

**BEFORE THE HON'BLE NATIONAL GREEN
TRIBUNAL, PRINCIPAL BENCH AT NEW DELHI**

(Under Section 18 read with Section 14 of the National Green
Tribunal Act, 2010)

ORIGINAL APPLICATION NO. 436 OF 2023

IN THE MATTER OF :

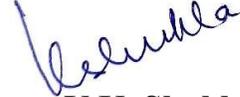
Association of Fly Ash Products Manufacturers (AFAPM)
... Applicant

Versus

Ministry of Environment, Forest & Climate Change & Anr.
... Respondents

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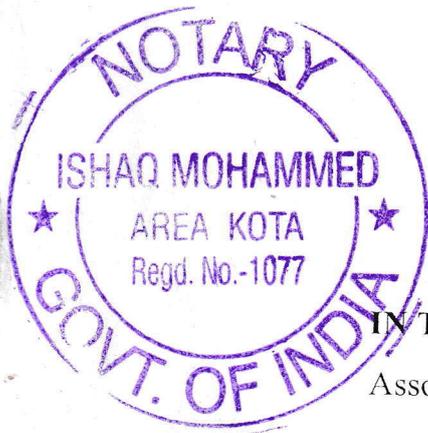
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Place: New Delhi

Date: 27.11.2023

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SERIAL NO. 572
DATE: 27-11-23
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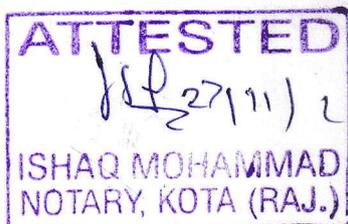
**REJOINDER AFFIDAVIT TO THE REPLY FILED BY
RESPONDENT NO.1-MoEF&CC**

I, Rajendra Singh S/o Late Ramnarayan Singh, aged about 58 years R/o 7C 13, Mahaveer Nagar Extension, Kota (Rajasthan)-324009, do hereby solemnly affirm and states as under;

1. That I am the founder member of the applicant association and as such is well conversant with the facts and circumstances of the present case and is competent to swear this present affidavit.

PARA WISE REPLY

2. That the contents of Para 1 to 5 do not call for any comment being matter of record/ formal in nature.
3. That the contents of para 6 & 7 of the reply as stated are totally wrong hence denied. It is vehemently denied that the view expressed by the ash bricks products manufacturer in consultative meetings before publication of Notification containing **draft provisions**



of Ash Utilization vide G.S.R. 285 (E) dated 22nd April, 2021 was at all considered in the said draft.

In fact, the said draft was published vide G.S.R. 285 (E) dated 22nd April of 2021 by the respondent Ministry by ignoring the view expressed by the ash bricks manufacturers in the consultative meeting held on 17-02-2021 through virtual mode. In fact, when the said draft notice was published by the respondent Ministry, the country was witnessing the highest death casualties due to the Covid-19 pandemic.

At the same time there was complete lock-down in the country and common people were remained inside of their home following the measures suggested during the period for the saving the precious life from the pandemic and those who were trapped in the pandemic were struggling in hospital for recovery. Due to which the appellant association could not file any objections/ reply to the said draft notification.

It is very important to bring to the notice of this Hon'ble Tribunal the mischief played by the respondent i.e. a public authority by that while publishing the draft Ash Utilization Notification dated 22nd April, 2021 the MoEF&CC has mentioned an incorrect Email-Id on which the objections/suggestions were called from stakeholders/ public at large, before final publication of the said Notification.

It is further submitted that after twenty days of the publication of draft notification the respondent Ministry





finally published a corrigendum dated 12.05.2021 by mentioning correct Email Id for receiving the objections.

In such a sensitive matter where the large number of stake holders were going to be affected, one fails to understand as to what was such urgency to issue draft notification in such a horrifying national disaster of Covid-19 pandemic. The reason is obvious that the Resp No.1 wanted to publish it without affording the proper opportunity to the stake holders to file objections.

In such compelling circumstances the applicant association had no option but to move to Hon'ble Delhi High Court by filing a Writ petition seeking directions against the respondent to here all concerned and consider as to how the interest of the fly ash products manufacturing units was getting jeopardized in case the draft notification was finalized in its original shape.

As more than 20-thousand-member industries of the applicant association who are major stake holders of ash utilization and working for conservation of fertile top soil with zero emission and zero discharge, it was prayed before the Hon'ble High Court to direct the respondent No.1 to hear their concern by affording an opportunity of physical meeting. It is only after the intervention of Hon'ble High Court, the respondent No.1 organized a meeting **under the Chairmanship of Director, HSMD of MoEF&CC, Govt. of India** and the minutes of meeting were published.



A handwritten signature in blue ink, consisting of stylized initials and a surname, with a horizontal line underneath.

Despite the assurance given by the MoEF&CC that the issues raised by the applicant association in the meeting, shall be considered when the final notification come, the concern of the applicant association was neither addressed nor included in the final notification.

On the contrary, all the promotional measures, approximately seventeen provisions which were available for the members of the association were taken away, which were not at all prejudicial to unutilized legacy Ash of 1670.603 Million Metric Tons lying dumped in the Ash Pond as on 31.12.2021 in addition to the current generation of Ash which are thrown in operational Ash Pond.

It is, therefore, apparent that the concern of the association was not considered in **final publication of Notification in Gazette of India vide S.O. 5481 (E) dated 31st December, 2021** despite being the major stake holders of Ash Utilization as a necessity to realize the objective of **Ash Utilization Notification of 2021** brought in supersession of **the Ash Utilization Notification of 1999** and its amendments to protect the environment. It would not be out of place to mention here that some provisions of **Ash Utilization Notification of 2021** are against the spirit of the preamble of Notification and are obstructing the way for hundred percent utilization of ash for disposal in environmentally sound manner.

4. That the contents of para 8 to 13 as stated do not call for any comments so far as they are related to reiteration of





the provisions of the notification, however rest of the contents of the paras under reply are wrong hence denied, except which are matter of record.

In paragraph A(2) of the Notification the prescribed **eco-friendly purposes of utilization of Ash in serial no (i) to (x)** are not stipulated in order of priority/preference for achieving the objective as set out in the preamble of the notification.

It is respectfully submitted that the third proviso of **sub-paragraph B(1)** of the said Notification as it is referred in **paragraph 10 of the counter affidavit** is in conflict with the **sub-paragraph A(7)** thereby TPPs are mandated to ensure the disposal of ash in environmentally sound manner for realizing the purpose of utilization of ash in accordance with **the first proviso of sub-paragraph B(1), B(3), B(6) and B(8)** as well in the light of **sub-paragraph A(2)** for which TPPs are held responsible.

At the same time **the third proviso of sub-paragraph B(1)** of said Notification contradicts and is in conflict with **the sub-paragraph D(1)** where the procedure for supply of Ash to user agencies are laid-down. In accordance with **the sub-paragraph D(1)**, it is mandated upon the TPPs to provide the Ash to the persons or agencies who are liable to utilize the Ash by serving the written notice by the TPPs, offering for sale, or transport or both.

Thus, it is clear from the mandate as stipulated in **the sub-paragraph D(1)** that there is no other means in



contradiction of the sub-paragraph D(1) accordingly the Ash shall be provided to the user agencies who are engaged in the area of activities of the first proviso of sub-paragraph B(1), B(3), B(6) and B(8) as well in the light of sub-paragraph A(2).

The third proviso of sub-paragraph B(1) of said Notification as it is referred in the paragraph 10 of the counter affidavit of the Respondent no.01 empowers the TPPs to exercise the discretionary power and in this light Ministry of Power issued the Advisory dated 22.02.2022 to provide the ash to user agencies adopting the procedure for disposal of ash through auction, which is in contravention of the mandatory provision of the sub-paragraph D(1) with the sole objective to monetize the sale of Ash.

