



BEFORE THE NATIONAL GREEN TRIBUNAL

WESTERN BENCH, PUNE

OA 70 OF 2021(WZ)

**IN THE MATTER OF:**

BRACKISH WATER RESEARCH CENTRE ..APPLICANT

VERSUS

GUJARAT POLLUTION CONTROL BOARD AND ORS ..RESPONDENTS

NDOH: 05.01.2022

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Place: Pune

Date:04.01.2022

Filed By

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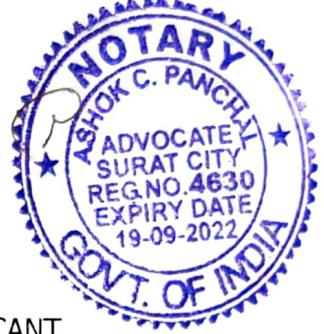
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REJOINDER AFFIDAVIT ON BEHALF OF THE APPLICANT TO THE REPLY OF RESPONDENT NO. 8-HINDALCO INDUSTRIES LTD.(UNIT-BIRLA COPPER)

I, MSH Sheikh, Aged about 47 years, S/o Hajimiyan Shaikh R/o Kasba Mohalla Mougul Street AT-Po-Ta OLPAD 394540 Dist Surat, Gujarat do hereby solemnly affirm and state as under: -

1. That I am the Applicant in the above-mentioned matter and as such am competent to depose the present rejoinder affidavit.
2. That the contents of the reply filed by the R-8 is denied in entirety except where it is specifically admitted.

PARAWISE REJOINDER

1. That the contents of para 1 are denied for want of knowledge the and R-8 is put to strict proof of the same.
2. That the contents of para 2 are vehemently denied as wrong and false. The applicant has placed on record all the documents

*MSH Sheikh*

sourced under RTI and based on actual site visit to the surrounding areas. The picture of violation of environmental laws and acts is evident from the material on record and it continued unabated as such.

#### REJOINDER TO THE PRELIMINARY OBJECTIONS

3. That the contents of para 2 are vehemently denied as wrong and false. The applicant has placed on record all the documents, sourced and there is no suppression of any fact. On the contrary the reply filed by the R-8 is actually an admission of all the violations pointed out by R-1/GPCB, so in view of the admission of the environmental violations, the R-8 is liable for restitution and restoration activities and for payment of environment compensation that ought to be computed by GPCB.
4. That the contents of para 2 are vehemently denied as wrong and false. The applicant has diligently placed on record all the documents, available and provided by the regulatory authorities. The present OA is an outcome of investigation and inquiry and after flagging the issues to R-1/GPCB, R-2, R-6, R-7/MoEF&CC. All the contentions raised in the para are replied in a consolidated manner. There are no remediation measures undertaken and the averments made in the reply is a smokescreen. Over a period of time there is non-compliance of EC conditions and CCA. Some of the violations highlighted by the applicant and evidenced from the inspections reports of R-1/GPCB and R-6/CPCB relate to dumping of copper slag in Dahej reserved Forest, leachate wastewater



accumulation in Dahej reserved forest, heavy fugitive emissions in duct line of Smelter plant 3 due to leakages in duct line, ESP attached to Smelter Plant-3 non-operational, seepage of acidic greenish coloured water in SAP-1 plant and its accumulation in Kaccha drain/storm water drain, parameters of PM and SO<sub>2</sub> not reflected in OCEMS of stacks of Smelter Plant-3, indiscriminate dumping of Phosphogypsum and copper slag in and around the unit, dumping of heavy metals bearing toxic hazardous waste without encapsulation in captive TSDF site and in open, untreated water from Copper Slag storage area flowing into CRZ-1A area, persistent fugitive emissions at the plant, dumping of Arsenic bearing sludge in captive TSDF site without encapsulation, non-provision of leachate collection system for captive TSDF SLF Cell No.7, groundwater contamination, leachate water from captive TSDF site travelling out of the unit premises into the Gulf of Khambat, release of Sulphur oxides (SO<sub>x</sub>) and Sulphur dioxide (SO<sub>2</sub>) from the manufacture of Sulphuric acid from the Sulphuric acid plant (SAP) due to inefficient scrubbing system and improper functioning of APCM (air pollution control monitoring devices) causing eye irritation amongst the residents of the nearby villages, Sulphuric acid parameters of 25 mg/ Nm<sup>3</sup> (normal cubic meter) not being met on account of non-functional acid mist eliminator, high Hydrogen fluoride (HF) emissions from Phosphoric Plant etc. At different point in time R-1/GPCB, has conducted inspection and flagged the violations and can be seen from a series of Inspection reports from 2018 onwards until 2021, that violations have continued. Additionally, R-1/GPCB has not



