

**IN THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 327 OF 2022**

IN THE MATTER OF :

Amaravati Fly Ash Bricks
Manufacturers Association

...Applicants

Versus

Union of India & Ors.

...Respondents

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Drawn and filed by:



Ajit Sharma & Saurabh Rajpal
Amicus Curiae

Place: New Delhi
Dated: 23.04.2025

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PRELIMINARY REPORT OF THE AMICUS CURIAE

1. That the above-mentioned Original Application and connected Original Applications have been filed, *inter-alia*, to assail the following office orders, notifications and to issue the following directions:
 - a. Office Order dt. 22.02.2022 issued by the Ministry of Power, Govt. of India as superseded by Guidelines dt. 15.03.2024;
 - b. Office Order dt. 16.03.2022 issued by Dr. Narla Tata Rao Thermal Power Station, Andhra Pradesh;
 - c. Notification dt. 31.12.2021 as amended on 01.01.2024 issued by MoEF&CC;
 - d. Prohibit thermal power plants (“TPPs”) from storing fly ash in Fly Ash ponds; and
 - e. To direct setting up of fly ash depots in urban areas for consumption by the local brick manufacturing industry.
2. This Hon’ble Tribunal vide order dt. 15.12.2022 framed the following issues for adjudication in the present case:
 - a. Whether notification dated 31.12.2021 issued by MoEF&CC, Respondent no. 5 contemplating utilization/disposal of legacy fly ash during period extending to ten years permitting storage thereof in fly ash dykes/ponds for the above said period is detrimental to environment and violative of the fundamental right to clean and healthy environment forming part of the right to life and liberty under Article 21 of the Constitution of India and the mandates of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention

and Control of Pollution) Act, 1981 and the Environment (Protection) Act, 1986?

- b. Whether the TPPs are liable to pay environmental compensation for air and water pollution caused by legacy fly ash stored by them in the ash dykes/ponds without taking appropriate remedial measures for utilization/disposal thereof?
- c. Whether advisory dated 22.02.2022 issued by MoP and order dated 16.03.2022 issued by Respondent no. 5 are not in consonance with notification dated 31.12.2021 issued by MoEF&CC and are violative of order dated 18.01.2022 passed by this Tribunal in O.A. No. 164/2018 (earlier O.A. No. 276/2013) titled as **Ashwani Kumar Dubey Vs. Union of India and Ors.**?

ISSUE 1

3. Whether MoEF&CC notification dt. 31.12.2021 as amended on 01.01.2024, permitting utilization of legacy fly ash for 10 years, is violative of:
 - (i) Fundamental right to clean and healthy environment guaranteed under Article 21 of the Constitution of India;
 - (ii) The provisions of the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981; and
 - (iii) The provisions of Environment (Protection) Act, 1986?

Genesis of fly ash regulation in India.

4. MoEF's **first notification** w.r.t. use of fly ash was published on **14.09.1999**, in compliance with the order passed by the High Court of Delhi in W.P. (C) No. 2145/1999 (*order dt. 28.07.1999*), which notification directed promotion of use of fly ash in manufacturing of building materials and construction activity within a radius of 300 kms from TPPs. Key features of the 14.09.1999 notification are as follows:
 - a. Within 50Km of TPP, Clay Bricks or Tiles or Block manufactures shall mix 25% of FLY ASH (Fly Ash, Bottom Ash and Pond Ash) with Soil on weight to weight to basis.
 - b. TPP, for the period of atleast 10 years, shall provide Ash without any payment/ consideration, for the purpose of manufacturing ash based products like Cement, Concrete blocks, bricks, panels or any other material etc. for construction activity. [ref. cl. 2(1)]

