, Ponda Goa, Authorised Signatory of Vedanta Limited, Respondent No. 4 above named, do hereby state on solemn affirmation as under:

1. That I am the Chief Operating Officer (Iron Ore, Goa business) of the Respondent No. 4 (“**Answering Respondent**”) and hence conversant with the facts of the captioned Original Application (“**OA**”) and am duly authorised to file the present Affidavit on behalf of the Answering Respondent.
2. At the outset I deny all and singular, the contents of the Rejoinder Affidavit dated 31.08.2020 and the Addl. Rejoinder Affidavit dated 03.09.2020 and 09.09.2020 and no part thereof be deemed admitted for the lack of a specific traverse.

**FORUM HUNTING & MAINTAINABILITY:**

3. That the Applicant in the instant OA has challenged the grant of the Consent to Operate (“**CTO**”) dated 19.09.2019, which is evident from a reading of prayer (a) of the OA:

*“a) For an order directing GPCB to withdraw its CTO for starting operations in violation of EIA Notification, 2006” [Emphasis added]*

4. That the Applicant, in its rejoinder, has labored to say to the contrary, i.e. that it has not challenged said CTO, but only sought for withdrawal of the same citing the absence of an EC to operate the beneficiation plants. Whatever be the basis of the challenge, it is without doubt a challenge to the grant of the CTO, on the basis of which the subject Plant is operating today. It is settled law that “crafty

drafting” cannot be employed to get over legal bars. In the instant case, by merely employing the word “*withdraw its CTO*” as opposed to “*set aside the CTO*” the Applicant cannot circumvent the appeal provisions provided in Section 16 of the NGT Act, by merely fashioning the appeal as an OA under Section 14 of the NGT Act. Further, prayer (c) is again a specific challenge to a condition in the CTO. A challenge to a consent to operate, on whatever ground it may be, cannot be *de hors* the requirement of an appeal, or else the scheme of the NGT providing specific limitations would be wholly defeated. Thus, none of the prayers of the OA are unrelated to the legality of the CTO and the grant of any of the prayers will amount to setting aside of the CTO, which it is humbly submitted can only be countenanced in an appeal, which does not lie before this Hon’ble Tribunal but to the Administrative Tribunal under Section 31 and 28 of the Air and Water Act respectively.

5. In this context, it is submitted that the Hon’ble Supreme Court in *State of Tamil Nadu v. Sesa Sterlite* 2019 SCC OnLine 221 has held in categorical terms in the context of orders under the Air and Water Act that “*a leapfrog appeal to the NGT cannot be countenanced.*”, and further that “*the NGT is only conferred appellate jurisdiction from an order passed in exercise of first appeal. Where there is no such order, the NGT has no jurisdiction*”. In the instant case, this Hon’ble Tribunal can only entertain an appeal against an order of the Administrative Tribunal of Goa, i.e. the Appellate Authority under the Air and Water Act in Goa.



6. Similarly, it is submitted that an OA cannot be preferred by merely citing an environmental issue, when there is a statutory remedy prescribed, i.e., an appeal under the statute concerned to the Administrative Tribunal. The Hon’ble Supreme Court has in *Sesa Sterlite (supra)* also held that “*the NGT has no general power of judicial review akin to that vested under Article 226 of the Constitution of India possessed by the High Courts of this country.*”
7. That the fact that the instant OA is clearly not maintainable is evident from the order of the Bombay High Court at Goa, where the Applicant has unsuccessfully filed a writ petition, being PIL WP No. 69/2019, seeking the very same pleas as raised in this OA:

“a) For an order quashing and setting aside the consent to operate dated 19.09.2019.”

8. The Hon’ble High Court however dismissed the said writ petition holding as follows:

“3. It is pointed out that in terms of the Air (Prevention and Control of Pollution) Act, 1981 and of the Water (Prevention and Control of Pollution) Act, 1974, the consent to operate and authorization or the renewal of consent to operate by order dated 19/9/2019 granted to M/s. Vedanta Limited is appealable to the Appellate Authority which is the Administrative Tribunal of Goa. Accordingly, we see no reason as to why the petitioner should not be relegated to the alternate remedy under the said Acts. If the petitioner have remedy under any other Acts, they are at liberty to avail of the same.” [Emphasis supplied]

9. That, though the Hon’ble High Court expressly adverted to the correct remedy, the Applicant has chosen not to invoke the said remedy, since the same would be hopelessly barred by limitation. Pertinently, the CTO was granted on 19.09.19, and the limitation for an appeal against the grant of the said CTO expired on 19.10.2019 i.e. after an expiry of 30 days from the date of grant under Section 28 of the Water Act and Sec. 31 of the Air Act.

10. That the following circumstances would show that the Applicant is indulging in forum hunting:

- a. The Applicant preferred PIL WP 69/2019 before the High Court on 11.12.2019 where it failed to obtain any relief, since the same was dismissed on 16.12.2019.
- b. The Applicant then preferred the instant OA on 17.12.2019, wherein this Hon’ble Tribunal, on 09.01.2020, when it was heard for the first time, did not grant any interim relief.



11. That it is well settled that a litigant indulging in forum hunting ought not to be entertained, as has been held by this Hon’ble Tribunal in a *catena* of decision, while relying on the decision of the Supreme Court in *Dr. Buddhi Kota Subbarao v. K Parasaran* AIR 1996 SC 2687 among others.

#### SUPPRESSION OF MATERIAL DOCUMENTS

12. The fact that Applicant has attempted to get over the aforesaid bar is all the more evident on an examination of the Addl. Rejoinder filed by the Applicant, dated 03.09.2020, wherein the Applicant has sought to rely on a report dated 21.05.2012, to contend that Plants IIA and IVA were only constructed in 2012.

The said report in fact only pertains to an inspection conducted by the GSPCB, with regard to a complaint received from one Mr. Ramesh Gauns with respect to the alleged pollution of the river Khandepar and Opa due to mining activities, and not with respect to the operation of the beneficiation plants in issue in the instant case, which is evident from para 1 of the said report which reads as follow:

*“The inspection was carried out with regard to the complaint received from Mr. Ramesh Gauns, Pajwada, Bicholim-Goa vide letter no. NIL dated 08.05.2012 against no. of mines operating around river Khandepar. Accordingly the inspection was conducted at M/s Sesa Goa Ltd (Codli Group of Mines) for polluting river Khandepar and Opa project due to operation of mining activities”*

13. The Applicant has sought to rely on a vague reference to the construction of “two plants”, at para (i), in the said report to contend that the Answering Respondent’s plants were only constructed in 2012. The Answering Respondent submits that the said statements and documents have been made by suppressing material documents and solely to mislead this Hon’ble Tribunal as:

- a. First, the said report did not pertain to and was not an inspection of plants IIA and IVA;
- b. Secondly, there is no reference to either plants IIA or IVA, and in all probability what was noticed by the said inspection committee was merely the relocation of the Plants, within the Codli Mines, which was necessitated by and was done in terms of the Mining Plan, so as to utilise the mineral below the beneficiation plants in the interest of mineral conservation and development;
- c. Thirdly, if the said work undertaken at the site was illegal, the GSPCB surely would have issued some show cause notice or taken action against the Answering Respondent. The failure of the Applicant, even after inspecting the records from the GSPCB’s offices, to demonstrate any such action against the Answering Respondent, even after 8 years from the said report, belies any illegality *qua* plants IIA and IVA.



14. On the contrary, had the Applicant diligently inspected the records of the GSPCB, it would be evident from the said records and more particularly, letters dated 08.02.1991, 18.03.1991, 03.04.1991 and 11.01.1996 that the Plants have been in existence prior to 1991. In fact, the letter dated 11.01.1996, from the Answering Respondent to the Member Secretary of the GSPCB, expressly

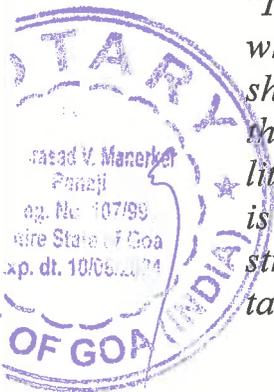
records that the “*Beneficiation Plant II and IV was commissioned in 1979.*” These Plants have been renumbered as Plant IIA and IVA, upon their relocation.