undertaken steps to stop the continued violations. The undertaking of certain piecemeal measures does not absolve R-8 of the violations of the past and its effect upon the environment, which has neither been assessed by R-1/GPCB. The R-1/GPCB has been a mute spectator to the continued violations by R-8. The averment of answering respondent as to the shutdown of DAP and PAP plant being voluntary is a hogwash, as it is outcome of the various inspection reports of R-1/GPCB and notice of Direction issued by R-1/GPCB. As per averments made in the present reply and reply given to R-1/GPCB pursuant to the inspections conducted, the closure is temporary. It is vehemently denied that the applicant has averred that the PAP and DAP plant are operational, the factum of their closure is mentioned in Inspection report (IR) dated 13/02/2020. The inspection report of March 2021, also mentions that DAP and PAP Plant is closed, so applicant is only relying upon the documents of the R-1/GPCB. In the IR dated 13.02.2020 it is mentioned that DAP and PAP plants are not operation but "in PAP plant reactor 3 acidic fumes are observed liberating from the top of the reactor and heavy dusting of rock phosphate". After the temporary closure of DAP and PAP plant, there was a complaint made by Lakhigram Gram Panchayat of air, water, noise pollution on account of copper smelter plant. The DAP and PAP plant are major contributors to the air pollution in the area, though air pollution continued unabatedly and the same is evident from notice of direction dated 06.11.2021 issued by R-1/GPCB, pursuant to the Inspection conducted. The factum of DAP and PAP plant not being operational has no bearing on



issue of disposal of phosphogypsum which has been dumped discriminately in the plant area and the same is evidenced from the observations of R-1/GPCB. The dumping of copper slag is not a "historical issue", as it continues unabated and the same is evident from IR of R-1/GPCB, representation of applicant made in 2021 showing pictures of copper slag dumped in creek area, CRZ IA area near the plant. The averment of R-8 that copper slag is a "historical issue" (though not admitting) is an acceptance of its dumping and its impact on the environment and coastal area has to be assessed. The picture of SLF shown is misleading as this is just one of SLF cells, there are 8 in numbers. The question is of dumping of Hazardous waste in SLF for which CTE has not been obtained and the same is evident from the inspection report of R-1/GPCB. The applicant has not "cherry picked and highlighted certain observations from inspection reports", these are the averments made by regulatory authority i.e. R-1/GPCB. In the Inspection reports of R-1/GPCB, the reply of R-8, is also mentioned and against that whether there is compliance or non-compliance of directions is made by R-1/GPCB, so where is the question of cherry picking observations.

5. That the contents of para under reply are denied as wrong and false. It is a common practice in environmental matters for the project proponent to undermine the applicant who has highlighted the environmental violations. The guidelines of Delhi High Court is not relevant. The applicant is an organization working on the environmental and coastal conservation, ecology,



fisheries and livelihood of marginalized fishermen in South Gujarat since 2003 and is headed by its President, Shri M.S.H. Sheikh who is a whistle-blower, environmentalist and have 20 yrs experience of pollution abatement with studying more than 250 EIA report and having requisite qualifications. (B.Sc Chemistry.)

6. That the contents of para under reply are denied as wrong and false. The averments as regards to violations as regards to Dahej reserved forest in 2009-2011 was to show a historicity of past actions and events. It is obvious that those violations still continue unabatedly.
7. That the contents of para under reply are denied as wrong and false. The cause of action is based upon the material on record and not just IT dated 13.06.2018, 24.01.2020 as stated by answering respondent. The prayer (a) seeking quashing of CCA dated 30.05.2020 is not barred by limitation as per order dated 23.09.2021 passed by Hon'ble Supreme Court in SMW (C ) 3/2020 In Re Cognizance for Extension of Limitation.

