

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT CHENNAI
O.A. NO. 253 of 2024**

IN THE MATTER OF:

Sri Chaitanya Sravanthi

Rep. by Founder and President, Dr. Shirin Rahman Shaik,

D. No. 48-8/12, Dwarakanagar,

Visakhapatnam,

Andhra Pradesh - 530 016

...Applicant

Versus

State of Andhra Pradesh & 9 others

...Respondents

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TO THE COUNTER AFFIDAVIT OF RESPONDENT NO.9**

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Place: Chennai

Date: 03.06.2025



Counsel for Applicant

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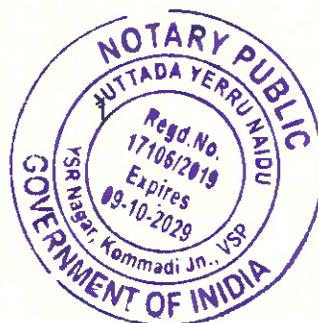
REJOINDER AFFIDAVIT TO THE COUNTER AFFIDAVIT OF RESPONDENT NO.

9

I, Dr. Shirin Rahman Shaik, wife of Dr. Shaik Abdul Rahman, aged about 75 years, having office at D.No. 48-8/12, Dwarakanagar, Vishakhapatnam, Andhra Pradesh - 530 016 and presently at Visakhapatnam, Andhra Pradesh, do solemnly hereby affirm and state as under:

1. I am the President of the Applicant herein and I am aware of the facts of the present case and as such, I am duly authorized and competent to affirm this affidavit on behalf of the Applicant.
2. The Applicant has gone through the averments made in the counter affidavit filed by Respondent No. 9 and has understood the meaning of the same. The averments made in the said counter affidavit are not admitted and are denied unless same are specifically admitted in this affidavit.
3. For the reasons hereinbelow and further grounds as may be relied upon in oral arguments, the Applicant is advised to state that the application filed by the Applicant must be allowed.

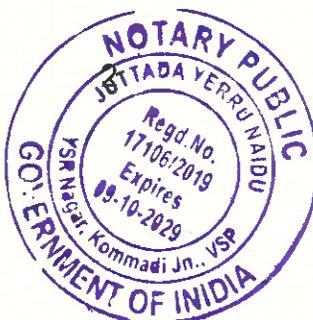
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4. At the outset, it is submitted that Ammonium Nitrate ("AN") is notified as an explosive under Section 17 of the Explosives Act, 1884 (Act, 1884) and is accordingly subject to stringent regulatory supervision in order to safeguard public safety and welfare. The mere fact that AN may hold commercial value and contribute towards the overall growth of the country, cannot be a justification for its indiscriminate or unregulated commercial exploitation, particularly where such exploitation endangers the lives and security of the general public by exposing them to the risks inherent in explosive materials.
5. It is further submitted that the averments of Respondent No. 9 that it imports fertilizer grade AN and not explosive grade AN is misleading. In this context, it is submitted that in India, AN is not recognized as a "Fertilizer" under the Fertilizer (Inorganic, Organic or Mixed) (Control) Order, 1985 ("FCO"), issued under the Essential Commodities Act, 1955. This being the case, AN cannot be used as a component in the manufacture of fertilizers as averred by the 9th Respondent. For such reason, the contention of the 9th Respondent, that absence of ammonium nitrate imports would severely impact agricultural output is incorrect.
6. It is pertinent to note that it is in fact Calcium Ammonium Nitrate, which is produced from AN, that is considered as a fertilizer under the FCO and approved by State Governments for agricultural use. Part A of Schedule I of the FCO specifies that Calcium Ammonium Nitrate with a nitrogen concentration of 25% or 26% qualifies as a fertilizer/fertilizer grade. Conversely, Ammonium Nitrate with a nitrogen content of 34.5% or higher is classified as explosive-grade as per Indian Standard Specifications. Even assuming, without admitting, that Respondent No.9 allows import of only fertilizer grade AN, it cannot be presumed that the large scale bulk imports of AN - Fertilizer grade is solely

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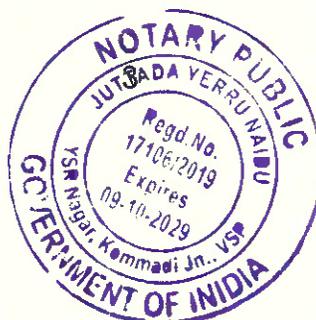


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intended only for agricultural purposes. Further, the 9th Respondent has not provided any evidence whatsoever to show that importers are using AN only for Fertilizers. In fact, the importers are in no manner connected to the business of manufacture of Fertilizers, and all the companies that are importing AN from the Respondent No. 9 are companies that manufacture explosives and are in no manner engaged in manufacture of Fertilizers.

