

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN BENCH ZONE
AT
CHENNAI**

APPEAL NO. 15 OF 2020

IN THE MATTER OF:

THE CONSERVATION ACTION TRUST,
5, Sahakar Bhavan, 1st Floor, LBS Road,
Narayan Nagar, Ghatkoper (W),
Mumbai-400 086
Represented by its Executive Trustee,
Mr. Debi Goenka & 1 Others.

...APPELLANT.

VERSUS

UNION OF INDIA,
Ministry of Environment and Forests & Climate Change,
Through its Secretary
Paryavaran Bhawan,
CGO Complex, Lodhi Road,
New Delhi- 110 003 and 3 others

...RESPONDENTS.

**REPLY TO THE WRITTEN SUBMISSIONS FILED BY THE
APPEALANTS ON BEHALF OF THE 4th RESPONDENT**

ADVOCATES FOR THE 4th RESPONDENT

J. RAMACHANDRA RAO, Additional Advocate General, Telangana State.

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Mob: 7667967963, 9849012022.

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I N D E X

Sl.No.	Particulars	ANNEXURE NUMBER @ page no.	Remarks
1	Reply to the Written Submissions Filed by the Appealants		1-22
2	Verification Affidavit		23-24
3	Report on degraded forest land by Addl. PCCF, MoEF & CC, Chennai	ANNEXURE-1	25-29
4	Approval for the long term coal linkage by Ministry of coal, GoI	ANNEXURE-2	30-33

5	Coal sample analysis report by M/s.Indian Institute of Chemical Technology, Hyderabad	ANNEXURE-3	34
6	MoEF & CC Notification on validity of Public Hearing	ANNEXURE-4	35-36

THROUGH

ADVOCATES FOR THE 4th RESPONDENT

J. RAMACHANDRA RAO, Additional Advocate General, Telangana State.

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Mob: 7667967963, 9849012022.

Place: Chennai

Date: 17.01.2022.

Bb
952/06

Counsel for 4th Respondent

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH
AT CHENNAI**

APPEAL NO. 15 of 2020 (SZ)

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5, Sahakar Bhavan, 1st Floor, LBS Road,
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Represented by its Executive Trustee,
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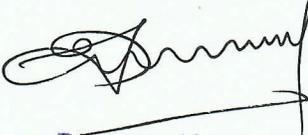
-Vs-

UNION OF INDIA,
Ministry of Environment and Forests & Climate Change,
Through it's Secretary
Paryavaran Bhawan,
CGO Complex, Lodhi Road,
New Delhi- 110 003 and 3 others

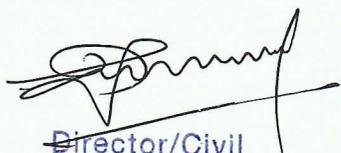
...RESPONDENTS

**REPLY TO THE WRITTEN SUBMISSIONS FILED BY THE
APPEALANTS**

I, Shri. A. AJAY, S/O. A. CHANDAPPA, aged about 57 years, Occupation:
DIRECTOR/CIVIL, TSGENCO, Vidyut Soudha, Hyderabad – 500 082, do
hereby solemnly affirm and sincerely swear on oath as follows:-


Director/Civil
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

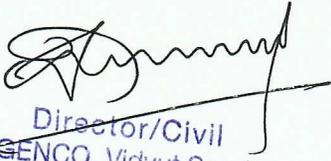
1. It is humbly submitted that I, in my official capacity as DIRECTOR/ CIVIL, in the Office of the TSGENCO, VIDYUT SOUDHA, HYDERABAD, the answering 4th Respondent in the above-mentioned matter, am well conversant with the facts and circumstances of the case on the basis of the official records. Further, I am authorized and competent to swear to the contents of the Instant Counter – Affidavit.
2. It is respectfully submitted that I have gone through the contents of the Appeal filed by the Appellants, and I have understood the same. I am well conversant with the facts and circumstances of the instant Appeal and thereby seek leave of this Hon'ble Tribunal.
3. It is respectfully submitted that the contents which are specifically and categorically not admitted by the answering Respondent herein all the other averments / contentions / allegations as made in the Appeal preferred by the Appellants, are deemed to be denied and disputed by the answering Respondent herein, and further the Appellants herein may be put to strict proof of the same.
4. In reply to Para 1, it is submitted that the Appellant is stating about granting of Environmental clearance for the project. The same is borne on record and is a matter of fact.


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5. In reply to Para 2, it is respectfully submitted that the allegations made by the Appellant are absolutely incorrect. At the outset, it is to submit that the Project Proponent (Respondent No.4 herein) has already replied in the counter affidavit to the critical issues stated in written submissions. Further, it is submitted that the EIA/EMP Report was prepared as per the TOR conditions & the directions of MoEF & CC duly following all the due procedures and the same was submitted to the Expert Appraisal Committee (EAC), MOEF & CC, GoI. Subsequently, MoEF & CC, GoI has granted the Environmental clearance as per the recommendations of EAC.

6. It is further submitted that in reply to Para 3,

- i. The site selected for establishing the above power project is a highly degraded forest land which is clearly stated by the Addl. PCCF, MoEF & CC, Regional Office, Chennai after his site visit and report submitted vide his Lr. No. 13.3 (9)/INS/ ROSEZ/ 2014/26, dated. 20.02.2015 (Copy enclosed as Annexure-I), wherein he has mentioned that there are no endangered/ rare/ unique species of Flora and Fauna present in the above forest. Also, there is no protected archaeological/heritage/ defence or any other important monuments in the area. The area is not having wildlife sanctuary or national park. Nearest protected area is Amrabad Tiger


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reserve at about 10 km distance from the above diverted forest land. The MoEF & CC, GoI, considering the above report has accorded Stage – II clearance for diversion of above forest land to an extent of Ac. 4676.00 in favour of TSGENCO for establishing the above project.

- ii. The above selected site is a specific site taking into view that the site has nearest water source i.e. river Krishna, nearest Railway Station i.e. Vishnupuram Railway station which is located at a distance of 7.00 km from the project site and nearest State highway (Narketpally to Addanki) which provides required water to power plant, rail network for transportation of coal and other materials. Also, there are 8 major cement industries within 50 km radius which will help in utilization of 100 % ash that will be generated in the power plant which is one of the mandatory requirement as per MoEF & CC environmental norms. It is submitted that the allegation of the petitioner that invalid and wrong site selected is not correct.
- iii. It is most respectfully submitted that the Appellants are unnecessarily highlighting this issue. It is submitted that the Sub-Committee has visited the site and submitted its report to the MoEF&CC and the Sub-Committee after inspecting the site thoroughly has recommended the grant of TOR for the project with additional conditions to be complied.


Director/Civil
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It is most respectfully submitted that the cumulative impact assessment on AAQ was done and the same was produced in the revised EIA/EMP report under Chapter – 3, Para No. 3.3.1 and 3.3.2. Page No. 64 to 75. Cumulative impact assessment of all sources of emissions including handling and transportation of existing and proposed projects was also given in report under Chapter – 4 at page No. 211-215 & 219.