#### REJOINDER TO PRELIMINARY SUBMISSIONS

8. That the contents of the para under reply is descriptive to the categorisation of industries in the country and need no reply.
9. That the contents of para under reply are denied as wrong and false. What is required is an independent third-party audit by a

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technical committee to undertaking a complete performance assessment for adequacy of Environmental Management System of the entire copper smelter complex and a cumulative assessment of all the plants and activities. It is submitted that the Copper Smelter complex needs a major overhaul and the old plants need to be dismantled and cleaner technologies are required, the piecemeal measures that the R-8 is attempting will not result in any substantial outcomes as far as water, air, coastal and land pollution is concerned. The scale of operation and the revenue generated as outlined in para 15 of reply, all the more puts on the industrial unit, the responsibility to conduct its industrial operations in an environmentally sustainable manner, which is not the case presently. The large scale of the operation cannot be a ground for polluting the environment.

10-15 That the contents of para under reply are denied as wrong and false. The benign nature of averments in the para under reply does not take away the fact that there is continuous violation of environmental statute. The facts as to revenue, employment generation are irrelevant to the issues under adjudication. The green belt and its existence have to be assessed and checked by R-1/GPCB.

16-17. That the contents of para under reply are denied for want of knowledge. The facts as to assistance rendered during covid times are irrelevant to the issues under adjudication as the

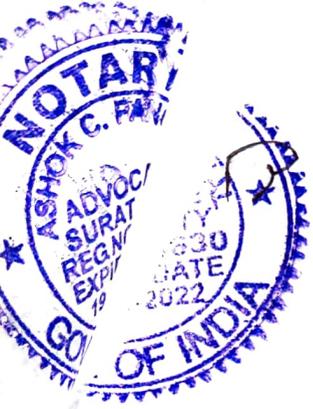


same doesn't absolve R-8 of following the conditions specified under CCA and EC.

18-20 That the contents of para under reply are denied for want of knowledge. The facts as its CSR activities are irrelevant to the issues under adjudication as the same doesn't absolve R-8 of following the conditions specified under CCA and EC. Further, CSR is also statutorily mandated by law.

21-27 That in reply to the contents of the para under reply, the R-8 is put to strict proof of the same, its existence and efficacy needs to be certified. There is an urgent need for an independent third-party audit by a technical committee to undertaking a complete performance assessment for adequacy of Environmental Management System of the entire copper smelter complex and a cumulative assessment of all the plants and activities. It is submitted that the Copper Smelter complex needs a major overhaul and the old plants need to be dismantled and cleaner technologies are required, the piecemeal measures that the R-8 is attempting will not result in any substantial outcomes as far as water, air, coastal and land pollution is concerned. These piecemeal measures if they exist (not admitted), are firstly not an outcome of benign thinking on part of R-8, but the continuous directions and show cause notice and 'observations' of violations of CCA conditions by R-1/GPCB. There are no historical emissions as air pollution continues unabated and the same is evident from notice of directions dated 06.11.2021. The present reply is an

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attempt by R-8 to sweep all the "historical" violations under the carpet, without explaining what is meant by "historical". There is an admission of the violations in the reply of R-8, so there is a need to assess and impose environmental compensation by R-1/GPCB, which has been ineffective in the present case to stop the continued environmental violations. There is a need for constitution by this Hon'ble Tribunal of an expert Technical committee to undertake an assessment of the entire copper smelter complex. The R-8 given its scale of operation and revenue generated is in a position to undertake a major environmental overhaul of the complex smelter complex and not just some "modification" in PAP and DAP plant. The averment as to reducing its dependency on captive power plant and sourcing requirement for electricity from Renewable sources, is misleading and an eye wash as sourcing of Renewable energy /electricity is mandated as per Renewable Power Obligation (RPO) for captive power producer (CPP) under such as R-8 being an obligated entity under Electricity Act, 2003. RPO is enforced on three categories of consumers—(a) Distribution Licensees; (b) Open Access Consumers; and (c) Captive Consumers. Obligated entity is defined as entity mandated under clause (e) of subsection (1) of section 86 of the Act to fulfil the RPO. Obligated Entity: An Obligated Entity (OE) is defined as an entity that falls under the obligation to meet the Renewable Purchase Order. The following three entities fall under this category: – Captive Power Producer (CPP): Any person who owns a grid-connected Captive Generating Plant based on conventional fossil fuel with installed

