

BEFORE THE HONOURABLE  
GREEN TRIBUNAL SITTING AT  
CHENNAI

Application No. 87 of 2025 (SZ)

Venugopal Reddy, V.O.

& others

...Applicants

-Vs-

The Principal Secretary,

Mines and Minerals Department, AP

And 8 Others

...Respondents

COUNTER AFFIDAVIT FILED BY  
THE 8<sup>th</sup> AND 9<sup>th</sup> RESPONDENT

A.ANURADHA

C.D.VIVEKANANDAN

Counsel for 8<sup>th</sup> Respondent

98845 06405

BEFORE THE NATIONAL GREEN TRIBUNAL SITTING AT CHENNAI

[ SEE RULE 15]

APPLICATION NO 87 OF 2025 [SZ]

Venugopal Reddy, V O

& 3 Others

.... Applicants

Versus

The Principal Secretary,

Mines and Minerals Department, AP

and 8 others

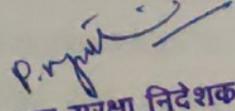
Respondents

....

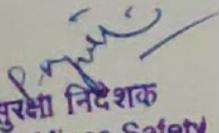
**COUNTER AFFIDAVIT FILED BY THE RESPONDENT NO: 08, &  
RESPONDENT NO. 09**

I, Raghupathi Peddireddy, S/o Shri Sambaiah, aged 51 years, presently working as Director of Mines Safety in the Directorate General of Mines Safety, Nellore Regional Office, Nellore, do hereby solemnly and sincerely affirm and state as follows, on behalf of Respondents No.08 and No.09:

I am acquainted with the facts relevant to Respondent No.08 (Director of Mines Safety, Nellore) and Respondent No.09 (Deputy Director of Mining Safety, South Central Zone, Hyderabad). I am competent and duly authorised to file this counter affidavit on their behalf.

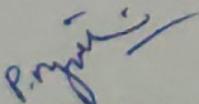
  
खान सुरक्षा निदेशक  
Director of Mines Safety  
नेल्लूर क्षेत्र / Nellore Region  
Directorate General of Mines Safety  
Ministry of Labour & Employment

- i. In reply to paragraphs 1 and 2 of the application, it is respectfully submitted that the contents are matters of record for the applicant and require no comment from the answering respondents.
- ii. As to paragraph 1, the statements regarding ownership of agricultural land and investment in plantation are matters of record pertaining to the applicants, and no comments are offered by the answering respondents.
- iii. With reference to paragraph 2, allegations pertaining to dumping of mining waste or overburden in non-mining licensed area (Korlakunta panchayat/ beyond mine boundary), alleged dust pollution, drying of groundwater, and loss of plantation, it is respectfully submitted that these matters do not fall within the purview of the Mines Act, 1952. Matters relating to alleged illegal mining activities or violation of environmental laws are not within the statutory jurisdiction of the answering respondents acting under the Mines Act, 1952. Additionally, the allegations are not specifically directed against Respondents 8 and 9; accordingly, no comments are offered on behalf of the answering respondents.
- iv. Regarding the averments in paragraph 3, relating to approval of mining projects/plans and verification of impact on adjacent land owners, the answering respondents respectfully submit that these are not functions or matters governed by the Mines Act, 1952, and thus no comments are offered on their behalf.
- v. In so far as paragraph 4, dealing with approval of mining plans and environmental clearances, the answering respondents submit that such matters do not fall within the scope of powers and functions assigned under the Mines Act, 1952. Accordingly, no comments are offered from Respondents 8 and 9.
- vi. With respect to paragraph 5, concerning disclosure of damages, award of compensation, and receipt of complaints or legal notices, the answering respondents state that these issues do not fall within the statutory responsibilities of Respondents 8 and 9 under the Mines Act, 1952. Further, no complaint or legal notice has been received from the applicants. Therefore, the answering respondents do not offer any comments on these matters.

  
खान सुरक्षा निदेशक  
Director of Mines Safety  
क्षेत्र / Nellore Region  
General of Mines  
Ministry of Labour & Employment

- vii. Regarding paragraph 7, the answering respondents state that the contents are matters of record and require no specific response.
- viii. In respect of paragraphs 8 to 14, it is respectfully submitted that the issues raised therein, including alleged legal violations, liability for compensation, and requests for interim measures, do not arise under or relate to the Mines Act, 1952 and the functions of the answering respondents. Accordingly, no reply are offered on these paragraphs.
- ix. The answering respondents respectfully submit that the responsibilities conferred upon the Directorate General of Mines Safety under the Mines Act, 1952 pertain strictly to ensuring safety, health, and welfare standards in mines as per the provisions of the Act and do not extend to granting mining leases, environmental clearances, assessment of environmental damage, or payment of compensation. Matters of alleged environmental violations, encroachment, dumping, or compensation as raised by the applicants are regulated by other statutory authorities and specific legislation, and do not fall within the regulatory or administrative competence of these respondents.
- x. In view of the above, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to consider these facts and submissions while passing orders in the above application, and pass such further or other orders as deemed fit and proper in the circumstances of the case.

Solemnly affirmed at Chennai on this the 21<sup>st</sup> day of August, 2025, and signed before me.

Before me   
खान सुरक्षा निदेशक  
Director of Mines Safety  
नेल्लूर क्षेत्र / Nellore Region  
Directorate General of Mines Safety  
Ministry of Labour & Employment

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