

**BEFORE THE HONOURABLE NATIONAL GREEN TRIBUNAL, SOUTH ZONE
CHENNAI.**

ORIGINAL APPLICATION NO. 93 of Year 2024.

IN THE MATTER OF:

Sajimon Joseph

..... **Applicant(S)**

Versus.

The Chief Secretary, Government of Kerala and Others. **Respondents(S)**

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SAJIMON JOSEPH (APPLICANT FOR PETITION NO. OA-93/2024, SZ)



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Place: Koombara, Calicut
Date: 21/10/2025

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CHENNAI.**

ORIGINAL APPLICATION NO. 93 of Year 2024.

IN THE MATTER OF:

Sajimon Joseph **Applicant(S)**

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The Chief Secretary, Government of Kerala and Others. **Respondents(S)**

Affidavit filed by the Applicant objecting to SEIAA's decision to revoke the Stop Memo issued to the Project Proponent on 02/11/2024, based solely on the MoEAF&CC report dated 18/06/2025.

I, Sajimon Joseph, the Applicant in the present application, do hereby respectfully submit this additional affidavit before this Hon'ble Tribunal in connection with the ongoing proceedings in Original Application No. 93/2024 (SZ) [**Old No. OA 770/2024, SUO MOTU**], concerning the illegal quarrying activities allegedly being carried out in Survey No. 2442 (Part), Koodaranhi Village, Koombara, Kozhikode District, Kerala – 673604. I am the Applicant in the above Original Application and am fully conversant with the facts and circumstances of the case. I am competent to swear to this affidavit.

1. The present Application challenges the arbitrary, non-transparent and environmentally detrimental decision of the State Environmental Impact Assessment Authority (SEIAA), Kerala, to revoke the Stop Memo dated 02/11/2024 issued against the Project Proponent (PP), despite repeated findings of serious environmental violations.
2. The Stop Memo was issued following three rounds of field inspections by the Joint Committee, SEIAA and its expert appraisal committee (SEAC), based on clear

evidence of violations of Environmental Clearance (EC) conditions and ongoing environmental degradation due to the quarrying operations.

3. In SEIAA Meeting No. 151 held on 30–31 December 2024, under Item No. 151.16, the Authority itself resolved to:

“Direct the Standing Counsel to take steps to vacate the stay on the stop memo, as the explanation submitted by the Project Proponent in response to the show-cause notice is not satisfactory and continued mining will aggravate environmental damages further.” (ANNEXURE-1A).

4. Again, in SEIAA Meeting No. 152 dated 30–31 January & 1 February 2025, the Authority noted continued non-compliance and the inability of the Project Proponent to rectify the violations. In Item No. 152.34, SEAC reported several instances of serious deviations. **ANNEXURE-1B.**
5. SEIAA Meeting No. 153 (21–22 February 2025), under Item No. 153.09, further directed the Project Proponent to submit a compliance report within three months, failing which EC would be cancelled without further notice. **ANNEXURE-1C.**
6. Contrary to the above consistent observations and without any joint verification involving SEIAA or the Applicant, the Authority later relied solely on a site inspection conducted on 29/04/2025 by a single official from IRO MoEAF&CC, Bangalore, requested unilaterally by the Project Proponent, and in which neither SEIAA officials nor the Applicant were involved.
7. The MoEAF&CC official who conducted this inspection had no prior knowledge of the site-specific ecological or legal context, nor was he briefed about the detailed complaints submitted by the Applicant or the extensive findings of SEIAA and SEAC.
8. The said inspection report, lacking objectivity, accuracy, and participation from other stakeholders, formed the sole basis of the decision taken in SEIAA Meeting No. 157 dated 19/09/2025, under Item No. 157.32, to revoke the Stop Memo. **ANNEXURE-1D.** A formal complaint challenging the revocation of the Stop Memo based solely on the inspection conducted by a single official from the MoEAF&CC along with the Project Proponent on 29/04/2025 was submitted by the Applicant on 11/10/2025 to SEIAA, Kerala. The said complaint is enclosed as **ANNEXURE- 2.**

9. The revocation was carried out despite SEIAA's earlier documented findings, including irreversible and irreparable violations such as:
- a) Multiple vertical fractures have been observed on the eastern quarry wall, along with inclined fractures dipping in the opposite direction of the slope.
 - b) Non-maintenance of required benches (only 3 benches instead of 21).
 - c) Five quarries and one crusher unit are currently operating within a 500-metre radius of the area, effectively forming a quarrying cluster.
 - d) Violation of buffer zones with vested forests and public road, deviation of road etc.
 - e) Excessive mining beyond EC limits and water, sound pollution by tipper lorries.
 - f) Quarrying on slopes exceeding 70° to 80°, risking landslides.
 - g) Overburden dump exceeding 50 feet in height at quarry site, agricultural Land (Rubber Plantation), and streams.
 - h) Obstruction and pollution of two natural streams, ground water pumping from the pit at night without filtration and leaving to the natural stream.
 - i) Encroachment into forest land without proper demarcation.
 - j) The heavy blasting sound, by using, including unauthorized explosive materials, in close proximity to residential areas has resulted in excessive noise pollution, contamination of water sources, destruction of public roads, and damage to official survey stones. Additionally, there is evidence of **unauthorized alteration of public records**, including the manipulation of official documents to falsely show an increase in road width from 4 meters to 8 meters, allegedly to facilitate quarry/crusher operations and to protect illegal compound walls of the project proponent, raising serious concerns of procedural and legal violations.
 - k) Repeated landslides ecologically sensitive zone included in the western ghats and slope instability in the project area etc.
11. The precautionary principle, as laid down in *Vellore Citizens' Welfare Forum v. Union of India* (1996) 5 SCC 647, mandates that environmental protection must be given precedence even in the face of scientific uncertainty.
12. The 'Polluter Pays' principle and the doctrine of inter-generational equity are equally applicable. The continued operation of this quarry without addressing critical environmental violations undermines these constitutional and statutory principles under Articles 21, 48A and 51A(g) of the Constitution of India, and Section 3 of the Environment (Protection) Act, 1986.

13. An affidavit was submitted by the Applicant before the Hon'ble Tribunal on 27/07/2025, objecting to the site inspection conducted jointly by the MoEAF&CC and the Project Proponent, which was carried out without notifying the Applicant and without the involvement of SEIAA Kerala. The inspection report, prepared following this unilateral visit, was submitted by the Project Proponent before the Hon'ble Tribunal and SEIAA, while the same was not provided to the Applicant, thereby violating principles of natural justice and procedural fairness.
14. The revocation of the Stop Memo based solely on an isolated and procedurally flawed inspection, bypassing SEIAA's own findings, is arbitrary, unsustainable in law, and contrary to the public trust doctrine.
15. The Applicant most respectfully submits that the revocation of the Stop Memo dated 02/11/2024, as recorded in the proceedings of SEIAA Kerala Meeting No. 157, Item No. 157.32 dated 19/09/2025, is vitiated by serious procedural lapses and a lack of transparency. The decision was based solely on an inspection conducted without any notice to the Applicant, without the involvement of SEIAA itself and Applicant, and in complete disregard of SEIAA's earlier findings of multiple and serious environmental violations by the Project Proponent. Such a process violates the principles of natural justice and undermines the precautionary and sustainable development principles embedded in environmental jurisprudence. Moreover, there has been no effective monitoring or enforcement action by the concerned government agencies in relation to these illegal and unauthorized activities, largely due to the undue influence and unlawful nexus operating in favour of the Project Proponent.

I, Sajimon Joseph, do hereby verify that the contents of this Affidavit are true and correct to my knowledge and belief, and nothing material has been concealed therefrom.

SAJIMON JOSEPH (APPLICANT FOR PETITION NO. OA-93/2024, SZ)



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Koodaranhi Via, Calicut DT, Kerala- PIN-673604
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Place: Koombara
Date: 21/10/2025

ANNEXURE-1A.

Item No. 151.16 **O.A No. 93 of 2024 (SZ) (Earlier O A No.770/2023(PB)) filed by Sri. Sajimon Joseph against the quarry activities of Sri. Thankachan Mathalikunnel before the Hon'ble NGT
(File No.1068/EC4/2024/SEIAA)**

The Authority deliberated on the matter and noted the reply dated 26.11.2024 to the show-cause notice issued to the Project Proponent, as well as the interim order dated

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12.11.2024 in WP(C) No. 39873 of 2024. The Authority observed that the Hon'ble High Court, via its interim order, stayed the stop order issued by the SEIAA and directed the Project Proponent to provide an explanation in response to the show-cause notice.

The Authority reviewed the explanation dated 26.11.2024 submitted by the Project Proponent and found it unsatisfactory.