7. It is further submitted that Respondent No.9 is not competent to comprehend or assess the grave implications associated with the use, storage, and transportation of AN, especially in relation to critical concerns such as safety, security, health, and environmental pollution. It is well known that due to the hazardous nature of AN, it is a highly regulated chemical. Further, it is only after the explosion at Beirut and keeping in mind the proximity of the Respondent No. 9 to strategic assets as set out in the Application. Therefore, only after considering the grave implications associated with handling AN, the Government of Andhra Pradesh took a decision to phase out AN imports in Respondent No. 9 through its Memo dated 6.1.2023.
8. The answering Respondent now proceeds to provide a para-wise reply of averments made by Respondent No.9 in its counter affidavit:
9. The contents of paragraphs 1 to 3 merit no specific response, and Respondent No. 9 is put to strict proof of the same.
10. With respect to the averments in paragraph 4, it is respectfully denied that Respondent No. 9 imports fertilizer grade AN and the Respondent No. 9 is put to strict proof. In fact, as per the report on adequacy of safety measures by the Respondent No. 9 issued by the Government of India dated 18.11.2024 (*Annexure No. 19 filed by Respondent No.9*), it is stated that the Respondent No. 9 has designated dedicated berths i.e. EQ3, EQ4, EQ6 and EQ7 for AN handling. As

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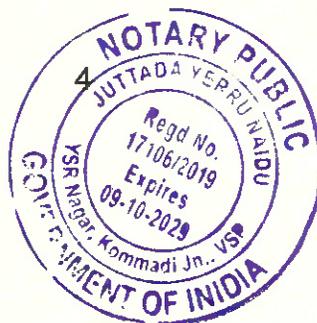


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per the details provided by the Respondent No. 9 on dedicated berths in its website, EQ3 and EQ4 were commissioned in 2019 for handling Fertilizers, Steel and Multi-Cargo. EQ6 was commissioned in 1966 for handling Iron Ore, Caustic Soda and Multi-Cargo and EQ7 commissioned in 1995 for Multi-Cargo, Iron Ore and Thermal Coal. The Respondent No. 9 has contended that generally AN is unloaded in EQ3 and EQ6 wharf. In this regard, it is submitted that the Respondent No. 9 does not hold a designated berth for handling AN.

11. The contents of paragraph 5 and 31 are vehemently denied. It is submitted that as per the report on adequacy of safety measures by the Respondent No. 9 issued by the Government of India dated 18.11.2024 (*Annexure No. 19 filed by Respondent No.9*), it is observed that several safety measures are not complied by Respondent No. 9 in handling AN. This is further evident from the Safety Audit Report issued by the Government of India, Ministry of Labour and Employment dated October 2022 (*Pg. 28 & Pg. 72 of Annexure 3*) and Report dated 9.9.2024 on Adequacy of Safety Measures by Respondent No. 9 for import of AN. Further, in paragraph 31, Respondent No. 9 only relies on its own self-certification to state that it has an exemplary track record for the past 20 years in handling AN.
12. The contents of paragraph 6 are matters of record and merit no response.
13. As regards contents of para 7, Respondent No. 9 has provided an incorrect list of ports that are notified for importing AN into India. As per the Notification issued by Ministry of Shipping dated 16.7.2013, the Major ports of Kolkota (including Haldia Dock Complex), Vishakhapatnam, VO. Chidambaranar and Chennai Ports were notified for import of AN. Further, Jaigad Port and Jawaharlal Nehru Ports in Maharashtra were notified for import of AN on 29.9.2015 and 12.2.2014 respectively. Subsequently, Paradip Port, Odisha was notified for import of AN *vide* Notification dated 21.10.2020.

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14. As regard to the contents of para 8, the Respondent No. 9 has provided incorrect facts about the companies' manufacturing AN. It is submitted that, as per licenses issued by PESO, P1 License ("Manufacture and to possess for sale Ammonium Nitrate and possess for sale of Ammonium Nitrate") is issued only to certain manufacturers. The list does not contain companies like, BASF, Coromandel International as they do not manufacture or have the license to manufacture AN in India. The list of companies that have obtained valid license for manufacture of AN in India are set out below:

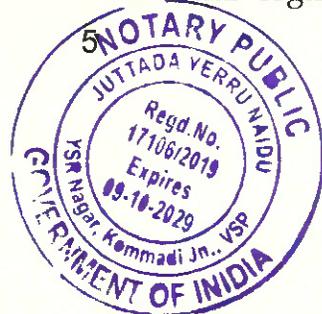
List of Licences Granted in AN -> Form-P1, Ammonium Nitrate Rules, 2012, in State All, District All, As on dated 16-Apr-2025

Sl. No.	Old License No.	New License No. (Dockey)	Name and Address (Correspondence)	Situation Of Premises (Premises Address)	Capacity	Date of Grant Of License	Validity Of License	Current Status
2	NA	AHQMAYP14 (A675)	MAHACHANAGIRTECH LIMITED Plot No. 7, MIDC Industrial Area, Tada, Taluka Rajgadh, Maharashtra - 412008	Survey No. 41, K. MIDC Tada, RAJGAD, Maharashtra - 412008	Ammonium Nitrate: 142,00,000 Kgs	20-11-2013	31-03-2026	Valid
3	NA	AHQMAYP13 (A676)	MAHACHANAGIRTECH LIMITED Plot No. 7, MIDC Industrial Area, Tada, Taluka Rajgadh, Maharashtra - 412008	Survey No. 41, MIDC Tada, RAJGAD, Maharashtra - 412008	Ammonium Nitrate: 142,00,000 Kgs	20-11-2013	31-03-2026	Valid
4	NA	AHQMAYP12 (A664)	MANOHAR AP TECH PRIVATE Plot No. 20, Stage - 07, Tada, MIDC, District SHIRAHOLUR, Andhra Pradesh - 522602	Survey No. 21, Taramata, District F. (Taddei) SHIRAHOLUR, Andhra Pradesh - 522472	Ammonium Nitrate: 2000 429,00,000 Kgs	13-01-2014	31-03-2026	Valid
7	NA	AHQMAYP11 (A654)	M/S. NARAYAN CHEMICALS PRIVATE Naras Nandga, Narasga, NARASga, RUPANAGAR, District RAJGAD	Survey No. Narsa Narasga, Narasga, RUPANAGAR, District RAJGAD	Ammonium Nitrate (50K): 1,18,00,000 Kgs	08-01-2014	31-03-2026	Valid
10	NA	AHQMAYP12 (A673)	M/S. NARAYAN CHEMICALS PRIVATE Narasga and Narasga, Narasga, RUPANAGAR, District RAJGAD	Survey No. Narsa Narasga, Narasga, RUPANAGAR, District RAJGAD	Ammonium Nitrate: 1,18,00,000 Kgs	08-01-2014	31-03-2026	Valid
11	NA	AHQMAYP14 (A655)	M/S. RASHMI CHEMICALS & FERTILIZERS LIMITED Maha Road, Chembur, Mumbai - 40074, Maharashtra	Survey No. 1, Mohali, M. M.A. West Block 3, 400074	Ammonium Nitrate: 1,35,25,000 Kgs	16-12-2014	31-03-2026	Valid
14	NA	AHQMAYP12 (A682)	MAHACHANAGIRTECH LIMITED Plot No. 7, MIDC Industrial Area, Tada, Taluka Rajgadh, Maharashtra - 412008	Plot No. 7, MIDC Tada, RAJGAD, Maharashtra - 412008	Ammonium Nitrate (50K): 2,00,00,000 Kgs	20-11-2013	31-03-2026	Valid
2	NA	AHQMAYP13 (A672)	M/S. RASHMI CHEMICALS & FERTILIZERS LIMITED Administrative Building, Maha Road, Chembur, Mumbai - 40074, Maharashtra	Survey No. 070, No. 1, Narasga Village, RAJGAD, Maharashtra - 400074	Ammonium Nitrate: 1,35,00,000 Kgs	16-12-2014	31-03-2026	Valid
22	NA	AHQMAYP14 (A673)	MAHACHANAGIRTECH LIMITED Plot No. 7, MIDC Industrial Area, Tada, Taluka Rajgadh, Maharashtra - 412008	Survey No. 41, K. MIDC Tada, RAJGAD, Maharashtra - 412008	Ammonium Nitrate (50K): 1,42,00,000 Kgs	20-11-2013	31-03-2026	Valid
23	NA	AHQMAYP13 (A659)	MAHACHANAGIRTECH LIMITED Plot No. 7, MIDC Industrial Area, Tada, Taluka Rajgadh, Maharashtra - 412008	Survey No. 41, MIDC Tada, RAJGAD, Maharashtra - 412008	Ammonium Nitrate: 1,42,00,000 Kgs	20-11-2013	31-03-2026	Valid
24	NA	AHQMAYP13 (A660)	M/S. SURESH CHEMICALS PRIVATE Plot No. 1, Tada, MIDC, District SHIRAHOLUR, Andhra Pradesh	Survey No. 20, Tada, District SHIRAHOLUR, Andhra Pradesh - 522602	Ammonium Nitrate: 3000 2,55,10,000 Kgs	20-08-2013	31-03-2026	Valid

15. The contents of paragraph 9 are matters of record and merit no response. It is however submitted that as raised in the application, that the proximity of strategic assets and the strategic location of the Respondent No. 9 necessitates that import of AN ought not to be permitted as any untoward incident involving AN explosion would result in disastrous consequences resulting in loss of lives of several millions of people apart from destroying strategic assets and causing severe environmental chemical pollution including toxic effects on soil, water, air and human health.

16. With respect to the contents of paragraph 10, the averment of Respondent No. 9 that AN is not an explosive by itself is denied. It is respectfully submitted that the Respondent No. 9, being a mere commercial organization, does not possess

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technical expert set to differentiate fertilizer and explosive grades of AN. By virtue of Section 17 of the 1884 Explosives Act, AN is classified as an explosive, which is further supported by the response given by the then Honorable Minister of Chemicals & Fertilizer in the Parliament. Further, even assuming AN cannot be termed as an explosive, AN is categorized as an oxidizing agent (or oxidizer) as per UN Classification for Dangerous Goods, which shows the risk of its inherent explosive character. This necessitates de-notification of Respondent No. 9's port for importation of AN.

17. The contents of para 11, to the extent of Respondent No. 9 stating that it only imports AN of fertilizer grade is denied. As stated above, it is reiterated that AN is not classified as a fertilizer under the FCO.
18. The contents of para 12 are denied *in toto* as the averments are completely contrary to the reports filed by the Ministry of Labour and Employment, Government of India. These reports reflect non-compliance with mandated safety protocols, contrary to Respondent No. 9's claims.

It is pertinent to note that the Occupation Safety and Health (Audit) Report 2023 issued by the Director General, Factory Advice Service and Labour Institute ("DGFASLI"), identified several deficiencies and recommended corrective actions to be undertaken especially in relation to assessing safety and health of workers employed. The report, *inter alia*, included the following:

Subject	Observation	Recommendations
OSH & Environmental Policy	Policy has been declared in 2020 and signed by the Chairman of Respondent No. 9	Policy must be reviewed periodically and commitment of management towards handling AN in port (explosive substance) shall also be the part of the policy.
Fixed Fire	There is no fixed	Wharf area handling AN

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Fighting System	firefighting system in the wharf handling AN	shall be provided with fixed firefighting system and only fresh shall be used for firefighting.
Facilities for unloading AN	There was not any fixed berth to handle AN bags. It is done as per availability of vacant berths.	Handling of AN shall be carried out only on dedicated berths and the berths shall be properly marked with warning signages. Entry of unauthorized workers/visitors shall be prohibited.
Stacking of AN bags at Wharf Area	During the course of discharge of import AN in jumbo bags on the wharf, approx. 15-20 numbers of bags were stacked on the wharf.	As minimum as possible number of AN jumbo bags (preferably 10 numbers) shall be stacked on wharf area to reduce the intensity of risk and to proper accounting and from safety point of view.
Handling of AN in night hours	Unloading of AN is done round the clock (even after sunset)	Handling of AN in dark hours shall be as per Rule 6(7) of the Ammonium Nitrate Rules, 2012 ("2012 Rules").
Sweeping and clearance of AN spill	When spillage of AN (on deck) was brought in to notice of the stevedore, it was collected (using iron shovel) by a casual worker with bare hand.	The spilled cargo should be swept out separately and cleared away immediately by the skilled and trained personnel in consultation with the importer. [...]
Transportation of AN jumbo bags	There were no dedicated transports meeting requirements to transport	AN shall not be transported with any other explosives, inflammable substances, oil,

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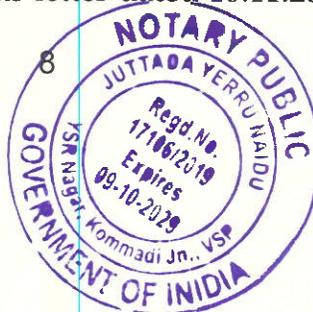


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	explosives or dangerous goods such as AN	gases, carbonaceous matter, etc. Transportation of AN shall be done directly to the destination without any interim storage in compliance to the requirements of the Statutory Authorities. [...]
Compliance of provisions under 2012 Rules framed under Explosives Act, 1884	Compliance of provisions of 2012 Rules, by the port authority, stevedore, agent, and importer is not adequate.	Provisions of 2012 Rules shall be complied by all stakeholders as applicable.
Site Notification	Handling of AN exceeds the threshold quantities as mentioned in MSIHC Rules, 1989	Respondent No.9 is handling huge quantity of AN as per the prevailing statistics and exceeds the threshold quantities as mentioned under Schedule 2 of S. Nos. 3 and 4. Hence the site notification shall be carried out by Respondent No. 9 at the earliest as per requirements of MSIHC Rules, 1989.

By letter dated 18.11.2024, further safety measures were mandated by DGFASLI, especially given the substantial quantities of AN being handled at the port. However, Respondent No.9 *vide* its letter dated 18.11.2024 has only made vague

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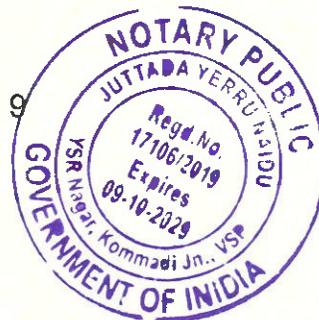


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assurances of compliance without furnishing any substantive proof of implementation. Further, with respect to the contents of paragraph 12, Respondent No. 9 has placed significant reliance on studies conducted by reputed international bodies such as International Labour Organization (ILO), World Health Organization (WHO), etc. However, the interpretation and application of such research requires technical experts who are equipped to undertake a scientific and context-specific analysis. Since Respondent No. 9 does not possess such technical knowledge, and is merely a commercial organization, the averments made by Respondent No. 9 in this regard are denied.

19. As regards the contents of para 13, to the extent of Respondent No.9 stating that AN is crucial for ensuring food security is wholly denied as the AN imported through Respondent No. 9 is not used for food production in India.
20. The contents of para 14 are denied *in toto*. It is submitted that Respondent No.9, who has hitherto consistently maintained that the import in question pertains solely to fertilizer-grade Ammonium Nitrate (AN), has now, for the first time, raised an averment that the cessation of AN imports through the said Port would adversely affect coal mining operations or food shortage in India. It is respectfully submitted that there exists no shortage or scarcity of AN in relation to coal mining activities in India. Furthermore, coal mining operations are in no manner connected with or incidental to agricultural activities within the country. Furthermore, PESO, *vide* letter bearing No.E25/(37-38)Misc/2022/Import-Export dated 10.03.2022, urged domestic industries to augment AN production. Several companies viz., Rashtriya Chemicals and Fertilizers Limited, Chambal Fertilizer, and Deepak Fertilizer Group Company and Gujarat Narmada Valley Fertilizers & Chemicals Limited, have accordingly initiated addition of new capacities or

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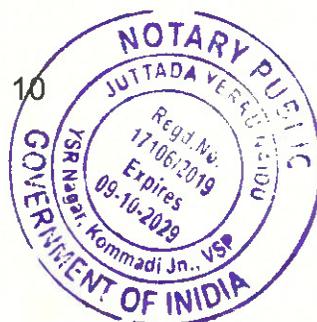


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already expanded domestic AN manufacturing, obviating any necessity for continued imports through Visakhapatnam Port.

21. The contents of paragraphs 15 and 16 are matters of record. As stated above, the DGFASLI, Ministry of Labour & Employment, Government of India, has time and again issued safety audit reports pointing out that the Respondent No. 9 is not in compliance with safety standards for handling AN. Therefore, in the event, the No Objection Certificate as requested by the Respondent No. 9 is granted for import of AN into the Respondent No. 9 Port, any untoward incident involving AN explosion would result in disastrous consequences resulting in loss of lives of several millions of people apart from destroying strategic assets and causing severe environmental chemical pollution including toxic effects on soil, water, air and human health.
22. The contents of para 17 and 23 are also denied *in toto*. It is submitted that the absence of past accidents does not preclude future risks. In fact, even in the case of the explosion at Beirut Port, it was the first of its kind at that port, and the explosion created massive destruction. In addition, this application is filed for preventing any untoward incident involving explosion of AN. Preventive measures, including the interim relief sought, are necessary to avert potential disasters. In this context, it is further submitted that Respondent No. 9 does not have the evidence to support that the claim of the Applicant has become infructuous. It is further submitted that the precautionary principle has been endorsed by Courts especially in cases involving severe damage to the environment as laid down by the Hon'ble Supreme Court of India in *Vellore Citizens Welfare Forum and A.P. Pollution Control Board v. Prof. M.V. Nayadu (Retd.) and ors.* (1999) 2 SCC 718. In fact, the Respondents herein ought to discharge their

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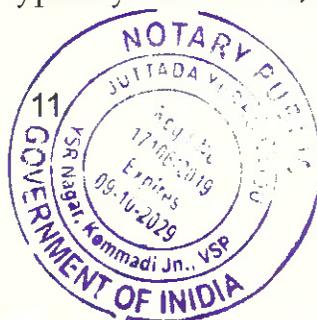


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obligations in line with the precautionary principle to prevent the occurrence of environmental damage.

23. The contents of paragraph 18 are vehemently denied.
24. The contents of paragraph 19 and 20 are matters of record and merit no response.
25. The contents of paragraph 21 are denied.
26. As regard to the contents of paragraph 22, it is reiterated that AN is not authorized for use as a fertilizer in India under FCO. Moreover, imported AN is stored in vessels having more than 15,000 tons capacity, going up to 20,000 tons capacity. These vessels remain berthed for up to / more than two weeks, during which the imported AN cargo is unloaded from the vessels. As such these vessels become 'temporary' storage sites, which poses a great safety risk to Visakhapatnam's dense population and the strategic assets located in proximity to the Respondent No. 9.
27. The contents of para 24 merit no response and the Respondent No. 9 is put to strict proof.
28. As regards to contents of paragraphs 25 to 26 and 28 to 30, it is averred by Respondent No. 9, that, imported AN by sea is not stored at the Port premises but is instead directly unloaded and transported to the stevedore's licensed warehouse. However, following the Beirut explosion of 2020, the license of the stevedore's warehouse at Visakhapatnam Port was cancelled, pursuant to the findings of various investigation agencies which revealed numerous instances of non-compliance with applicable safety and regulatory standards. Further, it is admitted by the Respondent No. 9 that, as per the Ammonium Nitrate Rules, 2012 immediate transfer from port to warehouse is mandated, yet there is no compliance due to the lack of licensed stevedore warehouses. It is pertinent to note that vessels carrying AN are typically between 15,000 tons to 20,000 tons in

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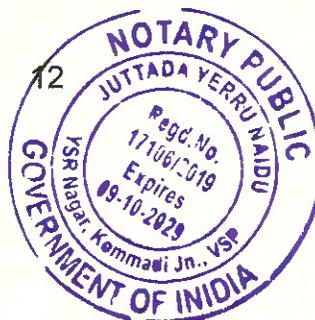


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capacity. Therefore, the unloading capacity may take up to / more than two weeks depending on discharge rate of 1,000 tons per day, which poses a great safety risk to Visakhapatnam's dense population and the strategic assets located in proximity to the Respondent No. 9.

29. The contents of paragraph 27 are denied.
30. The contents of para 31 are denied *in toto*, as Respondent No. 9 has not adhered to all applicable rules, regulations and safety protocols.
31. As regard to the contents of para 32, it is denied that AN is imported by fertilizer industry for making fertilizers. 100% of the subject AN is imported by Explosives Manufacturers for manufacturing commercial explosives.
32. With respect to the averments in paragraph 34, given Visakhapatnam's dense population and the strategic assets located in proximity to the Respondent No. 9, precautionary measures ought to be taken to shift AN import operation away from Visakhapatnam Port. Further, it is evident from the reports furnished by the DGFASLI, Ministry of Labour & Employment, Government of India, that the Respondent No. 9 is not in compliance with the safety standards for handling AN.
33. The contents of paragraph 35 are denied.
34. As regard to the contents of para 36, it is submitted that the Applicant does not seek a complete ban on importation of AN, but only seeks stringent regulation, especially limiting imports into highly populated areas due to the nature of AN.
35. With respect to the contents of paragraph 37 to 44, it is submitted that the Central Government has extensive powers under Section 3 of the Environment Protection Act, 1986 read with Rule 13 of the Environment Protection Rules, 1986 to ensure that it takes all possible measures for the purpose of protecting, preventing, controlling and abating environmental pollution including by prohibiting or

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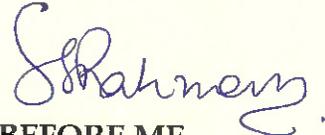
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restricting handling of hazardous substances. Further, the Respondent No. 9 Port is situated in close proximity to several strategic assets and these assets also hold combustible chemicals and explosives. Therefore, in the event of an untoward incident similar to the blast in a warehouse in Tianjin, China or Beirut explosion, would be catastrophic to the city of Vishakhapatnam. In fact, during the Russia-Ukraine war, the handling of AN was halted at the Port of St. Petersburg, and it remains halted till date. It is also well known that AN fumes and toxic inhalation of AN dust can irritate the respiratory tract and chronic exposure to it may cause respiratory issues. It is submitted that the Applicant need not wait for the occurrence of an untoward incident and the Respondents herein are obligated to discharge their obligations in line with the precautionary principle as endorsed by the Hon'ble Supreme Court of India for preventing the occurrence of environmental damage.

