

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

O.A. No. 114 to 122 of 2020

Mallapu Chengamma	... Applicant in OA No. 114 of 2020
Pantrangam Ramasubbaiah	... Applicant in OA No. 115 of 2020
Poluru Murali	... Applicant in OA No. 116 of 2020
Nalajam Sreenivasulu	... Applicant in OA No. 117 of 2020
Vinnamala Munisekhar Reddy	... Applicant in OA No. 118 of 2020
Saguturu Krishna Reddy	... Applicant in OA No. 119 of 2020
Pantrangam Subrahmanyum	... Applicant in OA No. 120 of 2020
Polluru Bhargavi	... Applicant in OA No. 121 of 2020
Saguturu Dayaker Reddy	... Applicant in OA No. 122 of 2020

-Versus-

State of Andhra Pradesh
& 65 Ors

... Respondents in OA Nos. 114 to
122 of 2020

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Dated at Chennai on this the 17th day of November, 2021.

**COUNSEL FOR RESPONDENT
Nos. 10, 28, 31 & 34**

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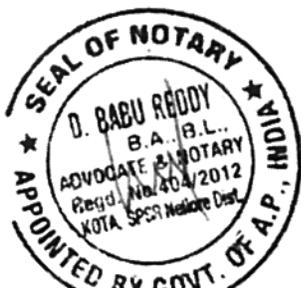
-Versus-

State of Andhra Pradesh & 65 Ors	... Respondents in OA Nos.114 to122 of 2020
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**COMMON COUNTER STATEMENT FILED ON BEHALF
OF RESPONDENT Nos. 10, 28, 31& 34**

The Respondents above-named **humbly** submit as follows:

1. The Respondentsabove-named submit that they have perused a copy of the application and documents filed in support of O.A. 114 to 122 of 2020 (SZ) and emphatically deny all the averments/allegations contained therein except those that are matters of record and those specially admitted to herein. The Respondents above-named also put the Applicant to strict proof of the averments/allegations made in the applications.
2. The Respondents above-named submit that most of the allegations/averments made by the respective Applicants are false and lack merit and as such do not warrant any response from the Respondents above-named. However, this may not be deemed as admission of any fact on the part of the Respondents above-named for



1 M. Sailaja

2 [Redacted]

3 M. [Redacted]

the mere absence of any specific traverse. The Respondents above-named state that the basis on which the respective Applicants have arrayed the Respondents and the basis of the allegations made in the OAs are unclear and not backed by any document.

3. The Respondents above-named named submit that the averments made in the respective Applications alleging illegal/high-handed acts of the Respondents above-named have affected the rights of the respective Applicants is vehemently denied and the Applicants are put to strict proof of the same. The Respondents above-named submit that the Applicants have erroneously arrayed the Respondents above-named as a party to this Application. The Respondents above-named state that they are not carrying on any illegal activities as alleged and further that they are not letting out any waste/discharge into the rivers/water bodies as alleged.
4. The Respondents above-named submits that entire application is set out on the ground that the Respondents above-named and others are carrying on illegal/unauthorized prawn and shrimp aquaculture farm in the various survey numbers at the villages mentioned in the Applications, without obtaining the mandatory permissions/clearances and the same are vehemently denied as false in so far as the Respondents above named are concerned.
5. The Respondents above-named state that based on the recommendations of the High-Level Committee constituted by the District Collector, Sri Potti Sriramulu Nellore District, and after considering the objections from the public, aqua zones were approved for setting up Aquaculture Farms.
6. The Respondent No. 10/31 (Manubolu Sailaja) submits that she holds valid Certificates of Registration bearing nos. AP-II-2018 (19814) and AP-II-2018 (19816) issued by the Coastal Aquaculture Authority,



1 M. Sailaja

2



3 H. Gundamma

Government of India, Ministry of Agriculture and Farmers Welfare, to run Aquaculture Farm.

7. The Respondents 28 and 34 state that they are not running any illegal aquaculture farm as alleged. The Respondents above-named state that they are not conducting any illegal activities as alleged and further that they are not discharging waste/effluents into irrigational water bodies as erroneously alleged by the Applicants in the OAs.
8. The Respondents above named further submit that the OAs are motivated and have been instituted by members of opposing political factions. It is further pertinent to note that there are no specific details or allegations made against any specific Respondent and mere blanket, vague and general allegations/statements are made by all the Applicants in all the OAs without any factual/documentary basis.
9. The Respondents above-named further submit that the Applicants have miserably failed to make out any impropriety or illegality on the part of the said Respondents to bolster the vague allegations made in the OAs.
10. The Respondents above-named reiterate at the risk of repletion that there is no illegal activity whatsoever being carried out by them nor is there any discharge of untreated waste and chemical effluents into the irrigation canal or the neighboring agriculture lands nor any attempt made to demolish the bunds or pipes or crops.
11. The Respondents above-named state that they have at all times acted in compliance with all the statutory provisions and shall continue to follow the same in the future as well. The allegations made by the Applicants against the Respondents above-named are reckless and baseless to say the least. The Respondents above-named submit that the instant OAs, in so far as they relate to the above Respondents, ought to be dismissed as they lack substance and/or merit.



1 M. Scilaga
2
3 H. g. uderacua

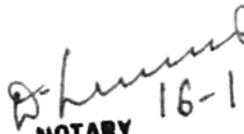
It is therefore prayed that this Hon'ble Tribunal may be pleased to dismiss O.A. Nos. 114 to 122 of 2020 (SZ) with cost and pass such further/other order(s) as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case and thus render justice.

Dated at Nellore on this the 15th day of November, 2021.


COUNSEL FOR RESPONDENT
NOS.10, 28, 31 & 34

1 M Sailaja
2 
3 H. guderoana
RESPONDENT NOS.
10, 28, 31 & 34




16-11-21
NOTARY
APPOINTED BY GOVT. OF A.P. INDIA
D. BABU REDDY, B.A., B.L.
ADVOCATE & NOTARY
Regd. No. 404/2012
KOTA, SPSR Nellore Dist.

1 M. Sailaja
2 
3 H. guderoana



भारत सरकार, कृषि एवं किसान कल्याण मंत्रालय /
GOVERNMENT OF INDIA, MINISTRY OF AGRICULTURE AND FARMERS WELFARE
तटीय जलकृषि प्राधिकरण / COASTAL AQUACULTURE AUTHORITY



1920

तटीय जलकृषि फार्म का पंजीकरण प्रमाण पत्र
CERTIFICATE OF REGISTRATION OF COASTAL AQUACULTURE FARM

प्ररूप -II / FORM-II

तटीय जलकृषि प्राधिकरण अधिनियम 2005 की धारा 13 और तटीय जलकृषि प्राधिकरण नियमावली 2005 के नियम 11 के अधीन
Under Section 13 of Coastal Aquaculture Authority Act, 2005 and Rule 11 of Coastal Aquaculture Authority Rules, 2005.

पंजीकरण संख्या / Reg. No. AP-II-2018(19814) तारीख / Dated : 07-JAN-2019

श्री/ श्रीमती/ सुश्री..... पुत्र / पुत्री / पत्नी.....

..... निवासी का तटीय जलकृषि फार्म दिनांक

की संख्या..... द्वारा तटीय जलकृषि प्राधिकरण द्वारा पंजीकरण तिथि से पाँच साल के लिए पंजीकरण किया जाता है।

The coastal aquaculture farm of ..SMT. MANUBOLU.SAILAJA, W/O SHRI. SATHEESH.....

residing at.....PITTIVANIPALLI (V), CHITTAMUR (M), SPSR NELLORE (DT), ANDHRA PRADESH.....
PIN:524415.

is registered by the Coastal Aquaculture Authority vide No.AP-II-2018(19814).....
dated.....07-JAN-2019..... for a period of five (5) years from the date of registration.

इकाई और अपनाई जाने वाली प्रौद्योगिकी के ब्यौरे / DETAILS OF UNIT AND TECHNOLOGY TO BE FOLLOWED

1. फार्म का स्थल / Location of the Farm

राज्य / State	जिला / District	तालुक/मंडल / Taluk/Mandal	राजस्व ग्राम / Revenue village
ANDHRA PRADESH	NELLORE	CHITTAMUR	PADARTHIVARI KANDRIGA

2. सर्वेक्षण संख्या / Survey Numbers :

SY.NO: 7-2A, 7-3

1. फार्म का क्षेत्रफल(हैक्टेयर में) / Area of the farm (in hectare) :

a) फार्म का कुल क्षेत्रफल / Total farm area :0.94.....

b) जल प्रसार का कुल क्षेत्रफल / Total water spread area : ..0.56.....

2. पालन की जाने वाली प्रजातियां / Species to be cultured : ...SPF.Litopenaeus.vannomei.....

3. स्थांक रखने का घनत्व / Stocking density : ...NOT EXCEEDING 2.00,000/ha.....

4. प्रति वर्ष फसल संख्या / No. of crops / year :2 PER YEAR.....

स्थान / Place : CHENNAI

तारीख / Date : 07-JAN-2019



(अधिकृत हस्ताक्षर कर्ता / Authorised Signatory)



भारत सरकार, कृषि एवं किसान कल्याण मंत्रालय /
GOVERNMENT OF INDIA, MINISTRY OF AGRICULTURE AND FARMERS WELFARE
तटीय जलकृषि प्राधिकरण / COASTAL AQUACULTURE AUTHORITY



1922

तटीय जलकृषि फार्म का पंजीकरण प्रमाण पत्र
CERTIFICATE OF REGISTRATION OF COASTAL AQUACULTURE FARM

प्ररूप -II / FORM-II

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Under Section 13 of Coastal Aquaculture Authority Act, 2005 and Rule 11 of Coastal Aquaculture Authority Rules, 2005.

पंजीकरण संख्या / Reg. No. AP-II-2018(19816)

तारीख / Dated : 07-JAN-2019

श्री/ श्रीमती/ सुश्री..... पुत्र / पुत्री / पत्नी.....
..... निवासी का तटीय जलकृषि फार्म दिनांक

की संख्या..... द्वारा तटीय जलकृषि प्राधिकरण द्वारा पंजीकरण तिथि से पाँच साल के लिए पंजीकरण किया जाता है।

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1. फार्म का स्थल / Location of the Farm

राज्य / State जिला / District तालुक/मंडल / Taluk/Mandal राजस्व ग्राम / Revenue village

.....ANDHRA.....NELLORE.....CHITTAMUR.....PITTIYANIPALLI.....
PRADESH

2. सर्वेक्षण संख्या / Survey Numbers :

SY.NO:15

1. फार्म का क्षेत्रफल(हैक्टेयर में) / Area of the farm (in hectare) :

a) फार्म का कुल क्षेत्रफल / Total farm area :1.00.....

b) जल प्रसार का कुल क्षेत्रफल / Total water spread area : ..0.60.....

2. पालन की जाने वाली प्रजातियाँ / Species to be cultured : ...SPF.Litopenaeus.vannamei.....

3. स्टाक रखने का घनत्व / Stocking density : ...NOT EXCEEDING 2,00,000/ha.....

4. प्रति वर्ष फसल संख्या / No. of crops / year :2 PER YEAR.....

सीन /Place : CHENNAI

तारीख / Date : 07-JAN-2019



(Handwritten Signature)

(अधिकृत हस्ताक्षर कर्ता / Authorised Signatory)

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

O.A. No. 114 to 122 of 2020

**COMMON COUNTER STATEMENT &
ANNEXURE FLED ON BEHALF OF
RESPONDENT NOS. 10, 28, 31 & 34**

**R. PALANIANDAVAN (1266/08)
G. RAJKUMAR (348/2000)
S. MANISHA BOHRA (4583/18)
R. REVANTH KUMAR (5386/2019)**

**COUNSEL FOR RESPONDENT
Nos. 10, 28, 31 & 34**

Ph: 9884110509