In the above circumstances, the Authority decided the following:

- 1. Wait for the final judgment of the NGT, as the case is pending with the tribunal.**
- 2. Direct the Standing Counsel to take steps to vacate the stay on the stop memo, as the explanation submitted by the Project Proponent in response to the show-cause notice is not satisfactory and continued mining will aggravate environmental damages further. The Legal Officer shall expedite the action.**

The Authority noted that the agenda and the file were not updated with the details of the interim order in WP(C) No. 39873 of 2024. The SEIAA Secretariat should take necessary action to update the details at the earliest.

Item No. 151.17 **Environmental Clearance issued to the Building Stone Quarry project of Sri. Rajeevan Nambiar, Managing Director, M/s Kokkallur Granite Pvt. Ltd at Re-Sy Block No. 1, Re-Sy Nos. 49/1B, 85, 86 in Balussery Village, Koyilandy Taluk, Kozhikode - Interim order dated 03.12.2024 in WP(C) No. 37162/2024.
(File No. 1262/EC1/2019/SEIAA)**

ANNEXURE-1B

Item No. 152.34 **Environmental Clearance issued to the Granite Building Stone Quarry project of Sri. Thankachan M. S. at Sy No. 2442 (pt), in Koodaranhi village, Kozhikode - O.A No. 93 of 2024 (SZ) (Earlier O. A. No. 770/2023 (PB)) filed by Sri. Sajimon Joseph against the quarry activities of Sri. Thankachan Mathalikunnel before the Hon'ble NGT – Interim Order dated 28.01.2025 in WP(C) No. 39873/2024 filed by Sri. Thankachan M.S. (File No. 1068/EC4/2024/SEIAA)**

In order to comply with orders of the Hon'ble High Court, as intimated by the Authority, the Project Proponent Sri. Thankachan M. S. and his advocate J. Abhilash attended the hearing. The Project Proponent intimated that he had complied with EC

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conditions properly and is ready to provide the details. Authority observed that the SEAC in its field inspection report observed many instances of noncompliance of EC conditions.

After hearing the Authority directed the project proponent to submit a detailed hearing note within seven days, with supporting documents to substantiate his claims.

ANNEXURE-1C

Item No. 153.09 Environmental Clearance issued to the Quarry project of Sri. Thankachan M. S. at Sy. No. 2442 (pt), in Koodaranhi village, Kozhikode - O. A. No. 93 of 2024 (SZ) (Earlier O. A No. 770/2023 (PB)) filed by Sri. Sajimon Joseph against the quarry activities of Sri. Thankachan Mathalikunnel before the Hon'ble NGT – Interim Order dated 28.01.2025 in WP(C) No. 39873/2024 filed by Sri. Thankachan M. S.
(File No. 1068/EC4/2024/SEIAA)

The Authority deliberated on the matter and noted the hearing note submitted by the Project Proponent on 07.02.2025, the email from Sri. Sajimon Joseph dated 11.02.2025, and the interim order dated 20.02.2025 in WP(C) No. 39873 of 2024. The Authority observed that, as per the interim order, the Hon'ble High Court directed that the implementation of any order adverse to the Petitioner shall only proceed after obtaining permission from the Court. The Authority also reviewed the hearing note and noted that the SEAC, in its field inspection report, identified multiple instances of noncompliance with EC conditions.

Considering these findings, the Authority decided as follows:

1. The Project Proponent shall rectify all non-compliances of EC conditions as observed during the field inspection and submit a compliance report **within three months**. A copy of the field inspection report shall be provided to the Project Proponent.
2. On receipt of the compliance report, the SEAC shall inspect the site and verify the compliance status.
3. If the Project Proponent fails to comply the directions within the time limit, the Environmental Clearance will be cancelled without further notice.
4. The decision of the Authority shall be communicated to the Standing Counsel for submission before the Hon'ble High Court.
5. The legal officer to ascertain the position of O.A before the Hon'ble NGT.

ANNEXURE-1D

Item No.157.32 Environmental Clearance issued to the Quarry project of Sri. Thankachan M.S. at Sy. No. 2442 (pt), in Koodaranhi village, Kozhikode - O.A No. 93 of 2024 (SZ) (Earlier O.A. No. 770/2023 (PB)) filed by Sri. Sajimon Joseph against the quarry activities of Sri. Thankachan Mathalikunnel before the Hon`ble NGT – Interim Order dated 28.01.2025 in WP(C) No.39873/2024 filed by Sri. Thankachan M.S
(File No.1068/EC4/2024/SEIAA)

The Authority perused the proposal and noted the decisions taken in various SEIAA/SEAC meetings held on different dates. It was recalled that in the 153rd SEIAA meeting, the Project Proponent was directed to rectify all non-compliances of EC conditions as observed in the field inspection report.

The Authority also noted the interim order dated 10.07.2025 in O.A. No. 93 of 2024 (SZ) and I.A. No. 41 of 2025 (SZ), wherein the Hon`ble NGT observed that it was unclear whether the Stop Memo had been withdrawn or suspended by MoEF&CC in the absence of

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SEAC, Kerala, and directed SEIAA, Kerala, to verify the same and file a report at the earliest. In compliance, the Authority, vide letter dated 26.07.2025, forwarded the Action Taken Report to the Standing Counsel, NGT.

Subsequently, the Standing Counsel, vide e-mail dated 11.08.2025, intimated that the Action Taken Report dated 26.07.2025 had been placed before the Hon`ble NGT on 30.07.2025. The Hon`ble NGT suggested that the Project Proponent approach MoEF&CC in the absence of SEIAA or wait until SEIAA is duly constituted, and further observed that only upon the Project Proponent complying with all EC conditions and the Stop Memo being withdrawn could the stay be vacated.

The Authority further noted the order dated 18.09.2025 in WP(C) No. 32249 of 2025 and the Certified Compliance Report (CCR) from IRO MoEFCC, Bangalore. The Hon`ble High Court, through this order, directed the withdrawal of the Stop Memo if SEIAA was satisfied that the remedial measures had been duly implemented. Upon deliberation of the CCR and the Compliance Report, the Authority found the compliance satisfactory.

In these circumstances, the Authority decided to revoke the Stop Memo issued on 02.11.2024, subject to a strict directive to the Project Proponent to scrupulously comply with all EC conditions. The Authority also resolved that this decision shall be communicated to the Hon`ble High Court in compliance with its directions, and the Legal Officer shall take necessary action in this regard.

Any Other Items for Consideration:

ANNEXURE-2

Place: Koombara, Calicut/Kerala

Date: 11/10/2025

To,

- 1) The Hon'ble Chairman,
State Environmental Impact Assessment Authority (SEIAA), Kerala
4th Floor, KSRTC Bus Terminal, Thampanoor, Thiruvananthapuram
Ph: 0471-2334262, seacseiaakerala@gmail.com.
- 2) The Joint Secretary and IA Monitoring Engineer
MoEF&CC, Delhi.
- 3) Dr. Adiraju Bharathwaj
Scientist.

Sub: Urgent Representation Regarding Revocation of Stop Memo – Quarry Project of Sri. Thankachan M.S., Koodaranhi Village, Kozhikode District. File No 1068/EC4/2024/SEIAA,

Ref: Applicant- Sajimon Joseph

Case: O.A No. 93 of 2024 (SZ) before Hon'ble NGT (SZ).

Respected Sir,

I, the undersigned, the Applicant in the matter currently pending before the Hon'ble National Green Tribunal (NGT), respectfully submit this representation in connection with the recent decision of SEIAA Kerala to revoke the Stop Memo dated 02.11.2024, issued against the quarry project of Sri. Thankachan M.S., located at Sy. No. 2442 (pt), Koodaranhi Village, Kozhikode District. This submission is made with a request for urgent consideration at the upcoming SEIAA meeting, in view of the serious environmental and procedural concerns involved.

1. Background and Context.

It is humbly submitted that SEIAA had issued a Stop Memo after conducting multiple site inspections, which found serious and repeated violations of Environmental Clearance (EC) conditions by the project proponent. These findings were recorded on-site by SEIAA's own expert committee members, and the decision to halt the operations was rooted in grave environmental concerns and violations.

2. NGT Directions Misinterpreted.

The Hon'ble NGT, vide interim order dated 10.07.2025 in O.A. No. 93/2024, had not directed any fresh inspection of the project site. The Hon'ble Tribunal had only sought clarification regarding the status of the Stop Memo and advised that, in the absence of SEIAA, the Project Proponent could approach MoEF&CC or wait for reconstitution of SEIAA.

Hence, the subsequent site visit conducted solely by MoEF&CC and the Project Proponent on 29.04.2025, without prior intimation to or involvement of the Applicant or SEIAA officials, was not in compliance with the principle of natural justice.

3. Violation of Natural Justice.

As the Applicant before the Hon'ble NGT and a directly affected party, I was neither informed nor given an opportunity to participate in the inspection carried out by Mr. Suresh Kumar Adapa, Scientist E, MoEF&CC, along with the Project Proponent. This omission is a serious procedural lapse and violates the principles of natural justice and the right to be heard.

The SEIAA meeting held on 22.02.2025, under Agenda Item No. 153.09, clearly stated that if the Project Proponent fails to comply with the directions within the prescribed time, the Environmental Clearance (EC) will be cancelled without further notice. Despite multiple opportunities given by SEIAA to rectify the violations, the Project Proponent consistently failed to comply, and the deviations were repeatedly observed and rejected. Therefore, the decision to revoke the Stop Memo appears to be incorrect and inconsistent with SEIAA's own findings, especially as it was taken solely based on the questionable and one-sided report submitted by MoEF&CC, without proper verification or the involvement of SEIAA officials and the affected parties and NGT Applicant.

4. Flawed Basis for Revocation of Stop Memo.

The revocation of the Stop Memo, as per the SEIAA's recent decision, item No. 157.32 dated 19/09/2025, appears to be based solely on the site report jointly prepared by the Project Proponent Shri. Thankanchan Mathalikunnel and his team with a single MoEF&CC official, without independent verification or hearing the applicant and SEIAA. This is despite:

- a) Earlier Three joint inspection reports by SEIAA and its expert members clearly identifying serious EC violations, including:
 - i) As per the SEIAA report submitted to the Hon'ble NGT on 17.01.2025, multiple vertical fractures have been observed on the eastern quarry wall, along with inclined fractures dipping in the opposite direction of the slope. These structural instabilities, combined with the heavy overburden dumped at several high-risk locations, pose a serious threat to the life and property of residents living below the site.
 - ii) The improper maintenance of only three benches instead of the required 21 for a quarry wall exceeding 70 meters in height. The authorities' directive, which merely emphasizes the need to correct violations, fails to ensure or verify that these corrective measures were actually implemented before permitting the resumption of operations.
 - iii) The quarry slope is dangerously steep, exceeding, approximately 70 degrees as per CR, whereas the permissible slope as per CR (Compliance Requirements) is only 42 degrees, posing serious safety and stability risks.
 - iv) Illegal dumping of overburden waste exceeding 50 feet in height at multiple locations, along with stagnant gallons of contaminated water and quarry-generated silicon waste, has led to mud and pollutant flow downstream, causing damage to nearby houses, agricultural land, the only local water source, and

increasing the risk of more landslides in the ecologically sensitive area of western ghat.

- v) Encroachment into the designated buffer zones and adjoining forest land, as reported by both the then Calicut DFO and the Village Officer. The SEIAA reports also noted the absence of a clearly demarcated boundary between the quarry site and the reserved vested forest land, raising serious concerns about illegal expansion and environmental damage.
- vi) Obstruction of natural streams with high level of overburden, resulting in contamination of domestic water sources. One stream has been completely blocked at multiple points, while another has been narrowed significantly, forcing natural water flow into a heavily contaminated quarry pit. This pit is dangerously deep, potentially reaching the groundwater table and overflowing the polluted water from the pit. Additionally, the operator is reportedly pumping water at night and carrying out blasting activities, further polluting the only available water sources for local residents.
- vii) Failure to maintain the mandatory 50-meter buffer zone from the public road and adjoining forest area, along with the unauthorized diversion of the existing Panchayat Road, in clear violation of regulatory norms and local access rights.
- viii) Illegal alteration of public records to falsely show the road width as 8 meters instead of the actual 4 meters, including destruction of survey stones along the 1.2 km stretch leading to the quarry site.
- ix) There is a lack of proper dust and noise suppression measures both at the quarry site and along the residential areas through which tipper lorries transport quarry waste and stones. This poses a serious health hazard to local residents and is highly alarming given the scale and frequency of vehicle movement.
- x) These are only a few of the violations among the 48 conditions stipulated by SEIAA. The full extent, gravity, and impact of the violations can only be accurately assessed through a comprehensive site visit.
- xi) The Project Proponent is operating two quarries at the same location, both situated on plantation land held under pattayam and used for rubber cultivation for several decades. As per Government of Kerala Order No. 139/2024 (RD) dated 26.07.2024, quarrying is strictly prohibited in such plantation areas. Furthermore, the Hon'ble High Court has also specifically ordered that pattayam-held plantation land shall not be used for quarrying purposes, making the ongoing operations a clear violation of both government and judicial directives.
- xii) Moreover, it is submitted that five quarries and one crusher unit are currently **operating within a 500-metre radius of the area, effectively forming a quarrying cluster**. It is also noted that the 5th Respondent has already prepared the structure for an additional stone crusher unit. The cumulative environmental impact of these activities poses a significant threat to the region's fragile ecosystem, which is already vulnerable and prone to landslides and other natural disasters. This situation strongly reinforces the urgent need to reassess the environmental clearance process and to seriously consider declaring the area as an Ecologically Sensitive Zone.

