

BEFORE THE NATIONAL GREEN TRIBUNAL,  
SOUTHERN BENCH AT CHENNAI.

ORIGINAL APPLICATION No. 315/2024

IN THE MATTER OF :-

Nadavala Ashok,

...

Petitioner

VS

Ministry of Environment

Forests and climate change & 6 others.

...

Respondents 1 to 6

**REJOINDER BY THE PETITIONER IN RESPONSE TO THE REPORT FILED  
BY THE 3rd RESPONDENT, (GW&WAD)**

INDEX

S. No.	Particulars	Page No.
1.	Memo of Parties	2
2.	Rejoinder	4
3.	Annexure - I	9
4.	Annexure - II	10
5.	Verification	11

Dated 21-04-2025

FILED BY

N. Ashok  
(Nadavala Ashok)

**BEFORE THE NATIONAL GREEN TRIBUNAL ,  
SOUTHERN BENCH AT CHENNAI.**

**OA No. 315 /2024**

**IN THE MATTER OF :-**

Nadavala Ashok,

S/o Nadavala Babu,,

Pantapalem Village,

Muthukur Mandal,

SPSR Nellore Dt.

Andhra Pradesh State.

Cell No. 7358517352

...

Petitioner

**VS**

**1. Ministry of Environment**

Forests and climate change,

Rep by Secretary

Indira Paryavaran Bhawan

Jorbagh Road

New Delhi – 110 003.

India.

Email: webmaster-moef@nic.in.

Phone: +91-11-24360675.

**2. Water Resources Department,**

Government of Andhra Pradesh,

Rep by Director

D.No.48-10-9/1, N.H. Feeder Road,  
Near Ramavarappadu Circle, Currency Nagar,  
Vijayawada, Andhra Pradesh,India.

3. Ground Water & Water Audit Department ,

Office of the Director,

Ground Water & Water Audit Department,

4th & 5th Floor, Vysya Bhavan,

Namboori Gopalrao Street,

Vijayawada-520013, Andhra Pradesh.

4. District Collector and District Magistrate,

Achari street Collector's office,

Nellore, Andhra Pradesh, Pin code- 524001.

5. Nellore Municipal commissioner,

Nellore Municipal Corporation office,

Dargamitta, Nellore.

Pincode: 524003,

Andhra Pradesh, India.

6. Andhra Pradesh Pollution Control Board

D.No.33-26-14 D/2, Near Sunrise Hospital

Pushpa Hotel Centre, Chalamavari Street

Kasturibaipet, Vijayawada – 520010

Phone: 0866-2463202 / 2463204

... Respondents 1 to 6

**REJOINDER BY THE PETITIONER IN RESPONSE TO THE REPORT FILED  
BY THE 3rd RESPONDENT, GW&WAD,**

TO

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

MOST RESPECTFULLY SHOWETH:

I, Nadavala Ashok, 31 years old, Hindu residing at Pantapalem Village, Muthukur Mandal, SPSR Nellore District, Andhra Pradesh, do hereby solemnly affirm and sincerely state as follows:

1. I am the Applicant in the above Original Application No. 315 of 2024 (SZ) and am well acquainted with the facts and circumstances of the case. I am competent to swear this Rejoinder Affidavit in response to the report filed by the 3rd Respondent (Ground Water & Water Audit Department) dated 01.03.2025, pursuant to the Hon'ble Tribunal's order dated 02.01.2025.
2. I have read the report filed by the 3rd Respondent, including its annexures, and deny all averments made therein except those specifically admitted herein. The 3rd Respondent is put to strict proof of the rest.
3. I state that I have filed the above application seeking to address the illegal extraction of groundwater by edible oil industries and private vendors in in Pantapalem Village, which violates the Andhra Pradesh Water, Land and Trees Act (APWALTA), 2002, and prior NGT orders and prior NGT orders (O.A. No. 221 of 2015).

4. I seek liberty from this Hon'ble Tribunal to file further affidavit(s) if found necessary at a later stage.
5. I state that the Hon'ble NGT, in its order dated 13.07.2022 in O.A. No. 221 of 2015, directed edible oil industries in Muthukur Mandal to source water only from government-authorized sources and adhere strictly to permitted quantities as per consents and permissions (Page 3, GW&WAD Report).
6. I submit that the GW&WAD report fails to address ongoing violations wherein edible oil industries, including Cargil India Pvt. Ltd., 3F Industries Ltd., South India Krishna Oil Fats Pvt. Ltd., and Adani Wilmar Unit-2, are sourcing groundwater from unauthorized agricultural filter points in Pantapalem Village via tankers, as noted in Annexure II (Page 10).
7. I state that the report's claim that all 12 edible oil industries are utilizing groundwater within permitted limits (Page 6, Annexure V) is misleading, as it does not confirm whether these industries exclusively use authorized sources or continue to rely on illegal tanker supplies, in violation of the NGT's directions.
8. I submit that the failure to enforce the NGT's order in O.A. No. 221 of 2015, by allowing industries to source water from unauthorized tankers, constitutes contempt of court, and I request penal action against non-compliant industries and cancellation of their No Objection Certificates (NOCs).
9. I state that the GW&WAD report acknowledges the illegal extraction of 960-1200 KLD of groundwater by farmers in Pantapalem Village through 10-15 unauthorized filter points supplying tankers to industries (Annexure II, Page 10), but fails to provide evidence of effective measures to halt this activity.
10. I submit that the report's reliance on the Tahsildar's action taken report (Annexure III, Page 13), which claims 13 unauthorized filter points were seized on 22.10.2024, is inadequate, as it does not confirm whether all illegal filter points were addressed or if extraction has ceased and i humbly submit that GPS-stamped photographs (Annexure A1) taken post-22.10.2024 confirm that unauthorized filter points remain operational, with tankers actively transporting groundwater to industries.
11. I state that the Tahsildar's report (Annexure III, Page 13) admits that four farmers were previously transporting water to industries via tankers, yet no details are provided on