A copy of the letter dated 11.01.1996 from the Answering Respondent to the Member Secretary of the GSPCB is hereto annexed and marked as ANNEXURE R-1.

15. That, in fact, the Applicants have in the Addl. Rejoinder Affidavit dated 03.09.2020 (at para 2), admitted that they have examined these reports, but it appears that they have maliciously suppressed the aforesaid documents to mislead this Hon’ble Tribunal, so as to obtain some favourable relief, by unfair means.

16. The Hon’ble Supreme Court in a number of case has deprecated such a practise of suppressing material facts and documents, and in *Dalip Singh v. State of U.P.*, (2010) 2 SCC 114 has held that courts must not entertain petitions where there is such suppression. Pertinently, the Hon’ble Court states:

*“In the last 40 years, a new creed of litigants has cropped up. Those who belong to this creed do not have any respect for truth. They shamelessly resort to falsehood and unethical means for achieving their goals. In order to meet the challenge posed by this new creed of litigants, the courts have, from time to time, evolved new rules and it is now well established that a litigant, who attempts to pollute the stream of justice or who touches the pure fountain of justice with tainted hands, is not entitled to any relief, interim or final.”*



#### BAR OF LIMITATION

17. Even assuming, without admitting, that the said report pertains to the construction of Plants IIA and IVA, and the Applicant’s OA in fact pertained to the grant of an EC, the same is grossly barred by limitation as the said report clearly establishes that construction of the said Plants commenced prior to 2012, i.e., over seven (7) years before the filing of the instant OA, and the NGT Act prescribes a period of six (6) months and five (5) years, under Sections 14 and 15 respectively, to approach this Hon’ble Tribunal. Furthermore, the Applicant has not even filed an application for condonation of the said delay and has on the contrary falsely stated at para 23, under the head of “Limitation”:

*“23. The application is filed under Section 14 and 15 of the NGT Act and is within the limitation period. The application is being filed within one month of the commencement of beneficiation plants.”*

18. The Answering Respondent further submits that contrary to the aforesaid statement of commencement in 2019, the Applicant has, at para 8 of the Addl. Rejoinder dated 03.09.2019, stated that:

*“... On 19.08.2015, the brand new plants IIA and IVA were simply granted consent to operate, even though the Board had never granted them consent to establish.”*

19. It is also evident from a reading of the aforesaid paras that the plea as to the absence of, or the requirement of an EC, is clearly an afterthought raised by the Applicants in order to overcome the bar of limitation, if not from 1979 (when no such requirement of an EC or a CTO existed) then at least from 2012, which amounts to a delay of 35 years and seven (7) years, respectively.

#### PRE-EXISTING PLANTS

20. The Answering Respondent submits that prior to the stoppage of mining operations, the said Plants were utilised to beneficiate the ore extracted from the Codli mines.

21. Pertinently, all iron ore mines in Goa are entirely mineralised and same is the case with the Codli mines. Thus, the land upon which the Plants stood was also mineralised, and hence was always intended and planned/scheduled to be broken up in terms of the Mining Plan, i.e., due provision was made for the same in the Mining Plan.

22. A beneficiation plant, in highly mineralised mines, does not have a static location. The same being the case with the Codli mines, the beneficiation plants within the Codli mines were also bound to be relocated in terms of the mining scheme and mining plan and the exigencies thereof, so that an important facet of scientific mining, i.e., zero waste mining under the NATIONAL MINERAL POLICY, 2008 is complied with. In other words, as far as feasible in view of the exigencies of mining operations, the entirety of the mines should be optimally utilised.

