

BEFORE THE NATIONAL GREEN TRIBUNAL

SOUTHERN ZONE, CHENNAI

O A No. 46 OF 2022 (SZ)

Perala Shekhar Rao  
Aged about 59 years, Occ: Social Worker  
R/o. H.No.104, 11-14-262  
Manjeer Heights - II, Chitra Layout,  
L.B. Nagar, Hyderabad  
Telangana State 500 074  
Mail Id: advsravan@gmail.com  
Mobile: 9676999194

... Applicant

Versus

Union of India,  
Rep.by its Secretary,  
Union Ministry of Environment,  
Forest & CC  
Indira paryavaranBhavan  
New Delhi 110 003  
Mail:secy-moef@nic.in  
Phone 011 24695262, 24695265& Others

...Respondents

**REPLY FILED ON BEHALF OF THE 12TH RESPONDENT**

- 1) The 12th respondent respectfully submits as follows that the above Application has been filed by the Applicant seeking for appropriate action by the Official Respondents in respect of alleged Environmental Violations by the Private Respondents in the Application.



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2) At the outset, it is submitted that the application itself is not maintainable on account of the fact that it is politically motivated and at the same time devoid of material particulars. The Applicant has made vague allegations without any supporting materials against the Private Respondents without ascertaining any factual position by approaching the statutory authorities in a proper manner. For example, the Applicant has alleged that the Private Respondents are operating their mines without any Environmental Clearance, consent from Pollution Control Board, etc while actually the Private Respondents have obtained all Environmental Clearances and are operating their mines in total compliance of the conditions of consent issued by the Pollution Control Board. The Applicant by filing this application without any substance is seeking for a roving enquiry by the Hon'ble Tribunal without presenting even some prima facie material to substantiate his accusations as against the Private Respondents. This would establish the fact that the application itself has been filed with an ulterior motive purely to threaten and harass the mining industries in order to make an unfair gain. The applicant is a politician and is attempting to abuse the process of court and therefore his conduct deserves to be deprecated by this Hon'ble Tribunal.



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- 3) It is submitted that assuming the Environmental Concerns raised by the Applicant are really genuine, the Private Respondents would be obliged to collectively address all the issues in the interest of Environment. However, if the allegations are made only for the purpose of harassing the Private Respondents with a hidden agenda then the Applicants like the present one deserve strong condemnation by this Hon'ble Tribunal.
- 4) In so far as the contents of the application are concerned the Applicant has made general statements concerning the guidelines relating to the mining industry in paragraph 1. It is not known as to how the Applicant chose to target this Respondent alone as though the details of only these Respondents are available with him. This exposes the ulterior motive of the applicant.
- 5) The allegations in paragraphs 2 & 3 are denied. In so far as the Respondents are concerned there is no excess mining and the mine are being operated in accordance with the Environmental Clearance, Mining Rules and as per the conditions of consent issued by the TSPCB from time to time.
- 6) The pictures of wild animals and the photographs of mining areas as produced in para 5 cannot be correlated with the industry of the 12th Respondent. In the absence



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of any specific allegations as against the Respondents, the same cannot be answered. Similarly, the allegations in para 6 & 7 are too general in nature without pointing out any violation on the part of these Respondents.

- 7) The allegations in para 8 are made against the Official Respondents about which the Respondents are unable to offer any remarks. But in so far as this Respondent is concerned all amounts due towards mining charges have been periodically remitted by them. In so far as the complaint preferred by the Applicant as mentioned in para 9, it is submitted that except naming the Private Respondents and referring to a report of the year 2013 nothing has been brought out in the complaint to point out any violation on the part of the 12th Respondent.
- 8) With regard to paras 10 to 12 of the application, it is submitted that when W.P.(PIL) No. 183/2018 has been filed before the Hon'ble High Court of Telangana seeking action by the Official Respondents in respect of the very same cause of action, the present application filed before this Hon'ble Tribunal is most inappropriate in as much as the Hon'ble High Court of Telangana is already seized of the issue and the same is pending. The Hon'ble Supreme Court of India has also in a recent judgment reported in (2022) 8 SCC 165 has categorically held that when the



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matter is directly in issue before the Hon'ble High Court, the Hon'ble National Green Tribunal need not take cognizance of the very same issues as the same is likely to result in conflict of decisions.

- 9) This Respondent emphatically deny the allegations in para 13 that the Private Respondents are influential and their family members are part of the Government and therefore the Official Respondents are not taking any action.
- 10) The grounds raised in para 14 (A) to 14 (J) are devoid of any substance in as much as general statements are made without any substance as to the nature of violation committed by the Private Respondents. In other words, the Applicant has approached this Hon'ble Tribunal without any material and seeking to have a roving enquiry while actually the Official Respondents are already taking care of implementation of all environmental norms. This Respondent advised to submit that while the judgments referred to in the application have laid down indisputable legal propositions of substantial importance relating to environment, the same have been quoted out of context and therefore are not applicable to the facts of the present case.