*emba*





On the question of waste management, no plan has been made and submitted to Authorities or produced here. There is no data is given when where and how much quantity of copper slag and Phosphogypsum is used inside plant /disposed as the same is being disposed of illegally outside plant in RF and in Coastal areas. There is no document showing the slag analysis as to whether there are any heavy metals, acid etc. as the same impact the environment. On the question of disposal of Phosphogypsum, the same is in violation of Guidelines for Management, Handling, Utilisation and Disposal of Phosphogypsum Generated from Phosphoric Acid Plants (October, 2014) issued by Central Pollution Control Board. The relevant portion of the guidelines are extracted for reference:

*"6 Environmental impacts associated with phosphogypsum dumping yards Phosphogypsum (fresh & untreated) is acidic in nature due to the residual phosphoric acid, sulphuric acid and hydrofluoric acid within the porous structure. The acidic nature of fresh phosphogypsum may keep trace elements dissolved from the phosphate rock in a potentially mobile state (i.e leachable form) and the impurities include fluorides, sulphates, residual acids, organics, trace metals as well as naturally occurring radionuclides.*

*The environmental concerns associated with phosphogypsum stacks include fluoride uptake, ground and surface water pollution if located nearby. Main vectors for their transport into the*

*ashok*



environment are wind and water erosion, infiltration, leaching into surface and ground water and airborne emissions of gaseous and radioactive elements. Fine particles of phosphogypsum may be picked up and transported by the prevailing wind and vehicular traffic on stacks into adjacent areas. Dust particles containing fluoride is a concern for operational and non-operational stacks. Elevated levels of fluoride have been found in soil or vegetation adjacent to the phosphogypsum stacks. Disposal of phosphogypsum on land may pose seepage problems beneath the repositories or the process water holding ponds if not lined or controlled properly. Fluoride contaminant present in phosphogypsum may attack silicate minerals and dissolve them, which can be seen by the following equation:

$$H_2O + HF + MAiSiO_2 \rightarrow \square M^+ + AlF_3 + SiF_4 + nH_2O$$
 Where,  $MAiSiO_2$  represents an aluminosilicate mineral  $M$  represents  $Ca$ ,  $Mg$ ,  $Na$ ,  $K$ , and  $Fe$  Some of the  $SiF_4$  may hydrolyse to form  $H_2SiF_6$  (fluorosilicic acid) within the phosphogypsum leachate. The presence of  $H_2SiF_6$  may result in dissolution of clayey soils at the bottom of phosphogypsum repositories, which may allow accelerated movement of contaminants into the groundwater in due course of time if phosphogypsum is not contained properly. Water erosion of phosphogypsum stacks may create solution cavities and instabilities in constructed berms and dikes, leading to surface runoff of phosphogypsum, erosion around piping systems and gully erosion. Slopes of phosphogypsum stacks may become more susceptible to failure and erosion with heavy rain fall. The run-off from phosphogypsum may result acidic condition

*li hda*



in receiving water ponds such a water and ponds may cause fish mortality

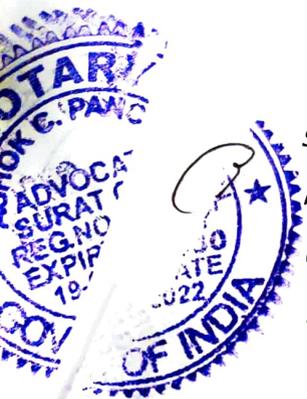
Typical trend analysis of the characteristics of the groundwater in and around the Phosphoric acid plant is given in Table 8 & Table 9. Prior to preparation of these guidelines, Central Pollution Control Board (CPCB) conducted visit to 07 no. of phosphoric acid plants and phosphogypsum samples were collected and the analysis results of the samples are given in Table 10.

7 Guidelines for transportation, storage, management, handling, utilisation and disposal of phosphogypsum

7.1 Applicability of the guidelines: These guidelines are applicable (a) To the existing generators of phosphogypsum or phosphoric acid plants; any construction of new phosphogypsum stack; Operation or closure or proposed for closure of phosphogypsum stack (s); lateral expansion of the existing phosphogypsum stack (s); and any expansion in the phosphoric acid production. (b) For Transportation, temporary storage ( intermediate storage, and at rail yard loading points) and handling of phosphogypsum at yards and/ or phosphogypsum stacks. (c) Utilisation of the phosphogypsum such as cement industry, road construction activity, plaster board manufacturing industry and for soil conditioning in agriculture

7.2 Approvals required, site selection, location criteria, construction, operation and maintenance of phosphogypsum

*emc*



stack (for both dry and wet stacks) General guidelines with respect to the approvals required, site selection, location criteria, construction, operation and maintenance of the phosphogypsum stacks are given in subsequent paras.