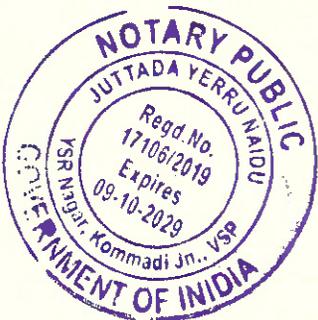
36. As regards the contents of paragraph 45, it is submitted that the Safety Audit Reports furnished by the DGFASLI, Ministry of Labour & Employment, Government of India show that the Respondent No. 9 is not compliant with safety requirements for handling AN.
37. The contents of paragraph 46 merit no response.

In light of the above, it is humbly prayed that this Hon'ble Tribunal may be pleased to grant the reliefs as prayed for, and thus render justice.

Solemnly affirmed at _____ on this
the 28th day of May, 2025 and
she having signed in
my presence


BEFORE ME

ADVOCATE



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After Ukrainian Attack, St. Petersburg Moves Ammonium Nitrate Out of Port



Multipurpose terminal at Port of St. Petersburg (file image)

PUBLISHED MAR 21, 2024 8:09 PM BY [THE MARITIME EXECUTIVE \(HTTPS://MARITIME-EXECUTIVE.COM/AUTHOR/MAREX\)](https://maritime-executive.com/author/marex)



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Amidst a regular drumbeat of Ukrainian drone attacks on Russian infrastructure, the Port of St. Petersburg has decided to halt the handling of ammonium nitrate, a common fertilizer that also doubles as an explosive. An explosion involving the same substance leveled half the port of Beirut in 2020.

According to Kommersant, after the Ukrainian drone strikes on Ust-Luga (<https://maritime-executive.com/article/video-fire-breaks-out-at-russian-Ing-terminal>), in January, St. Petersburg's governor feared that a similar attack on the ammonium nitrate transfer terminal could cause a disaster. The St. Petersburg terminal normally handles about three million tonnes per year, and - if ignited - a commercial quantity of the substance could potentially generate a devastating blast.

This category of cargo will likely be shifted to Ust-Luga, once the preparations are made to receive it. In the interim, reports Kommersant, there is enough demand on the domestic market to absorb the supply without exports.

Russian Railways has also restricted the transport of ammonium nitrate to several switchyards in the St. Petersburg area, according to Ukrainska Pravda.

Ammonium nitrate has a long history of causing serious industrial accidents. The Port of Beirut blast killed about 200 people in 2020; the Texas City blast of 1947 killed more than 500; and the massive Tianjin explosion of 2015 - caused by a combination of ammonium nitrate and other substances - killed 173 people and caused \$1.5 billion in insured damages, plus another \$9 billion in supply chain damages and lost profits.

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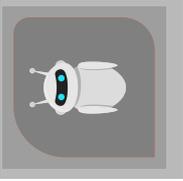
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INNER Harbour - East Quay Berths **Latest Restrictions & allowable drafts of the vessels in Inner and Outer**

Harbour

SINO.	BERTH	Permissible LOA (M)	Permissible DRAFT (M)	YEAR OF COMMISSION	CARGO	EQUIPMENT
1.	EQ1	240.00	14.50	2015	<ul style="list-style-type: none"> • Steam Coal 	2 Nos. 100 T HMCs, 2Nos Loading System and Con

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2.	2 Multi Purpose Berths (EQ2 to EQ5)	240.00	14.50	2019	<ul style="list-style-type: none"> Fertilizer Fertilizer Raw materials Steel Multi-Cargo 	Work order issued for installation of 1 no 100T(MHC) MOBILE HARBOUR CRANE
3.	EQ6 (PPP)	240.00	11.00	1966	<ul style="list-style-type: none"> Iron ore Caustic soda Multi-cargo 	4 Nos. 20T Capacity Electric wharf Cranes Project awarded to Everson
4.	EQ7 (PPP)	240.00	14.50	1995	<ul style="list-style-type: none"> Multi-Cargo Iron ore Thermal coal 	1 no. 140T HMC Project awarded to IPL & JM Baxi
5.	EQ8 (BOT)	235.00	14.50	2005	<ul style="list-style-type: none"> Dry Bulk 	5Nos. 100T HMC
6.	EQ9 (BOT)	235.00	14.50	2005	<ul style="list-style-type: none"> Dry bulk 	- " -
7.	EQ10 (PPP)	160.00	11.00	2015	<ul style="list-style-type: none"> Caustic soda Edible oil 	Unloading arms of 300TPH