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11) After this Hon'ble Tribunal directed by its order dated 19/04/2022 to file a report, the Respondents 3, 5,7 & 9 have filed a detailed report dated 15/10/2022 before this Hon'ble Tribunal wherein they have set out the nature of mining operations being undertaken in Karim Nagar District, RajannaSircilla District, Peddapally District and Jagithyal District. The report which has been filed after a joint inspection by the concerned authorities clearly states that all the operating quarries are possessing valid environmental Clearance issued by the competent authority i.e. SEIAA as well as consent orders from the TSPCB. This respondent is filing herewith all statutory clearances in respect of the operation of their quarries issued by the authorities from time to time for the kind perusal and consideration of this Hon'ble Tribunal.

**M/S. Sandiya International Granites (Respondent No.12)**

S.No	Survey Number	Location	Environmenta l Clearance	CTE	CTO	Mining Lease
1	596	Nagulam aiyal Village (2.57Ha)	Environmenta l Clearance issued by SEIAA Bearing No.213 dated 08.03.2013	CTE issued by TSPCB dated 13.05.201 3	CTO issued by TSPCB dated 19.01.2019	a) Mines and quarry lease issued by Asst.Director of Mines Geology dated 02.07.2019 for a period of 20 years b) Work order issued by



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						Asst. Director of Mines Geology dated 28.08.2009 for a period of 20 years
2	596	Nagulam aiyal Village (1.0Ha)	Environmental Clearance issued by SEIAA Bearing No.383 dated 25.10.2013	CTE issued by TSPCB dated 16.09.2016	CTO issued by TSPCB dated 01.04.2017	a) Mines and quarry lease issued by Asst. Director of Mines Geology dated 13.08.2009 for a period of 20 years  b) Work order issued by Asst. Director of Mines Geology dated 28.08.2009 for a period of 20 years (28.08.2009 - 27.08.2029)
3	596	Nagulam aiyal Village (2.0Ha)	Environmental Clearance issued by SEIAA Bearing No.248 dated 08.05.2013	CTE issued by TSPCB dated 25.09.2013	CTO issued by TSPCB dated 23.11.2021	a) Mines and quarry lease issued by Asst. Director of Mines Geology dated 06.10.2010 for a period of 20 years



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						b) Work order issued by Asst. Director of Mines Geology dated 12.10.2010 for a period of 20 years (12.10.2010 - 11.10.2030)
4	596	Nagulam aiyal Village (5.30Ha)	Environmental Clearance issued by SEIAA Bearing No.286 dated 10.03.2013	CTE issued by TSPCB dated 24.09.2013	CTO issued by TSPCB dated 23.11.2021	a) Mines and quarry lease issued by Asst. Director of Mines Geology dated 02.02.2010 for a period of 20 years b) Work order issued by Asst. Director of Mines Geology dated 04.02.2010 for a period of 20 years (04.02.2010 - 03.02.2030)
5	596	Nagulam aiyal Village (2.0Ha)	Environmental Clearance issued by SEIAA Bearing No.248 dated 08.05.2013 &	CTE issued by TSPCB dated 14.09.2016	CTO issued by TSPCB dated 24.03.2017	a) Mines and quarry lease issued by Asst. Director of Mines Geology dated 13.08.2009 for a period of 20



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PARTNER

			Environmental Clearance issued by SEIAA Bearing No.382 dated 25.10.2013			years b) Work order issued by Asst. Director of Mines Geology dated 28.08.2009 for a period of 20 years (28.08.2009 - 27.08.2029)
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12) In these circumstances, the Application filed by the Applicant making serious allegations without ascertaining the factual position obtaining in the case, whether willfully or otherwise, cannot be countenanced and the Private Respondents have been unnecessarily made parties to this present case selectively only in order to harass them due to political vendetta. The Applicant deserves to be penalized for making wild allegations without any substance and for abuse of process of law.

Under these circumstances, 12th Respondent prays that this Hon'ble Tribunal may be pleased to dismiss Appeal No.46 of 2022 with costs and thus render justice.

Dated at *Kavim naya* on this the 20th day of March 2026

12th Respondent



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PARTNER

**VERIFICATION**

I, Jalagam Linga Rao, M/s Sandiya International Granites, the 12th Respondent herein do hereby verify that what are all stated above are true and correct to the best of my knowledge, information and belief.

Verified at *Karimnagar* on this the 20th day of March 2026  
M/s. SANDIYA INTERNATIONAL GRANITE

*SLW*

PARTNER

*T. Hemala/Ka*

*COUNSEL FOR 12<sup>th</sup> RESPONDENT*

12th Respondent



**// ATTESTED //**

*[Signature]*  
**D. Raja Shekhar Rao**  
M.Com., LL.B.  
**ADVOCATE & NOTARY**  
(Appointed by the Govt. of A.P India)  
H.No. 3-7-202, Vavilalaopally, Karimnagar

Date..... *07-04-2026*

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**SOUTHERN ZONE, CHENNAI**

**O A . No. 46 OF 2022 (SZ)**

Perala Shekhar Rao

... Applicant

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Rep.by its Secretary,  
Union Ministry of Environment,  
& Others

... Respondents

**REPLY FILED BY THE 12TH RESPONDENT**

**M/S. T.HEMALATHA, R.RAJMOHAN & S.DEEPIKA**

**COUNSEL FOR RESPONDENT NO. 12**