The Advisory of MoP issued on 22.02.2022 has nothing to do with the disposal of Ash in environmentally sound manner in terms of the mandate that is statutorily binding upon the TPPs. The disposal of Ash through auction with the sole objective to monetize the sale of Ash is also against the mandatory provisions for purposeful utilization of ash in accordance with the first proviso of sub-paragraph B(1), B(3), B(6) and B(8) as well in the light of sub-paragraph A(2) for which TPPs are held responsible.

The disposal of Ash through auction with the sole objective to monetize the sale of Ash is also against the



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spirit of the **preamble of notification**. The preamble of Notification has been reproduced hereinafter:

“And whereas, to implement the aforesaid notification (Ash Utilization Notification of 1999) more effectively based on the polluter pays principle (PPP) thereby ensuring 100 percent utilization of fly ash by the coal or lignite based thermal power plants and for the sustainability of fly ash management system, the Central Government reviewed the existing notification; and whereas environmental compensation needs to be introduced on the polluter pays principle;”

“And whereas, there is a need to conserve top soil by promoting manufacture and mandating use of ash based products and building materials in construction sector;”

“And whereas, there is a need to conserve top soil and natural resources by promoting utilization of ash in road lying, road and flyover embankments, shorelines protection measures, low lying areas of approved projects, backfilling of mines, as an alternative for filling of earthen materials;”

“And whereas, it is necessary to protect the environment and prevent the dumping and disposal of fly ash discharged from coal or lignite based thermal power plants on land.”

In this regard, it is necessary to mention that the preamble of notification states that this notification has been brought with the objective to implement **aforesaid**



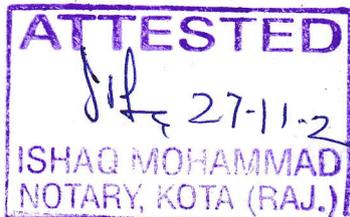
Notification (the Ash Utilization of 1999) based on polluter pays principle(PPP) **more effectively** thereby ensuring 100 percent utilization of fly ash for sustainability of fly ash management system.

And in this connection, it submitted that **the first Ash Utilization Notification of 1999** was issued by the Central Government in the Ministry of Environment and Forest **in year 1999** in the light of **the order passed on 28th July, 1999** by the **Hon'ble High Court of Delhi in the matter of C.W. No. 2145 of 1999**. The said order is reproduced hereinafter;

“Respondents is directed to see that the final notification is published within a period of two weeks from today.

Such directions are being given because it is necessary to protect the environment conserve the top soil and prevent the dumping and disposal of fly ash produced by coal and lignite based thermal plants on land and landfills. This will also make use of the fly ash.”

However, the disposal of ash through auction by the TPPs to streamline the procedure for disposal of the ash to monetize the sale has neither been obligated upon the TPPs as mandate to utilize ash for eco-friendly purposes in accordance with **serial table of sub-paragraph A(2)** nor it is defined as mandate for the purpose of utilization of Ash under **the first proviso of sub-paragraph B(1), B(3),B(6) and B(8)** nor it is stipulated as mandate in **the sub-paragraph D(1)** for



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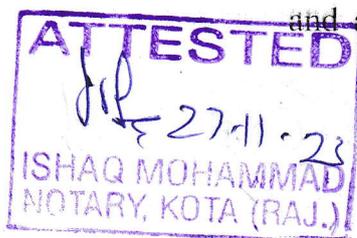


statutorily obeying the procedure for supply of Ash to the persons or agencies who are liable to utilize Ash in prescribed area of activities for ensuring the disposal in environmentally sound manner.

The sale of ash through auction is open for all to participate in addition to the persons and agencies who are liable to utilize the ash as per the mandate of Notification. Auctioneer has to furnish only the oath of affidavit notarized by the notary of public stating that Ash shall be utilized for the intended purpose only. And taking such affidavit from auctioneer TPPs get themselves absolved of their statutory responsibility to ensure the utilization of ash for intended purpose as stated above for disposal in environmentally sound manner.

The unintended auctioneer in the shape of traders and transporters, middle man and intermediaries hold the entire quantity of ash allotted through the auction by bidding at maximum price for the purpose of trading and resale to actual users for their commercial benefit and create an artificial crisis of Ash.

In this way the utilization of Ash gets discouraged. Now after passage of two years since publication of **the Ash Utilization Notification of 2021** that the level of Ash Utilization has deteriorated further and has fallen the level as it was before the publication of Notification due to conflicting and uncomprehensive **provisions of 2021 Notification** stating one thing in one provision and at the same time stating another thing in another



provision in contradiction and give the space of each stakeholder to interpret in accordance with their comfort.

It is underlined here that once there is mandate for the procedure as laid-down in **the sub-paragraph D(1) for ensuring the supply of Ash to the persons and agencies who are liable to utilize Ash**, then there is no necessity to give the discretionary power to TPPs under the stipulation of **the third proviso of sub-paragraph B(1) for disposal of Ash through other means**.

In this regard, it is submitted that the progressive figures of utilization of ash cited by TPPs could not be justified in the absence of third-party statutory audit which is to be conducted by the statutory body and its submission of report in the light of the statutory provision stipulated in **the sub-paragraph E(5)**.

Practically it is found that there is huge gap between auctioned quantity of Ash and lifted quantity of Ash out of the very auction. In many cases, the bidders left the lifting of Ash after taking the partial quantity of Ash out of the allotted quantity of Ash from the auction.

Thereafter, the TPPs prefer to throwing unsold as well as unlifted quantity of Ash in Ash Pond/dyke in the shape of water slurry in moist form rather providing it to Ash Bricks Manufacturers for the sustainability of fly ash management system and for gainful utilization in environmentally sound manner.

Therefore, the sale of Ash through auction and in this way compelling the fly ash bricks manufacturers to





join the same platform of Ash auction with big corporate entities like cement companies, giant construction sector, big traders and transporters and other big entities is leading to unfair and unequitable treatment for promoting the competition.

And such unfair and unequitable treatment will further lead to unreasonable and commercially inconsistent procurement of Ash as raw material for fly ash bricks manufacturing. This commercially inconsistent procurement on unreasonable price may badly endanger the commercial survival of fly ash bricks manufacturing activities in the situation when the price cap is imposed on the usage of Ash Bricks by the mandatory provision that is stipulated in **the sub-paragraph B(8) of Ash Utilization Notification of 2021 and its amendment dated 30th December, 2022.**

Ultimately, it will derail the activities and the whole process oriented towards the realization of the objective of Notification as it is envisaged in the preamble of the Notification. Therefore, it is submitted that the entire working should be exercised and dealt with the environmental prospective that necessitates the framing of environmental guidelines for ensuring the disposal of ash in an eco-friendly manner.

This task could be accomplished with devising and enforcing the promotional policy for the survival of **approximately 20000.00nos. (twenty thousand in numbers) Micro and Small fly ash bricks manufacturing units working in the mode of zero**



emission and zero discharge and for conservation of fertile topsoil all across the country with the framing of appropriate environmental guidelines.

In this regard it is necessary to underline the observation and direction of this Hon'ble Court passed in order while adjudicating the matter O.A. 164 of 2018 on 18.01.2022 that is reproduced hereinafter;

“Requisite air pollution control devices (FGD) are not being installed, CAQMS are not being installed at proper locations and connected to CPCB server, huge accumulated (1670.602 Million Tonnes as on 31-12-2021) fly ash is not being utilized nor scientifically stored, the ponds/dykes are not properly maintained resulting in polluting water sources, air and land, apart from adverse health effects and damage to the flora and fauna.”

“Further, as responsible corporate organizations, the PPs need to discharge corporate social responsibility to honour dignity of human life and the environment.”

“Another obstacle pointed out is advisory issued by the Ministry of Power dated 22.09.2021 that instead of being given free, fly ash should be sold which is not viable as there is no buyers perpetuating storage to the detriment of environment and public health and cost. Not only such advisory is unmindful of disastrous consequences, it is also against the recent statutory notification of MoEF&CC dated 31.12.2021. We find



it to be so and direct that being detrimental to environment, the same will not be enforced.”