As such, the allegation of the petitioner that cumulative impact assessment on AAQ has not been done is absolutely incorrect.

It is most respectfully submitted that the Hydro-geological impact assessment was carried out by M/s. Vimta labs Limited, Hyderabad through M/s. Hydro-Geo Survey Consultants Pvt Ltd, Jodhpur and the details are incorporated in the revised EIA/EMP report under Chapter-3, Para – 3.4.3, Page 101-111.

As such, the allegation of the petitioner that hydro-geological impacts have not been studied is not correct.

It is submitted that the Public hearing for the project was conducted on 31.05.2016 in the project premises and about 3000 villagers from surrounding villages have attended the public hearing meeting. It is further submitted that MoEF&CC, GoI has exempted TSGENCO from re-conducting the public hearing for revised EIA/EMP report vide Letter No. J-13012/18/2015-IA.I(T),


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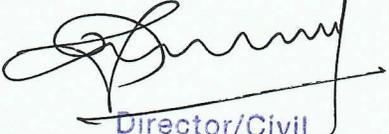
dated. 22.02.2017 by duly directing the Project Proponent to submit the Revised EIA report to TSPCB to upload the same on TSPCB website and issue a public notice in two Newspapers for seeking the comments from the public within a period of 21 days. TSPCB has uploaded the revised EIA/EMP report submitted by TSGENCO on the website of TSPCB on 01.02.2017 and also issued the public notices on 02.02.2017 in Namaste Telangana (Telugu) & Hindu (English) daily newspapers.

It is submitted that the EIA/EMP report was prepared as per the TOR conditions & the directions of MoEF & CC duly following the procedures and submitted the same to the Expert Appraisal Committee (EAC), MOEF & CC, GoI. The sub-committee under the Chairmanship of Professor C.R. Babu, visited the project site on 05.12.2015 and studied the site conditions and submitted the detailed report to EAC. Subsequently, after all the compliances, the MoEF & CC, GoI has granted ToR for the project. The Environmental clearance for the project was accorded by the MoEF & CC, GoI as per the recommendations of EAC. As such, the allegation of the petitioner may be put to a strict proof and the same is denied.

7. In reply to Paras 4 to 10, it is submitted that the Tungapadu stream and some of its streamlets are passing through the project site. The sub-committee of EAC, MoEF & CC, GoI visited the project site on 05.12.2015 and studied the

site conditions and submitted its report to EAC, MoEF &CC, GoI in which the sub - committee has recommended additional ToR conditions for protection of Tungapadu stream and its streamlets. The sub-committee's recommendations are as given below:

- a) The Tungapadu Vagu should not be diverted but it should be preserved and protected and its flows enhanced.
- b) The PP should leave a minimum of 100 m buffer on either side of its banks and this buffer should be developed into native forest.
- c) No effluent should be discharged into the rivulet or Krishna River.
- d) In areas where the banks are breached, the breaches should be plugged and strengthened.
- e) In areas where the riverbed is silted/partially blocked due to land slides, the blocks and silt should be removed in a way that the original gradient is maintained.
- f) No water from the stream is extracted.
- g) To sustain the downstream ecology of the Tungapadu Vagu, the Irrigation department should release minimum ecological flows from the reservoirs constructed in the upstream.


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TSGENCO, Vidyut Soudha,
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All the above conditions will be strictly implemented and maintained by the Project Proponent. The same commitment is given in the revised EIA/EMP report under compliance to additional ToR points as Annexure – 1F.

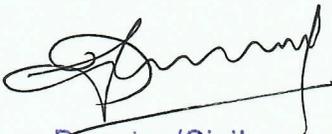
It is further submitted that the Sub-Committee had advised to shift of the Ash pond 500 m away from Tungapadu Vagu, Maintaining minimum of 500 m from the PROJECT BOUNDARY to the River Krishna and leaving a buffer zone of 100 m on either side of the Tungapadu Stream. Therefore, the Project Proponent has complied with the above recommendations and submitted the same in the Revised EIA report and presented the same before the EAC. Hence it is not correct to say that *“the sub-committee report reveals there is absolutely no word, or any reason being given by the sub-committee as to why the project is permitted to be setup in the present project against the TOR no 21”*. The sub-committee has walked along the project site, interacted with locals, public representatives and the Irrigation and Forest Department officials to ascertain the factual position of the project site and has meticulously recorded the same. This also proves that the Sub-committee and the EAC has applied their mind and used their professional background experience and domain knowledge to evaluate the project site and stipulate additional TOR conditions.

However, the Appellant has selectively shown Fig 4.20 which is section elevation of the HFL. The correct figure showing the distances between the Project Boundary and River Krishna and the buffer distance of 100m left on either side of the Tungapadu Stream is given in Fig No.2.8 at Page No. 26 of


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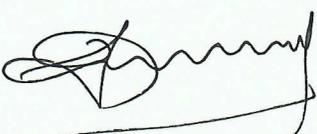
Revised EIA/EMP Report. Hence the Project Proponent has complied with the Additional TOR conditions stipulated by the MOEF&CC.

It is submitted that the Appellants assertion that our Reply is Startling is not tenable as this answering Respondent has presented the facts that we had complied with the Additional TOR Conditions. The Appellant is ignoring the fact that EAC visited the site and after reviewing the site suggested the Additional TOR conditions which is site specific, and the Project Proponent has complied with that. The entire drawings submitted to the MoEF&CC as part of the Revised Report has clearly shown the distances with respect to the Project boundary and the Tungapadu Stream. It is further submitted that if we refer to Figure 2.8 of the Revised EIA/EMP report, the interpretation of the Appellant that “all the project boundaries must be away from HFL plus 500 m of any water river, stream etc. is the general interpretation of the TOR Condition. However, in the present case the Sub-Committee constituted by the EAC has visited the site and gave its recommendations to MoEF & CC to stipulate the same as Additional TOR conditions. It is pertinent to mention that the Appellants are silent on this aspect and do not consider this aspect. In fact, it is to state that the Appellant is misleading the Hon’ble Tribunal. The Revised EIA/EMP report has presented the Drawing very clearly showing the distances being maintained as per the Additional TOR Conditions. (Fig. 2.8)


Director/Civil
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Hyderabad - 500 082

Further, it is to submit the reply to the above issue was already submitted in the counter affidavit filed by the answering Respondent No. 4 in Paras 19, 60, 65, 73, 76 to 79 and 84 to 89 of the Counter Affidavit.

8. In reply to Paras 11 to 21, it is submitted that these issues are already replied at Para – 2(Supra) regarding site selection of the project. Further, the reply to the above issues was already given in the counter affidavit filed by the answering Respondent No. 4 at Paras 7, 9 to 10, 12, 19 to 21 & 27 of the counter affidavit. It is to submit that the Appellants are again raising an issue which was suitably replied. The issue is that the MoEF & CC has not revised the siting guidelines as on date. The initial siting guidelines were issued in the year 1987. The Appellant is now proposing that they have consulted the Technical Manual prepared by ILFS published in 2010 and not the siting guidelines of MoEF issued in 1987. However, it is to state that in fact one has to appreciate the fact that MoEF & CC has started the exercise of notifying the boundaries of eco-sensitive regional, National parks with exact Coordinates and published the same on the website to have clarity on the boundaries. In fact, this answering Respondent had submitted that the siting Guidelines have not been revised and hence the Hon'ble NGT has asked MoEF & CC to revise the same keeping in view of the developments in technology of power plants etc. The Appellant is trying to mislead the Hon'ble Tribunal by saying that they have considered the Technical Guidance Manual prepared by ILFS published in 2010 and not the Siting guidelines published by MOEF in 1987.


