

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
AT ITS WESTERN ZONE BENCH AT PUNE**

(Appeal under Section 16(h) of the National Green Tribunal Act, 2010)

APPEAL NO. 35 OF 2020 (WZ)

IN THE MATTER OF:

Kheti Vikas Seva Trust ... Appellant

Versus

Adani Enterprises Limited and others ... Respondents

SUBMISSIONS IN COMPLIANCE OF ORDER DATED 3.2.2023

This Hon'ble Tribunal, in its order dated 3.2.2023, had directed the Respondent No.1 ('R-1') to provide the details of the objections/infirmities raised by the Appellant in its appeal and replies by the Respondents, indicating the pages where the said matter has been dealt with by them at length, in tabular form. Accordingly, the following table is being submitted on behalf of R-1:

Sr. No.	Allegations of the Appellant	Reply of the Respondent No.1
1.	<p><u>Removal of Trees:</u></p> <ul style="list-style-type: none">• R-1 has concealed as to how many trees have to be cut at the project site.• The Reserve Forest Land forming part of the project site has fully grown trees that will be removed.• Reliance placed on photographs at Pg.81-88 to show presence of trees within the project site. (Pg.12, para.5)	<ul style="list-style-type: none">• In view of the change in project site and amended EC, whereby forest land is excluded, the said grievance would not survive. (Pg.4753)• Appellant has actually produced Form-2 @ Pg.71 and claimed in the appeal that the said document is Form-1.• The Form-1 (Pg.419 @ Pg.422) correctly mentions that only some shrubs/weeds (mainly prosopis juliflora) present at the site shall be cleared. (Also see: Pg.4698)

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		<ul style="list-style-type: none"> • The photographs produced at Pg.81-88 are of areas outside of the project site and far away therefrom. The coordinates mentioned in the said photographs at Pg.81-88 have been plotted on a map, which shows that the photographs pertain to other area. (Pg.4696) • On falsity of such claims being exposed, Appellant changed its stand in rejoinder by claiming that there are several trees within 10 kms of the project area. (Pg.4486) • Allegations denied and dealt with in paragraph 26 of reply @Pg.368.
2.	<p><u>Presence of Water Bodies:</u></p> <ul style="list-style-type: none"> • The information provided in Form-1 submitted by R-1 regarding presence of water bodies is contradicted by information in Table 1.1 of EIA Report. (Pg.13, para.7) (Pg.26, para.43-46) 	<ul style="list-style-type: none"> • The correct Form-1 is produced by R-1 (See Pg.419 @ Pg.431) which provides details consistent with EIA Report. • Allegations denied and dealt with in paragraph 28 of reply @Pg.370, and in paragraph 43 of the reply @Pg.390. • See also, relevant portions of the EIA Report @ Pg.474, 537, 642.
3.	<p><u>R&R Details not provided:</u></p> <ul style="list-style-type: none"> • The local communities are dependent on the forest land for grazing their cattle, their rights over the forest land have clearly not been settled. • The EIA Report fails to consider these rights or determine rehabilitation and 	<ul style="list-style-type: none"> • The said allegations were premised on the fact that the project site include forest land. However, pursuant to amendment in EC, there is no forest land included in the project site (Pg.4753). • Even otherwise, the project site is forming part of a Special Economic Zone, and there are no

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	<p>resettlement packages for said persons. (Pg.14, para.10-11)</p>	<p>people in the core zone of the project. Thus, there is no resettlement and rehabilitation involved in the said project.</p> <ul style="list-style-type: none"> • Allegations denied and dealt with in paragraph 31 of reply @Pg.373
4.	<p><u>Surface water quality not studied as per ToR:</u></p> <ul style="list-style-type: none"> • ToR required study on surface water quality of nearby river (60 m upstream and downstream) and other surface drains at 8 locations, however in present case samples have been collected only from 4 locations. (Pg.15, para.12) 	<ul style="list-style-type: none"> • The rivers situated nearby to the project site are seasonal rivers. The perennial water body within study area of 10 km is the Arabian Sea. (See photographs @ Pg.4771-4773) • The seasonal rivers have water only during monsoon season, but for the purpose of EIA Report the samples are required to be collected only in the post-monsoon season. Thus, at the time of sample collection, there were no other surface water bodies besides the 4 locations in question. • EAC in its meeting held on 9th-11th January 2019 also took note of the fact that surface water samples were analysed from the available 4 locations. (Pg.284 @Pg. 289) • Allegations denied and dealt with in paragraph 32 of reply @Pg.374
5.	<p><u>EIA Report does not properly study alternative sites:</u></p> <ul style="list-style-type: none"> • The Project Site has been selected over alternative sites only because of proximity to existing source 	<ul style="list-style-type: none"> • Chapter-5 of the EIA Report deals in detail with analysis of alternative sites. After such analysis it has been concluded that project site is most advantageous in terms of environmental and technical criteria. (Pg.654-661)

