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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,

NEW DELHI

ORIGINAL APPLICATION NO. 766/2024

(I.A. No. 562/2024)

IN THE MATTER OF

Citizen Action Forum

...Applicant

Versus

Union of India & Ors.

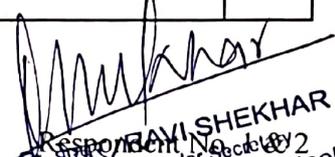
...Respondent(s)

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New Delhi
26/09/25

Through


Ravi Shekhar
अवर सचिव/Under Secretary
इस्पात मंत्रालय/Ministry of Steel
उद्योग भवन, नई दिल्ली
Udyog Bhawan, N. Delhi
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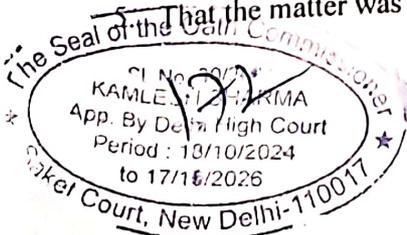
...Respondent(s)

**REPLY BY WAY OF AFFIDAVIT ON BEHALF OF RESPONDENT NO. 1: UNION OF
INDIA AND 2: MINISTRY OF STEEL**

I, Ravi Shekhar, aged about 37 years working as Under Secretary, having office at Udyog Bhawan, New Delhi, do hereby solemnly state and affirm as under: -

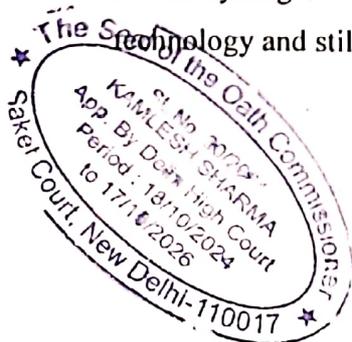
1. That deponent is well conversant with the facts and circumstances of the case and duly authorized to swear and affirm this affidavit on behalf of the Respondent No. 1 and 2 i.e. Union of India and Ministry of Steel respectively.
2. That the Instant I.A. 562 of 2024 in Original Application No. 766 of 2024 has been filed by the applicant highlights environmental concerns arising out of the use of coal-based Rotary Kiln Technology in steel manufacturing units. The applicant has advocated for the replacement of such polluting technologies with greener alternatives, particularly focusing on fuels such as hydrogen and Piped Natural Gas (PNG).
3. That Ld. counsel for the applicant has relied on several expert and institutional reports. These reports recommend transitioning to cleaner technologies such as natural gas-based or hydrogen-based Direct Reduced Iron (DRI) plants to mitigate the sector's carbon footprint.
4. That Taking cognizance of the issues raised, the Hon'ble National Green Tribunal vide its order dated 19.05.2025 has issued notice to the answering respondent. Further, The Hon'ble Tribunal has directed the Indian Institute of Technology (IIT), Kharagpur, to furnish a detailed report in the matter.

That the matter was listed on 12.08.2025.



Ravi Shekhar
रवि शेखर / RAVI SHEKHAR
अवर सचिव / Under Secretary
इस्पात मंत्रालय / Ministry of Steel
उद्योग भवन, नई दिल्ली
Udyog Bhawan, New Delhi

