

BEFORE THE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

[Through Physical Hearing (With Hybrid Option)]

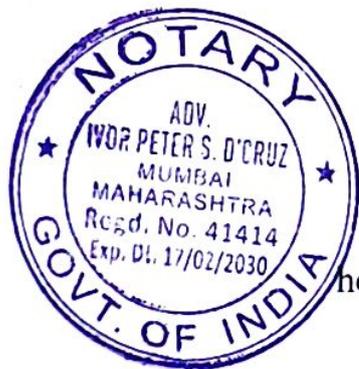
ORIGINAL APPLICATION NO.36 OF 2025 (WZ)

Samita Rajendra Patil ...Applicant

Versus

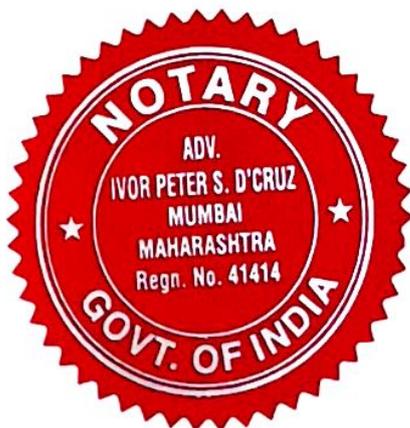
Jindal Steel Works Ltd. & Ors. ...Respondents

**OBJECTIONS CUM SUGGESTIONS OF THE AFFIDAVIT TO
REPORT OF JOINT COMMITTEE**



I, Samita Rajendra Patil, the Applicant hereinabove, do hereby state on solemn affirmation are as under :-

1. I say that I have filed the above said Original Application basically seeking a declaration that the Respondent Nos.1 to 3 cannot dispose off any industrial waste in CRZ – 1 area in view of CRZ Notification. Similarly, while granting the EC on 25.08.2015 to Respondent Nos.1 and 2 the Ministry of Environmental Forest has put conditions whereby development towards creek side as well as the Industrial Waste needs to be stored in the proper manner. The Respondent



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Nos.1 and 2 are manufacturing steel and Industrial Waste is generated on a large scale and the same is dumped on the mangroves behind Prism Johnson Limited Company which is fully occupied grownup mangroves. I say that I have also given the details of the lands to show where the mangroves are destroyed by depositing industrial waste. According to my knowledge there is no lagoon or place earmarked for depositing the industrial waste generating in the manufacturing of the steel and therefore, industrial waste is being disposed of in an unscientific manner. On these and amongst other grounds I have sought the substantive relief of removal of industrial waste from CRZ area and disposal of the same in accordance with law.

2. This Hon'ble Tribunal vide its Order dated 25.04.2025 constituted a committee and directed the said committee to visit the site and conduct inspection and find out whether the industrial waste is dumped.

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3. In pursuance to the same the committee has submitted a report. I have gone through the report. The findings of the Joint Committee Report are as follows :-

- a) *The subject land majorly falls in CRZ – 1, minor portion in CRZ – III area and partly outside situated at CRZ Area (para 6 (vii))*
- b) *The Joint Committee has found the steel slag and murum is dumped on certain portion of the land in CRZ Area. The said dumping in CRZ Area is a prohibited activity and in contravention of the provisions of CRZ Notification 2019. It is recommended that the said dumping should be removed from the site.*
- c) *The committee has referred the 2016 Rules, Guidelines etc. and noted as to how the iron and steel plants shall maximize external use or recycling of slag which cannot be used or recycled internally. Similarly, the committee has also referred a consent to operate and condition No.6 of the same under 'nonhazardous waste' use in the land development, road making, marine structure and the sand. (Para 6 (ix) to 6(xii)).*

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- d) *It is also evident from the report that the Respondent No.3 has purchased 10500 tons of industrial slag from Respondent Nos.1 and 2 in the month of April – May, 2023 but not clearly said as to whether these rules are followed or not by the Respondent Nos.1 and 2 for disposal of industrial waste.*
- e) **Objections and Suggestion :-** The committee has not referred any testing report and clarified that the industrial waste found at the site is hazardous or non-hazardous. Similarly, the committee has not clarified as to whether the industrial slag found at the site is disposed of in a ecofriendly manner. Because, the Respondent Nos.1 to 3 has just spread the industrial waste and not used in the construction of the road. Therefore, it was necessary for the committee to clarify as to how much is the quantity of the industrial waste is used for dumping in CRZ – 1 Area and non CRZ area.
- f) Similarly, the report is also silent as to how it is to be removed and to be dealt with. Similarly, the committee has also not clarified as to how much quantity is found and environment damage is caused & determined its penalty and whom it is to be imposed etc.