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	<p>of power and water and existing approach road.</p> <ul style="list-style-type: none"> The 3rd site seems to be more compatible with industrial land use as it is flat vacant land with no vegetation or forest cover. There are no natural streams passing through it. (Pg.17-18, para.17-18) 	<ul style="list-style-type: none"> Greater distance from water source, power source, port, and consequent construction of a fresh approach road, absence of conveyor belt, etc. would translate into high environmental impact. Therefore, connectivity is not only technical but also environmental criteria. The alleged concern in respect of inclusion of forest land and flow of river through project site will not survive in view of the change in project site for which amended EC is also granted. (Pg.4753) Allegations denied and dealt with in paragraph 34 of reply @Pg.376
6.	<p><u>Cumulative impact assessment study not carried out:</u></p> <ul style="list-style-type: none"> The EIA Report has determined the concentration of existing baseline due to the presence of two power plants but has not determined any impact due to addition of the copper plant or upcoming future projects. PP has only determined cumulative impact on air quality, traffic quality but not on the terrestrial, aquatic and marine ecology. (Pg.20-21, para. 22, 25) 	<ul style="list-style-type: none"> Chapter 4 of the EIA Report provides particulars in respect of anticipated environmental impacts of the project and mitigations measures, including cumulative impact assessment. (Pg.615-653) The project is proposed with (i) Zero Liquid Discharge to arrest water pollution (Pg.642) and (ii) secured landfill to mitigate any impact on soil and groundwater (Pg.645-646). The reliance placed on Guidance Manual is misconceived, since the same is not a regulatory document and has no legal force. Allegations denied and dealt with in paragraphs 35-37 of reply @Pg.380-382.

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7.	<p><u>Deficient impact assessment on fishing community:</u></p> <ul style="list-style-type: none"> • 32,000 KLD of water will be used in the project and yet chapter on impact assessment in EIA Report does not discuss probable change in the fishermen community and fish yield. (Pg.22-23, para.27-30) 	<ul style="list-style-type: none"> • The project site is located at a distance of 3.9 km from Gulf of Kutch, where fishing activities take place. • There is no intake or outfall facilities planned in the sea-front. Water for project will be sourced from desalination plant and the project will be operated on Zero Liquid Discharge concept. (See Pg.59-para.16) • The rivers in proximity of the project site are seasonal rivers and no fishing activities take place. • Existing roads used by fishermen do not pass through project site, and such roads will not be disturbed. (Pg.619) • Chapter-3 (@Pg.612-613), Chapter-4 (@Pg.642-643, 650), and Annexure-XII (Pg.1268-1273) of the EIA Report discuss the presence of fishermen in the study area and also highlight as to how the project will not have an impact of marine life. • Allegations denied and dealt with in paragraph 39 of reply @Pg.382-385. • In paragraph 31 (Pg.23) of the appeal, the Appellants have admitted that EIA Report has considered fishing community.