7.2.1 Requirement of approvals for new phosphogypsum stacks including expansion of old stacks (i) Phosphoric acid plants proposing to construct new or additional phosphogypsum stack (s) shall obtain necessary amendment in Consents under Water (Prevention and Control of Pollution) Act, 1974 & Air (Prevention and Control of Pollution) Act, 1981 from the concerned State Pollution Control Board (SPCB) or Pollution Control Committee (PCC) as well as shall obtain necessary approvals as required prior to the construction. (ii) The phosphogypsum stack system, henceforth, shall not be constructed, operated, expanded, modified or closed without prior approval from the State Regulatory Authorities i.e SPCB/PCC as the case may be.

(iii) The Phosphoric acid manufacturing unit shall submit the following details along with the Consent application such as (a) the details with regard to the ownership of the land where phosphogypsum stack is proposed to be constructed in accordance with these guidelines; (b) details of temporary storage area for storage of phosphogypsum if any; (c) design drawings of the proposed phosphogypsum stack; (d) details of transportation (within the phosphoric acid plant as well as to any end user of phosphogypsum); (e) construction and completion







including the lateral expansion of the existing phosphogypsum stack (s) shall be designed at least for a period of 05 years. (ii) As far as possible, the phosphogypsum stack should be constructed above the ground level and over the natural clayey strata (also blended with bentonite) to eliminate any seepage. For preparing or levelling the bottom layer of the phosphogypsum stack, in case of absence of sufficient quantity of native or local soil/clay, completely stabilised phosphogypsum may be used henceforth with the prior approval from CPCB. For this purpose, a proposal is required to be submitted through concerned SPCB/PCC with their views and recommendations to the Central Pollution Control Board (CPCB) seeking further approval. (iii) The side slopes of the stacks shall be maintained suitably from the stability point of the stack. (v) Any new phosphogypsum stack should have impervious liner system possessing adequate physical, chemical and mechanical properties to prevent failure due to physical contact with phosphogypsum or process wastewater or leachate, local climatic conditions, hydrostatic uplift pressure and the stresses which may arise due to stacking of phosphogypsum. (vi) Phosphogypsum stack base liner shall have a single composite liner comprising of a HDPE geomembrane of minimum thickness of 1.5 mm over a compacted clay or compacted amended soil layer of thickness 60 cm or mixture of native soil with bentonite or any other material of sufficient thickness and having or conforming to the coefficient of permeability of  $10^{-7}$  cm per second ( $10^{-9}$  m/sec) or less. Further, a layer of mechanically compacted & neutralized

*ambly*



phosphogypsum of suitable thickness may be placed above the drainage layer, with a maximum coefficient of permeability of  $1 \times 10^{-4}$  cm per second ( $10^{-6}$  m /sec) serving as the second part of the required composite liner system. (vii) Emphasis on protection of the geomembrane during placement and compaction of the phosphogypsum, and on prompt placement of phosphogypsum on the geomembrane shall be 19 given to avoid failure of the geomembrane while operating the phosphogypsum stack. (viii) All the joints of the geomembrane liner prior to commencement of the phosphogypsum stacking shall be tested for leakages if any (as per ASTM D 6392/ASTM D 5820/ASTM D 5641 or any ASTM standard protocol as applicable) and measures should be taken for proper welding of such joints, if required. Leachate collection, process wastewater, surface runoff collection and surge pond should have the following provision. (ix) The under-drain system comprising of perimeter piping system, lateral drains of suitable diameter, perforated and corrugated HDPE pipe shall be laid in a bed of non-reactive gravel, placed approximately at suitable interval. The collected leachate should be diverted to surge pond, from where it is returned to the process plant for re-use and excess flow if any be pumped to the effluent treatment plant, if required. (x) A HDPE lined peripheral ditch or garland dike (with passage at suitable intervals) need to be constructed surrounding the phosphogypsum stack so as to retain and collect runoff as well as collection of lateral seepage at the toe of the outer dike or embankment. (xi) Excess wastewater in the recirculation system between the phosphoric acid plant and the

