

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ADDITIONAL AFFIDAVIT
IN
ORIGINAL APPLICATION No. 327 OF 2022**

IN THE MATTER OF: -

AMARAVATI FLY ASH BRICKS MANUFACTURERS ASSOCIATION

...APPLICANTS

VERSUS

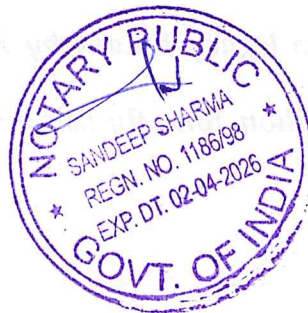
UNION OF INDIA & ORS

.....RESPONDENTS

**REPLY BY WAY OF ADDITIONAL AFFIDAVIT FILED ON BEHALF OF
RESPONDENT NO. 4 (MINISTRY OF POWER)**

I, Suresh Kumar Kadela, S/o P. R. Kadela, aged about 30 years, working as Assistant Director, in the office of Central Electricity Authority, Ministry of Power, , located at Sewa Bhawan, R. K. Puram, New Delhi-110066, do hereby solemnly affirm and state as follows:

2. That I am the officer in charge appointed on behalf of the answering Respondent in the instant Original Application and as such I am well conversant with the facts and thus competent to swear this affidavit.



सुरेश कुमार कडेल
SURESH KUMAR KADELA
सहायक निदेशक/Asstt. Director
केन्द्रीय विद्युत प्राधिकरण/C.E.A.
विद्युत मंत्रालय/Ministry of Power
भारत सरकार/Govt. of India
नई दिल्ली/New Delhi-65

3. That I have read and understood the contents of the accompanying Application and other documents. That the content of the present Additional Affidavit are true and correct to the best of my knowledge. That the averments made therein are true and correct to my knowledge.

4. That the annexures are true copies to their respective originals.

5. That the present additional affidavit has been filed pursuant to Order dated 31.01.2025 of this Hon'ble Tribunal in the present matter. It is submitted that this Hon'ble Tribunal vide Order dated 31.01.2025 was pleased to order the following:

"XXX

6. *We have gone through annexure-1. In row-d at page no. 1359 of the paper book quantum of fly ash generated (in million tons) during the period from 01.01.2022 to 31.12.2022 is mentioned as 284.44 and in row-e at page no. 1359 of the paper book quantum of fly ash in million tons utilized/disposed of during the period from 01.01.2022 to 31.12.2022 with mode of utilization/disposal is mentioned to be 213.14 resulting in addition to legacy fly ash by 71.30 million tons. Out of 213.44 million tons fly ash disposed of, 5.73 million*



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tons is mentioned in row-e (x) to have been disposed of by other modes of utilization. In row-f at page no. 1359 of the paper book, quantum of legacy fly Ash (in million tons) stored in Ash dykes/ponds upto 31.12.2022 is stated to be 256.13. In row-i at page no. 1360 of the paper book quantum of legacy fly ash (in million tons) utilized/disposed out of legacy fly ash stored in ash dykes/ponds of during the period from 01.01.2022 to 31.12.2022 with mode utilization/disposal is mentioned to be 106.99 out of which in row-i (x) 53.14 million tons fly ash is mentioned to have been disposed of by other modes of utilization. The reply filed by respondent no. 4 does not mention what are the other modes of utilization by which the fly ash/legacy fly ash has been disposed of.

7. *Additional reply be filed by respondent no. 4 at least one day before the next date of hearing fixed clarifying what are the other modes of utilization by which fly ash/legacy fly ash has been disposed of.*

XXX"

6. That in pursuant to Order dated 31.01.2025 of this Hon'ble Tribunal



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 केन्द्रीय विद्युत प्राधिकरण/C.E.A.
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in the present matter, the information sought submitted for the kind perusal:

- 6.1 The detailed break-up of the 5.73 Million Tonnes of Ash Utilization by **Other Modes of Ash Utilisation** is as follows:

<i>Description</i>	<i>Quantity</i>
Other Modes of Ash Utilisation	5.73 Million Tonnes
Break-up as follows	
In Ash and Geopolymer based construction material	0.12 Million Tonnes.
Manufacturing of sintered or cold bonded ash aggregates	2.36 Million Tonnes.
Use in over burden dumps	0.25 Million Tonnes
Construction of shore line protection structures in coastal districts	0.06 Million Tonnes.
Export of ash to other countries	2.93 Million Tonnes

- 6.2 The detailed break-up of the 53.14 Million Tonnes of Ash Utilization by **Other Modes of Legacy Ash Utilisation** is as follows:

<i>Description</i>	<i>Quantity</i>
Other Modes of Legacy Ash Utilisation	53.14 Million Tonnes
Break-up as follows	
In Ash and Geopolymer based construction material	1.36 Million Tonnes.
Manufacturing of sintered or cold bonded ash aggregates	1.36 Million Tonnes
Use in over burden dumps	1.50 Million Tonnes
Construction of shore line protection structures in coastal districts	1.45 Million Tonnes
Export of ash to other countries	1.65 Million Tonnes



Suresh Kumar Kadel

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सहायक निदेशक/Asstt. Director
केन्द्रीय विद्युत प्राधिकरण/C.E.A.
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Legacy ash utilization through stabilization (Green belt, Solar, Wind)	45.83 Million Tonnes
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7. That the present additional counter affidavit is being filed *bonafide* and in the interest of justice to apprise this Hon'ble Tribunal about the subsequent developments in the present matter.

8. In the circumstances, it is therefore most respectfully requested that this Hon'ble Tribunal may graciously be pleased to pass an order taking on record the aforesaid additional facts and documents and pass any other order as this Hon'ble Tribunal may deem fit and necessary, in the interest of justice and good faith.

Solemnly affirmed at New Delhi
on this 19th Day of Feb, 2025



Deponent
SURESH KUMAR KADELA
सहायक निदेशक/Asstt. Director
केन्द्रीय विद्युत प्राधिकरण/C.E.A.
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BEFORE ME

SANDEEP SHARMA
Advocate & Notary
Reg. No. 1186/98/Govt. of India
505, New Lawyer's Chamber Block
Patiala House Court Complex,
New Delhi-110001

19 FEB 2025

VERIFICATION

I, Suresh Kumar Kadela, above named deponent do hereby verify that the contents of the aforesaid additional counter affidavit are true and correct to my knowledge and belief and nothing material has been concealed therefrom. Verified at New Delhi on this 19th day of February, 2025.

DEPONENT

सुरेश कुमार कडेली
SURESH KUMAR KADELA
राहायक निदेशक/Asstt. Director
केन्द्रीय विद्युत प्राधिकरण/C.E.A.
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