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26/09/2024

Ms Leena Nandan
The Secretary
Ministry of Environment, Forests & Climate Change
Indira Paryavaran Bhawan
Jorbagh Road
New Delhi – 110 003

Dear Ms Nandan,

Sub: Open Letter in appreciation of your opening remarks at Summit of the Future Side Event in the UN Headquarters – PIB release Dt. 21/09/2024-The contextual introspection on fly ash brick industry in India.

Hearty compliments to you for the way you have highlighted the visionary leadership of Prime Minister Shri Narendra Modi in launching “Ek Ped Maa Ke Naam” or “Plant4Mother” aimed at involving the citizens of India and the world in planting trees as a mark of love and respect for one’s own Mother and ‘Mother Earth’. Your statistics highlighted that more than 750 million trees have been planted in India between June 5 and September 17 under his initiative.

While these promotional and propaganda activities are laudable in upholding the image of India, more so at international forums, the government should match its efforts back in India paying attention to certain ground realities. Our pointer is to the contribution of fly ash brick plants in terms of climate change indicators vide CDM brochure in the link below:

<https://drive.google.com/file/d/1BrbJvI0JEiFPpdyI-3cuEjLNZi8yW8CB/view?usp=sharing>

Each fly ash brick plant with an average capacity of 3 mn bricks/annum brings down carbon footprint by 723 tons (after leakage) which is equal to the sequestration by approx. 28,920 trees. About 30,000 operative fly ash brick plants are already reducing carbon footprint equal to that of 867.6 million trees. If government evolves conducive policies on fly ash utilisation, there is a potential to promote 100,000 fly ash brick plants that can bring down carbon footprint equal to that of 2892 million trees.

we give another equation, enabling you to realise the magnificence of fly ash brick industry in terms of solar power. By reducing 723 tons of carbon footprint for each plant, the 30,000 brick plants are bringing down carbon footprint equal to that of 23,863 GW of solar power generation. If the target of 100,000 plants is achieved it is equivalent to 79,545 GW. Nation’s target of solar power is 700 GW (175*4) which is yet to be achieved. Please note, fly ash brick activity is the ‘bird in hand’.

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Since you are the Secretary of Climate Change, we give third dimension in terms of 'Climate Change Social Cost (CCSC)' which is valued at USD 180 to 800 per ton of CO₂ by UN Experts. Please note, even at the conservative lower cost of USD 180, each fly ash brick plant conserves Rs. 10.08 million/year towards CCSC which is Rs. 302.4 billion by all operating plants at National level. Once the potential capacity of fly ash brick is tapped it touches to Rs. 1008 billion per year.

- While the government opted to focus its achievement of 750 million trees at UN forum, why is it not getting updated to the achievement of 867 million trees-equivalent by fly ash brick industry!
- If Hon'ble Prime Minister opted to proudly declare at COP 26 the solar power target of 175 GW for its meagre contribution to carbon footprint, how much pride he would have availed by declaring fly ash brick industry with 454 times of carbon footprint potential to that of solar!
- As Ministry of Climate Change can you afford to undermine annual sustentation of Rs. 1008 billion towards CCSC by fly ash brick segment, which is about 1.43% of our National GDP?

Unmindful of all this productive role of fly ash brick industry, union government has gravely strangulated it with its lopsided policies of fly ash utilization.

Despite conceiving a comprehensive Notification in 2021 in right manner based on 'Polluter Pays Principle' together with imposition of Environment Compensation, your ministry has diluted it by adding hostile clauses at the end conducive to 'Polluter Earns Provisions'. Ministry of Power (MoP) is the deemed polluter by virtue of representing TPPs (the actual polluters by generating fly ash). By virtue of giving regulatory role to MoP in the amendment to the same notification in 2024, your Ministry has violated the Environment Act. Taking advantage of this amendment MoP is encouraging bidding of fly ash, presumably to appease the private sector in power industry, casting irrevocable damage to the proliferation of fly ash brick industry.

The fallacy of MoP's argument that such revenue would help in reducing power cost is totally infructuous while they failed to reduce power cost against savings of 'pumping costs to ash ponds' for the billions of tons of fly ash utilised by users over the last two and half decades. Their another claim of projecting fly ash as commodity is equally flimsy while 65,000 acres of land is occupied with over 2400 million tons of ash, causing disaster after disaster every year due to breach of ash ponds endangering lands and communities. Their silly untenable claim is that they would achieve 100% utilisation by selling the fly ash, which they could never achieve even after giving free of cost over 23 years. It is sad that they are attempting to

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confuse the courts and wasting the precious time of judiciary with all such concocted arguments, to which MoEFCC is forced to remain as mute spectator.

Such lopsided policies question the veracity of government's commitments on Climate Change targets declared at international forums. Obligations of government with private industrial sector is understandable to which political bosses may succumb in order to keep the country on development path. But, when it comes to Environment and Climate Change welfare, your ministry should stand steadfast with defensive logistics in order to be answerable on Climate Change criteria.