Director/Civil
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

The Hon'ble Tribunal will appreciate that there is no variation in both the documents (i.e) 1987 and 2010 which brings to the point that MoEF&CC has to bring out the new siting guidelines in light of the developments that have taken place over a period of time. However, it is submitted that it is regretful that the Appellant is always blaming that the Project Proponent has violated siting guidelines but nowhere has appreciated the decision of the Project Proponent in complying with the new emission norms for thermal power plants which mandates implementation of the FGD system.

9. In reply to Paras 22 to 31, it is submitted that, three alternative sites were identified for establishment of the above project and the present location at Veerlapalem (V), Dameracherla (M), Nalgonda Dist, was selected as it is site specific in view of nearest water source, i.e., river Krishna, nearest Railway Station, i.e., Vishnupuram Railway station located at a distance of 7.00 km from the project site and nearest State highway (Narketpally to Addanki) as already stated above, which provides required water to power plant, rail network for transportation of coal and other materials. Also, there are 8 major cement industries within 50 km radius which will help in utilization of 100 % ash that will be generated in the power plant which is one of the mandatory requirements of MoEF & CC environmental norms. Further, the reply to the above issue was


Director/Civil
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

already given in the Counter Affidavit filed by the answering Respondent (4) at Paras 15 to 17.

10. In Reply to Para 32, it is submitted that the reply to the above issue was already given at para – 2 (II) of this reply (Supra). Further, it was also replied in the counter affidavit filed by this Project Proponent at Paras 19,45,68 & 97.

11. In Reply to Para – 33 to 40, it is submitted that the quantity and source of coal for Indigenous and imported coal required for the project were already given in the EIA/EMP report at Page. No. 20 to 21. Further, the Ministry of coal, GoI vide letter No. 23014/1/2018-CLD, dated. 15.02.2018 has approved for the long term coal linkage of 14.00 MTPA of G9 grade coal (inclusive of 7.0 MTPA of imported coal substitution) to the 4000 MW Yadadri Thermal Power Station as per the SHAKTHI policy (Copy enclosed as Annexure–II). Now, there is no proposal of utilization of imported coal for the above project as it is proposed to utilize 100% Indigenous coal.

Further, the detailed reply to the above issue was already given in the counter affidavit filed by the answering Respondent No. 4 at Paras 28 to 30 and 48.

12. In reply to Para – 41 to 50, it is submitted that the Characteristic Analysis of the coal to be used for the project was already given in the EIA/EMP report at Page. No. 20. The Coal characteristics of G9 Grade coal are as given below.


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Hyderabad - 500 082

Description	Unit	Indian Coal (based on SCCL data)
Fixed Carbon	%	33.0
Volatile Matter		27.00
Moisture		10.00
Ash		30.00
Calorific Value		Kcal/kg
Total		
Carbon	%	49.41
Hydrogen		2.83
Sulphur		0.42
Nitrogen		0.85
Oxygen (difference)		6.49
Moisture		10.00
Ash		30.00

A comprehensive study done by TERI is itself adequate to answer all the above issues. The same was enclosed as Annexure-11 in our earlier written submission. The Appellant has not bothered to read and refer this document in his written submissions dated 30-08-21 which proves one more time the Appellant's tiresome practice of beating around the bush by repeating the


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issues which have been answered by the Respondents and is misleading this Hon'ble Tribunal.

13. In reply to Paras 51 to 59, it is submitted that the as per the ToR, Baseline Monitoring of Heavy Metals and Radio activity present in the coal to be used was already done and the same is incorporated in revised EIA/EMP report at Page No. 21. The certified copy of the values obtained for radioactive elements in coal from M/s Bhabha Atomic Research Centre and Heavy metal analysis from M/s Vimta Labs Limited were already given as Annexure - 2 D in the Revised EIA/EMP report.

Further, as per the directions of MoEF & CC, GoI issued in EC as per Specific conditions: A (xv), the analysis of the G9 grade coal sample obtained from SCCL for Mercury (Hg) was again redone through M/s. Indian Institute of Chemical Technology, Hyderabad (Copy enclosed as Annexure-III) and the same is given as below.

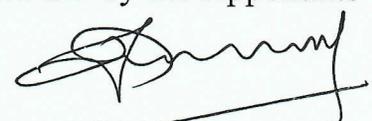
S. No	Sample code	Hg ($\mu\text{g/g}$)
1	SCCL G9 Grade coal	1.47


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The reply to the above issue was already given in the counter affidavit filed by the answering Respondent No. 4 at Paras 28, 37 to 39, 46 and 49 of the Counter Affidavit.

14. In reply to Paras 60 to 65, it is submitted that the coal required for the above project will be transported through Indian Rail network from SCCL mines and the transportation route is BDCR-Dornakal – Motamarri – Vishnupuram Railway Station (near project site). The total distance of this route from Rudrapur SCCL mines to the project is 228 km. Also, the reply to the above issues was given in the counter affidavit filed by the answering Respondent No. 4 at Paras 28, 43 to 45 & 47 of the Counter affidavit.

15. In reply to Paras 66 to 67, it is submitted that the Cumulative Impact assessment on AAQ was already given in the revised EIA/EMP report under Chapter -3 at Page No. 71 to 76. Further, the above issue was already replied in counter affidavit to the appeal, filed by the answering Respondent (4) at Paras 19, 42 & 68. Further, the Revised EIA report presented the cumulative impact assessment at Para 4.2.1.4. This was done for 15 km radius by including various cement plants etc. The emissions have been calculated based on the new emission standards prescribed by MoEF & CC for thermal power plants to be commissioned after 2017, as mentioned at page 211 of the revised report. It is further submitted that the fact that there is no mention of FGD by the Appellants


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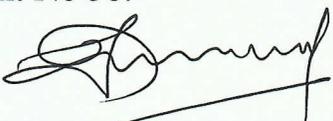
speaks volumes about their not going through the Revised EIA report and the written responses submitted by the Respondents. This shows how well the Appellants have applied their minds on the above issues and blame the EAC on the other hand.

16. In reply to Paras 68 to 72, it is submitted that the reply to this issue was already given at para – 2(III) above (Supra). The Hydro-geological impact assessment was carried out by M/s. Vimta labs Limited, Hyderabad through M/s. Hydro-Geo survey Consultants Pvt Ltd, Jodhpur and the details are incorporated in the revised EIA/EMP report under Chapter-3, Para – 3.4.3, Page 101-111 and this was already replied suitably in the counter affidavit filed by the answering Respondent (4) at Para No. 65 to 67 & 79. However, the Appellants are repeating a blatant allegation.