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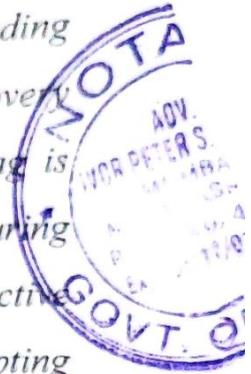
- g) Similarly, the committee has found in para 6 (xv) onwards that the Respondent No.3 is permitted to cut mangroves in 5 Hectares from 13 survey numbers. Whether the corrective measures of rejuvenation of mangroves have taken place or not. The committee has also found destruction of mangroves beyond 5 hectares but details and particulars are not given. How much damage is caused is also not clear. Similarly, it is not clarified as to how much mangroves are required to be rejuvenated at the site and whether it is feasible or not.
- h) The committee have referred disposal procedure laid down in CPCB guidelines at page no.164 of their report. Therefore, it is necessary to direct the authorities to ensure the periodical compliance of the same. The procedure laid down there in "*6.0 Guidelines for management of pyro-metallurgical slags of iron and steel plants. Iron and steel plants shall follow the principles of resource efficiency for optimal use of primary resources in production of iron and steel. The plants shall take steps to facilitate utilization of various wastes, by-products or process rejects including slags. They shall set-up*

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facilities for internal recovery of material, treating the slags to make it utilizable as alternate material outside the plant. Steel plants shall also take adequate safety measures and standard operating procedures shall be practiced in safe handling of iron and steel slags including the quenching, granulation and recovery operations. It shall be ensured that the slag is tapped in the slag pot or pit only after ensuring that slag pot or pit is dry. The flow of reactive slag into ladle is to be avoided by adopting suitable operational practices. After pouring and filling the Ingot moulds/ Bottom plates, foundry ladle shall be tilted with the help of auxiliary hoist of crane and total residual slag/metal shall be dumped into slag pots slowly. The safety guidelines for handling of hot metals issued by Ministry of Steel shall be followed. The following guidance is applicable to all types of iron and steel slags as mentioned in this document according to their characteristics;

6.1 Iron and Steel plants shall use best available options for maximising internal use of slags in process and recovery of resource material from slags.

6.2 The plants shall adopt appropriate cooling/quenching/treatment techniques to



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maximise recovery of resource material from slags. The slag treatment pits if any should have impervious hard surface to avoid contamination of soil and wastewater or surface run-off generated should be either re-cycled or treated prior to discharge. The slag handling in open yards if any should have imperious hard surfaces, and run-off from handling area shall be collected and treated prior to discharge.

6.3 Iron and Steel plants shall adopt environmental friendly practices in collection, handling, storage and transport of slag to avoid water and air pollution.

6.4 Iron and Steel plants shall adopt environmental policy for continuous improvement by adopting cleaner / new techniques. Environment management should be supervised by senior management.

6.5 Un-utilized slag shall be stored in captive storage yard having impermeable base and garland drain to prevent the soil and water / groundwater contamination. The unlined slag handling, storage areas and dumpsites shall be discontinued within 2 years from issuance of these guidelines.

6.6 A new slag storage yard shall be constructed above the ground with impermeable base such as

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compacted clay of minimum 600mm thickness over a single layer of 1.5mm thick geomembrane. Run-off from slag storage area shall be collected and treated prior to discharge.

6.7 All Iron and Steel plants shall monitor grounds water quality around storage area during pre and post monsoon seasons through a recognised laboratory (under the Environment (Protection) Act, 1986 or any NABL Accredited) for assessment of the contamination (if any) and such assessment reports shall be submitted to respective SPCB/PCC annually. The groundwater shall be monitored for parameters namely pH, alkalinity, Calcium, Magnesium, and heavy metals namely Fe, Mn, Al, Cd, Cr, Cu, Ni, Mercury, Pb and any other parameter that may be prescribed by SPCBs/PCCS/CPCB.

6.8 Iron and steel slags from pyro-metallurgical route may be used in following areas subject to meeting the quality requirement/standard for the material /application:

- i. Cement production*
- ii. Aggregate in cement-concrete*
- iii. Cement-concrete blocks / bricks/tiles*
- iv. Aggregate in construction of roads/ railways*

6.9 Iron and Steel plants intending to utilise iron or steel slag for any other purpose, not



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mentioned above may submit the proposal along with relevant details to CPCB through the respective SPCB/PCC.

6.10 Iron and Steel plants shall maximize external use or recycling of slag which cannot be used or recycled internally. Iron and Steel plants shall take steps to achieve 100% regular utilization of iron slag and steel slags for current generation within one year and also fully utilise the legacy iron slag by September 2025 and legacy steel slag by Sep 2027, respectively. Thereafter, the maximum allowable storage of slags at any point of time will not be more than one year's generation for steel slag and 6 months of generation for iron slag

6.11 Industry should submit the annual report on generation, quantity stored, quantity utilized and the concerned usage, and disposal as per format given in Annexure-II or on online waste reporting portal as and when developed by CPCB by 30th June of the following year to SPCB/PCC and CPCB.”