punitive actions against these farmers or industries, undermining the enforcement of APWALTA.

12. I submit that the GW&WAD report's assertion that the reconstituted Mandal WALTA Committee (Annexure IV, Page 14) is monitoring groundwater protection is vague, as no evidence is provided of meetings held since October 2024 or specific actions taken to curb illegal extraction and i submits that the reconstituted Mandal WALTA Committee has failed to enforce the APWALTA Act, allowing illegal extraction to persist.
13. I state that the report's claim of groundwater development in Muthukur Mandal at 36.47% (Page 6), based on the GEC 2023-24 report, is misleading, as the GEC 2021-22 report indicates Pantapalem Village's groundwater development at 61.90%, nearing semi-critical status, which warrants localized data and This data is outdated and does not reflect the current groundwater stress. i submit that since 2022, several edible oil industries, including Adani Wilmar Ltd. (Expansion) and new units like Ana Oleo Pvt Ltd, have commenced or expanded production, significantly increasing groundwater consumption. The report fails to provide the latest GEC data for Pantapalem Village, which is critical given the reported extraction of 960-1200 KLD by farmers for commercial purposes (Page 12)
14. I submit that the absence of specific groundwater level and Total Dissolved Solids (TDS) data for Pantapalem Village in the GW&WAD report renders its assessment of the "safe" category unreliable and irrelevant to my grievance about localized over-extraction.
15. I request that this Hon'ble Tribunal direct the Respondents to submit updated groundwater level and TDS data specific to Pantapalem Village, based on recent assessments, to evaluate the impact of illegal extraction.
16. I state that the GW&WAD report's list of permitted groundwater quantities for edible oil industries (Annexure V, Page 16) lacks evidence, such as flow meter readings or third-party audits, to verify compliance with the stated limits.
17. I submit that the report's claim that all industries have installed piezometers, flow meters, and recharge structures (Annexure V, Page 16) is unsubstantiated, as no

inspection records or compliance reports are provided to confirm their functionality or effectiveness.

18. I state that the joint inspection report from November 2023 (Annexure II, Page 9) is outdated and fails to reflect the current status of illegal extraction, especially since the Tahsildar's seizure of 13 filter points in October 2024 (Annexure III) does not guarantee cessation of violations.
19. I submit that the GW&WAD report does not address the lack of spacing norms for filter points in Pantapalem Village, as noted in Annexure II (Page 10), which violates APWALTA and contributes to groundwater depletion.
20. I state that the report's failure to investigate the role of private vendors, who continue to supply groundwater to industries via tankers and pipelines, as evidenced by the annexed photographs (Annexure 1 and Annexure 2), indicates a superficial approach to enforcement.
21. I request a thorough audit of water usage by all edible oil industries, particularly Cargil India Pvt. Ltd., 3F Industries Ltd., South India Krishna Oil Fats Pvt. Ltd., and Adani Wilmar Unit-2, to verify compliance with permitted quantities and confirm the cessation of illegal tanker and pipeline supplies.
22. I submit that the GW&WAD report's reliance on the Mandal WALTA Authority's actions (Annexure III, Page 13) is insufficient, as the authority has not provided a follow-up report on the effectiveness of the seizures or ongoing monitoring efforts.
23. I submit that the GW&WAD report fails to propose concrete remedial measures, such as mandatory rainwater harvesting or recharge structures for the identified filter points, to restore groundwater levels in Pantapalem Village, as requested in my representation.
24. I state that I have annexed photographs evidencing illegal groundwater extraction through tankers and pipelines in Pantapalem Village, marked as Annexure 1 and Annexure 2, respectively, to substantiate my objections.
25. I submit that the GW&WAD report is deficient, evasive, and fails to address the core issues of illegal groundwater extraction, necessitating further investigation and corrective measures by this Hon'ble Tribunal.

