Clarifications

1. **Whether all categories of workers mentioned in Paragraph 9 were classified as independent contractors?**
   Ans. Yes

2. **What is the shareholding structure of HPGE between HGRL and indica gov.?**
   Ans. The proposition does not specify the precise shareholding. Teams shall confine themselves to the facts provided.

3. **Whether the non-provision of statutory protections relating to wages, social security, and collective bargaining was a consequence of the terms contained in the standard agreements classifying the workers as independent contractors, or whether it resulted from their engagement through third-party agencies and subcontracting arrangements?**
   Ans. Teams may argue both aspects. No further clarification.

4. **What is the exact shareholding of HPGE? How much is held by HGRL, Prithvi Infrastructure, and the Government?**
   Ans. Refer clarification no. 2.

5. **Can the text of the Bilateral Investment Treaty be provided, particularly its provisions on the right to regulate, essential security, exhaustion of local remedies, denial of benefits, fair and equitable treatment, and expropriation?**
   Ans. No. Teams may rely upon generally accepted BIT principles and the facts stated in the proposition.

6. **What exactly constituted the "preparatory activities" undertaken before environmental clearance?**
   Ans. No further facts are provided. Teams shall rely upon the proposition.

7. **What is the exact chronology of the provisional licence, preparatory work, diversion of 5,200 hectares, environmental clearance, forest clearance, and Pollution Control Board consent?**

   Ans. Except as expressly stated, the chronology is not specified. Teams shall confine themselves to the facts contained in the Moot Proposition and may advance arguments based thereon.

8. **Does the proposition specify a notional year or present date to determine the applicable statutory framework and precedential position?**

   Ans. The proposition is set in the year 2026, unless expressly stated otherwise in the Moot Proposition.

9. **Were the lithium-leak footnotes omitted from the regulator's copy, or only from the public version? Who removed them?**

   Ans. The proposition only states that the footnotes were absent from the public version of the EIA report. No inference shall be drawn regarding any other version of the report or the identity of the person or entity responsible for such omission.

10. **Were the workers paid below the statutory minimum wage?**

    Ans. Whether the workers were paid below the statutory minimum wage is a disputed question of fact left open for argument.

11. **Is it admitted that the designation was based on the algorithm, or is that based only on the untabled report? Is the report part of the record?**

    Ans. No further clarification is provided regarding its evidentiary value or the extent to which its contents are admitted. Teams are at liberty to advance appropriate arguments.

12. **Is the project area within a Fifth Schedule area? Were the Tribes Advisory Council or the Governor's special powers invoked?**

    Ans. Yes. Dharini Basin is a designated Scheduled Area within the meaning of the Moot Proposition. Except as expressly stated in the Moot Proposition, no further

clarification is provided regarding the invocation of the Tribes Advisory Council or the exercise of the Governor's special powers.

13. **Has Indica ratified and domestically incorporated the ICCPR, ICESCR, ILO Conventions, UNDRIP, CBD, and Paris Agreement?**

Ans. Teams shall proceed on the basis that the constitutional framework and the international legal position of Union of Indica are pari materia with those of the Republic of India, unless inconsistent with the Moot Proposition.

14. **Was the State's inquiry statutory or departmental? Is it final or under challenge? Who comprised the independent committee?**

Ans. The proposition only states that an official inquiry was conducted by the State authorities and that an independent fact-finding committee was constituted by several civil society organizations.

15. **How is lithium classified in the proposition?**

Ans. For the purposes of this Moot Proposition, lithium shall be treated as a strategic mineral essential for supporting renewable energy technologies.

16. **Is Prithvi Infrastructure a statutory corporation or a Government company? Is it majority Government-owned and controlled?**

Ans. The Moot Proposition only states that Prithvi Infrastructure Ltd. (PIL) is a Public Sector Undertaking of Union of Indica.

17. **Which entity actually holds the mining lease and statutory clearances: HPGE, HGRL, or Prithvi?**

Ans. The Moot Proposition does not specify the entity holding the mining lease or the statutory clearances. Teams shall confine themselves to the facts contained in the Moot Proposition and advance arguments accordingly.

18. **Are HGRL, HPGE, and Prithvi to be treated as "State" for the purpose of the writ, or is that itself a contested issue?**

Ans. Whether HGRL, HPGE, and/or Prithvi Infrastructure Ltd. are amenable to writ jurisdiction or fall within the ambit of "State" or any other public law doctrine is a matter for adjudication. No further clarification.

19. **What does the Union-HGRL agreement provide regarding Government equity, sovereign guarantees, royalties, and benefit-sharing with affected communities?**
Ans. The Union-HGRL agreement is only described as a public-private partnership arrangement for the DILEZ project, along with the related arrangement involving PIL and the SPV HPGE.

20. **Who exactly has been arrayed as respondents? Has the State of Norland adopted HGRL's position or is HGRL acting independently?**
Ans. For the purposes of this competition, HGRL shall be treated as appearing in its own corporate capacity. Nothing in the Moot Proposition suggests that it acts on behalf of the State of Norland.

21. **Under what legal provision was the Dharini Basin designated a "strategic mineral zone"? Does this designation fast-track approvals or relax environmental and forest requirements?**
Ans. The Moot Proposition does not specify the statutory source of the designation. Teams shall confine themselves to the facts stated in the proposition and applicable law.

22. **What information is being withheld on national-security grounds? Were any reasons disclosed? Is the foreign defence-analytics firm connected to Norland or HGRL?**
Ans. No further clarification.

23. **Does the State admit that the environmental clearance was post-facto, or does it maintain that the work was merely exploratory?**
Ans. No further clarification. As stated in the moot proposition, the environmental clearance is alleged to be a post facto approval by the Petitioners. Whether the

clearance is legally sustainable is a matter for the teams to argue based on the facts provided.

24. **What is the legal basis and scope of the "provisional licence"?**

Ans. The Moot Proposition does not specify the statutory basis or scope of the provisional licence. Teams may advance arguments on the basis of the applicable law.

25. **Were the mine, thermal backup unit, chemical plant, and freight corridor assessed together or cleared separately?**

Ans. No further clarification.

26. **Did the Expert Appraisal Committee consider cumulative impact, groundwater risk, and lithium-leak risk? Are its minutes available?**

Ans. No further clarification.

27. **Is the expert who identified AI-generated portions an official source? Is that finding on record?**

Ans. No further clarification.

28. **How many Gram Sabhas voted? What was the total electorate, and what quorum requirement was allegedly not met?**

Ans. No further clarification.

29. **Who conducted and controlled the digital voting system on which identical IP addresses appeared?**

Ans. No further clarification.

30. **Was the forensic examination court-ordered or privately conducted? What were the "statistical anomalies," and is the report on record?**

Ans. No further clarification.

31. **Were the consultation materials and EIA made available in the local tribal language before voting?**

Ans. The Moot Proposition only states that the EIA report was published in English and was not translated into the tribal language. No further clarification is provided regarding other consultation materials.

32. **Of the approximately 20,000 displaced persons, how many are Scheduled Tribes, migrants, or recorded titleholders?**

Ans. The figures provided in the proposition are exhaustive.

33. **Under which law was displacement carried out? Was there a Social Impact Assessment and rehabilitation process?**

Ans. Teams may rely upon the applicable laws of Union of Indica corresponding to those in force in India. No further factual clarification is provided.

34. **Has any compensation or rehabilitation been offered or paid?**

Ans. The proposition only states that persons lacking formal land titles were excluded from compensation and rehabilitation.

35. **How many forest-rights claims were pending, and when were they filed?**

Ans. No further clarification.

36. **Are the sacred groves and elephant corridor officially recorded or protected?**

Ans. The Moot Proposition does not specify whether the sacred groves or elephant corridor are formally notified or legally protected. For the purposes of the proposition, it may be assumed that the sacred groves are community-preserved customary forest spaces traditionally revered by the local Adivasi communities, while the elephant corridor is the ecological migratory route referred to in the factual matrix. Teams are free to argue the legal significance of these features.

37. **Are the workers employees or independent contractors in substance? Who is the principal employer?**

Ans. The proposition states that workers were contractually classified as independent contractors. Whether such classification reflects the true legal relationship and who, if anyone, is the principal employer remain matters for argument.

38. **Are the allegations regarding unsafe conditions and wage suppression supported by official labour-inspection findings?**

Ans. No further clarification.

39. **Was the authority responsible for retaliatory dismissals and surveillance the State or the employer?**

Ans. No further clarification.

40. **Who constructed and operated the tailing dam, and to what engineering standard?**

Ans. No further clarification.

41. **Were the 27 deceased contract workers? Has compensation been paid? Are there any criminal proceedings or FIRs?**

Ans. No further clarification.

42. **Who conducted the groundwater contamination studies? Are they on record, and do they attribute contamination to the project?**

Ans. The proposition merely refers to independent scientific studies.

43. **Apart from hospital reports, is there any baseline or causation study linking health complaints to the project?**

Ans. No. The proposition expressly states that the hospital reports do not establish any direct causal link.

44. **Are the HGRL-affiliated monitoring bodies operating under any formal mandate? Is there independent regulatory monitoring?**

Ans. No further clarification.

45. **Under what legal authority was the internet shutdown imposed? Were the orders published, reasoned, time-limited, and reviewed?**

Ans. The Moot Proposition does not specify the precise statutory provision invoked for the internet restrictions. Teams may rely upon the applicable laws of Union of Indica corresponding to those in force in India.

46. **Under what authority were drones, facial recognition, and predictive policing deployed? Is the data retained?**

Ans. The Moot Proposition does not specify the statutory basis for deployment of drones, facial recognition, or predictive policing. Teams may rely upon the applicable legal framework corresponding to that in force in India.

47. **Under which law were activists detained? How many were detained, on what grounds, and were their cases reviewed by an Advisory Board?**

Ans. No further clarification.

48. **Were the protests peaceful, or did they involve violence or sabotage?**

Ans. No further clarification.

49. **Is the use of predictive policing admitted or merely alleged?**

Ans. The proposition records it as an allegation made by the locals and civil society organisations**.** No admission by the State is recorded.

50. **Has HGRL commenced arbitration or served a formal notice of dispute?**

Ans. No. The proposition only states that HGRL warned that adverse action may lead to investor-State dispute settlement proceedings. No arbitration or notice is stated.

51. **When did the Bilateral Investment Treaty enter into force, and what constitutes HGRL's protected investment?**

Ans. No further clarification.

52. **Is the petition directly under Article 32 before the Supreme Court, or has it come from the High Court or the NGT?**

Ans. The petition has been filed directly before the Supreme Court of Indica under Article 32 of the Constitution of Indica. There are no prior or parallel proceedings

before any High Court, the National Green Tribunal, or any other forum unless expressly stated in the moot proposition.

53. **Is the writ limited to enforcement of fundamental rights, or does it also seek continuing mandamus or judicial monitoring?**
Ans. The nature and scope of reliefs are left open for argument.

54. **Are teams confined to the four framed issues, or may additional issues be framed?**
Ans. Teams may frame additional issues, provided they are relevant to the facts of the proposition, as expressly stated in the Note.

55. **Are the petition's factual allegations admitted on record, or are they disputed?**
Ans. Unless expressly admitted in the proposition, all factual allegations remain open to challenge and argument by the parties.

56. **Has any respondent raised an objection regarding the jurisdiction of the National Green Tribunal? Are there parallel proceedings or prior litigation?**
Ans. No. The Moot Proposition does not indicate any objection regarding the jurisdiction of the National Green Tribunal or any parallel proceedings.

57. **Is the matter at the admission stage or the final hearing on merits?**
Ans. The matter is at the stage of final hearing on merits before the Supreme Court of Indica.

58. **What is the timeline between the filing of the petition, the tailing-dam failure, and the statutory clearances?**
Ans. Teams shall rely on the chronology contained in the proposition.

59. **Are the petitioners seeking complete cessation of the project, or fresh clearances, consultation, rehabilitation, and remedial measures?**
Ans. The precise reliefs sought are left open for argument.

60. Is any relief specifically sought against HGRL or HPGE, or only against the State?

Ans. The proposition does not particularise the reliefs against individual respondents.

61. Are the figures relating to displacement, deaths, forest diversion, and Gram Sabha consent exact or approximate?

Ans. Unless otherwise indicated, the figures stated in the proposition shall be treated as the facts of the moot proposition. Where the proposition uses expressions such as "approximately" or "nearly", those figures are approximate; where specific numerical figures are provided, they may be treated as stated facts for the purposes of the competition.