6. That it is most respectfully submitted that India has emerged as a resilient and fastest-growing major economy, maintaining robust momentum in steel sector growth through strong domestic demand, policy support, and expanding infrastructure. The steel sector is a critical pillar of India's economic development, contributing significantly to industrial growth, employment generation, and national infrastructure expansion. India is the second-largest crude steel producer in the world, with a production capacity of 200 million tonnes in FY 2025. Crude steel production in the country has grown at a CAGR of 5.8% over the past decade, with an accelerated 9.3% CAGR over the last three years to meet the domestic demand. The domestic demand is increasing at CAGR of 7.2 % over the past decade, with an accelerated 12.6 % CAGR in last three years driven by infrastructure growth, urbanization, and industrial expansion. The National Steel Policy, 2017 envisions achieving 300 million tonnes (MT) of crude steel production capacity by 2030-31 to meet the growing domestics demand.
7. That a major portion of the India's steel production is contributed by the Secondary Steel Industries (SSIs), which accounts for about 47% of the country's total output. A large number of SSIs within this sector rely predominantly on the Direct Reduced Iron (DRI) route as their main method of steel production. Among the DRI production methods, the coal-based DRI process holds significant importance in the Indian context due to its adaptability to the country's raw material availability, i.e. domestic coal and iron ore. India is one of the few countries with abundant reserves of non coking coal and iron ore, making the coal-based DRI route both economically viable and widely adopted, especially because of limited availability of natural gas in India. This method allows decentralized and flexible steelmaking, enabling small and medium players to contribute meaningfully to national production. Furthermore, the coal-based DRI route supports employment generation in backward areas and plays a crucial role in meeting the growing domestic demand for steel in construction, infrastructure, and manufacturing sectors. Given its entrenched role in India's steel ecosystem, any transition towards low-carbon alternatives must be long-term and sensitive to the techno economic challenges faced by these coal-based DRI units and in line with the net-zero commitment by 2070. Green hydrogen and CCS (Carbon Capture Storage and utilisation) are yet not proven technology and still being experimented on pilot scale.



Ravi Shekhar
 रवि शेखर/RAVI SHEKHAR
 अवर सचिव/Under Secretary
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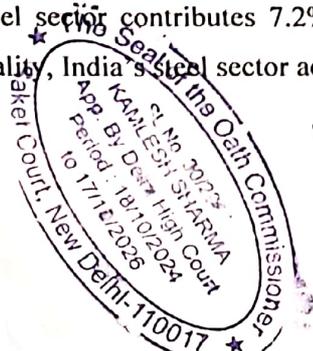
8. That in recent years, India has emerged as one of the fastest growing nation in terms of steel production enabling to meet its domestic steel consumption. In contrast, most of the developed economies have experienced a slowdown in domestic steel consumption, however production capacities created by them is continuing production and have created situation of oversupply and creating a risk of steel dumping into emerging markets like India. Such dumping—where steel is exported at prices lower than domestic production costs—poses a serious threat to India's steel industry, particularly for MSME players operating on thin margins. The influx of cheap, subsidized steel could undermine the competitiveness of domestic producers, distort market dynamics, and discourage investments in cleaner sustainable technologies. Therefore, it becomes imperative to not only strengthen domestic capacity but also implement appropriate trade safeguards to ensure a level playing field for Indian manufacturers as the country advances toward its ambitious steel production alongwith decarbonization targets. Any ban on Coal-based DRI in India will abrupt India's steel production significantly as well as the pace of economic growth. This will also ease the developed countries to dump their excess production in India to fill the gap.
9. That Coal-based DRI has been phased out in most developed countries, where scarp and natural gas are easily available and net-zero targets are set for 2050. These countries now predominantly use scrap-based Electric Arc Furnace (EAF) for steelmaking, supported by efficient scrap supply chains and low-emission power grids. The Developed countries are utilizing scrap upto 70-80% of their steel production. In contrast, India's scrap generation ecosystem is still in its early stages and will take time to integrate into the system of circularity. Due to relatively late industrialization in India, many sources of scrap—such as End of Life Vehicle (ELV), industrial equipment, Construction & demolition, and household appliances—have not yet reached their maturity for recycling. Consequently, the current availability of scrap in India is limited. At present, the scrap utilization is around 21% of total steel being produced in India, significantly lower than the levels observed in developed countries. Even for current scrap use, India relies heavily on imports. Approximately 25% of its total scrap consumption in steel making is from imported scrap. Upon reaching the maturity of end-of life iron & steel goods in India,

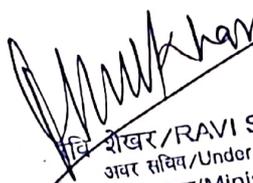



शेखर/RAVI SHEKHAR
अपर सचिव/Under Secretary
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उद्योग भवन, नई दिल्ली
Udyog Bhawan, New Delhi

domestic steel scrap will be available in sufficient quantity and will contribute in sustainable steel production significantly by replacing coal-based DRI route.

10. That a ban on coal-based DRI in India could severely disrupt domestic steel production, particularly affecting more than 2000 MSME-based DRI and re rolling units that contribute close to 40% of the nation's steel output. These units are critical for meeting India's growing steel demand, supporting employment, and enabling infrastructure expansion. Banning coal-based DRI without viable alternatives in place would risk industrial slowdowns, loss of livelihoods, and a breakdown in value chains that support rural and semi urban economies.
11. That under the framework of the Paris Agreement, the principle of Common But Differentiated Responsibilities (CBDR) has been globally recognized as a guiding concept for pollution reduction. Developed countries, having historically utilized a large share of global resources for their industrial growth, have committed to achieving net-zero emissions by 2050. In contrast, India, as a developing nation and a relatively late entrant to large-scale industrialization, is still striving to reach its full developmental potential. Acknowledging this, and in line with the CBDR principle, Hon'ble Prime Minister of India announced during the in COP-26, held in Glasgow, that India will achieve net-zero emissions by 2070—striking a balance between developmental needs and environmental responsibilities.
12. That Recognizing these realities, decarbonizing the steel industry is challenging due to its energy-intensive processes and carbon-heavy inputs. However, in alignment with the announcement made by Hon'ble PM in COP26 Summit to reduce carbon intensity of India's economy by more than 45% by 2030 and achieve net-zero by 2070, Ministry of Steel is committed to decarbonize the iron and steel sector, reflecting its dedication to addressing climate change and at the same time striving for continued economic growth and strengthening the sector's global competitiveness.
13. That according to reports by the World Steel Association and the International Energy Agency (IEA), the global iron and steel sector contributes approximately 7% of total global greenhouse gas (GHG) emissions. However, the claim in the petition—that India's steel sector contributes 7.2% of total global CO₂ emissions—is factually incorrect. In reality, India's steel sector accounts for less than 1% of global CO₂ emissions.




 दि. शेखर/RAVI SHEKHAR
 अवर सचिव/Under Secretary
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- 14. That it is also pertinent to mention that the steel is a deregulated sector and individual companies choose their method of steel-making as per their techno commercial discussions, relying on market-driven growth, for which no license is required from Ministry of Steel. The Sponge Iron Manufacturers Association (SIMA), 1501, Hemkunt Tower, 98, Nehru Place, New Delhi – 110019, as well as the Chhattisgarh Sponge Iron Manufacturers Association (CGSIMA), Aarti House, 2nd Floor, Ashoka Ratna, Vidhan Sabha Marg, Shankar Nagar, Raipur (C.G.) 492001, represents the country’s sponge iron and Direct Reduced Iron (DRI) industry. Since these Associations are directly affected stakeholders in the matter, it is respectfully submitted that, in the interest of justice and for proper adjudication of the issues involved, SIMA and CGSIMA may also be impleaded as respondents in the present case.
- 15. That the present Reply by way of affidavit may kindly be taken on record and into consideration, and the Hon’ble Tribunal may pass appropriate order(s), direction(s) as deemed fit and proper under the facts and circumstances of the present case.
- 16. That the Answering Respondent seeks leave to make additional submissions, if required, during the course of the proceedings as and when directed by this Hon’ble Tribunal.



26 SEP 2025

[Signature]
 रवि शेखर / RAVI SHEKHAR
 DEPENDENT
 अवर सचिव / Under Secretary
 इस्पात मंत्रालय / Ministry of Steel
 उद्योग भवन, नई दिल्ली
 Udyog Bhawan, New Delhi

Verification

Verified at New Delhi on September 2025 that the contents of the above reply affidavit are derived from the official records and personal knowledge and are correct and true to the best of my knowledge and belief. Nothing material has been concealed therefrom.

I certify that the Dependent has signed/Put T.I. in my presence

CERTIFIED THAT THE DEPENDENT
 Shri/Smt./Km. *Ravi Shekhar*
 S/o, W/o, R/o *Arjun Goje*
 Identified by *[Signature]*
 has been identified by *[Signature]* which
 Delhi.....
 that the contents of the affidavit are true and correct to the best of
 have been verified to the best of my knowledge
 true and correct to the best of my knowledge

[Signature]
 Oath Commissioner, Delhi
 Kamlesh Sharma
 New Delhi

26 SEP 2025

[Signature]
 DEPENDENT
 रवि शेखर / RAVI SHEKHAR
 अवर सचिव / Under Secretary
 इस्पात मंत्रालय / Ministry of Steel
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