5. Concerns Regarding the Certified Compliance Report (CCR).

While SEIAA noted a CCR from IRO, MoEF&CC, Bangalore, it is important to highlight that such a report was not preceded by an inspection involving all stakeholders, especially SEIAA members and affected residents and including the applicant. The credibility of the CCR is therefore questionable, particularly since it contradicts multiple earlier site inspections conducted by SEIAA's own committees and Joint committee of experts in the presence of project proponent without involving me.

It is respectfully submitted that W.P.(C) No. 32249 of 2025, filed by the Project Proponent, was disposed of by the Hon'ble High Court of Kerala. However, it is crucial to note that the Hon'ble NGT remains the primary and appropriate judicial forum for adjudicating environmental matters, as per the National Green Tribunal Act, 2010. The Hon'ble NGT had specifically sought the status of the Stop Memo and had not directed any new site inspection or revocation based solely on the Project Proponent's submissions or reports. Therefore, in the interest of procedural fairness and environmental protection, I humbly request that all relevant irregularities and procedural lapses including the unauthorised inspection conducted on 29.04.2025 without SEIAA or the Applicant's involvement be submitted before the Hon'ble NGT.

Furthermore, permitting the Project Proponent to pursue parallel reliefs before the Hon'ble High Court while the matter is actively pending before the NGT creates a risk of forum shopping and undue advantage. This was precisely cautioned against in the judgment in ***Dragonstone Realty Pvt. Ltd. v. State of Kerala & Ors. [W.P.(C) No. 27000 of 2023]***, where the Hon'ble High Court held that when an environmental dispute is seized by the Hon'ble NGT, the High Court should not ordinarily intervene under Article 226, especially when it may result in conflicting or premature reliefs.

Hence, I respectfully submit that all further decisions, including the validity or revocation of the Stop Memo, be kept within the jurisdiction and consideration of the Hon'ble NGT, and that the Hon'ble SEIAA submit a detailed report of all facts, including the procedural lapses and irregularities, for the NGT's just and proper adjudication.

6. Legal and Environmental Implications.

Reversing a Stop Memo, especially one issued after confirmed site violations, without following due process can:

- a) Undermine the authority and credibility of SEIAA itself;
- b) Set a dangerous precedent of circumventing public participation and stakeholder consultation;
- c) Result in irreparable environmental damage in a sensitive ecological zone as stated in SEIAA's report;

REQUEST

In light of the above, I humbly request the Hon'ble SEIAA to:

1. Re-examine its decision to revoke the Stop Memo issued on 02.11.2024 in light of earlier documented EC violations;
2. A fresh, impartial site inspection should be conducted strictly under the direction of the Hon'ble NGT, with the participation of SEIAA officials, the Applicant, and independent experts and judicial member as appropriate. This is essential because SEIAA is the statutorily authorized authority to assess compliance with Environmental Clearance conditions, and any inspection must follow due process, ensuring transparency, fairness, and adherence to the principles of natural justice.
3. Uphold the principles of natural justice by ensuring fair hearing and transparency before taking a final decision and file a true and fair reports before the honourable Tribunal.
4. Communicate to the Hon'ble Court the complete and accurate facts regarding the site inspection conducted on 29.04.2025, including the serious procedural lapses involved, such as the exclusion of SEIAA officials and the Applicant. It must also be brought to their attention that several environmental violations and irregularities persist on the site, causing ongoing and potentially irreparable damage.
5. Keep the Stop Memo in force until all EC conditions are verified by an independent multi-agency team and due process is completed based on directions of Honorable NGT.

Thank you for your kind attention and action in the interest of environmental justice.

Sincerely,



Sajimon Joseph

Applicant for NGT Case- O.A No. 93 of 2024 (SZ)

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PH-9964605575

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Enclosed:

- 1) Statement of facts submitted to Honorable NGT by the applicant.
- 2) SEIAA Report.
- 3) Copy of Affidavit submitted before the Honorable NGT regarding the site inspection of MoEAF&CC.