Signature



*phosphogypsum stack shall be routed to Effluent Treatment Plant (ETP), if required for further treatment to comply with the liquid effluent discharge norms stipulated under the Environment (Protection) Act, 1986 prior to final discharge or disposal. A typical phosphogypsum stack showing the design details is given in Figure 15 to 16."*

There is no approved plan as stipulated in the guidelines and none has been enforced by R-1/GPCB and shows the laxity of regulatory authority, even though there are repeated violations as regards to storage, handling of Phosphogypsum. There is no record of the quantity of copper slag generated or its analysis, there is indiscriminate dumping within the plant and in the nearby Dahej reserved Forest and the same is evident in the IR of 2021.

28- 34. That the contents of para under reply are vehemently denied as wrong and false. It is stated by R-8 that it is producing 1 Lakh mt/month of Sulphuric Acid though the permitted quantity of spent acid being Hazardous waste as per CCA (2020) is 66,960 tones per annum, so the production of Sulphuric Acid is exceeding the approved quantities, R-8 is illegally disposing off the additional quantities of Sulphuric Acid in the coastal areas around the Plant. R-8 has not placed on record data as regards to details of end users/industry using the Sulphuric Acid. R-8 should place on record records for last 2 years of Sulphuric acid generation and its legitimate use by other industry as spent Sulphuric acid being categorized as hazardous waste requires prior permission from R-

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1/ GPCB for sale and also its transportation in the form of manifest. The averment as to reduction of the Phosphogypsum, has to be assessed and bald assertions cannot be relied upon. The averment as to clearing the Phosphogypsum in next 12-16 months, underlines the fact that huge quantity exists so operation of PAP and DAP has nothing to do with its storage, handling and disposal. So just dumping of Phosphogypsum waste in the surrounding soil again in 2021 without an analysis would cause pollution by its acidic leachate. Thus, the haphazard mixing with soil and dumping may harm the local environment in future.

35-43 That the contents of para under reply are denied as wrong and false. The documents on record prove that there is dumping of wastewater and copper slag and the same is evident from the inspection report. The present industrial process from the copper smelter leads to production of copper slag. Presently, there is no analysis being done of the quality of copper slag being generated, as the quantity and profile of copper slag can inform the measures required for its storage, handling and disposal. The dumping of copper slag is taking place in the CRZ areas as per the pictures which were sent to regulatory authority which conducted inspection but **did not inspect the CRZ areas**. There is no approved plan for storage, handling and disposal of copper slag leading to its detrimental impact on environment especially reserved forest and CRZ areas. Just giving bald figures as to the dispatch without any evidence is no consequence. There needs to be verification of the factual averments made in the reply. The





state of the forest area as evidenced by the pictures show that the soil is effected to such as effect that nothing grows in the area where wastewater ponding took place and where copper slag is being dumped.

44- 53 That the contents of para under reply are denied as wrong and false. The photographs of the mangroves shown by R-8, is actually Prosopis julifera called Gando Bawal which is an invasive species and a problem in Coastal areas. R-8 have dumped slag over the coastal areas having mangroves areas. In the reply R-8 has not denied the specific averments or the Google Image showing the location of dumping of copper slag. The reference to the reply of R-8 to the IR "observations" is also part of the record of the IR, and its compliance and non-compliance is also mentioned. The response to the inspection reports doesn't show that all conditions stand compiled.

54. That the contents of para under reply are denied as wrong and false. In view of the submissions made herein above the OA of the applicant deserves to be allowed.

  
 DEPONENT  
 President  
 Brackish Water Research Centre

VERIFICATION:

Verified at Surat on 4<sup>th</sup> day of January, 2022 that the contents of above affidavit are true and correct to the best of my knowledge

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Date: 04 JAN 2022

and understanding and nothing material has been concealed there from.



*[Signature]*  
DEPONENT  
President  
Brackish Water Research Centre

SOLEMNLY AFFIRMED  
BEFORE ME

*[Signature]*

ASHOK C. PANCHAL  
NOTARY  
GOVT. OF INDIA

04 JAN 2022

*[Signature]*  
**ASHOK C. PANCHAL**  
**ADVOCATE & NOTARY**  
30, Vihar Society,  
Ved Road, SURAT-395004.

*(Ashok C Panchal)*