- c. The Central Government and State Government Agencies, the State Electricity Boards, the National Thermal Power Corporation and the management of the TPPs were directed to facilitate Ash based production units by making available Land, electricity and water for manufacturing activities.
 - d. Ensuring unhindered loading & flyash transport without undue loss of time.
 - e. TPPs to make available fly ash without any payment.
5. In the year 2003, the **MoEF&CC** amended the Fly Ash **Notification dt. 14.09.1999**, with following changes:-
- i. Construction agencies within 50Km of TPPs were bound to use 100% of fly ash brick / blocks/ tiles (with respect to volume) in their Construction Projects by 31.08.2005.
 - ii. **Construction Agencies within radius of 50Km to 100 Km from TPPs were bound to use 100% of Fly Ash Bricks / Blocks/ Tiles (with respect to volume) in their Construction Projects by 31.08.2007.**
 - iii. All clay brick, block or tile manufacturing unit within 100 Km will not be granted lease or renewal of lease in case the manufacturer does not mix a minimum of 25 % of weight to fly ash.
 - iv. TPPs to ensure fair quantity of ash to each user.
6. In 2009, the **MoEF&CC** further amended the notification dated **14.09.1999**, and introduced the following material changes:-
- i. The term “Fly Ash” was defined, as :-

*“The term **fly ash**” means and includes all categories or groups of coal or lignite ash generated at the thermal power plant and collected by Electrostatic Precipitator (ESP) or bag filters or other similar suitable equipments; bottom ash is the ash collected separately at the bottom of the boiler, pond ash is the mixture of ESP Fly ash and bottom ash, but, for the purpose of this notification, the term “fly ash” means and includes all ash generated such as Electrostatic Precipitator (ESP) ash, dry fly ash, bottom ash, pond ash and mound ash as the objective is to utilise all the ashes.”*

- ii. For achieving the ultimate object of conservation of top soil and to minimize environmental pollution, it is necessary to encourage the manufacturing of fly ash bricks or products.
- iii. Categorization of Construction Agencies with respect to distance with TPPs, as provided in 2003 notification, was withdrawn and **all the Construction Agencies, within 100 km of TPPs were made bound to only use “fly ash based products for construction in every construction projects”**.
- iv. The Central Government after assessment came to the conclusion that there is a need for restricting the excavation of top soil for manufacture of bricks and promoting utilization of fly ash produced by coal or lignite based Thermal Power Plants (hereinafter referred to as TPPs), this would result in conservation of top soil and minimize environmental pollution cause due to fly ash.
- v. **First time fly ash based products were categorized, the categorization was done on the basis of use of “Minimum% of Fly Ash with weight”**.
- vi. Two main changes of in the said amendment were (i) Declaration of Minimum 20% Quota of ‘free of charge esp fly ash’ for fly ash brick manufacturers and (ii) free of cost availability of pond ash to fly ash brick manufacturers on the “principle of as is where is basis”.

Note:- Minimum fly ash content for building material or products to qualify as “fly ash based products” category shall be as under:-

Table I

Serial Number	Building Materials or Products	Minimum % of fly ash by weight
(1)	(2)	(3)
1.	Fly ash bricks, blocks, tiles, etc. made with fly ash, lime, gypsum, sand, stone dust etc. (without clay).	50% of total input materials
2.	Paving blocks, paving tiles, checker tiles, mosaic tiles, roofing sheets, pre-cast elements, etc. wherein cement is used as binder.	Usage of PPC (IS-1489: Part-1) or PSC (IS-455) or 15% of OPC (IS-269/8112/12269) content.
3.	Cement.	15% of total raw materials
4.	Clay based building materials such as bricks, blocks, tiles, etc.	25% of total raw materials.
5.	Concrete, mortar and plaster.	Usage of PPC (IS-1489: Part-1) or PSC (IS-455) or 15% of OPC (IS-269/8112/12269) content.

7. In **2016**, another amendment was introduced in the notification of 1999, i.e.:-
- i. Instead of **100 Kms**, as provided under the **Notification dated 2009**, **Construction Agencies within 300 km of the TPPs were made liable to use fly ash bricks and fly ash based products.**
 - ii. TPPs were made bound to upload the detail of stock of each type of ash available with them.
 - iii. The Cost of Transportation of ash for manufacturing of ash based products within a radius of 100km from a coal or lignite based thermal power plant shall be borne by such coal or lignite based Thermal Power Plant and the cost of transportation beyond the radius of 100km and up to 300 km shall be shared equally between the user and the coal or lignite based thermal power plant.
 - iv. Restriction to provide 20% of dry ESP fly ash free of cost shall not apply to TPPs which are able to utilize 100% fly ash in the prescribed manner.
 - v. In order to meet the requirements of fly ash bricks and fly ash based products, TPPswere made bound to assist & support the ash based product manufacturers.
 - vi. State Authorities were made bound to amend their respective building bye laws of the cities having one million population so as to ensure the mandatory use of fly ash bricks.
 - vii. Even Government scheme or programme like MNREGA, Swatch Bharat Abhiyan, Pradhan Mantri Awas Yojana etc. were directed to ensure mandatory use of fly ash bricks or products where built up area is more than 1,000 sqfeet.
8. Vide **office memorandum dated 14.07.2016**, Respondent no. 1, issued a statement and clarified that in the amendment notification in utilization of fly ash issued vide 25.01.2006 those TPPs have been exempted to provide 20% ESP fly ash to fly ash brick manufacturers who have established its own fly ash based products manufacturing units and are able to utilize entire quantity of fly ash generated by them.
9. **Ministry of Power**, Govt. of India, issued an office **order dated 22.09.2021** on the issue of ‘supply of fly ash to the end users by the power plants to increase fly ash utilization. while observing that the demand of fly ash has been increasing year on

