

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE
BENCH, CHENNAI**

ORIGINAL APPLICATION NO. 55 of 2023

IN THE MATTER OF: -

S. Vijay

.... Applicant

Versus

**The Additional Chief secretary
and Ors.**

.... Respondent

**REPLY AFFIDAVIT FILED ON BEHALF OF STATE LEVEL
ENVIRONMENT IMPACT ASSESSMENT AUTHORITY (SEIAA)**



Filed by:
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MoEF&Cc.
Mob. No. 9444015330
Counsel for Respondent no. 2

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE AT CHENNAI**

ORIGINAL APPLICATION No. 55 of 2023

S. VIJAY

S/o. Subramani,
3/272, Aadhidravitar Street,
Thekkampatti Vattakadu Post,
Omalur Taluk, Salem,
Tamil Nadu - 636012.

.... Applicant

/Versus/

1. The Additional Chief Secretary to Government,

Water Resources Department,
Fort St. George,
Chennai - 600 002.

2. Member Secretary

State Environment Impact
Assessment Authority - Tamilnadu
3rd Floor, Panagal Maligai,
No. 1, Jeenis Maligai, Saidapet,
Chennai - 600 015.

**3. Central Ground Water Board South
Eastern Coastal Region**

Rep by its Regional Director,
E-Wing, G-Block, Rajaji Bhavan,
CGO Complex, Besant Nagar,
Chennai - 600 090.

4. Tamil Nadu Pollution Control Board

Rep. by its Chairman,
No.76, Anna Salai, Guindy,
Chennai - 600 032.

5. The Tamil Nadu Magnesite Limited,

Rep. by its Managing Director,
Having office at No.5/53, Omalur Main Road,
Jagirammalayam Post, Salem - 636 302.

.... Respondent(s)


Member Secretary
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
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COUNTER AFFIDAVIT FILED ON BEHALF OF SEIAA – Tamilnadu,
THE SECOND RESPONDENT

I, Deepak S. Bilgi, I.F.S., S/o Mr. Siddappa, aged about 44 years, working as Member Secretary, State Level Environment Impact Assessment Authority, Tamil Nadu (SEIAA-TN) having office at Third Floor, Panagal Building, Saidapet, Chennai - 600 015, solemnly affirm and sincerely state as follows:

1. I am filing this counter affidavit on behalf of the Second Respondent/SEIAA-TN herein and as such I am well acquainted with the facts and the circumstances of the case from the records available in this office.
2. At the outset, I deny the averments and allegations stated in this original application except those that are specifically admitted hereunder and put the applicant to strict proof of the same.
3. It is respectfully submitted that, the project proponent, M/s. Tamil Nadu Magnesite Limited has applied for Environmental Clearance for existing Magnesite and Dunite Quarry over an extent of 96.34.0 Ha at Thathiengarpatti Village, Omalur Taluk, Salem District, Tamil Nadu on 04.10.2018. The Project proponent has obtained Environmental Clearance under EIA notification, 1994 from MoEF&cc vide No.8-53/97-FC dated 23.06.1998.
4. It is respectfully submitted that; the project proposal was placed in the **121st meeting** of SEAC held on 30.11.2018. Based on the presentation made by the proponent and the documents furnished, the SEAC decided to defer the proposal for the following reasons:

"The Hon'ble Supreme Court vide judgment dated the 2nd February, 2018 in writ petition (Civil) No.114 of 2014 in the matter of Common Cause versus Union of India and others, inter-alia, has directed that the validity of the environmental clearances granted for mining projects under the notification number S.O.60 (E) dated 27.01.1994 of the Government of India in the erstwhile Ministry of Environment and Forests shall be five years. The Hon'ble Supreme Court vide judgment dated the 7th February, 2018 in Special Leave to Appeal (Civil) No.32138 of 2015 in the matter of Goa Foundation versus Ms. Sesu Sterile Ltd, & Others has reiterated that the validity of the Environmental Clearances for mining projects granted under the EIA Notification, 1994 shall be five years.

The Hon'ble Supreme Court in its aforesaid judgment dated the 7th February 2018 has held that para 9 of the notification S.O.1533 (E) dated 14th September 2006 of the Government of India in the erstwhile Ministry of Environment and Forests (hereinafter referred to as the EIA Notification. 2006), provides that the environmental clearance would be valid for the estimated project life subject to maximum of 30 years;

And whereas, in the view of the above, there would be two categories of cases related to mining projects under EIA notification 1994, namely

(a) Mining projects, which were granted environmental clearance under the EIA Notification, 1994, and also granted environmental clearance for expansion/ modernization/ amendment under the EIA Notification, 2006; and


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STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligai, No.1, Jeeris Road,
Saidapet, Chennai - 15

(b) Mining projects, which were granted environmental clearance under the EIA Notification, 1994, and but not obtained environmental clearance for expansion/ modernization/ amendment under the EIA Notification, 2006.

And whereas, as per third paragraph above, the projects mentioned in clause (a) of fourth paragraph above do not suffer from the infirmity of validity of environmental clearance being five years;

And whereas, the projects mentioned in clause (a) of fourth paragraph above, do not suffer from the infirmity of expansion vis-à-vis the base production as these projects were already appraised and granted environmental clearance under the EIA Notification, 2006,

And whereas, all mining projects mentioned in clause (b) of fourth paragraph above are required to obtain Environmental Clearance under the EIA Notification, 2006, in pursuance of the aforesaid judgements of the Hon'ble Supreme Court;

And whereas, the Ministry of Environment. Forest and Climate Change is necessary for implementation of the aforesaid judgments of the Hon'ble Supreme Court as well as for the protecting and improving the quality of environment and abating the environmental pollution, that all projects mentioned in clause (b) of fourth paragraph above, be brought under the regulatory framework of the EIA Notification. 2006:

Now, therefore, in exercise of the powers conferred by sub-selection (1) and clause (V) of sub-selection (2) of section 3 of the Environment

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Saidapet, Chennai - 15



Member Secretary

STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligai, No.1, Jeeris Road,
Saidapet, Chennai - 15

(Protection) Act, 1986 (29 of 1986) read with sub- rule (4) of rule 3 of Environment (Protection) Rules, 1986, the Central Government hereby directs, after having dispensed with the requirement of notice under clause (a) of sub- rule (3) of the rule 5 of the said rules in public interest, for implementation of the aforesaid Judgments of the Hon'ble Supreme Court, that the project proponent in all such cases involving validity of the environmental clearance and expansion of mining projects vis-à-vis the base production, shall make application within six months from the date of issue of this notification in Form-1 as given in Appendix-II of the EIA Notification, 2006, for grant of environmental clearance under the provisions of the EIA notification, 2006, and all such application shall be considered by the concerned Expert Appraisal Committee or the State Level Expert Appraisal Committee, as the case may be, who shall decide on the due diligence necessary including preparation of Environmental Impact Assessment Report and public consultation and the application shall be appraised accordingly for grant of environmental clearance."

In the view of the above, it is informed that as per the MoEF&CC Notification S.O.1530 (E) dated 06.04.2018, the project proponent in all such cases involving validity of the environmental clearance and expansion of mining projects vis-à-vis the base production, shall make application within six months from the date of issue of this notification. The date of six month for application for validity of the environmental clearance issued by MoEF&CC and expansion of mining projects vis-à-vis the base production expired on 05.10.2018.

It was observed that the project proponent has submitted application to SEIAA-IN (Both hard copy on 19.11.2018 and Online

application on 10.11.2018) after the cutoff date of six month issued by the MOEF&CC Notification S.O.1530 (E) dated 06.04.2018.

The project proponent has informed that online application was submitted to MoEF&CC on 30.05.2018 for the aforesaid project proposal within the stipulated time as mentioned in the MoEF&CC Notification S.O. 1530 (E) dated 06.04.2018.

In view of the above, the committee decided that the project proponent may approach MoEF&CC to transfer the online application filed by the proponent to MoEF&CC for seeking EC on 30.05.2018 to SEIAA – TN along with the hard copy of the application with note file processed by the MoEF&CC, and SEAC cannot process any application which is active in MoEF&CC.

5. It is respectfully submitted that, the project proponent, M/s. Tamil Nadu Magnesite Limited submitted their application of proposal for obtaining Terms of Reference (ToR) from MoEF&CC through online vide proposal number IA/TN/MIN/74485/2018 dated 13.04.2018.
6. It is respectfully submitted that, the proposal was placed in the **23rd EAC meeting** held on 25.06.2019;
 - (i) The project representative appeared before the committee without proper authorization from the project proponent without clarity that he will take all the decisions was not in order. Hence PP was advised to submit proper authorization letter.
 - (ii) PP has to submit the details of application submitted to the SEIAA along with the copies of SEAC minutes of meeting.

The EAC therefore deferred the proposal for want of above information.

7. It is respectfully submitted that, the proposal was later placed in the **24th EAC meeting** held on 24.07.2019;

PP along with the consultant made the detailed presentation before the committee. PP informed that initially the application for grant of ToR was submitted on 13.04.2018 in the Ministry. Subsequently, an essential detail was sought (EDS) on 04.05.2018 for which reply was submitted by the PP on 30.05. 2018.

EAC observed that both the minerals prior to 2006 were Major and PP had increased the base line production of 1993-94 level of Magnesite & Dunite in the year 1995-96 & 1994-1995 respectively without obtaining the prior Environmental clearance under EIA Notification 1994, hence violation of EIA Notification. The mining operations were stopped from 14.04. 2018.

EAC after detailed deliberation on information submitted and as presented, **recommended for the issuing Standard Term of Reference** along with the following specific Term of Reference for undertaking EIA and preparation of Environmental Management Plan (EMP):

- i. The State Government/SPCB to take action against the project proponent under the provisions of section 19 of the Environment (Protection) Act, 1986, and further no consent to operate to be issued till the project is granted EC.

- ii. The project proponent shall be required to submit a bank guarantee equivalent to the amount of remediation plan and natural and community resource augmentation plan 83 with the SPCB prior to the grant of EC. The quantum shall be recommended by the EAC and finalized by the regulatory authority. The bank guarantee shall be released after successful implementation of the EMP, followed by recommendations of the EAC and approval of the regulatory authority.
- iii. Assessment of ecological damage with respect to air, water, land and other environmental attributes. The collection and analysis of data shall be done by an environmental laboratory duly notified under the Environment (Protection) Act, 1986, or an environmental laboratory accredited by NABL, or a laboratory of a Council of Scientific and Industrial Research (CSIR) institution working in the field of environment.
- iv. Preparation of remediation plan and natural and community resource augmentation plan corresponding to the ecological damage assessed and economic benefits derived due to violation.
- v. The remediation plan and the natural and community resource augmentation plan to be prepared as an independent chapter 13 in the EIA report by the accredited consultants.
- vi. Budget of remediation plan and natural and community resource augmentation plan corresponding to the ecological



Member Secretary
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligai, No.1, Jeeris Road,
Saidapet, Chennai - 15

damage shall be completed within three years and to be prepared accordingly.

- vii. In case of violation of undertaking by way of affidavit to comply with all the statutory requirements and judgment of Hon'ble Supreme Court dated, the ToR/Environmental Clearance shall be liable to be terminated forthwith.
- viii. One season fresh base line data is to be collected for preparation of EIA/EMP reports.
- ix. Public Hearing in case of violation cases is mandatory and shall be conducted as the EIA Notification 2006 and as amended thereof.
- x. The PP should also address the all the issues raised during public hearing along with commitments made and with fund provision to address above issues in tabular form to be submitted along with EIA/EMP report.
- xi. Fund allocation for Corporate Environment Responsibility (CER) shall be made as per Ministry's O.M. No. 22-65/2017-IA.III dated 1st May, 2018 for various activities therein. The details of fund allocation and activities for CER shall be incorporated in EIA/EMP report.
- xii. Detailed hydrological study to be carried out in core and buffer zone of the project as per GEC 2015 guidelines.

- xiii. The Action Plan on the compliance of the recommendations of the CAG as per Ministry's Circular No. J-11013/71/2016-IA.I (M), dated 25.10.2017 needs to be submitted at the time of appraisal of the project and included in the EIA/EMP Report.
- xiv. Details of benefit accrued during the violation period along with capital cost of the project is to be submitted.
- xv. Mine plan approved by Indian Bureau of Mines to be submitted.
- xvi. DGMS permission is to be submitted for blasting at project site, if any.
- xvii. District Survey Report is to be submitted for minor mineral as per the EIA Notification 2006 as amended thereof.
- xviii. Submit the details of reclamation for the surrendered forest land (81.62 ha)
- xix. Compliance of CTO conditions.

Later, the Terms of Reference (ToR) was issued to the project through vide Lr. No. J-11015/64/2018-IA. II(M) dated 08.11.2019.

- 8.** It is respectfully submitted that, the ToR was accorded by MoEF&CC in the name of M/s. Tamil Nadu Magnesite Limited, Salem Vide 11015/64/2018-IA. II(M) dated 08.11.2019, with Public Hearing.


Member Secretary
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligai, No.1, Jeeris Road,
Saidapet, Chennai - 15

9. It is respectfully submitted that, the public hearing was conducted by Tamil Nadu Pollution Control Board on 29.01.2020 at 11:00AM at mines office premises of M/s. Tamil Nadu Magnesite Limited, Thatiengarpatti Village, Omalur Taluk, Salem district.
10. It is respectfully submitted that, the public hearing minutes received by SEIAA-TN on 05.02.2020 from TNPCB.
11. It is respectfully submitted that, the project proponent, M/s. Tamil Nadu Magnesite Limited / Fifth Respondent, submitted their application of proposal for obtaining grant of Environment Clearance through Form-I, Pre-Feasibility report vide Online Proposal No. SIA/TN/MIN/51099/2018, submission dated 15.02.2020 for Arasu Magnesite Mine Quarry Lease over an extent of 96.34 Ha at Kurumbapatti Reserve Forest, of Shevaroy's South Range Village, Omalur Taluk, Salem District, Tamil Nadu.
12. It is respectfully submitted that, the project proponent submitted the final Environment Impact Assessment and Environment Management plan to SEIAA - TN on 10.03.2020.
13. It is respectfully submitted that, the proposal was later placed in the **152nd SEAC** Meeting held on 23.05.2020. The SEAC noted the following:
- a) The Proponent, M/s. Tamil Nadu Magnesite Limited has applied for Environmental Clearance for the Proposed Magnesite quarry lease over an extent of 96.34.0 Ha in Thatiengarpatti Village, Omalur Taluk, Salem District, Tamil Nadu.

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Saidapet, Chennai - 15

Member Secretary
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligai, No.1, Jeeris Road,
Saidapet, Chennai - 15

- b) The project/activity is covered under Category "B2" of Item 1(a) "Mining of Mineral Projects" of the Schedule to the EIA Notification, 2006.

Based on the presentation made by the proponent and the documents furnished, the committee decided to make an on-the-spot inspection to assess the present status of the site by the sub-committee constituted by the SEAC since this project comes under violation. Based on the inspection report, SEAC would further deliberate on this project and decide the further course of action.

Subsequently, the proposal was considered as per the EIA Notification, 2006, by the State Level Expert Appraisal Committee, Tamil Nadu in its 162nd meeting held on 01.07.2020. The Sub-committee of the SEAC inspected the site on 24.06.2020 and submitted the report to SEAC.

14. It is respectfully submitted that, the inspection report of the sub-committee was placed in this **162nd SEAC** Meeting held on 01.07.2020. After the detailed discussion the SEAC decided to follow the guideline which was decided by the last authority. The SEAC classified the level of damages by following the criteria in the Joint Meeting (SEIAA & SEAC) held on 23.07.2018. A guideline for the fixation of bank guarantee for ecological damages, nature resource augmentation plan and community resource augmentation plan for the mining proposals filed under the violation notification dated 08.03.2018.


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Panagal Maligai, No.1, Jeeris Road,
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Member Secretary
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligai, No.1, Jeeris Road,
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Based on these guidelines this project comes under High Violation category. The Committee observes that the project existing Magnesite quarry lease over an extent of 96.34.0 Ha in Thathiengarpatti Village, Omalur Taluk, Salem District, Tamil Nadu by M/s. Tamil Nadu Magnesite Limited comes under the "High level Ecological damage category".

The Committee decided to recommend the proposal to SEIAA for grant EC subject to the following conditions in addition to the normal conditions:

- I. The amount prescribed for Ecological remediation (Rs. 48.18 lakhs), natural resource augmentation (Rs.57.81 lakhs) & community resource augmentation (Rs. 72.26 lakhs), totalling Rs. 178.25 lakhs shall be remitted in the form of bank guarantee to Tamil Nadu Pollution Control Board, before obtaining Environmental Clearance and submit the acknowledgement of the same to SEIAA-TN. The funds should be utilized for the remediation plan, Natural resource augmentation plan & Community resource augmentation plan as indicated in the EIA/EMP report.
- II. The project proponent shall carry out the works assigned under ecological damage, natural resource augmentation and community resource augmentation within a period of one year. If not, the bank guarantee will be forfeited to TNPCB without further notice.
- III. The proponent shall spend CER amount of Rs 48.17 lakhs. The proponent shall spend and submit the proof for the same to SEIAA before issuance of Environment Clearance.


Member Secretary
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligal, No.1, Jeeris Road,
Saidapet, Chennai - 15

- IV. M/s. Tamil Nadu Magnesite Limited should install cautionary board at the entry and important location of the mining site displaying caution notice to the public about the danger of the entering the Magnesite mining areas.
- V. Fencing all along the mined areas at the both portions to be revamped and made a continuous one without any gap or space to prevent entry of the people and animal in to the mined site.
- VI. Bio-fencing (thick vegetation cover) to be developed along the boundaries of the mined area.
- VII. Safety precautionary measures for all the employs who are working in the mines should be practiced and strictly to be followed
- VIII. Fugitive emission needs to be monitored on weekly basis and the compiled 6 monthly report need to be submitted to SEAC and TNPCB.
- IX. The control measures for the fugitive emission during drilling and cutting operation of rocks to be adopted at the site.
- X. Noise measurement also should be measured on a weekly basis and the report to be submitted to TNPCB on 6 monthly-basis.
- XI. The project proponent shall get necessary permission for the mined-out mineral taken from the project site road passing through the permitted forest road.
- XII. Medical check-up of the all the employs to be carried out periodically, specifically with respect to dust exposure levels and the possible control measures taken by M/s. Tamil Nadu Magnesite Limited for minimizing the dust exposure level on the worker and improving their health conditions to be furnished to the competent authority


Member Secretary

STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN

Panagal Maliga, No. 1, Jeevis Road,
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- XIII. It is recommended that future necessary caution needs to be taken regarding environment and ecological damage and protection as per the norms.
- XIV. The project proponent should not carry out mining below the ground water table without the NoC/ permission from the Central ground water Authority.
- XV. The proponent shall form the proper benches during the operation of quarry,
- XVI. During rainy season, the proponent shall supply a water to the farmers from the quarry after achieving the standards for irrigation purpose.
- XVII. The proponent shall provide more green-belt in the periphery of the mining area.
- XVIII. The proponent shall submit the proof for the credible action taken by the state Government/TNPCB the proponent under the provisions of section 19 of the Environment (Protection) Ac, 1986 before placing the subject to SEIAA.
- 15.** It is respectfully submitted that, the authority discussed in detail and decided to direct the project proponent to furnish the following in the **387th SEIAA** meeting held on 05.08.2020 & 06.08.2020. As recommended by the SEAC the amount for ecological remediation shall be remitted in form of the bank guarantee to TNPCB, before obtaining the Environmental Clearance and submit the acknowledgement to SEIAA-TN.

16. It is respectfully submitted that, the proposal was again placed in the **390th SEIAA** meeting held on 25.08.2020, a letter no.6671/2019 dated 14.08.2020 was sent by the Member Secretary, SEIAA-TN to the proponent, to produce the details mentioned, as directed by Authority in its 387th meeting.

In response the proponent has sent a letter to SEIAA vide M/s. TANMAG Letter No. TANMAG/MINES/295 dated 20.08.2020, that

“Due to Covid-19 lock down period, we are unable to find out any agency to implement the CER activities as mentioned in the MoEF&CC OM F.No.22-65/2017 IA.III Dated 01.05.2018. Under these circumstances, we would like to remit the CER amount of Rs. 48.17 lakhs to the Environment Management Agency of Tamil Nadu (EMAT) to carry out the above CER activities for the respective areas”.

The letter was placed in the 390th Authority meeting held on 25.08.2020 and the Authority after detailed discussions decided to request the Member Secretary, SEIAA – TN, to obtain full-fledged report from the project proponent for all the points decided by the Authority in its 387th meeting held on 05.08.2020 & 06.08.2020.

17. It is respectfully submitted that, the proposal was then placed in the **395th SEIAA** meeting held on 11.09.2020. The authority then discussed in detail and as requested by the project proponent, decided to request the proponent to deposit the CER amount of Rs.48.17 lakhs with EMAT subject to the condition that the CER activities listed will be done by EMAT in coordination with TANMAG.

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Saidapet, Chennai - 15


Member Secretary
STATE LEVEL ENVIRONMENT IMPACT ASSESSMENT AUTHORITY - TN
Panagal Maligai, No.1, Jeeris Road,
Saidapet, Chennai - 15

The proponent has deposited the amount of Rs.48.17 Lakhs, towards, CER, on 25.09.2020, vide Demand draft No.136006732 dt.25.09.2020 drawn on IOB, Salem main branch, with EMAT on 25.09.2020, vide their letter No. TANMAG/MINES/EC/398 Dated 25.09.2020 to Member Secretary, EMAT.

18. It is respectfully submitted that, the proposal was then placed in the **400th SEIAA** meeting held on 29.09.2020. After detailed discussion the authority decided to grant Environmental Clearance subject to the conditions recommended by the SEAC and subject to General Conditions in addition to normal conditions.

I. All the condition imposed by the Indian Bureau of Mines vide Lr.No.TN/SLM/MG/ROMP-1483.MDS, Dated 04.05.2018 should be strictly followed.

II. The EMP Cost shall be deposited in a nationalized bank by opening separate account and head wise expense statement shall be furnished to TNPCB with a copy to SEIAA annually.

III. The proponent should strictly comply with, Tamil Nadu Government Order (Ms) No.84 Environment and forests (EC.2) Department dated 25.06.2018 regarding ban on one time use and throw away plastics irrespective of thickness with effect from 01 .01.2019 under Environment (Protection) Act, 1986.

IV. A detailed post-COVID health management plan for workers as per ICMR and MHA guidelines or the State Govt. guideline may be followed and report shall be furnished.

V. The CER amount of Rs 48.17 Lakhs shall be spent for CER activities listed by EMAT in coordination with TANMAG.

19. It is respectfully submitted that, the Environmental Clearance (EC) was issued to the project through vide Lr. No. SEIAA-TN/F.No.6671/ALR/1(a)/EC-4398 dated:14.10.2020.

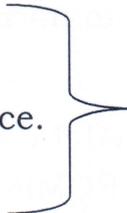

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Panagal Maligai, No.1, Jeeris Road,
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It is therefore humbly prayed that this Hon'ble National Green Tribunal Court, South Zone, may be pleased to record the above-mentioned facts and pass appropriate orders as this Hon'ble NGT(SZ) may deem fit and proper in this case and thus render justice.


SECOND RESPONDENT
MEMBER SECRETARY

Member Secretary
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Solemnly affirmed at Chennai
On this 16th day of August 2023
& Signed his name in my presence.




BEFORE ME
Attested Officer

Assistant Environmental Engineer
State Level Environment Impact Assessment Authority-Tamilnadu
Third Floor, Panagal Maligai
Saidapet, Chennai – 600 015