17. In reply to Paras 73 to 78, it is submitted that M/s. Vimta labs Limited, Hyderabad have carried out the Hydro-geological impact assessment through M/s. Hydro-Geo survey Consultants Pvt Ltd, Jodhpur for the above project in an extent of 2800 Acres which covers both main plant and ash pond. The Hydro-geological impact assessment study covered all the aspects such as Hydro - geological characteristics, ground water flows, drainage pattern, remedial measures, etc. in the total project area. Further, the project is designed based on the Zero Liquid Discharge (ZLD) system and also the ash pond will be provided

with HDPE liner to prevent the leaching and contamination of ground water. To achieve the zero discharge from the ash pond, it is proposed to provide ash water recovery system in which, decanted water from the ash pond will be collected and it will be treated in the ash water treatment plant and the treated water will be re-utilised in the ashing system. This was incorporated in the revised EIA/EMP report under Chapter-3, Para – 3.4.3, Page 101-111, Chapter – 4, Para - 4.2.6.3, Page – 287 to 290 and Chapter – 2, Para - 2.10.3 & Fig - 2.11, Page No. 42 & 44 respectively. This issue was already replied suitably in the counter affidavit filed by the answering Respondent (4) at Paras 53 to 57, 60, 65, 67, 79 to 90.

It is further submitted that the Sub-Committee after visiting the site has accepted the proposal of the Respondent-4 to shift the Ash Pond and recommended to maintain minimum buffer of 500 m between the ash pond and the Tungapadu vagu which should be developed into a green belt. Accordingly, the Respondents have complied with the condition and submitted the Revised Plant Layout at Fig-2.8 in the revised EIA report. The Sub-committee has advised the PP not to extract water from the Tungapadu vagu. The Respondents have complied with the same at Para 4.2.3.12, Page 261 of the revised EIA report. The very fact that geo-technical investigations cannot be taken up at site without obtaining the Environmental Clearance and CFE for the project done at the site and hence, the design of ash pond cannot be finalized. This was exactly stated in the earlier responses of the Respondents at Point No 58.



Director/Civil
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

18. In reply to Paras 79 to 87, it is submitted that the cumulative impact on the river Krishna was done and incorporated in the revised EIA/EMP report at under Chapter-4, Para - 4.2.3.8 to 11, Pg-258 to 261. Further, the reply to the above issue was given in the counter affidavit filed by the answering Respondent (4) at para Nos : 5(C), 29, 72 to 76, 89.

The project was accorded permission by the Government of Telangana, Irrigation Department as per the allocations by Krishna Water Disputes Tribunal -1 (KWDT-1). The impact due to withdrawal of water was discussed at Para 4.2.3.8, pg. 258 of the Revised EIA report. The Government of Telangana has received an allocation of 299 TMC for projects located in Telangana. The average utilization of water based on 36 years of data (1972-72 to 2007-08) is 256 TMC. Considering this the Irrigation and CAD Department had allocated 208 cusecs of water (6.6 TMC) for the project. It may also be mentioned that the water requirement for the proposed 4000 MW power plant will be 3.10 TMC.

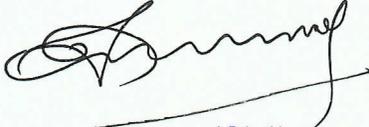
19. In reply to Paras 88 to 89, it is submitted that the project proponent has not proposed to destroy any of the streamlets of Tungapadu stream, but proposed to divert them suitably without affecting its flow pattern. This was incorporated in the revised EIA/EMP report under the Chapter -4, para-4.2.3, Fig. 4.21 (A&B), Page No. 263 to 268. Also, the reply to the above issue was given in the counter

affidavit filed by the answering Respondent (4) at para Nos : 65, 79 and 88 to 89.

20. In reply to Paras 90 to 92, it is submitted that the reply to the issues raised in the written submissions of the appellant was already addressed in the counter affidavit filed by the answering Respondent (4) as mentioned above. Hence, the statement of appellant that the “TOR - 22 & 23 are violated and hydro-geological impacts have not been studied and considered” by the project proponent is not correct. It is to submit that the Appellant is just repeating his pleadings once again.

21. In reply to Para 93, it is submitted that the reply to the issues mentioned under Para No. 93 of the written submissions is given in the below mentioned paras :

22. In reply to Paras 94 to 96, it is submitted that the EAC in its 63rd EAC meeting, pointed out on the various shortcomings of the original EIA report and asked for a revision of the EIA report incorporating the information like use of FGD technology, water withdrawal & availability, use of ACC technology, etc. The same was carried out by the Project Proponent and submitted to the EAC for consideration. The Project Proponent has requested MoEF & CC to exempt

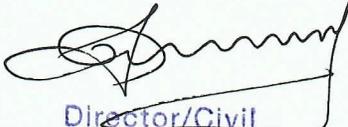

Director/Civil
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

from conducting the Public Hearing for the second time considering the following facts:

- a. Public hearing for the project was already conducted on 31.05.2016. The same is validated as per Office Memorandum dated 29th August 2017 (Annexure-IV) of MoEF & CC.
- b. There is no change in location or capacity of the project or change in the survey numbers of the land to be acquired.
- c. The EAC is an advisory Committee, but the Committee was convinced about the request of the Project Proponent and recommended to MoEF&CC to exempt the Project from Public Hearing. However, it asked the Project Proponent to upload the Revised EIA report on TSPCB website and giving a public notice in two Newspapers for seeking the comments from the public within a period of 21 days.

TSPCB has uploaded the revised EIA/EMP report submitted by TSGENCO on the website of TSPCB on 01.02.2017 and also published the public notices on 02.02.2017 in Namaste Telangana & Hindu newspapers.

23. In reply to Para – 97 to 101, it is submitted that the project proponent has requested the EAC to exempt from re-conducting the public hearing second time in view of the facts mentioned in the above para. The re-constituted EAC in its 1st EAC meeting held on 28.12.2016 was convinced with the above facts and has recommended to MoEF & CC, GoI to exempt TSGENCO from re-


Director/Civil
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

conducting the public hearing. The committee has further directed the Project Proponent to upload the Revised EIA report on TSPCB website and giving a public notice in two Newspapers for seeking the comments from the public within a period of 21 days. Same was done by the project proponent as per the directions of EAC. Therefore, the exemption from conducting public hearing for the revised EIA report is not arbitrary.

24. In Reply to Paras 102 to 103, it is submitted that, as per the directions of EAC issued in the MoM of its 1st meeting, TSPCB has uploaded the revised EIA/EMP report submitted by the Project proponent on the website of TSPCB on 01.02.2017 for seeking the public comments and also published the public notices on 02.02.2017 in Namaste Telangana (Telugu daily) & Hindu (English daily) newspapers.

25. In reply to Paras 104 to 108, it is submitted that, the Public hearing for the original EIA/EMP was already conducted and the directions of EAC issued in the MoM of its 1st meeting were followed with respect to the revised EIA/EMP report in which all the shortcomings communicated in the previous EAC meetings were attended. The project proponent has not violated the MoEF notification or any directions and guide lines of MoEF & CC. Hence, the allegations made by the appellant at Para No. 104 & 108 are not correct.

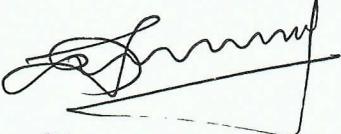

Director/Civil
ISGENCO, Vidyut Soudha,
Hyderabad - 500 082

26. In reply to Paras 109 to 141, it is submitted that the MoEF & CC may be the proper party to reply as the case laws mentioned by the Appellant are mostly referred to the MoEF & CC. However, this answering Respondent reserves its liberty to reply to any other contentions/ case laws orally at the time of arguments and if any new contentions are raised the same be adverted to by this answering Respondent by filing appropriate counters.

27. It is humbly submitted that this reply may be read as part and parcel of the Counter Affidavit filed by this answering Respondent.

For the aforesaid reasons, it is humbly prayed that the Hon'ble Tribunal may be pleased to dismiss the present Appeal No. 15 of 2020 in the interest of justice and pass such other order or orders that may deem fit and proper in the circumstances of the case.

Solemnly affirm and signed
At Hyderabad this the 13th day
of January, 2022


Deponent
Director Civil
RSGENCO, Vidyut Soudha,
Hyderabad - 500 082

Before me

Advocate, Hyderabad

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH
AT CHENNAI**

APPEAL NO. 15 of 2020 (SZ)

IN THE MATTER OF:
THE CONSERVATION ACTION TRUST,
5, Sahakar Bhavan, 1st Floor, LBS Road,
Narayan Nagar, Ghatkoper (W),
Mumbai-400 086
Represented by its Executive Trustee,
Mr. Debi Goenka & 1 Others.

...APPELLANT.

-Vs-

UNION OF INDIA,
Ministry of Environment and Forests & Climate Change,
Through it's Secretary
Paryavaran Bhawan,
CGO Complex, Lodhi Road,
New Delhi- 110 003 and 3 others

...RESPONDENTS.

AFFIDAVIT

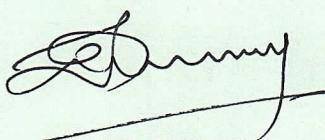
I, Shri. A. AJAY, S/O. A. CHANDAPPA, aged about 57 years, Occupation:
DIRECTOR/CIVIL, TSGENCO, Vidyut Soudha, Hyderabad – 500 082, do
hereby solemnly affirm and sincerely swear on oath as follows:-

That I am working as DIRECTOR/CIVIL, TSGENCO, Vidyut Soudha,
Hyderabad in RESPONDENT No. 4 Corporation in the main appeal and I am


Director/Civil
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

conversant with the facts and circumstances stated in the reply and as such, I am competent to swear this affidavit.

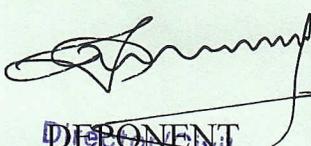
That the contents of the accompanying reply from paragraph No.1 to 27 are true and correct and have been drafted under my instructions.


DEPONENT
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

VERIFICATION

Verified on this 13th day of January, 2022 that the contents of the above-mentioned affidavit are true to the best of my knowledge and based on legal advice and that have not suppressed any material fact.


952/06
COUNSEL FOR RESPONDENT NO. 4


DEPONENT
TSGENCO, Vidyut Soudha,
Hyderabad - 500 082

Place: Hyderabad

Date: 13.01.2022



सत्यमेव जयते

भारत सरकार
GOVERNMENT OF INDIA
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
MINISTRY OF ENVIRONMENT, FORESTS & CLIMATE CHANGE
Regional Office (South Eastern Zone),
1st & 2nd floor, HEPC Building, No.34, Cathedral Garden Road,
Nungambakkam, Chennai - 600034, Tel.No.044-2822 2325
E.Mail: roefccc@gmail.com



No.13.3 (9)/INS/ROSEZ/2014/26
Dated: 20.02.2015

To

The Additional Director General of Forests (FC),
Ministry of Environment, Forests & Climate Change,
Indira Paryavaran Bhavan, Jor Bagh Road, Aliganj,
New Delhi - 110 003.

Subject: - Proposal for diversion of 4334.01 hectares of forest land for the
"proposed Damercherla Coal Based Thermal Power Station of
capacity 4400 MW at Veerlapalem (V) and 2400 MW at Dilwarpur
(V) of Damercherla (M), Nalgonda District, Telangana State in
favour of TSGENCO".

Reference: - MoEF & CC F.No.8-79/2015-FC dated 06.02.2015

Sir,

The project site was inspected on 15.02.2015 along with Shri S.B.L. Mishra, Principal Chief Conservator of Forests & Head of Forest Force, Shri D. Nagabhushanam, Conservator of Forests, Shri P.Satyanarayana, Divisional Forest Office, Nalgonda, Chief Engineer, Telangana State Power Generation Corporation Ltd. (TSGENCO), Shri N. Satyanarayana, Joint Collector & Additional District Magistrate, Nalgonda and other officials of the Telangana State Government. Based on the site inspection, perusal of records and discussions with the officials, report is furnished, as under: -

The proposal is for diversion of 4334.01 hectares of forest land for the proposed Damercherla Coal Based Thermal Power Station of 4400 MW capacity at Veerlapalem (V) and 2400 MW capacity at Dilwarpur (V) of Damercherla (M), Nalgonda District, Telangana State in favour of TSGENCO.

The number of the proposal is FP/TG/THE/9535/2015 and the name of the proposal is "Damercherla Thermal Power Project". The same has been electronically received on 23.01.2015.

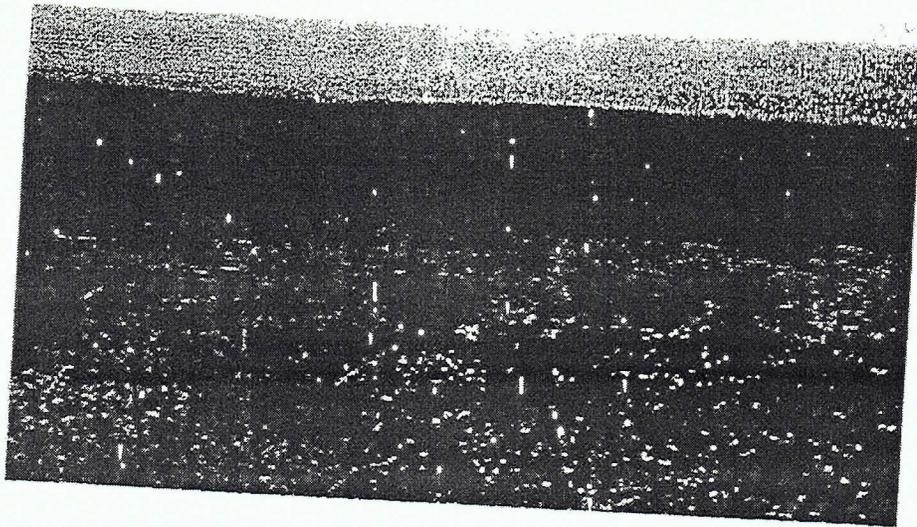
The details of forest area proposed for diversion are:-

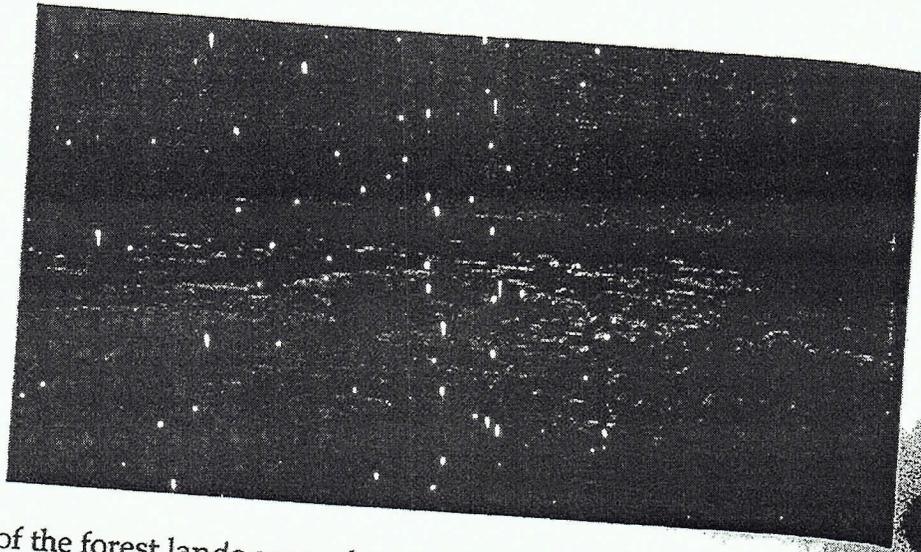
Name of the Division & Range	Name of Forest Block	Compartment Numbers	Area in hectares
Nalgonda Division & Miryalaguda Range	Veerlapalem RF	41, 42, 43, 44 & 45	2389.7
	Dilawarpur RF	47, 48, 49 & 50	1679.4
	Gangadevigattu RF	35	264.9
TOTAL			4334.0

The details of area required for various activities are -

Power Plants	-	1892.3 ha
Greenbelt	-	809.4 ha
Solar Power	-	1367.4 ha
Township	-	264.9 ha
Total	-	4334.0 ha

The density of vegetation in most of the forest area is less than 0.2. The forest type is southern dry deciduous scrub forests and thorny forests (5A/C3/BSI and 6A/C1/DS1). The main species found in the area are *Acacia sundra* (Sandra), *Grewia rotundifolia* (Jaana), *Albizia amarea* (Narlenga), *Chloroxylon swetenia*, *Butea monosperma* (Moduga, Kalime, bushes and Xerophytes). The fauna present in these areas are hare, wildboar, etc.





Part of the forest lands are under encroachment.



There are no endangered / rare / unique species of flora and fauna in the areas. There is no protected archaeological / heritage site / defence or any other important monuments are located in the area. The area is not a wildlife sanctuary or national park. Nearest Protected Area is Amrabad Taluk at about 10 Km distance from the proposed area for diversion. No work started as on date in the area.

An extent of 14684.23 acres of government land in 71 locations / survey numbers has been identified for the purpose of Compensatory Afforestation. Out of this, about 10700 acres is reported to have been found to be suitable for Compensatory Afforestation, as per the verification done by the Forest Department. The District Collector has furnished 'No Objection Certificate' under the Scheduled Tribes and Other Forest Dwellers (RoFR) Act 2006. 2503 families (Scheduled Castes - 109,

duled Tribes - 1622 and others - 772) are likely to be displaced due to the establishment of the project.

Justification for the project

The peak power demand of Telangana State is about 180 Million Units, against which, only 135 Million Units is available, leaving a shortfall of 45 Million Units. The current installed capacity in the State is 4365.30 MW (Thermal 2282.5 MW, Hydel 2081.80 MW and Solar 1.00 MW). As per the information provided by the TSGENCO, Telangana State will require about 22400 MW by the end of 12th Plan. Due to the shortage of power, small and medium scale industries are severely affected. To bridge the gap between demand and supply, it is very much essential for large scale capacity addition. TSGENCO has considered three locations, viz., Pudukuduchelka of Kothagudem (M), Khammam District, Pandurangapuram (V), Paloncha (M), Khammam District and Veerlapalem (V), Dilawarpur (V) & Gangadevi Gutta (V), Damercherla (M), Nalgonda District for setting up new power plants. TSGENCO has selected the present location to establish coal based thermal power stations with a capacity of 4400 MW at Veerlapalem Village and 2400 MW at Dilawarpur Village of Damercherla Mandal, Nalgonda District.

The present location has been selected for setting up thermal power plants in view of its proximity to the Krishna water, railway line and national highway and ports of Kakinada, Machilipatnam and Krishnapatnam, through which coal can be imported. Number of cement plants are situated nearby the present site, where fly ash generated from the power plants can be utilized.

Observations

Nalgonda District has a geographical area 14240 Sq. Km and the forest area in the district is about 6% of the geographical area. Looking to the percentage of area under forest cover, extreme caution needs to be exercised in diverting any forest land in the district. The forest is highly degraded and requires special measures and high inputs for rehabilitating and protecting the same.

The area required, as per the norms, for setting up of power plants of 6800 MW capacity is about 760 ha (1900 acres) only. If it is inevitable to divert the forest land for an infrastructural project for public purpose in the national interest, it has to be the barest minimum.

As per para 4.5 of the guidelines issued under Forest Conservation Act 1980, "the Central Government will not entertain any proposal for diversion of forest land for construction of residential or dwelling houses. Diversion of forest land for construction of other buildings also will not be normally considered". Therefore, proposal for.

diversion of 264.87 ha is not recommended. Diversion of 809.4 ha proposed for greenbelt is also not recommended since greening can be done even without diversion.

Area proposed for solar power project is 1367.43 ha. There is a case for using some of the degraded forest lands for solar power generation. But, solar power generation activity can deprive the habitat for some wildlife and can also have adverse effect in the adjoining areas from wildlife point of view. Hence, it is desirable that clear policy is arrived at as to what type of degraded lands and to what extent can be used for solar power generation and guidelines are formulated for allotment.

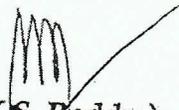
Limestone reserves are reported in some of the areas proposed for diversion. They may need to be excluded to be able to extract the limestone in future.

Recommendation

Looking to the critical power situation in the newly formed Telangana State and keeping in mind the need to generate additional power to meet the requirement of industrial, agriculture and domestic sectors, the proposal may be considered subject to the following: -

- (i) Diversion may not be treated as precedent and may be restricted to 1892.35 ha.
- (ii) Areas having limestone reserves underneath may be avoided as far as possible.
- (iii) One third of the area diverted shall be utilized for maintaining greenbelt.
- (iv) 2% of the cost of power produced shall be provided to the Forest Department for afforestation to be done and special forest and wildlife protection measures to be undertaken, preferably, in Nalgonda District and for promoting agro forestry, road side plantations, environmental education, etc.

Yours faithfully,



(K.S. Reddy)
Additional PCCF (Central)

File No.25014/1/2018-CLD
Government of India
Ministry of Coal
<<>

IMMEDIATE

Shastri Bhawan, New Delhi
Dated the 15th February, 2018

To,

1. Chairman,
Coal India Limited,
Coal Bhawan,
Premise No-04 MAR,
Plot No-AF-III, Action Area-1A,
Newtown, Rajarhat, Kolkata-700156
2. The Chairman-cum-Managing Director,
Singareni Collieries Company Limited,
18, Red Hills, Khairatabad PO, Hyderabad,
Telangana.



Subject:
1/2018.

Meeting of the Standing Linkage Committee (Long-Term) for Power Sector- SLC/LT No.

Sir,

I am directed to forward herewith minutes of the meeting of the SLC (LT) for Power Sector held on 19.01.2018 to consider requests for linkages to State Sector Power Plants and review status of existing coal linkages/LoAs and other related matters.

2. Recommendations of the SLC(LT) in respect of all the items have been approved by the Competent Authority.

Encls. - as above.

(Signature)
(Dominic Dungdung)
Under Secretary to the Govt. of India

Copy to -

- | | |
|---|-------------|
| 1. Additional Secretary, Ministry of Coal | Chairperson |
| 2. Principal Advisor (Energy), NITI Aayog, Yojana Bhawan New Delhi. | Member |
| 3. Joint Secretary (Coal), Ministry of Coal | Member |
| 4. Advisor (Projects), Ministry of Coal | Member |
| 5. Joint Secretary (Thermal), Ministry of Power, Shram Shakti Bhawan, New Delhi | Member |
| 6. Joint Secretary (Ports), Ministry of Shipping, Transport Bhawan, New Delhi | Member |
| 7. Joint Secretary, Ministry of Steel, Udyog Bhawan, New Delhi | Member |
| 8. Joint Secretary, Department of Industrial Policy & Promotion, Udyog Bhawan, New Delhi | Member |
| 9. Executive Director, T. T. (F), Railway Board, Room No. 261, Rail Bhawan, New Delhi. | Member |
| 10. Director (Marketing), Coal India Limited. | Member |
| 11. CMD's BCCL, CCL, ECL, MCL, NCL, SECL & WCL | Members |
| 12. Chairman-cum-Managing Director, Central Mine Planning & Design Instt Ltd., Gondwana Place, Kanke Road, Ranchi (Coal & Commercial) | Member |

*De/coal
C/coal*

Chief Engineer
TSGENCO V.S., Hyderabad-82.
Inward No. *2089*
20 FEB 2018
(Signature)
C/o. Chief Engineer
Coal Project (Coal & Commercial)

DIRECTOR (FUEL MANAGEMENT)
TSGENCO, V. S, HYD-82.
C.No. *157* Inward
20 FEB 2018
(Signature)
Director
(Fuel Management)

- | | |
|---|-----------------|
| 13. Chairman, Central Electricity Authority, Sewa Bhawan, RK Puram, New Delhi | Member |
| 14. Chairman, NTPC, Scope Complex, Lodhi Road, New Delhi-110003 | Member |
| 15. Joint Secretary (CBA-II Section), Ministry of Coal | Special Invitee |

Copy to:

(i) Director (Technical), CIL (ii) GM (S&M), CIL, Kolkata (iii) CGM (CP), CIL, Kolkata (iv) GM (S&M), CIL, Delhi.

Copy also to -

1. PS to Minister of Coal 2. OSD to Minister for Coal 3. PSO to Secretary (Coal) 4. PPS to Additional Secretary (Coal) 5. PPS to Joint Secretary (LA)

Copy also to - NIC, Ministry of Coal with the request to place it on the Website of the Ministry for information of all concerned.

No. 23014/1/2018-CLD
Government of India
Ministry of Coal

New Delhi, Dated January, 2018

Minutes of the meeting of the Standing Linkage Committee (Long Term) for Power Sector held on 19.01.2018.

A meeting of the Standing Linkage Committee (Long Term) for Power Sector was held on 19.01.2018 under the Chairmanship of Additional Secretary (Coal) to consider requests for linkages to State Sector Power Plants and review status of existing coal linkages/LoAs and other related matters. The list of participants is at Annexure -1.

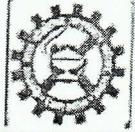
Agenda	Brief description of Agenda Item	Summary of discussions	Recommendations with reasons
Agenda Item No. 1 Confirmation of the Minutes of the SLC(LT) meeting held on 21.08.2017.	Confirmation of the Minutes of the SLC(LT) meeting held on 21.08.2017.	There were no comments from any side.	Minutes of the SLC(LT) meeting held on 21.08.2017 are confirmed.

DSR/PM

<p>Agenda Item No. 2</p> <p>Request received from MoP for grant of Coal linkages to Thermal Power Station of TSGENCO</p>	<p>Ministry of Power vide its OM dated 16.10.2017 referred to Govt. of Telangana's requests for coal linkage. MoP requested Ministry of Coal to consider the request of TSPGCL and to recommend coal linkage from SCCL for 22.20 Million Tonnes Per Annum (MTPA) of coal (inclusive of 7.0 MTPA Imported coal substitution) to the upcoming Thermal Power Stations of TSGENCO as per the SHAKTI Policy as detailed below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>S.No.</th> <th>Power Station</th> <th>Capacity (MW)</th> <th>Coal Requirement (MTPA)</th> <th>Grade of Coal</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>KTPS-VII</td> <td>800</td> <td>4.00</td> <td>G10/G11</td> </tr> <tr> <td>2.</td> <td>Bhadradi TPS</td> <td>1080</td> <td>4.20</td> <td>G9/G10</td> </tr> <tr> <td>3.</td> <td>Yadadri TPS</td> <td>4000</td> <td>14.00</td> <td>G9</td> </tr> <tr> <td>Total</td> <td></td> <td>5880</td> <td>22.20</td> <td></td> </tr> </tbody> </table> <p>MoP had stated that the above requests have the recommendation of Central Electricity Authority.</p> <p>The SLC (LT) to take a view in the matter.</p>	S.No.	Power Station	Capacity (MW)	Coal Requirement (MTPA)	Grade of Coal	1.	KTPS-VII	800	4.00	G10/G11	2.	Bhadradi TPS	1080	4.20	G9/G10	3.	Yadadri TPS	4000	14.00	G9	Total		5880	22.20		<p>Representative of TSGENCO stated that at Kothagudam TPP of TSGENCO of 720 MW capacity (4x60 MW + 4x120 MW) would be getting decommissioned 2018-19 onwards.</p> <p>SLC (LT) recommended grant of linkage to KTPS-VII and Bhadradi TPS from SCCL. SLC (LT) recommended grant of linkage to Yadadri TPS subject to the condition that linkage quantity for the units of TPPs of TSGENCO that are to be decommissioned would be included in the linkage quantity of Yadadri TPS. The linkage quantity shall be as per the prescribed norms.</p>
S.No.	Power Station	Capacity (MW)	Coal Requirement (MTPA)	Grade of Coal																							
1.	KTPS-VII	800	4.00	G10/G11																							
2.	Bhadradi TPS	1080	4.20	G9/G10																							
3.	Yadadri TPS	4000	14.00	G9																							
Total		5880	22.20																								

Agenda Item No. 3
Vidarbha Industries Pvt. Ltd. (VIPL) : For Unit -I at Butibori, Nagpur

1. Director (CLD) briefed the agenda of the meeting to all participants. Copy of Agenda Note is marked as Annexure-2. The Committee gave an opportunity to PP to state and explain its stand as regards the LoA issued initially to GCPP. PP supplied its written submissions along with few documents which are placed as Annexure-3.
2. PP stated that status of Unit-I was mentioned as GCPP in the original application dated 05.05.2006, but CEA later clarified that the Unit should be treated as IPP because the tariff of the proposed power plant is linked to regulated tariff and that there will be no captive consumption. As clarified by CEA, PP had informed MoC that they may be treated as IPP. SLC (LT) in the meeting held on 02.08.2007, deferred the case of Unit-I as MoP representative stated that the project is unlikely



INDIAN INSTITUTE OF CHEMICAL TECHNOLOGY
(Council of Scientific & Industrial Research)
HYDERABAD- 500007



Dr.R.Srinivas
Chief Scientist & Head
Analytical Chemistry Division

Phone No: 040-27191342
Fax No: +91-040-27193156
E-mail: srini@iict.res.in

Ref: ACMS/TSGENCO/2017

Date: 23-08-2017

To:
Chief Engineer (Coal & Commercial),
Ground Floor, Room No 107, A- Block,
TSGENCO Vidyut Soudha,
Hyderabad - 500 082.

Dear Sir/Madam,

This is with reference to your letter dated 29-06-2017 regarding the analysis of Coal sample for Hg by ICP-OES and the report for the same is given below.

ICP-OES Analysis Report

S.No	Sample Code	Hg ($\mu\text{g/g}$)
1	SCCL G9 Grade Coal	1.47

Analyzed by

Scientist-in-Charge

for Director

1. This Certificate refers to sample(s) examined only.
2. These Results should not be used for commercial purpose (Advertisement)

O/o Chief Engineer (Coal & Commercial) TSGENCO, V.S., Hyderabad-82.	
Inward No.:	1403
23 AUG 2017	
Chief Engineer (Coal & Commercial)	

Deferral
Leslee

ANNEXURE - 5

200

No. J-11013/41/2006-IA-II (I) (Part)
Government of India
Ministry of Environment, Forest and Climate Change
(Impact Assessment Division)

Indira Paryavaran Bhawan
Jor Bagh Road, Aliganj
New Delhi-110003

Dated: 29th August, 2017.

OFFICE MEMORANDUM

Subject: Terms of Reference for EIA/EMP studies for the projects/activities requiring Environmental Clearance under the EIA Notification, 2006 - Extension of validity period - regarding.

In order to streamline the process and provide greater clarity in issuing Terms of Reference (ToRs) for undertaking EIA/EMP studies for the projects/activities requiring Environmental Clearance under the EIA Notification, 2006, the following decisions have been taken with immediate effect:

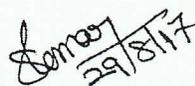
- (i) The validity of ToRs for projects/activities (except for River Valley and HEP Projects), for submission of EIA/EMP reports shall be three years.
- (ii) The validity of ToRs for River Valley and HEP Projects, for submission of EIA/EMP report shall be four years.
- (iii) The above validity period can be extended by the concerned Regulatory Authority for a maximum period of one year without referring the proposal to the EAC/SEAC concerned, provided an application is made by the applicant before expiry of the validity period, together with an updated Form-1 and proper justification and there is no change in terms and conditions of the ToRs. After the lapse of validity, such extension will need EAC/SEAC consideration.
- (iv) Thus, an outer limit of validity of ToRs shall be 4 years for all the projects/activities and 5 years for River Valley and HEP Projects.
- (v) The ToRs will specifically mention the date of expiry of validity.
- (vi) Extension of validity of ToRs beyond the outer limit of four years for all projects/activities, and five years for River Valley and HEP projects, shall not be allowed/considered by the Regulatory Authority.
- (vii) The baseline data used for preparation of EIA/EMP reports may be collected at any stage, irrespective of the request for ToR or the issue thereof. However, such a baseline data and the public consultation should not be older than 3 years, at the time of submission of the proposal, for grant of Environmental Clearance, as per ToRs prescribed.

- (viii) Public consultation shall be conducted during the validity of the ToRs. The public consultation conducted after the expiry of ToRs shall not be accepted by the Regulating Authority.
- (ix) In case the proposal for Environmental Clearance along with EIA/EMP reports based on the ToRs prescribed, is not submitted within the validity period of ToRs, and/or not complying with the above conditions, the process shall be started *de novo*. The already collected baseline data may be re-used, provided it is not more than 3 years old and duly recommended by EAC/SEAC in their due diligence.
- (x) In case, any proposal for ToR is delisted for want of additional information within the time period, as stipulated by the Ministry, the same can be listed again after the requisite information is submitted.

2. This Office Memorandum is issued in supersession of the earlier OMs of this Ministry as under:

- i) No. J-11013/ 41/2006-IA-II (I) dated 22.03.2010;
- ii) No. Z-11012/1/2013-IA-I (Part) dated 19.11.2013;
- iii) No. Z-11012/1/2013-IA-I (part) dated 12.12.2013;
- iv) No. J-11013/ 41/2006-IA-II (I) dated 22.08.2014;
- v) No. J-11013/ 41/2006-IA.II (I) dated 08.10.2014;
- vi) No. J-11013/41/2006-IA.II(I) dated 07.11.2014; and
- vii) No. J-11015/109/2013-IA.II(M) dated 12.01.2017

3. This issues with the approval of the competent authority.


(Sharath Kumar Pallerla)
Scientist 'F'

Copy to:

1. All the officers of IA Division
2. Chairperson/Member Secretaries of all the SEIAAs/SEACs
3. Chairman of all the Expert Appraisal Committees
4. Chairman, CPCB
5. Chairpersons/Member Secretaries of all SPCBs/UTPCCs

Copy for information:

1. PS to Minister for Environment, Forest and Climate Change
2. PPS to Secretary(EF&CC)
3. PPS to AS(AKJ) / AS (AKM)
4. PPS to JS(GB) / JS(JT)
5. Website, MoEF&CC
6. Guard file

**BEFORE THE HON'BLE NATIONAL
GREEN TRIBUNAL,
SOUTHERN ZONE AT CHENNAI**

Appeal No: 15 of 2020

**REPLY TO THE WRITTEN
SUBMISSIONS FILED BY THE
APPELLANTS**

Filed On:

Filed By:

J. RAMACHANDRA RAO
Y. RAMA RAO
B. LAKSHMINARASIMHAN

COUNSELS FOR THE 4th
RESPONDENT

Address for Service:-