23. It is very clear from the Mineral Conservation and Development Rules, 1988 (MCDR 1988) as well as the Mineral Conservation and Development Rules,



2017 (MCDR 2017) that the mining plan is a dynamic document, which will reflect the need for changes in the area of the mining lease which is worked, in view of the need for systematic development of the mines. In fact, Rule 11(1) of the MCDR, 2017 contemplates that mining must be done in terms of a Mining Plan and Rule 11(3) thereof expressly contemplates that the mining plan will change every five (5) years. That mining plans must necessarily change over time is also clear from Rule 12(1) of the MCDR 2017 which provides that mining operations must be carried out in a manner that ensures “*systematic development of mineral deposits, conservation of minerals and protection of the environment*”. Again, Rule 22(1) of the MCDR 2017 provides for a progressive mine closure plan to be submitted as part of the mining plan. A progressive mine closure plan implies that as mining is completed in one portion of the mining lease area, that portion of the mine will be closed and mining will continue in another portion of the mining lease area. Moreover, although the surface features mentioned as part of a ‘surface plan’ in Rule 28 of MCDR, 1988 did not specifically mention beneficiation plants, that is now made explicit by Rule 32 of the MCDR 2017, which specifically mentions them as a feature to be mentioned in the ‘surface plan’. Importantly, the Annual Returns are to be filed in terms of the format provided in Form H-1 of the MCDR, 1988, which expressly requires the submission of the “*up to date*” ‘surface plan’ along with the said returns. In other words, the ‘surface plan’ which *inter alia* indicates the beneficiation plant and other structures on the mines, has to be updated annually and filed. This again implies that a surface plan is dynamic and can change from year to year.

24. In fact, even the EIA MANUAL FOR MINERAL BENEFICIATION, 2010 when it talks of location at para 1.9 does not require the specification of the coordinates of the plant but only those of the boundaries of the mines. It reads as follows:

*“1.9 Brief Description of Project*

*Details of the project nature, size, location and its importance to the country and the region are to be included. project site description- survey/ village, tehsil, district, State & extent of the land, **latitude & longitude of the boundaries** as per the state/ central govt. gazette notification should be furnished.” [Emphasis supplied]*

25. It is submitted that if the location of beneficiation plants were to be static, then the EIA manual would have mandated the coordinates of the plant instead of the boundaries of the mines.

26. Accordingly, in the Mining Plan of the Answering Respondent, the area, where the Plants originally stood was scheduled to be broken up for extraction of the ore in the year 2012. Thus, various structures including the plant office, canteen and the beneficiation plants necessarily had to be, and were, in fact, relocated for this purpose. In fact, over the span of the entire mining plan, virtually all structures have had to be relocated on the mines.

27. Consequently, the Respondent had to physically shift the very same Plants, i.e., II and IV along with other structures, to a different location (by a mere distance of 500 m) within the Codli mines, as is the common practise for fully mineralised mines, so that the ore beneath the original location could be extracted, which was duly intimated to the GSPCB, which had no objection. The plants (which have now been renumbered as IIA and IVA) and other structures now stand on a portion of the Codli mines which has previously been excavated and now has been back-filled.

28. The Answering Respondent submits that though all the aforesaid documents were available with the Applicant, as stated in its Additional Affidavit dated 03.09.2020 (and thus it was aware of the said relocation), it has with an intention to mislead this Hon'ble Court, in its Additional Affidavit dated 09.09.2020, only provided the Google Images for a small portion of land, where the Plants stand today and further contended that they did not exist in 2007. However, on an examination of a larger portion of the said land in 2007, it is seen that the Plants did in fact exist, though at a short distance of 500 mts. This, it is submitted is a clear case of concealment by the Applicant.

A copy of the Google Images of 2007 of Codli mines is hereto annexed and marked as ANNEXURE R-2.

#### RE-STARTING A PRE-EXISTING PLANT DOES NOT REQUIRE AN EC

29. That the Applicant has contended in para 10 of the Rejoinder that "*re-starting the beneficiation plant*" will require an EC. This is an absurd interpretation of the EIA Notification, inasmuch as, by this measure, resumption of activity after any hiatus, whether on account of weather or labour holidays or stoppage on account of acts of God such as the COVID-19 pandemic would require a plant to obtain a fresh EC, even if the plant predates the EIA Notification, 2006.



30. That this contention of the Applicant is wholly untenable, in view of the plain words of Para 2 of the EIA Notification, 2006, which deals with requirement to obtain an EC, and reads as follows:

*“2. Requirements of prior Environmental Clearance (EC):- The following projects or activities shall require prior environmental clearance from the concerned regulatory authority, which shall hereinafter referred to be as the Central Government in the Ministry of Environment and Forests for matters falling under Category ‘A’ in the Schedule and at State level the State Environment Impact Assessment Authority (SEIAA) for matters falling under Category ‘B’ in the said Schedule, before any construction work, or preparation of land by the project management except for securing the land, is started on the project or activity:*



- (i) *All new projects or activities listed in the Schedule to this notification;*
- (ii) *Expansion and modernization of existing projects or activities listed in the Schedule to this notification with addition of capacity beyond the limits specified for the concerned sector, that is, projects or activities which cross the threshold limits given in the Schedule, after expansion or modernization;*
- (iii) *Any change in product - mix in an existing manufacturing unit included in Schedule beyond the specified range.” [Emphasis added]*

31. Thus the contention of the Applicant, in para 10 of the Rejoinder, that though the plants predate the EIA Notification, 2006, they will nonetheless require an EC, as and when it resumes after a hiatus, is contrary to the aforesaid notification.

32. That the Plants in question had a hiatus in view of the absence of ore for processing, since the mines of the Answering Respondent are not operational since 16.03.2018. However, once the State Government auctioned ore in August 2019 and the Answering Respondent successfully bid for the same, ore became available and the plant got the needed raw material. Hence, there is no gainsaying that the plants did not operate for a certain period.

33. That, hence, the Answering Respondent having set-up Plants IIA and IVA prior to 1994, and then having *not* expanded/modernised the said Plants or changed the product-mix, was not required to obtain a prior EC from the MoEFCC or the SEIAA.

34. That the Applicant has made misleading statements (in its IA for urgent listing dated 24.07.2020), ostensibly on the basis of the Affidavit dated 18.03.2020 filed by the MoEFCC. In fact, these are merely (misleading) inferences conjured up by the Applicant. The said statements are as follows:

“6. ... The Respondent No. 5 (MoEF&CC) has filed a reply affidavit dated 18.03.2020 which indicates that the Respondent No. 4 does not have an environment clearance (EC) for the operation of the said beneficiation plant. ...

7. That it is evident from the reply affidavit of Respondent No. 5 (MoEF&CC) that Respondent No. 4 is involved in an illegal operation of commencing beneficiation plant operations without obtaining EC. ...

[Emphasis added]

35.I say that the aforesaid statements are misleading, inasmuch as the MoEFCC has merely culled out provisions of the EIA Notification, 2006, requiring “certain projects to obtain prior EC before any construction work in case of new projects or expansion and modernisation of existing projects or activities. ...”, and that the requirement of such EC applied to the *setting up of a new mineral beneficiation plant or in case of expansion of a mineral beneficiation plant.*

36.I say that the MoEFCC’s affidavit has at no place dealt with Plants IIA and IVA, but only comments on Plant 3B, which has been confirmed by the GSPCB to be unoperational. Hence, I say that it is pertinent to note that the MoEFCC’s affidavit is only in the context of an EC granted on 29.12.2008 “*for expansion of Codli Iron Ore Mines (Total ML area 299.55 ha) from 4.0 to 7.0 MTPA and Expansion of Ore **Beneficiation Plant No. 3** from 1.20 to 5.0 MTPA capacity, at village Codli, in Sanguem Taluk, in South Goa District*” which no doubt has been set-aside by the Hon’ble Supreme Court *vide* its judgment dated 07.02.2018 in *Goa Foundation v. Sesa Sterlite Ltd. and Ors.* (2018) 4 SCC

37.I say that, hence, contrary to what has been sought to be projected by the Applicant in its IA for urgent listing, all the comments in the said Affidavit filed by the MoEFCC pertain to Plant 3B, which is not in operation and the same can be confirmed from the Report filed by the GSPCB, in terms of the order of this Hon’ble Tribunal dated 09.01.2020, which, at page 2, records that only “*Plant No. IIA and Plant IVA is in operation and plant IIIB [3B] is partially dismantled and not in operation. Iron ore obtained through E auction process is processed in the beneficiation Plant no. IIA and Plant IVA...*”. Hence, the comments of the MoEFCC are not germane to the instant OA, as the dispute in the captioned OA is limited to Plant No. IIA and IVA.



38. That the said Affidavit filed by the MoEFCC therefore, does not in any manner comment on the requirement of an EC for the plants, bearing **Plant No. IIA and Plant IVA**, which are the subject matter of the CTO in challenge and the same stands confirmed from the contents of the CTO, dated 19.07.2019 (as amended on 12.03.2020), which records that it was granted only for Plant IIA and IVA, and not for Plant 3B.

A copy of the amendment to the renewal of CTO dated 12.03.2020 bearing ref. no. 12/2019-PCB/311271/R0002569/10466/Made-71 is hereto annexed and marked as **ANNEXURE R-3**.

RESPONDENT'S PLEA ON EXTRAPOLATION OF GOA FOUNDATION II REJECTED BY  
SC

39. That the contention of the Applicant in para 6 of the Rejoinder that equates the cessation of "mining operations" directed in *Goa Foundation II* with "mineral beneficiation" is an argument already implicitly rejected by the Hon'ble Supreme Court in *Chowgule & Co v. Goa Foundation*, 2020 SCC Online SC 103, inasmuch as the Hon'ble Supreme Court in response to an argument (of the Applicants in the instant OA) that transportation of ore too had been prohibited by *Goa Foundation II*, held as follows:



*"If this court in Goa Foundation II (supra) intended to prohibit the mining as well as transportation of the minerals/iron ore with effect from 16.03.2018 nothing precluded it from doing so. ...The only prohibition contained in the said order after 15.03.2018 is for carrying out mining operations"*.

40. That the aforesaid *dicta* it is submitted, squarely applies also to the contention of the Applicant in the instant OA that beneficiation would come within this prohibition. This, apart from the fact that "mining operations" as defined in Section 3(d) of the MMDR Act, is "*operations undertaken for the purpose of winning any minerals*" and hence cannot include making of the end product, as held by the Delhi High court in *Hyderabad Asbestos Cement Products Ltd v. Union of India*, 1980 SCC OnLine Del 503.

## APPLICANT CANNOT BRUSH ASIDE REPORT OF THE GSPCB

41. That it is pertinent to note that all the factual allegation made by the Applicant in the OA have been belied by the report of the GSPCB. Yet the Applicant has sought to nitpick the said report to suggest that it does not absolve the Answering Respondent.

42. I say that pertinently, the Report confirms that the plants in operation are Plant IIA and IVA and not 3B.

43. I say that the Report of the GSPCB having exposed the false averments made by the Applicant in the OA, the instant OA deserves to be dismissed with costs.

## ALLEGED 'DISCREPANCIES' IN BENEFICIATION APPROVALS OF NO CONSEQUENCE:

44. I say that the Applicant's allegation of "discrepancies" in the permissions granted by the GSPCB and the Goa DMG has no sequitur. I say that obviously, the Answering Respondents will be governed by the least common denominator, i.e., for the overlapping period and extent/quantities in the said permissions, until further extended or modified.

45. I say that what is stated by me in forgoing paragraphs of this additional Affidavit-in-reply namely 1-3, 4(part), 7-10, 12-16, 18(part), 19-23, 24(part), 26-30, 31(part), 32-39, 40(part), 42-44 are true to the best of my knowledge, based on the records available with the office of the Answering Respondent, and remaining paras namely 4(part), 5, 6, 11, 17, 18(part), 24(part), 25, 31(part), 40(part) and 41 are as per legal advice, which I believe to be true.