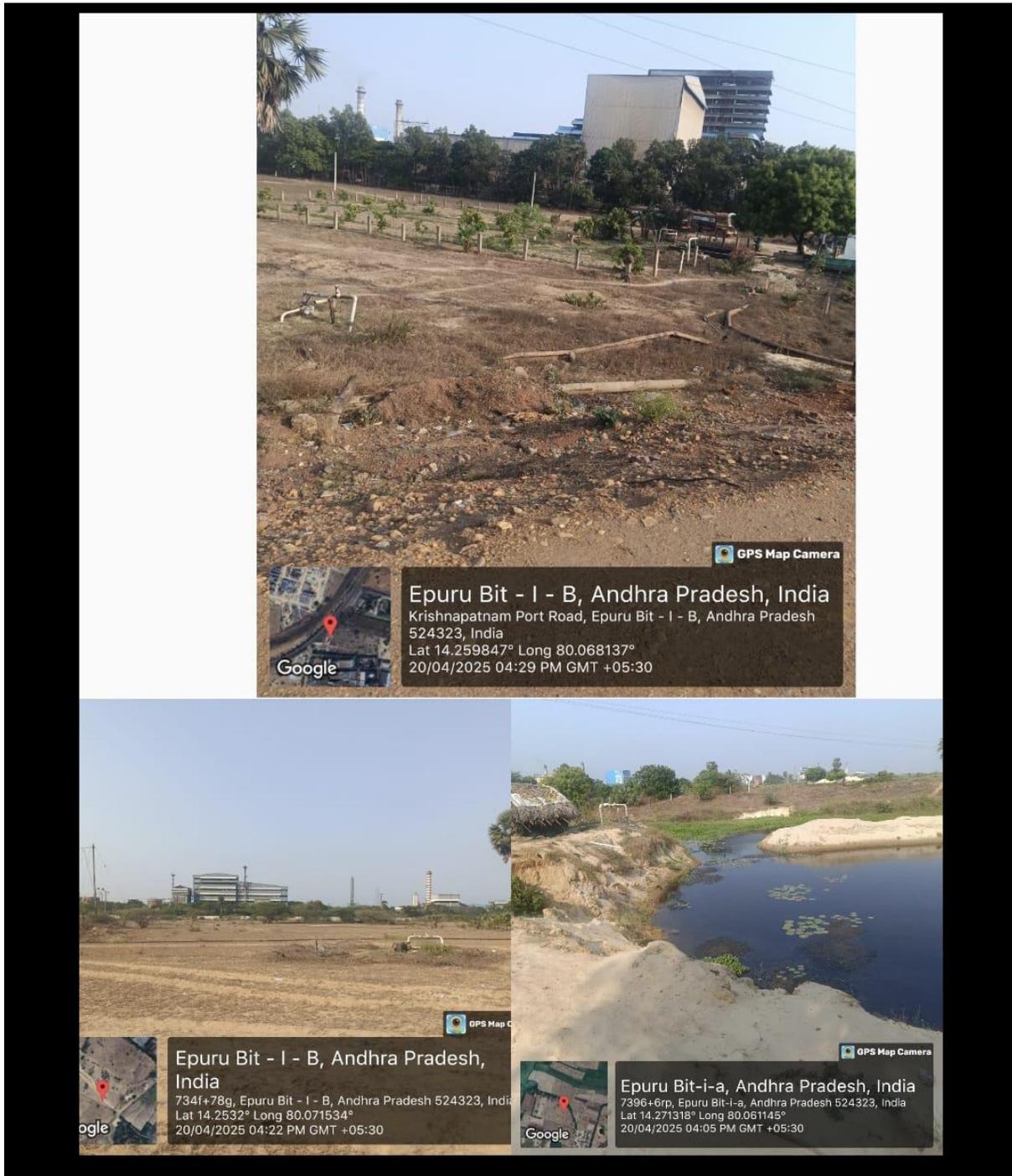
**Prayer:**

27. In the light of above revelation Hon'ble Tribunal may be pleased to:
- a. Direct the Respondents to ensure strict compliance with the NGT's orders in O.A. No. 221 of 2015, including penal action and cancellation of NOCs for industries sourcing water from unauthorized sources.
  - b. Constitute an independent committee to inspect the illegal ground water extraction of edible oil companies situated in pantapalem village.
  - c. Order the submission of updated groundwater level and TDS data specific to Pantapalem Village, based on recent assessments, to evaluate the localized impact of illegal extraction.
  - d. Direct a detailed audit of water usage by edible oil industries, particularly Cargil India Pvt. Ltd., 3F Industries Ltd., South India Krishna Oil Fats Pvt. Ltd., and Adani Wilmar Unit-2, to verify compliance with permitted quantities and confirm the cessation of illegal tanker supplies.

**Annexure - I : Latest GPS photocopies of groundwater filter points for illegal extraction through tanker:**



**Annexure - II: Latest GPS photocopies of groundwater filter points for illegal extraction and pumped directly to industries through pipeline:**



**Verification**

I, Nadavala Ashok, do hereby verify that the contents of paragraphs 1 to 32 are true to my personal knowledge and that I have not suppressed any material fact.

Solemnly affirmed at Pantapalem on this the 20th day of April, 2025, and signed in my presence.

Nadavala Ashok  
Applicant-in-Person

*N. Ashok*