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8.	<p><u>Concealment of presence of agriculture and pastoral community:</u></p> <ul style="list-style-type: none"> • Agriculturalists and pastoralists include 80% of the population surrounding the project site, and there is no information about such community that will be affected due to the project. (Pg.23-23, para.31-33) 	<ul style="list-style-type: none"> • As per 2011 Census Data, out of the main workers, 77.15% fall within the category of Other workers, whereas only 11.76% are agricultural labourers and 10.45% are cultivators. (Pg.1260) • No agricultural or pastoral community is present in the project site. • The project site does not encompass any gauchar/ grazing land. • Allegations denied and dealt with in paragraph 40 of reply @Pg.385-386.
9.	<p><u>Deficient impact assessment on marine environment and ecology:</u></p> <ul style="list-style-type: none"> • 32,000 KLD of water will be taken from the desalination plant which will affect the marine environment. • PP has not carried out any study on effect on marine, coastal, and fisheries. (Pg.24-25, para.34-38) 	<ul style="list-style-type: none"> • As explained earlier, the project will have no interference, much less an impact on marine environment and ecology. • In this regard, please see the relevant portions of the EIA Report at Pg.618, 642, 643, and 650. • Allegations denied and dealt with in paragraph 41 of reply @Pg.387-389.
10.	<p><u>Deficient impact assessment on Dhaneshwari river:</u></p> <ul style="list-style-type: none"> • There has been no assessment of impact of the project on the river even though it clearly falls within the project site. (Pg.25-26, para.39-42) 	<ul style="list-style-type: none"> • The said allegations would no longer survive in view of the change in project site, whereby the Dhaneshwari river has been excluded from the project site, and thereafter the EC has been amended. (Pg.4753) • Even otherwise, Chapter-4 of the earlier EIA Report (Pg.462) provides for impact on water resources, and indicated as to

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		<p>how Dhaneshwari river will not be diverted. The unamended EC had also set out specific conditions in respect of maintenance of Dhaneshwari river (<i>See Para.5 @ Pg.56, Para. xxvi @Pg.64</i>)</p> <ul style="list-style-type: none"> Allegations denied and dealt with in paragraph 42 of reply @Pg.389-390.
11.	<p><u>Incorrect information about presence of mangroves within project site:</u></p> <ul style="list-style-type: none"> There are mangroves present within the project area and yet there has been no impact assessment carried out on the mangroves. There is large scale destruction of mangroves as per the Report of the Committee for the Inspection of Adani Port and Special Economic Zone Limited ('APSEZ') prepared by Centre for Science and Education in April 2013. (<i>Pg.28-29, para.47-52</i>) 	<ul style="list-style-type: none"> The project site is outside the CRZ area and there are no mangroves within the project site. The fact about presence of mangroves within 10 km radius of project site has been disclosed in the Form-1 (<i>Pg.431</i>) as well as EIA Report (<i>Pg.600</i>). R-1 has also submitted a Wildlife Conservation Plan & Mangrove Conservation Plan (<i>Pg.2146</i>) as part of the Additional Details Sought by the EAC in June 2019, and a revised plan as part of Revised Additional Details Sought by the EAC in January 2020 (<i>Pg.3206</i>), which was also submitted to the Deputy Conservator of Forest (<i>Pg.4487</i>). In the said Revised Additional Details Sought, R-1 has answered a specific query of EAC and clarified that no mangroves are present within the project site. (<i>Pg. 3201</i>) Thereafter, in the revised Wildlife Conservation Plan & Mangrove Conservation Plan also discloses the presence of

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		<p>mangroves within 10 km radius (Pg.3238, 3283) and also disclosed impact on the same (Pg.3285).</p> <ul style="list-style-type: none"> • In line with aforesaid plan, R-1 also made commitments for conservation measures for mangroves to the EAC (Pg.3203). • The final Wildlife Conservation Plan & Mangrove Conservation Plan was submitted before the EAC as part of further Additional Details Sought in February 2020 (Pg.4492). • The EC also records observations and conditions in respect of mangrove conservation. (See para. vii @ Pg.62, para. xix & xxiii @Pg.64, para. ix @Pg.69) • The Report of April 2013 of the Committee for the Inspection is regarding APSEZ and does not pertain to the project. In any case, R-1 had submitted the compliance of specific conditions of EC granted to APSEZ before the EAC (Pg.3848-4287). • Allegations denied and dealt with in paragraph 44 of reply @Pg.391-392.
12.	<p><u>Conceals information about flora/ fauna surrounding the project site:</u></p> <ul style="list-style-type: none"> • The presence of the project will have an impact on the faunal species within the 	<ul style="list-style-type: none"> • Pursuant to the change in project site and amended EC, forest land has been excluded from the project site. (Pg.4753) • Even otherwise, there is no concealment of information

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	<p>whole project area and not just the project site. (Pg.31, para.57)</p>	<p>about flora/fauna surrounding the project site.</p> <ul style="list-style-type: none"> R-1 has produced before EAC a detailed EIA Report as well as Wildlife Conservation Plan & Mangrove Conservation Plan, which disclose the facts about presence of flora and fauna in core and buffer zones, and impact assessment thereon, as follows: <ul style="list-style-type: none"> EIA Report – Pg. 597-608, 650 Additional Details Sought – Pg.2163-2166, Pg.2178-2193, Pg.2194-2218, Pg. 2348 Revised Additional Details Sought – Pg.3224-3227, Pg.3240-3255, Pg.3256-3281, Pg.3444-3445 Further Additional Details Sought – Pg.4511-4514, Pg.4529-4543, Pg.4544-4571. The EC also records observations and conditions in respect of wildlife conservation. (See para.ii @Pg.66, para. ix @Pg.69) Allegations denied and dealt with in paragraph 45 of reply @Pg.393-395.
13.	<p><u>Deficient impact assessment on the proposed Biodiversity Heritage Site:</u></p> <ul style="list-style-type: none"> Gujarat Biodiversity Board had earlier made a proposal to declare the proposed area as a Biodiversity Heritage 	<ul style="list-style-type: none"> National Biodiversity Authority, India has issued ‘Guidelines for Identification, Notification, and Management of Biodiversity Heritage Sites’, wherein BHS is defined and a comprehensive procedure has been laid down for

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	<p>Site ('BHS'), which was later shelved.</p> <ul style="list-style-type: none"> • Since the proposed area was a proposed BHS, it clearly means it is a biodiversity rich area, and therefore the project requires a biodiversity impact assessment under Biological Diversity Act, 2002. (Pg.31-32, para.58-62) 	<p>identification and notification of BHS.</p> <ul style="list-style-type: none"> • No area within the study area has been identified or notified as BHS. • EIA Report states that earlier there was a proposal to declare the area as a BHS, but the said proposal was shelved. (Pg.600) • In any case, a detailed impact assessment as part of Wildlife Conservation Plan & Mangrove Conservation Plan was produced before the EAC as mentioned above. • Allegations denied and dealt with in paragraph 46 of reply @Pg.395-396.
14.	<p><u>Deficient impact assessment of Air Quality:</u></p> <ul style="list-style-type: none"> • Baseline data in respect of acid mist is insufficient, without which it is impossible to assess the impact of acid mist concentration once the project is in operation. (Pg.33, para. 63) 	<ul style="list-style-type: none"> • Acid mist is not a parameter under the National Ambient Air Quality Standards 2009. • No source of acid mist exist in study area during the monitoring period, and therefore there does not arise any question of collecting baseline data regarding emission of acid mist. • EAC in its recommendations had specified limits for acid mist emission from the proposed sulphuric acid plant stack. R-1 has proposed to monitor acid mist from proposed sulphuric acid plant stack on monthly basis during plant operation phase (Pg.667, 669) • R-1 also provided details of mechanisms to be employed for

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		<p>acid must control. (Pg.4685-4689)</p> <ul style="list-style-type: none"> • The EC also records observations and conditions in respect of acid mist. (See para xiv @Pg.62, para.vi @Pg.63) • Allegations dealt with in paragraph 47 of reply @Pg.397.
15.	<p>There are no monitoring location within the Reserved Forest, thus PP has not determined the impact of air pollution on the Reserved Forest at all. (Pg.33, para.64)</p>	<ul style="list-style-type: none"> • The location of the 8 monitoring stations within the study area were finalized in accordance with the applicable guidelines. • Justification for choosing each of the 8 locations has been explained in the EIA Report (Pg.578-579). • Allegations denied and dealt with in paragraph 48 of reply @Pg.397.
16.	<ul style="list-style-type: none"> • Impact on air quality has not been properly determined. Data collected during 3 months from October to December 2016 shows that PM₁₀ concentrations exceeded the annual standard at 3 out of 8 locations. (Pg.34-35, para. 65-66) • Air quality data for Wandh, Kandagara, Moti Khakhar collected over different periods of 3 months each show level of PM₁₀ concentrations exceeding the annual standard, which should have been disclosed in the EIA Report. (Pg.35-35, Para.67, 68) 	<ul style="list-style-type: none"> • Appellant is wrong in seeking to compare data of air quality for 3 separate periods of 3-6 months in 3 separate years against limits prescribed for yearly average. • Comparison of 3 month data of air quality with prescribed limit of yearly average is untenable. • Allegations denied and dealt with in paragraph 49 of reply @Pg.398.