I say that the Annexures R- 1 to R-3 at pages 220 to 222 annexed to the instant reply are true copies of their respective originals.

PLACE: Panaji Goa

DATE: 14 .10.2020

DEPONENT

ADVOCATE FOR RESPONDENT NO.4

VERIFICATION

Verified at ...Panaji..... on this ...14<sup>th</sup> day of October, 2020 that the contents of the above affidavit are true and correct to the best of my knowledge and belief.

DEPONENT



SOLELY AFFIRMED AND VERIFIED  
BEFORE ME BY Shri. Joseph  
Coelho Authorised Signatory  
REG. NO. 5152 DATE: 14/10/2020  
  
SHIVPRASAD V. MANERKER  
NOTARY AT PANAJI  
ENTIRE STATE OF GOA INDIA

Ashu Jila

Codli,  
11th January, 1996

The Member Secretary,  
The Goa State Pollution Control Board,  
House No. 243, Patto,  
PANAJI GOA.

Dear Sir,

Sub: Consent under section 25/26 of the water  
[prevention and control of pollution]  
Act 1974 for Codli Plant II & IV

Beneficiation Plant II and IV was commissioned in 1979 and under the scheme of regularisation of old cases we had applied for consent application on 8th February 1991. However we have not heard anything in that respect from your end.

Therefore we, once again submit herewith an application in form No. IV in triplicate in respect of our Beneficiation Plant at Codli. A demand draft No. 159366 dated 26.12.95 for Rs. 6400/- [Rupees six thousand four hundred only] drawn in your favour towards consent fee for eight years is enclosed herewith.

Kindly issue us the necessary consent at your earliest.