year, vide the said office order directed all coal / lignite based power plants to provide fly ash to the end users through bidding process only in the following way:

- i. “It is observed that the demand of fly ash has been increasing year on year basis contributing to increase in the fly ash utilization. fly ash is emerging as a valuable commodity. as the end users of fly ash like cement plants, brick kilns, road and construction agencies etc. are commercial ventures and all their input costs are accounted for, fly ash should invariably be auctioned through a transparent bidding process.
- ii. All Coal / Lignite based power plants are hereby advised to provide fly ash to the end users for all new commitments for supply of fly ash based on the following guidelines:
 - a. The power plants shall provide the fly ash to end users through a transparent bidding process only.
 - b. If after bidding/ auction some quantity of Fly Ash still remains un- utilized, then only, as one of the options, it could be considered to be given free of cost on first come first served basis if the user agency is willing to bear transportation cost.
 - c. If ash remains unutilised even after the steps taken in Paras (a) and (b) above, TPP shall bear the cost of transportation of Fly Ash to be provided free to eligible projects.
 - d. The end users shall be obligated to source the fly ash from the nearest TPPs to reduce the cost of fly ash transportation. If the nearest TPP refuses to do so, the end user project shall approach Ministry of Power for appropriate directions.
 - e. The transportation cost wherever required to be borne as per provisions of MOEF&CC notification by the power plants, shall be discovered on competitive bidding basis only. Thermal Power Plants shall prepare a panel of transportation agencies every year based on competitive bidding for transportation in slabs of 50km which may be used for the period. The TPPs shall call for bids well in advance so, that a transportation panel is in place as soon as the previous panel expires. There should not be gap between the expiry of one panel and the finalization of the fresh panel.

- f. The fly ash will be offered to the end users on the competing demand basis, i.e the end users who offer the highest price for fly ash and seek minimum support for transportation cost will be offered the same fly ash on priority. This will reduce the tariff of electricity and burden on the consumers.
- g. The power plants may offer fly ash subject to their technical restrictions such as all precautions required for Dyke Stability and Safety etc. The power plants having lower ash utilizations shall make all out efforts to increase the fly ash utilization.

10. This notification dt. 14.09.1999 was superseded by a subsequent **notification dt. 31.12.2021** issued u/s 3(1) and 3(2)(v) of the Environment (Protection) Act, 1986 (the “**MoEF 2021 Notification**”). Key features of MoEF 2021 Notification are:

- a. Every TPP *shall* be responsible to ensure utilization of 100% fly ash generated by it in an eco-friendly manner as explained in Clause A of this notification. [Clause A(1)]
- b. A 8 member committee comprising of CPCB, MoEF&CC, Ministry of Power, Ministry of Coal, Ministry of Road Transport & Highways, Dept. of Agricultural Research & Education, Institute of Road Congress, and National Council for Cement & Building Materials was constituted to determine eco-friendly ways of utilisation of fly ash. [Clause A(3)]
- c. Legacy fly ash to be utilized fully within 10 years in the ratio of 20% utilisation within 1st year, 35% utilization in 2nd year, and 50% utilisation within 3-10 years, from 01.04.2022. However, this requirement does not apply where ash pond or dyke has stabilised and reclamation has taken place with greenbelt as certified by pollution control board. [Clause A(5)]
- d. Creation of temporary ash ponds permitted as per specifications laid down by CPCB and Central Electricity Authority. [Clause A(6)]
- e. Provisions were made for utilisation of fly ash, particularly within a distance of 300 kms of the TPP. [Clause B] The Responsibility for eco-friendly utilisation rests with the purchasers or users of fly ash and not TPPs. [Clause C(5)]