INNER Harbour - West Quay Berths

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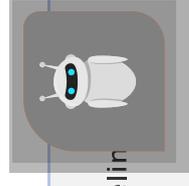
8.	WQ1	240.00	13.50	1994	<ul style="list-style-type: none"> Multi-Cargo Thermal Coal Iron Ore and Sulphuric Acid 	2 no. 140T HMC's are operational from WQ1 berths.
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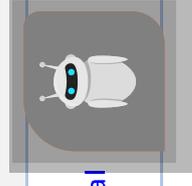
9.	WQ2	240.00	13.50	1992	<ul style="list-style-type: none"> Thermal Coal Cooking Coal Multi-Coal
10.	WQ3	240.00	13.50	1992	<ul style="list-style-type: none"> Coal
11.	WQ4	240.00	11.50	1965	<ul style="list-style-type: none"> Thermal coal Cooking coal Multi-Cargo Caustic soda(NALCO) <p>Bulk cargos are being handled with ship cranes Caustic Soda is handled through under ground pipeline</p>
12.	WQ5	240.00	11.50	1965	<ul style="list-style-type: none"> Alumina (NALCO) Caustic Soda <p>Conveyor System for loading alumina (2200TPH) and Caustic Soda (600TPH)</p>
13.	WQ6	230.00	14.50	2015	<ul style="list-style-type: none"> C.P.Coke LAM Coke Steel Multi-Cargo <p>2 Nos. 60T capacity Rail Mounted level luffing cranes.</p>
14.	WQ7	240.00	14.50	2018	<ul style="list-style-type: none"> Manganese Ore Coal and Coke Multi-Cargo <p>1 no 100 T HMC is operational at WQ7 & WQ8 berths. (Mechanization is in progress) Another 100T HMC shall be deployed by June 2021</p>
15.	WQ8	240.00	14.50	2018	<ul style="list-style-type: none"> Manganese Ore Limestone Multi-Cargo
>INNER Harbour - Western Arm					
16.	Fertilizer Berth	200.00	10.06	1967	<ul style="list-style-type: none"> Fertilizer Liquid Ammonia Molten Sulphur <p>Direct discharge through pipeline farms.</p>

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17	OR-I	195.00	11.00	1957	<ul style="list-style-type: none"> • POL • Styrene Monomer and Chemicals 	Direct discharge through pipeline to tank farms.
18	OR-II	185.00	9.75	1957	<ul style="list-style-type: none"> • POL • Styrene • Monomer and Chemicals 	Direct discharge through pipeline to tank farms.
19	OR-III	160.00	11.00	2021	<ul style="list-style-type: none"> • POL • Styrene • Monomer and Chemicals 	Direct discharge through pipeline to tank farms.
OUTER Harbour						
20	OSTT	280.00	17.00	1985	<ul style="list-style-type: none"> • Crude oil and Petroleum products 	Three unloading arms with discharge capacity of 5500 tonnes per hour
21	LPG	230.00	14.00	1998	<ul style="list-style-type: none"> • LPG and petroleum products 	Marine unloading arms, Pipelines and Direct
22	OB-1&2 (PPP)	300.00	16.50	2015	<ul style="list-style-type: none"> • Iron Ore 	fully mechanised Iron Ore terminal
23	CRUISE TERMINAL	300.00	8.50	2023	<ul style="list-style-type: none"> • Cruiser 	A world-class terminal for cruise ships, with all amenities, access to public areas, and close proximity to a beautiful beach at Hill Gardens, Hill Stations, Temples etc.
24	VGCB (PPP)	300.00	18.10	2013	<ul style="list-style-type: none"> • Coal 	fully mechanised Coal terminal

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25	VCTPL-1&2 (BOT)	390.00	16.00	2003	<ul style="list-style-type: none"> Containers 	7 Nos. 19Nos. RTGCS 5 Nos. Reach Stackers
26	VCTPL-3&4 (PPP)	450.00	16.00	2022	<ul style="list-style-type: none"> Containers 	7 Nos. 19Nos. RTGCS 5 Nos. Reach Stackers

1. Details of the restrictions and allowable drafts of the vessels in inner harbour and outer harbour



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**BEFORE THE HON'BLE NATIONAL
GREEN TRIBUNAL SOUTHERN ZONE**

O.A. No. 253 of 2024

IN THE MATTER OF

Chaitanya Sravanthi

... Applicant

-versus-

Ministry of Shipping, Ports and
Waterways Government of India and 9 Ors.

.....Respondents

**Rejoinder Affidavit and Documents
filed by the Applicant to the
Counter Affidavit of Respondent No.9**

M/s. Madhan Babu

Vishnu Mohan

K. Sanjay

Vishnu Manoharan

Counsel for Applicant

9381353434