Thanking you,

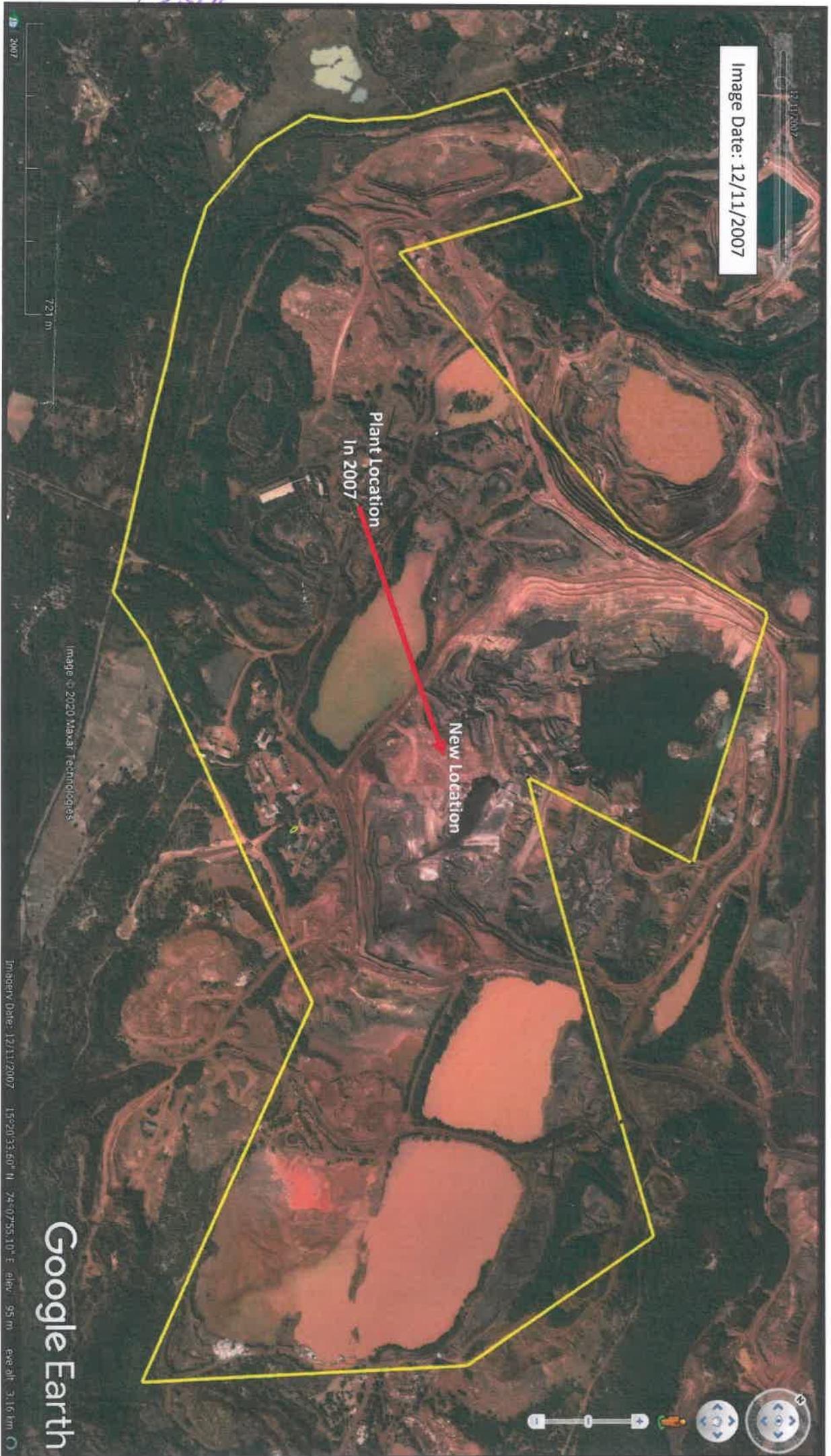
Yours faithfully,  
BA COA LIMITED

General Manager -  
Mining Operations [Goa]

Encl: a.a.



Prasad V. Manerker  
Panaji  
Reg. No. 107/99  
entire State of Goa  
Exp. dt. 10/08/2024



SATELLITE IMAGE OF CODLI MINE

# GOA STATE POLLUTION CONTROL BOARD

## गोंय राज्य प्रदूषण नियंत्रण मंडळ

(An ISO 9001-2015, ISO 14001:2015, OHSAS 18001:2007 Certified Board)

Phone Nos. : 0832-2407700  
2407701, 2407702  
2407703

Tel/Fax No. : 0832-2407700



Email Ids:  
Chairman, GSPCB: chairman-gspcb.goa@nic.in  
Member Secretary GSPCB: ms-gspcb.goa@nic.in  
Environment Engineer, GSPCB: ee-gspcb.goa.nic.in  
Scientist, GSPCB: scientist-gspcb.goa@nic.in  
Office: goapcb@gspcb.in

No.12/2019-PCB/311271/R0002569/10466/Amde-71

Date 12/03/2020

### AMENDMENT

Sub: Partial modification in the Renewal of Consent to Operate under Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981, and Authorization under Rule 5 of the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules 2018 Order issued to M/s. VEDANTA LIMITED (Unit: Codli Beneficiation Plant).

Ref:-1) Renewal of Consent to operate under the Water Act and Air Act Order bearing no. 12/2019-PCB/311271/R0002569 dt. 19/09/2019.

2) Corrigendum bearing no. 12/2019-PCB/311271/R0002569/8576 dt. Amde-32 dt. 20/09/2019

In partial modification in the Renewal of Consent to Operate under Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Authorization under Rule 5 of the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules 2018 Order issued to M/s. VEDANTA LIMITED (Unit: Codli Beneficiation Plant), the address and the serial no. 6 General Conditions (xvii) above may be read as follows above may be read as follows:-

M/s VEDANTA LIMITED  
(Unit Codli Beneficiation Plant 2A&4A)  
Survey No.24/1,Village Codli,DharbandoraGoa.

#### 6. GENERAL CONDITIONS:

(xvii) The units shall manage the daily trips in staggered manner in consultation with DMG, so that traffic congestion is avoided at major junctions.