- i) The report refers to Google images produced by MCZMA from 2018 to 2022. However, MCZMA has not referred and supplied the recent Google images from March 2025. I am enclosing

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the copy of the Google image of 2025 above, said OA at page no.

- j) The bare perusal of Google image of 2/2022 .of page174. of above said OA 36 of 2025 and Google image enclosed at page 172,173 for 2/2024 ,2/2025 shows the further destruction of the mangroves.
- k) It is pertinent to note that the report refers only those survey numbers which are referred by me in above said OA for destruction of mangroves. However, the mangroves are destroyed beyond those survey numbers which I have marked but for want knowledge I could not mention those survey numbers in my OA. However I have marked the portion on Google image of 2025 of page no 172 .of my OA. Therefore, committee have aught to have submitted the report of destruction of mangroves on other survey numbers also which is a part of the google image of 2025.
- l) Similarly, the committee has enclosed the google image at page no. 239 at natural pond and creek channel. Those image of 2018 shows the natural mangroves at page no. 238. Whereas, the google image of 2022 at page no. 239 shows that the mangroves near the creek channel and pond are



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completely destroyed, the report is silent about the same.

- m) If the site visit was arranged both to inspect the land where slag was disposed and to assess its impact on mangroves, then why was the committee not fully prepared and why were the necessary instruments not arranged? In such a case, how was the site study conducted? It appears that the assessment was based only on visual observations, with no scientific or technical measurements or evaluations carried out

4. Thus, the committee has found that the steel, slag and murum is illegally dumped within the protected CRZ area. Therefore, the committee has recommended immediate removal of all dumped material as it contravene the CRZ Notification 2019.

5. Therefore, it is necessary to direct the authorities :-

- a) to identify the areas or survey numbers from where the slag is to be removed.

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- b) to assess the total deposit and the loss caused to the environment and penalty to be imposed and from whom it should be recovered;
- c) to direct the mangroves division South Konkan, whether 22220 mangroves are planted or not and what steps are taken for the same;
- d) what steps needs to be taken to rejuvenate the mangroves in the various survey numbers falling in CRZ – I and III (excluding 13 survey numbers comprising 5.03 Hectares where permission was granted to cut the mangroves by removing the industrial waste).
- e) to direct the authorities to place on record as to how and what manner the industrial waste generated during the manufacturing process of steel is to be removed where it is to be taken and how it is to be disposed off in ecofriendly manner and direct the authorities to set up system



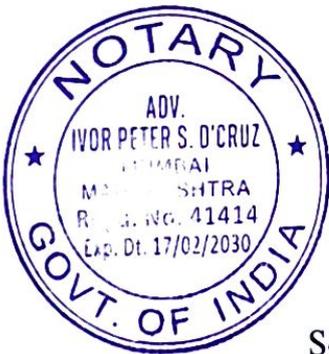
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to monitor its disposal in a ecofriendly manner on a permanent basis.

f) We please to direct the MCZMA and other authorities to keep continuous monitoring of destruction of mangroves, and they should take steps against the erring parties and further the mangroves should be rejuvenated.

6. I crave leave to add any other additional objections and suggestions as and when required.

Whatever stated hereinabove are true and correct facts which I believe to be true for which I sign hereunder.



Solemnly affirmed at Mumbai)

Dated this 16th day of February, 2026)

Patil

SAMITA RAJENDRA PATIL

BEFORE ME Applicant

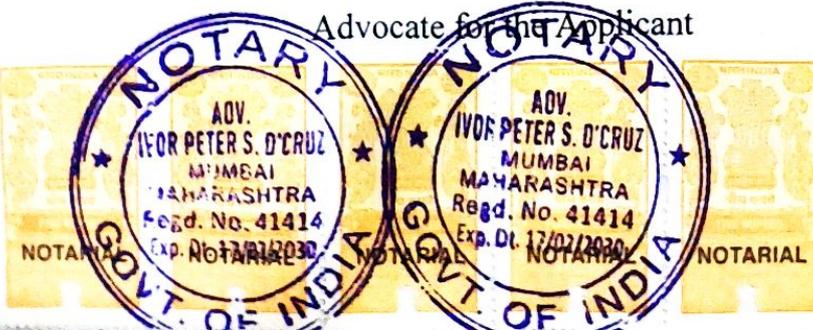
Identified by me,

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16 FEB 2026

Advocate for the Applicant



NOTED & REGISTERED
Sr. No.: 05 of 20 26
Book No.: 01

ORIGINAL SEEN & VERIFIED
AADHAR PAN ELECTION DRIVING LICENCE PASSPORT
No. 4805 6624 8923