“Advisory issued by the Ministry of Power dated 22.09.2021 will not be enforced being the against the spirit of notification dated 31.12.2021 and obstructing much needed speedy utilization/disposal of legacy fly ash” (1670.602 Million Tonnes as on 31-12-2021).

It is further submitted that the utilization of Ash is getting discouraged and mandate under sub-paragraph B(8) with the stipulation of “**price cap or tag**” stated in last sentence is obstructing the utilization of Ash.

It is quiet disheartening to acknowledge that there is price cap imposed through the aforesaid mandatory provision and parallely the Ministry of Power has issued **Advisory dated 22-02-2022** exercising the discretionary power conferred upon the TPPs in the light of **the third proviso of sub-paragraph B(1) of the Ash Utilization Notification of 2021** that obligates the TPPs that the Ash shall be offered to the prospective user agencies as stipulated in **the MoEF&CC Notification dated 31.12.2021 on competing demand basis, i.e. user agency who offers the highest price and meets the transportation cost will be offered the Ash on priority** without any concern for the scientific disposal of Ash in environmentally sound manner for the prescribe purposes of utilization.

Whereas, it is important to mention here that the MoEF&CC Notification dated 31.12.2021 has not mentioned anywhere in Notification that the Ash



shall be offered to the prospective user agencies on competing demand basis, i.e., user agency who offers the highest price and meets the transportation cost will be offered the Ash on priority.

On the other hand, the procedure for supply of Ash as mandated in the **sub-paragraph D(1)** that is statutorily binding upon the **TPPs** for supply of Ash to user agencies also stipulates that **the TPPs** shall provide Ash by serving the written notice offering for sale or transport or both, and that gives the option **TPPs** to provide Ash both on chargeable and non-chargeable with the stipulation in written notice.

Whereas, it is underlined here that the mandate of the **sub-paragraph D(1)** is ignored and made redundant by the **TPPs** before **the Advisory of Ministry of Power dated 22-02-2022**. Therefore, the discrimination on the basis of price cap/tag between the **TPPs** and actual users will lead to obstacles on the way of hundred percent utilization of Ash.

5. That the contents of Para 14 to 16 as stated are wrong hence denied, except which are matter of record. It is respectfully submitted that the parameters of Notification dated **31st December, 2021** has not been modified taking into account the provisions specified in **the Hazardous and Other Wastes (Management and Transboundary Movement) Rules of 2016**, to the extent to which the applicability of the Rules is attracted to the Utilization, transportation, and disposal



of fly ash. Therefore, the direction of Hon'ble Supreme Court of India is not complied by the MoEF&CC.

It is further submitted that Ash is classified as Hazardous and other waste in Schedule VI tagged with Basel No. A2060 and B2050 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules of 2016.

6. That the contents of Para 17 to 19 as stated are wrong hence denied, except which are matter of record. It is respectfully submitted that the time relaxation provided to TPPs under **the sub-paragraph A(4) and A(5) for utilization of Ash** has weaken the Ash Utilization activities as the relaxation in extending the time for utilization of Ash has become norms since the first publication of fly **the ash utilization Notification of 1999** and finally the amendments thereof **in the year 2016** has fixed the final deadline for Utilization of Ash on the **31st December, 2017**. Again, the **Notification of 2021** has further extended the timeline for utilization of Ash that is meaningless, when there is potential area of activities is available for absorption in bricks manufacturing sector for ensuring the **utilization of Ash**. In this regard it is necessary to underline the observation of **this Hon'ble Court** in the matter of O.A. 117 of 2014 passed in para no.31 of the order dated 20.11.2018 that is reproduced hereinafter;

“Since non-utilization of 100% fly ash, especially after 31.12.2017, the date fixed in the Notification of



the MoEF&CC dated 25.01.2016, invites penal consequences under the provisions of the Environment Protection Act, 1986, liability in this regard is not only of the persons responsible for non-utilization but also for generators of the fly ash. The generator cannot avoid responsibility for due disposal of any residue pollutants on account of its activity. The principle of 'extended producer's liability' is well recognized as part of 'Sustainable Development'. Applying the 'Precautionary Principle', the permission to dump fly ash in the mined voids has to be subject to all precautionary measures necessary for environment protection. Area of utilization of fly ash has been extended to 300kms, which may call for more stringent conditions to avoid damage to the environment."