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17.	<p>The baseline data collected is misleading. (Pg.36, para.69)</p>	<ul style="list-style-type: none"> • Data on Ambient Air Quality mentioned in the EIA Report pertains to the period of October to December 2016. (Pg.443) • The data relating to Ambient Air Quality produced in the six monthly EC compliance report by Adani Power Limited and Coastal Gujarat Power Limited are for the period of July-September 2019. • Therefore, there cannot be any comparison of both the sets of data. • Allegations denied and dealt with in paragraph 50 of reply @Pg.399.
18.	<p>Ground Level Concentration should have been predicted using CALPUFF instead of AEROMOD. (Pg.37-38, para.70-72)</p>	<ul style="list-style-type: none"> • Following deliberation over R-1's application, air dispersion modelling studies were repeated using CALPUFF as per the advice of EAC. (Pg.4624-4645) • EAC has acknowledged the same in its minutes of meeting dated 24th-25th February 2020 (Pg.333) • Allegations dealt with in paragraph 51 of reply @Pg.400.
19.	<p>EIA Report underestimates how SO₂ and NO_x emissions would impact levels of PM_{2.5}/PM₁₀ in project area. (Pg.39-40, para.73-76)</p>	<ul style="list-style-type: none"> • R-1 has undertaken CALPUFF air modelling study, wherein chemical transformations (including secondary formation of pollutant) are already taken into consideration, and the results have been found to be within prescribed limits. • Appellant is comparing three monthly data with prescribed yearly average, which is untenable.

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		<ul style="list-style-type: none"> • Allegations denied and dealt with in paragraph 52 of reply @Pg.401.
20.	<p>The cumulative Ground Level Concentration predicted is misleading. (Pg.40-42, para.77)</p>	<ul style="list-style-type: none"> • Impact due to the nearby existing industries (the aforesaid 2 thermal power plants) has been predicted and the results have been presented in the EIA Report. (Pg.634) • In any case the power plants of both CGPL and Adani Power Limited were operational at the time of collection of baseline data. Thus, the baseline data encompasses the impacts due to operation of the said two power plants as well as other sources within the study area. • In the EIA Report, the predicted maximum GLC due to the aforesaid two power plants have been compared with the maximum baseline GLC of Station AAQ-8. However, isopleths shown in Figures-4.7 to 4.9 of the EIA Report (Pg.635-637) clearly show that the maximum impact is at a distance of 4.2 kms in the NE direction on CGPL, which is almost 3 kms east of AAQ-8. • The resultant cumulative GLC shown in Table 4.6 (Pg.626) is for the worst-case scenario, where the maximum GLC of the study area has been added to the maximum predicted incremental concentration due to the said project and the proposed cement grinding unit. The resultant cumulative GLC is within the

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		<p>prescribed limits stipulated by CPCB.</p> <ul style="list-style-type: none"> Allegations denied and dealt with in paragraph 53 of reply @Pg.402.
21.	<p><u>Project cannot be set up on Forest Land:</u></p> <ul style="list-style-type: none"> Setting up of the project on forest land is not justified. There is no reasoning as to why the project has been allowed on reserve forest land. (Pg.42-44, para.78-85) 	<ul style="list-style-type: none"> In view of the change in project site and amended EC, whereby forest land is excluded, the said grievance would not survive. (Pg.4753) Also see sur-rejoinder of R-1 starting from Pg.4609. Allegations denied and dealt with in paragraph 54 of reply @Pg.403-405.
22.	<p><u>Objections raised during public hearing as well as written objections were not considered:</u></p> <ul style="list-style-type: none"> EAC has failed to consider the serious objections raised during the public hearing. (Pg.44-45, para.86-90) 	<ul style="list-style-type: none"> The EIA Report disclosed the objections raised during the public hearing, the responses given, and the action plan. (Pg.673-1036) The EAC noted that there are strong oppositions from stake holders and in its meeting held on 9th-11th January 2019 (Pg.294) sought consolidated list of point-wise issues raised and response provided alongwith action plan for implementation. R-1 provided consolidated list of point-wise issues raised and response provided alongwith action plan for implementation in Additional Details Sought (Pg.2469-2504) Following a site visit, the sub-committee of EAC directed R-1 to revise the consolidated list