- f. Environmental compensation of Rs. 1000/- per ton of unutilised fly ash. [Clause C(1) and C(3)]
- g. CPCB and State PCB were entrusted with the responsibility of enforcing and monitoring. [Clause E(1)]

11. **Ministry of Power**, Govt. of India vide its **Officer Order dated 22.02.2022** issued another Advisory and as such again directed all the Lignite and Coal based Thermal Power Plants to provide ASH to user agencies through TRANSPARENT BIDDING PROCESS only. Accordingly, the Chief Engineer/ O&M, Dr. Narla Tata Rao Thermal Power Station on behalf of Andhra Pradesh Power Generation Corp. Ltd. sent an intimation letter dated 16.03.2022 for sale of fly ash to brick companies.
12. Pertinently, **MoEF&CC** amended its earlier notification dt. 31.12.2021 on **01.01.2024**, which has also been impugned in the connected Original Application No. 661/ 2024.
13. **Ministry of Power**, Govt. of India, on **15.03.2024**, issued impugned “**Guidelines for coal or lignite Thermal Power Plants (TPPs)** to utilize ash by providing it to the user agencies as stipulated in the MoEF&CC Notification dated 31.12.2021 and its subsequent amendments”. The new Guidelines dated 15.03.2024 have introduced limited auction and open auction methods with special provisions that “*while utilizing ash under the notification shall reserve certain percentage of ash for supply to all Micro, Small and Medium Enterprise (MSMEs) engaged in ash –based product manufacturing namely, bricks, blocks, tiles, sintered or cold bonded ash aggregates, fiber cement sheets, pipes, boards, panes for sale at concessional price or through auction in accordance with the ‘Guidelines’ issued by Central Government in the MoP*”.
14. It is well-settled that the right to clean environment is an integral part of fundamental right under Article 21 of the Constitution of India. In support of the above proposition, reliance is placed on the judgment of Hon’ble Supreme Court of India in **Occupational Health and Safety Association Vs. Union of India and Ors.** [(2014) 3 SCC 547, para 10].

15. Furthermore, Section 22 of the Air (Prevention and Control of Pollution) Act, 1981 prohibits discharge of air pollutants in excess of the prescribed standards. Similarly, Sections 16 and 17 r/w Sections 25 & 2(k) of the Water (Prevention and Control of Pollution) Act, 1974 require the CPCB and the State PCBs to prevent and control water pollution. That CPCB has issued several notifications, including notification dt. 14.10.2024 issued under the Air Act, 1981 and Water Act, 1974 directing all State PCBs to, inter-alia, ensure compliance with CPCBs “Guidelines on Design, Construction, O&M and Annual Certification of Coal Ash Ponds, June 2023”.
16. Section 7 of the Environment (Protection) Act, 1986 (the “EPA, 1986”) prohibits any person from discharging environmental pollutants in excess of prescribed standards. MoEF vide notification dt. 14.09.1999 issued u/s 3 & 5 of the EPA, 1986, with respect to legacy waste, in Clause 2(2) and 2(3) directed the disposal of all legacy fly ash within a period of 10 & 15 years for TPPs. Therefore, the MoEF Notification dt. 14.09.1999 itself contemplated that all legacy fly ash would stand utilized at most by 2014. However, despite this unambiguous mandate, legacy fly ash has not been utilized and MoEF’s Notification dt. 14.09.1999 remained unenforced. The issues raised in the present would perhaps not have arisen in large part had the MoEF ensured strict compliance of its notification dt. 14.09.1999.

Adverse effects of fly ash generated by TPPs in India:

17. Several studies have been conducted analysing samples collected from villages located in close proximity of a TPP, which reveal breaches in ash ponds leading to pollution of surface and ground water, which in turns impacts the flora and fauna.¹ In Occupational Health and Safety Association Vs. Union of India and Ors. [(2014) 3 SCC 547, paras 10, 12-14] the apex court accepted a report prepared by NIOH

¹ For example, see Pallavi D Nasare, Mahendra Thakre, “Determination of surface water quality around thermal power plant based on water quality index and physicochemical characteristics” in International Journal of Ecology and Environmental Sciences, Volume 3, Issue 3, 2021, Page No. 181-189 (available at <https://www.ecologyjournal.in/assets/archives/2021/vol3issue3/3-3-46-149.pdf>). Also, see Mrinmay Ghorai etc., “The impact of coal fly ash power station on distribution and biodiversity of freshwater fishes in Rupnarayan River, West Bengal, India” in International Journal of Current Research, Vol. 7, Issue 12, pp. 23954-23961 (available at https://www.researchgate.net/publication/288829039_THE_IMPACT_OF_COAL_FLY_ASH_POWER_STATION_ON_DISTRIBUTION_AND_BIODIVERSITY_OF_FRESHWATER_FISHES_IN_RUPNARAYAN_RIVER_WEST).

mentioning fly ash as one of the causes of increased health risks among workers at TPPs. Thus, the adverse effects of fly ash on people's health, on soil fertility, on contamination of ground and surface water and the environment around TPPs where such fly ash gets deposited is well documented.

JUDICIAL PRECEDENTS:

18. **Aravali Power Co. Pvt. Ltd. Vs. Vedprakash and Ors.** [2022 INSC 547, paras 7, 9 & 12] - Supreme Court of India directed MoEF&CC to not only scrupulously enforce the monitoring, audit and reporting mechanism of the notification dt. 31.12.2021 but to also revisit the said notification to ensure its compliance with the Hazardous and Other Wastes(Management and Transboundary Movement) Rules, 2016. The Court however clarified that its judgment shall not be interpreted to mean that it has upheld the MoEF&CC notification dt. 31.12.2021.
19. **Occupational Health and Safety Association Vs. Union of India and Ors.** [(2014) 3 SCC 547, paras 10, 12-14] – Supreme Court of India accepted the recommendations of a report prepared by National Institute of Occupational Health (NIOH) titled Environment, Health and Safety Issues in Coal Fired Thermal Power Plants of the year 2011 regarding safety of workers working in TPPs. The Report acknowledged that fly ash is a health hazard responsible for morbidities and health risks. The Court directed various High Courts to monitor the status and compliance of the NIOH Report among TPPs situated within their territorial jurisdiction.
20. **Ashwani Kumar Dubey vs. Union of India & Ors.** [O.A. No. 164/ 2018, order dt. 18.01.2022] – this Hon'ble Tribunal accepted the recommendations made by the Joint Committee appointed therein and acknowledged the failures of the TPPs in failing to dispose of fly ash. The Tribunal also held that Ministry of Power's advisory dt. 22.09.2021 is against the MoEF&CC's statutory notification dt. 31.12.2021 and therefore should be kept in abeyance. The Tribunal also acknowledged that MoEF&CC's notification dt. 31.12.2021 extending time limits for disposal of fly ash may appear retrograde at first blush. (*refer to para 19 of the said judgment*)
Pertinently, this judgment was set-aside by the Hon'ble Supreme Court of India in **Singrauli Super Thermal Power Plant vs. Ashwani Kumar Dubey & Ors.** [(2023)

8 SCC 35] on the ground of violation of principles of natural justice and the matter has been remanded to this Hon'ble Tribunal where it continues to be pending as on date.

21. **Tribunal on its own motion - regarding effluent discharge by the Raghunathpur Thermal Power Plant (T-WBHRC) Vs. District Magistrate & Collector Purulia and Ors.** [O.A. No. 104/2021/EZ, order dt. 10.04.2023] – this Hon'ble Tribunal relied upon its judgment passed in Ashwani Kumar Dubey (supra) and directed that further action to prevent pollution by Raghunathpur TPP be taken in terms of the said judgment.
22. **Shankar Dayal Mishra Vs. Ministry of Environment, Forests and Climate Change and Ors.** [O.A. No. 115/2023/EZ, judgment dt. 12.02.2024, paras 8-11 & 14] – this Hon'ble Tribunal directed that NTPC, which operates Kahalgaon Super TPP, is liable to pay environmental compensation for failing to prevent fly ash pollution.
23. **Tamil Nadu Fly Ash Bricks and Block's Manufactures Association Vs. Tamil Nadu Generation & Distribution Corporation Limited and Ors.** [2014 (6) MLJ 275, paras 15-19 & 49] – Madras High Court held that it is the bounden duty of TPPs to have safeguard measures so that fly ash is not let lose in the atmosphere and that the same is collected and removed in a manner, which prevents environmental pollution.
24. **Sipat Super Thermal Power Plant NTPC Ltd. and Ors. Vs. Chhattisgarh State Environment Conservation Board Bilaspur** [CRMP No. 1681/ 2017, order dt. 07.07.2023, paras 2, 3, 7-10 & 12] - High Court of Chhattisgarh refused to quash a criminal complaint filed by Chhattisgarh State Environment Conservation Board against the Sipat Super TPP for failing to comply with MoEF&CC's notifications regarding disposal of fly ash. Court, prima facie, held that the fact that private companies are not coming forward to collect fly ash would not absolve the TPP of its responsibility to dispose fly ash in terms of MoEF&CC's notifications and as such directed for trial to proceed u/s 39 of the Air Act, 1981.

25. Status of Compliance with Order Dt. 20.03.2025 passed by this Hon'ble Tribunal.

S.NO.	COMPLIANCE OF ORDER DATED 20.03.2025 BY RESPONDENTS	STATUS
1.	<p><u>CPCB:</u></p> <p><i>“Vide order dated 20.02.2025 the Central Pollution Control Board was directed to look into the aspects highlighted in the above said order, get the audits carried out in time bound manner and to file response giving detailed information with respect to all the aspects mentioned in the above said order”</i></p>	Not filed
2.	<p><u>MoEF&CC:</u></p> <p><i>“10. This Tribunal observed in order dated 20.02.2025 that in Office Order dated 22.03.2022 and 15.03.2024, the Ministry of Power has recognized fly ash/legacy fly ash as valuable commodity and directed the Ministry of Power and MoEF & CC to file additional responses clarifying as to (i) whether fly ash/legacy fly ash has any adverse impact on environment or not (ii) whether fly ash/legacy fly ash constitutes environmental pollutant or not and (iii) whether any prolonged storage of fly ash/legacy fly ash involves any violation of the provisions of the Environment (Protection) Act, 1986 and Rules framed and Notifications issued under the same.</i></p> <p><i>11. The Ministry of Power has not filed any response and learned Additional Solicitor General appearing for the Ministry of Power has submitted that response in this regard may be sought from MoEF & CC.</i></p> <p><i>12. It may be added here that in the table given in reply dated 14.01.2025 filed by Ministry of Power, the relevant aspects mentioned in row-g and h at page no. 1359 of the paper book were also left to be replied to by MoEF & CC.</i></p> <p><i>13. MoEF & CC has not filed its response with respect to all the</i></p>	Not filed

	<p><i>aspects highlighted in order dated 15.12.2022 reiterated in order dated 16.12.2024 and also the aspects mentioned in order dated 20.02.2025.</i></p> <p><i>14. Learned Counsel for MoEF & CC seeks some more time to file its response.</i></p> <p><i>15. MoEF & CC is directed to file its response in compliance with above mentioned orders at least one week before the next date of hearing fixed.”</i></p>	
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26. It is clear from such studies that there have been several recorded instances in India where fly ash has caused considerable damage to local environment and the people's right to live in a clean and healthy environment guaranteed by Article 21 of the Constitution of India. As such, it prima facie appears that non-disposal of legacy waste generated several years ago, and the pollution caused due to storage of legacy waste, has resulted in violation of fundamental right to clean and healthy environment guaranteed by Article 21 of the Constitution of India.

27. Similarly, the fact, the legacy waste still subsists at TPPs as on date despite the mandate of MoEF's earlier Notification dt. 14.09.1999 issued u/s 3 & 5 of the EPA, 1986 directing complete utilisation of fly ash by 2014, is in itself an admission of breach of Section 7 of the EPA, 1986. As such, it prima facie appears that non-disposal of legacy waste is a violation of Section 7 of the EPA, 1986 for the reasons explained above.

28. That the above-mentioned preliminary report is therefore being filed to assist this Hon'ble Tribunal and that a final report, along with recommendations and best practices followed in other countries for fly ash management and disposal, would be filed in due course.



Drawn and filed by:

Ajit Sharma & Saurabh Rajpal
Amicus Curiae

Place: New Delhi
Dated: 23.04.2025