Further it is necessary to underline the observation of this Hon'ble Court in the matter of O.A. 1016 of 2019 made in para no.09 of the order dated 23.03.2020 that is reproduced hereinafter;

"We may now consider another aspect of the matter i.e., impact of the brick kilns on the top soil. As noted in order dated 05.03.2020, CPCB has undertaken to look into this aspect and has not yet completed its study. As per available study, there is huge environmental cost in using top soil for making brick making¹. Reference may also be made to a study on "The Impact of Brick Kiln operation to the degradation of topsoil quality of Agricultural Land"².





There is further issue of unutilized fly ash adversely affecting the environment which may require barring red clay brick kilns. This is proposed in a draft notification of the MoEF&CC 25.02.2019 within 300kms of coal or lignite based thermal power plants. No doubt the said notification is only a draft but the same is evidence of such step being necessary for sustainable development”.

With respect to the **Draft Ash Utilization Notification of 2019**, it is submitted that it is rescinded by the **Gazette Notification G.S.R. 340 (E) dated 24th May, 2021** just thirty-two days after the publication of Draft Ash Utilization Notification of 2021.

It is further submitted that the provision of “price cap/tag” added with the mandatory provision of utilization of fly ash bricks in construction activities within the specified distance from the coal and lignite based TPPs will jeopardize the scope of utilization of ash. Because, the discretionary power has been vested with the TPPs for charging the Ash cost in case the TPPs are able to dispose of the Ash through other means in addition to the prescribed area of utilization for ensuring the disposal in environmentally sound manner. Additionally, at the same time TPPs are mandated to follow the procedure of supply of Ash in accordance with the obligatory provision of **the sub-paragraph D(1)** offering for sale or transport or both. However, the mandate under **the sub-paragraph D(1)** has not been practiced and made inert before the



execution and operation of **Advisory of Ministry of Power dated 22-02-2022**. Therefore, the discrimination based on the price cap/tag among the stakeholders is not justified and is practically making interruption in the motion of utilization of Ash.

On the other hand, the mandate stipulated in sub-paragraph B(8) is meaningless because of being not obligated the construction approving authority either undertaking construction or giving the administrative approval or approving the design or funding the construction activities for making the provisions for usage of Ash Bricks and prescribe the use of fly ash bricks in building by-laws, in their respective tender document, schedule of specifications and construction application including appropriate standards and codes of practice and make provision for use of fly ash bricks in schedule of approved materials and rates (**SoR**), or in estimate of work or in Bill of Quantities (**BoQ**).

In Addition to the above, the mandate stipulated in **the sub-paragraph B(8)** is meaningless because of being not obligated persons or entities engaged in the individual household and self-construction activities in unorganized sector which also includes the construction done by masons, civil contractors, small builders, individuals to use Ash bricks for the masonry work in construction activities. It is mentioned here that construction carried out by such unorganized sector is estimated at around **87%** of making main mode of construction where the only conventional brick

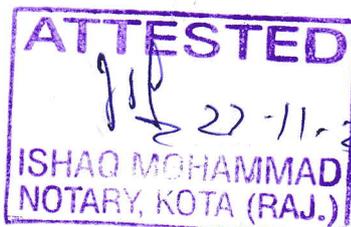


masonry units are used, though which have the potential capacity of absorption of Ash and where **the Ash Utilization Notification of 2021** has not mandated the use of fly ash bricks thereby the vast utilization of fly ash could be ensured in such untapped area of activities.

7. That the contents of Para 20 to 23 as stated are wrong hence denied, except which are matter of record. It is most submitted that there is no concept of operational pond Ash in this **Ash Utilization Notification of 2021**. The Pond Ash is classified as Legacy Ash where the accumulated unutilized Ash is dumped and stored before the publication of this notification that the cutoff date is **31-12-2021**. It is stipulated in the preamble of Ash Utilization Notification of 2021 as follows;

“And whereas, in the said notification the phrase ‘ash’ has been used which includes both fly ash as well as bottom ash generated from the coal or lignite based thermal power plants;”

At the same time, it is stipulated in **the sub-paragraph A(1) of the Ash Utilization Notification of 2021** that *“Every coal or lignite based thermal power plant (including captive or co-generating stations or both) shall be primarily responsible to ensure 100 percent utilization of ash (fly ash, and bottom ash) generated by it in an eco-friendly manner as given in sub-paragraph (2).* Therefore, the provision made in the **sub-paragraph A(6) of Ash Utilization Notification of 2021** and amended through the **amendments Notification of 2022** contradicts the



provision stipulated in **the sub-paragraph A(7)** for ensuring the disposal of Ash in environmentally sound manner because there is no existing provision for mandating the manner to be followed by the TPPs for the disposal of Ash from the operational ash pond. It is underlined here that through **the provision of the sub-paragraph A(6)** the concept of operational ash pond is evolved to save TPPs from the responsibility for ensuring the disposal of Ash in safe, scientific and environmentally sound manner in addition to the legacy ash that is stored in ash pond before the publication of **the Ash Utilization Notification dated 31.12.2021**. And, therefore, there is no timeline fixed for the utilization of Ash that is dumped in operational ash pond of which the concept is evolved in the provision of sub-paragraph A(6) of Ash Utilization Notification of 2021.

8. That the contents of Para 24 to 27 as stated are wrong hence denied, except which are matter of record. It is submitted that the progressive utilization of Ash could not be justified without authenticating the veracity from statutory audit conducted by the authorized auditors of CPCB and their submission of reports in the light of the provision of the sub-paragraph E(5) of Ash Utilization Notification of 2021.



In view of the facts and circumstances stated herein above the present original application filed by the applicant association may kindly be allowed. It is prayed accordingly.




DEPONENT
 (Rajendra Singh)

VERIFICATION

I, the deponent above named do hereby verify that the contents of this affidavit are true and correct to the best of my knowledge derived from the records and nothing relevant has been concealed therefrom. Verified at Kota, Rajasthan on this _____ day of November, 2023.

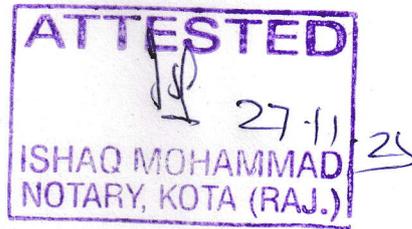


IDENTIFIED BY

Ishaq


DEPONENT
 (Rajendra Singh)

मनिष ६१० बजरंग लाल
 नि० देवली अरब मार्ग,
 मिलाह नगर कलोरिया
 कोटा (राज.)
 डा. ५७४७-२००१-३७०५



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VK Shukla <vkslawoffices@gmail.com>

OA No. 436 of 2023 Association of Fly Ash Products Manufacturers Vs. Ministry of Environment, Forest & Climate Change

1 message

VK Shukla <vkslawoffices@gmail.com>
To: secy-moef@nic.in, secy-power@nic.in

Mon, Nov 27, 2023 at 7:39 PM

Sir(s)

PFA copy of rejoinder to the reply/ counter affidavit filed by respondent No.1&2 in the above said matter.

Regards

V.K. SHUKLA**Advocate, Supreme Court of India****Madhav & Associates, B-69, LGF | Lajpat Nagar-1 |****New Delhi-110024 | Telefax: 011-45558066****E-mail: vkslawoffices@gmail.com | Mob.: +91 8800131234****CONFIDENTIALITY NOTE**

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2 attachments**Rejoinder MoEF final 27.11.2023.pdf**
13061K**Rejoinder MoP final 27.11.2023.pdf**
8722K