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		<p>regarding public hearing (Pg.308@311).</p> <ul style="list-style-type: none"> • R-1 provided revised consolidated list regarding public hearing in Revised Additional Details Sought (Pg.3581-3751). • Allegations denied and dealt with in paragraph 55 of reply @Pg.406-407.
23.	<p><u>Faulty Appraisal by EAC:</u></p> <ul style="list-style-type: none"> • EAC merely accepted statements made by the PP without verifying the ecological sensitivity of the area and directing for a robust environmental impact assessment. (Pg.46, para.95) 	<ul style="list-style-type: none"> • The EAC appraised the project over 4 meetings as follows: <ul style="list-style-type: none"> 9th-11th January 2019 (Pg.284-295) 22nd-23rd August 2019 (Pg.3112-3121) 23rd-24th December 2019 (Pg.296-313) 24th-25th February 2020 (Pg. 314-333) • A sub-committee of the EAC also undertook a site visit on 9th-10th December 2019 (Pg. 308). • EAC sought additional details from R-1 on further clarifications in respect thereof on multiple occasions. The additional details provided by R-1 are as follows: <p>Additional Details Sought – Pg.2074</p> <p>Revised Additional Details Sought – Pg.3122</p>

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		<p>Further Additional Details Sought – Pg.4329</p> <ul style="list-style-type: none"> • Thus, the EAC recommended EC only after being satisfied on all issues, concerns, and queries. • Allegations denied and dealt with in paragraph 56 of the reply @ Pg.407-409.
24.	<p><u>Secured Waste Disposal:</u></p> <ul style="list-style-type: none"> • On perusal of Annexure 11(a), it is patently evident that such if a diagram of Layout Showing Piezometer locations’ and no coordinates of Secured Landfill (‘SLF’) have been provided by R-1. <i>(Para.55 of Rejoinder, Pg.4488)</i> • R-1 has failed to provide details of location and extent of SLF where solids are to be dumped. • R-1 has provided no information as to the manner of treatment of waste effluents prior to sending to RO plant. • R-1 has not undertaken studies that determine the quantity of solids likely to be generated by the Multi Effect Evaporator (‘MEE’). <i>(Para.58 of Rejoinder, Pg.4489)</i> 	<ul style="list-style-type: none"> • The Appellant has erroneously claimed that the page number of Annexure 11(a) is Pg.3075. In fact it is at Pg.3376, wherein location and coordinates of SLF in addition to the piezometer locations is provided. • The said details were provided by R-1 to EAC in Revised Additional Details Sought (Pg.3352-3369, Pg.3370-3391) • The said details were provided by R-1 to EAC in Revised Additional Details Sought (Pg.3299-3300, Pg.3345-3351) • The details of the solids to be generated from the MEE and quantity thereof is mentioned in the EC (<i>Item 4, Para.11, Pg.58</i>) • Allegations denied and dealt with in paragraph 29 of the sur-rejoinder (<i>Pg.4609 onwards</i>).

The Hon'ble Tribunal may be pleased to refer to the following documents in respect of its other queries during the hearing held on 3.2.2023:

- (i) Addendum Report of EIA Report filed before the EAC in May 2021 regarding amendment to the EC: **Pg.4774-4881**
- (ii) Minutes of the Meeting of the EAC held on 31st May-1st June 2021 considering the application for amendment to EC: **Pg.4665 @Pg.4687-4695**
- (iii) Amended EC dated 23.6.2021: **Pg.4753-4758**
- (iv) Transfer (dated 3.8.2021) of EC in favour of Kutch Copper Limited: **Pg.4768-4770**
- (v) Stage-I Forest Clearance in favour of APSEZ: **Pg.243-246**



Place: Pune

Date: 17.2.2023

Advocate of the Respondent No.1