

**BEFORE THE NATIONAL GREEN TRIBUNAL, SITTING AT PUNE  
(WESTERN ZONE)**

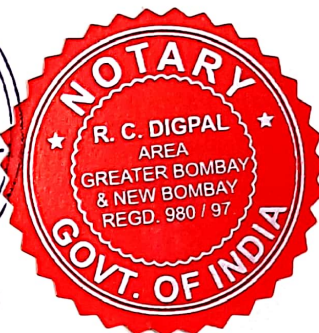
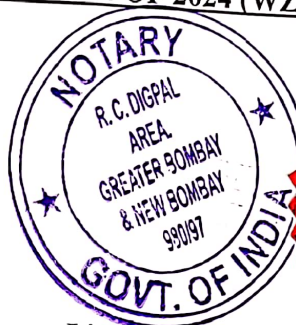
**ORIGINAL APPLICATION NO : 14 OF 2024 (WZ)**

**IN THE MATTER OF:**

**APPLICANT : Brahmanand R Tiwari**

// VERSUS //

**RESPONDENTS No. 1- Lloyds Metal Energy Limited & others**



**AFFIDAVIT ON BEHALF OF THE APPLICANT**

1. I, Brahmanand Tiwari, aged about 40 years, Son of Shri Ram Akbal Devicharan Tiwari, resident of 1008, Kamdhenu, Plot No 3, Sector 14, Kharghar, Navi Mumbai:410210, A seasoned journalist and Editor-in-Chief of EX7 NEWS BROADCAST in Mumbai, as well as President of THE MEDIA Foundation, do hereby solemnly affirm and state as under:
2. I humbly request the Hon'ble Justice with all my sincerity to provide me an opportunity to present my side on all the related matters. I was very ill for the past few months due to which I could not appear on some dates. I also did not receive even a single online email that was sent to me by the Hon'ble Court's office. Hence, the related matter is related to environmental protection. Lloyds Metals and Energy Limited and their associate company Thriveni Earth Movers Pvt Ltd have violated many environmental norms. This matter is related to the entire mankind through various struggles of the tribal community. Hence, I request the Hon'ble Judges to hear the entire matter for the public interest and provide us time to my side.
3. The report submitted by the District Collector and Magistrate of Gadchiroli and the District Mining Officer of the same district, in compliance with the order/direction of the Hon'ble Court dated 16.02.2024, is completely false, the figures are incorrect, the Affidavit is incorrect and one-sided, beyond the truth and facts, As per the order dated 22.03.2024 in OA 14 of 2024 (WZ), while the second additional affidavit filed by these people before the National Green Tribunal Pune through Online is also full of discrepancies, the veracity of which cannot be trusted, Respondent No. 1 and 2 had extracted minerals beyond the permissible limit and even at present it is being extracted many times more than the permissible limit, causing immense damage to the environment. The reply submitted by them in the report dated 26.02.2024 has no connection with the reality. Respondent No. 1 and 2 are extracting several lakh metric tonnes of ore, which the District Mining Officer and the DM working at the district headquarters have no measurement of nor any control over. The report submitted by them is the result of copy paste and traditional format only. As a result, neither the date nor the figure given by them is correct. The figures mentioned in the report that after granting iron ore production capacity at the rate of 10 million tonnes per annum, they had extracted 583276 metric tonnes of ore till

31.03.2023 are completely wrong, rather it is close to 4,082,932 metric tonnes which is more than 7 times the permissible limit.

4. I request the Hon'ble Court to direct MoEF to immediately suspend environmental clearance and mining leases of Lloyds Metal and Energy Limited, ECs were given on the wrong facts presented by the state government, which were not properly verified by the MoEF officials, Respondent No 1 and Respondent No 2 was involved in "political witch hunting" due to which the officials concerned are under pressure and are not able to present the true report before the Hon'ble Court.
5. Respondent Nos. 1 & 2 have extracted the mineral beyond the permissible limit, the report submitted by Respondent Nos 4 & 5 is baseless, one-sided, false and involved in corruption, the report/reply submitted by the respondent Nos. 4 & 5 is copy paste and conventional and has no connection with reality, in such circumstances I humbly request the Hon'ble Court to appoint an investigation team in which I should also be included, various dimensions of the investigation should be looked into in depth.

**Applicant:** Brahmanand R Tiwari

*Brahmanand Tiwari*

**Signature:**

**Mumbai**

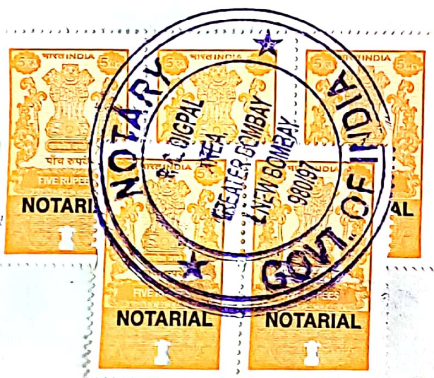
**Date:** 12 SEP 2024

**VERIFICATION**

Verified that the contents of the above affidavit from paragraph Nos 1 to 5 are true and correct to the best of my knowledge, belief and information derived from the record and believed to be true by me.

Hence signed at Belapur Navi Mumbai on this 12 September 2024.

I know and identify the applicant



*Brahmanand Tiwari*  
 Before Me  
*R. C. DIGPAL*  
 R. C. DIGPAL  
 ADVOCATE & NOTARY  
 MUMBAI

REGISTERED VIDE	
NO.:	1282
DT:	12 SEP 2024

1282