We reiterate that Government has missed in realising the magnificent role of fly ash brick industry for its contribution to Ecology-Environment-Economy-Empowerment, presumably due to inadequate briefing from your ministry. For reaching to 100% utilisation of fly ash, which fly ash brick segment alone can cope up, Government shall make available fly ash to this industry as easy as clay, so that its colossal environmental service and economic potential can be effectively tapped, rather than craving for the 'alms' earned out of selling fly ash.

We introduce you to the new economic equation of '*Euphoric Revenue*' and '*Productive Revenue*' being collected by Central and State Governments. In the contextual reference to the euphoric revenue out of liquor, the income is nullified by the cascading effect of tangible and intangible damage to the society and human resources, more so in the working class, in terms of man days' loss, efficiency loss, criminal acts, family conflicts, social unrest, deaddiction budgets, health repair budgets, appeasing Aarogyasri schemes etc. In contrast, productive revenue out of taxes goes to development programs of the Nation without any nullifying tags.

The revenue out of fly ash is another reference the '*Euphoric Revenue*' since, by retrogression in utilisation, the exchequer loses more than the revenue-earning towards pond management, disaster-compensation, '*Environment Compensation*', expenditure on consequential pollution, carbon footprint and Climate Change Social Costs. Please have the balance sheet made diligently to realise this glaring fact.

Despite having patent, desisting from invoking the same, we have dedicated our fly ash brick (FaL-G) technology to the Nation in 1990 in the interest of total fly ash utilisation and welfare of climate. We are now totally agonised at our age of 70s, by the way our efforts are shattered through unethical fly ash policies.

As scientists, administrators, politicians and judicial members, we are all accountable to our conscience while introspecting our professional deeds, be it while rocking on retirement chair over a cup of coffee or at the terminal point of the life. This is the doctrine of Hinduism which our beloved PM believes and upholds at the time of crisis.

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So we appeal to you for taking our statistics together with your inputs to Hon'ble PM so that, we are sure, he would compromise on his priorities and extend a judicious decision on this issue. Let us not bury this subject anymore with irrational arguments and personal judgments in our urge to have petty gains, deflecting from the path of 'Sustainable Development' that upholds the welfare of this Earth for future generations.

We conclude this letter with an expression of Prof. Satish Dhawan, the renowned space scientist and ex. Chairman of ISRO, that says "*Science and Technology are the powerful tools of development and progress. We must judiciously tap their potential for improving the living standards of humans but not to allow these tools to be cornered for mere profit making by a few business houses*".

With warm regards,

Sincerely yours,



Dr N Bhanumathidas N Kalidas

Enc:

- I. Charter of Dedication to the Nation.
- II. World Bank Certificate on carbon credits.

Copy to:

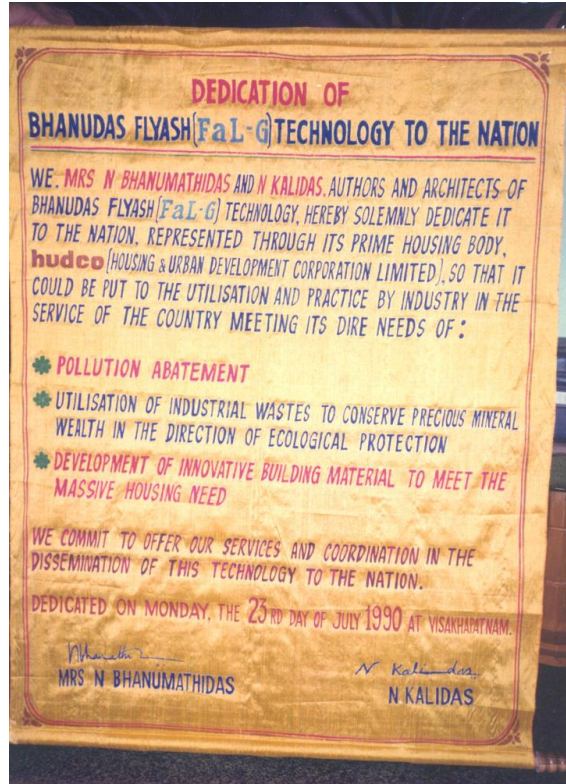
1. Shri Narendra Modi
Hon'ble Prime Minister of India.
2. Shri YV Chandrachud
Hon'ble Chief Justice of India.
3. Ms Bela M Trivedi
Hon'ble Judge of Supreme Court of India.
4. Shri N Chandrababu Naidu
Hon'ble Chief Minister
Govt. of Andhra Pradesh.
5. Shri K Pawan Kalyan
Hon'ble Dy Chief Minister and Minister of Environment
Govt. of Andhra Pradesh.
6. Secretary
Union Ministry of Power

For kind information on the ground realities of fly ash brick segment in India.

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Enc I): Charter of Dedication of FaL-G brick technology to the Nation in 1990:



Enc II): Certificate from the World Bank while signing Agreement for transfer of carbon credits out of fly ash brick activity:

