

To,
The Hon'ble Secretary,
Ministry of Environment, Forest and Climate Change (MoEFCC),
Indira Paryavaran Bhawan, Jor Bagh Road,
New Delhi - 110003.
Email: diriapolicy-moefcc@gov.in

Subject: Objections to Draft EIA Notification S.O. 4411(E) dated September 26, 2025
(Amendment for Exemption of Standalone Cement Grinding Units from Prior Environmental Clearance)

Dear Sir/Madam,

I/We, _____ as responsible citizens of India, hereby submit objections to the Draft EIA Notification S.O. 4411(E) dated September 26, 2025, which proposes to exempt standalone cement grinding units (without captive power plants) from prior Environmental Clearance (EC), provided raw materials and finished products are transported via railways and/or E-vehicles. This exemption is contrary to environmental protection and public interest for the following reasons:

Grounds for Objection:

Environmental Risks: Standalone cement grinding units generate significant dust pollution (PM2.5 and PM10), water contamination, and noise pollution, posing health risks to local communities. Specifically, the proposed Ambuja Cement unit at Mohone (Ambivali), Kalyan Taluka, Maharashtra, is in a densely populated area, exacerbating these issues as per Central Pollution Control Board (CPCB) guidelines on air quality.

Violation of Constitutional Rights: Article 21 of the Indian Constitution guarantees the right to a clean environment as a fundamental right (*Vellore Citizens' Welfare Forum v. Union of India, 1996 SCC*). The EIA Notification, 2006, under Section 3 of the Environment (Protection) Act, 1986, mandates public participation through hearings (Para 7(ii)). This exemption denies such participation, violating procedural safeguards and the precautionary principle enshrined in environmental jurisprudence.

Lack of Transparency and Potential Bias: The notification appears tailored to benefit specific projects, such as Ambuja Cement's Mohone Ambivali unit by Adani Group, raising concerns of favoritism.

Non-Compliance with Pollution Control Norms: The proposal contravenes the Environment (Protection) Act, 1986 (Section 3), and Air (Prevention and Control of Pollution) Act, 1981, by bypassing mandatory Environmental Impact Assessments (EIA). Conditions like rail/EV transport lack enforcement mechanisms, leading to unchecked pollution as highlighted in NGT precedents (e.g., *Satendra Pandey v. MoEFCC*, where EIA amendments were challenged for environmental dilution).

Inadequate Safeguards: The subcategorization of these units as 'B1' or 'B2' under EIA 2006 (Item 3(b)) requires appraisal, but the exemption ignores cumulative impacts in eco-sensitive zones, violating the sustainable development principle (*Indian Council for Enviro-Legal Action v. Union of India, 1996 SCC*).

Demands:

Immediately revoke the Draft Notification S.O. 4411(E) dated September 26, 2025.
Mandate full EIA and public hearings for the Ambuja Cement grinding unit at Mohone (Ambivli), Maharashtra.
Disclose preparation details, including Expert Appraisal Committee (EAC) minutes and stakeholder consultations, under RTI Act, 2005.

Conclusion:

Environmental protection is a governmental duty under Article 48A and 51A(g) of the Constitution. This notification risks public health and ecosystems. We urge consideration of these objections during the 60-day public comment period. If not addressed, we reserve the right to approach the National Green Tribunal (NGT) under Section 14 of the NGT Act, 2010, or file a PIL in the Supreme Court/High Court under Articles 32/226.

Yours sincerely,

Name:

Address:

Contact No:

Date: