

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE, KOLKATA BENCH
ORIGINAL APPLICATION NO. 53 OF 2024**

IN THE MATTER OF:

MATHEW GONMEI

...APPLICANT

VERSUS

STATE OF MANIPUR & ORS

...RESPONDENTS

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Date :10.08.2025


 Filed By
 Pukhrambam Ramesh Kumar
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Office of Ramesh Pukhrambam <courtclerkoframesh@gmail.com>

**Service of Reply on behalf of State of Manipur in Original Application 53/2024
(Mathew Gonmei Vs State Of Manipur)**

Office of Ramesh Pukhrambam <courtclerkoframesh@gmail.com>

Sun, Aug 10, 2025 at 8:52 PM

To: advocate.paushali@gmail.com

Sir(s)/Ma'am(s),

I am attaching herewith a copy of the Reply being filed by me on behalf of State of Manipur in the above-captioned matter. This may be treated as service upon you.

 **Reply Affidavit ref to OA No 53 of 2024.pdf**
5111K

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IN THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE, KOLKATA BENCH
ORIGINAL APPLICATION NO. 53 OF 2024

IN THE MATTER OF:

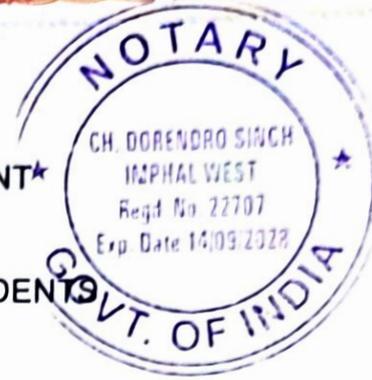
MATHEW GONMEI

...APPLICANT*

VERSUS

STATE OF MANIPUR & ORS

...RESPONDENTS



REPLY ON BEHALF OF THE STATE OF MANIPUR TO THE AFFIDAVIT
DATED 19.03.2025 FILED BY THE APPLICANT

I, R.K. Amarjit Singh (IFS), presently serving as the Special Secretary (Forest, Environment & Climate Change), Government of Manipur, do hereby solemnly affirm and state as under:-

1. That I am currently working in the aforesaid capacity and that I am conversant with the facts of the present case and therefore competent to depose the present affidavit on behalf of all the State Respondents herein.
2. That I have read and understood the content submitted by the Applicant in the Affidavit dated 19.03.2025 filed by the Applicant and it is humbly submitted that except for all that is a matter of record, all allegations, statements, and submissions are denied and disputed by the Respondent State. Nothing contained in the application shall be deemed to be admitted or accepted unless the same is expressly admitted herein.

PRELIMINARY SUBMISSIONS

3. It is further submitted that the Respondent State is tirelessly taking necessary steps for the protection and development of the Zeilad Wildlife


68-08-25.
CH. DORENDRO SINGH
Advocate & Notary, Govt. of India
Regn. No. 22707
Imphal West, Manipur-795113

Sanctuary such as plantation of food and shelter tree species, capacity building programmes for local volunteers on firefighting, patrolling, prevention of poaching, fire line cutting, eradication of invasive species, alternate livelihood generation activities, etc. in and around the sanctuary and will continue to do so.



4. It is most humbly submitted that as per the Report submitted by the Divisional Forest Officer/Wildlife Division, there are reports of Jhum cultivation and tree felling for bona fide use by villagers residing within the area of the sanctuary. However, the extent and impact are localized and limited and do not correspond to the broad forest degradation claims put forward by the applicant. Furthermore, it is humbly submitted that the customary practice of Jhum cultivation, in the absence of settlement of rights under the provisions of the wildlife (Protection) act, 1972, poses a major challenge. It is humbly submitted that once the process of settlement of rights is complete, the Respondent State will be in a better position to effectively protect, conserve and develop the rich flora and fauna diversity and the unique ecosystem of the sanctuary.

INTERPRETATION OF THE MAPS PRODUCED BY THE APPLICANT

5. It is most respectfully submitted that upon comparison of the satellite map referred to by the applicant in the Affidavit dated 19.03.2025 with the Forest Survey of India (hereinafter referred as 'FSI') Forest Cover Maps for the years 2019, 2021, and 2023, it is observed that the interpretation presented by the applicant does not align with the official forest cover


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classification. Furthermore, the areas that were consistently classified as "Open Forest" in all three FSI reports have been shown as "Closed Forest" in the maps provided by MARSAC. It is humbly submitted that since "Closed Forest" cannot naturally regenerate or transition from "Open Forest" within a span of just one or two years, the claim of the applicant is incorrect and misinterpreted as the forests produced in the maps are incorrectly classified. A true and correct copy of the Forest Survey of India Forest Cover Maps for the years 2019, 2021, and 2023 are marked and annexed respectively as **ANNEXURE A-1 (PAGE NO. 9), ANNEXURE A-2 (PAGE NO. 10), and ANNEXURE A-3 (PAGE NO.11).**

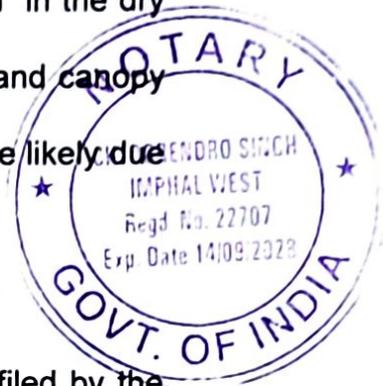


6. It is further submitted that upon comparison of the FSI Forest Cover Maps of 2019, 2021, and 2023, it is observed that certain patches previously classified as "non-forest" have been re-classified as "scrub" in the 2023 map, which indicates a trend of vegetation recovery and gradual forest development.
7. It is most respectfully submitted that the Google Earth imagery dated 28.02.2017, 19.10.2019 and 29.01.2024 of the sanctuary indicates progressive forest cover development in multiple patches that were earlier mapped as "non-forest". A true and correct copy of the Google Earth imageries dated 28.02.2017, 19.10.2019 and 29.01.2024 are marked and annexed herewith respectively as **ANNEXURE A-4 (PAGE NO. 12), ANNEXURE A-5 (PAGE NO. 13), and ANNEXURE A-6 (PAGE NO. 14).**

Handwritten signature and date: 68-09-25.

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8. It is further submitted that the sanctuary comprises a mix of Secondary Moist Bamboo Brakes, Cachar Tropical Semi-Evergreen Forest, and East Himalayan Sub-Tropical Wet Hill Forest, which naturally exhibit seasonal variation in canopy cover. These forests may appear as "open" in the dry season and "closed" post monsoon season due to leaf flush and canopy regeneration. It is submitted that the observed changes may be likely due to seasonal or resolution-based misclassification.



PARA-WISE RESPONSE

9. That with regard to Para 2 of the affidavit dated 19.03.2025 filed by the Applicant, it is most respectfully submitted that there is no destruction of large tracts of open forest and closed forest or large encroachments in the Zeilad Wildlife Sanctuary. However, it has been reported by the Divisional Forest Officer, Manipur vide letter that there persist the old age customary practices of shifting cultivation and collection of firewood and timber from Jhum cultivated areas for bona fide local consumption. It is humbly submitted that Settlement of Rights needs to be completed to curb the present issue. In that regard, the Collector has issued proclamations inviting claims of right over the land from any interested persons. As soon as the Settlement of Rights is complete, the final notification shall be issued by the State and the present issue will be effectively remediated.
10. That with regard to Para 3 of the affidavit dated 19.03.2025, it is most respectfully submitted that it is correct that the Manipur Remote Sensing Application Centre is providing important database for the implementation


08-08-25.

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of different schemes and projects in the state. However, the Centre/Agency is not a recognized authority or an appropriate authority for analyzing satellite imageries for determining the forest cover, forest density, forest types, etc.

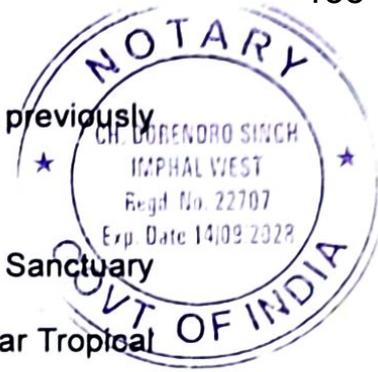
11. That with regard to Para 4 and 5 of the Affidavit dated 19.03.2025, it is most respectfully submitted that the satellite imageries of the concerned area as on January 2024 and January 2025 are currently not available with the Forest Department, Government of Manipur at the moment. The changes of forest cover and density submitted by the petitioner are completely contradictory to the field report and therefore it is not possible for such large-scale transformation of forest areas to take place in just one to two years.
12. It is humbly submitted that the Respondent State has examined the forest cover changes in the Zeilad Wildlife Sanctuary based on the forest cover maps of the Forest Survey of India published in 2019, 2021 and 2023. It has been observed that certain patches of barren lands (Jhum abandoned lands) have turned to scrub forest in the year 2023, which indicates a trend of vegetation recovery and gradual development of forests. The State has also examined changes in forest cover in the sanctuary from the Google Earth imagery as on 28.02.2017, 19.10.2019 and 29.01.2024 which is the latest imagery available. It is further submitted that the satellite imagery does not indicate any significant changes in the forest cover and instead,



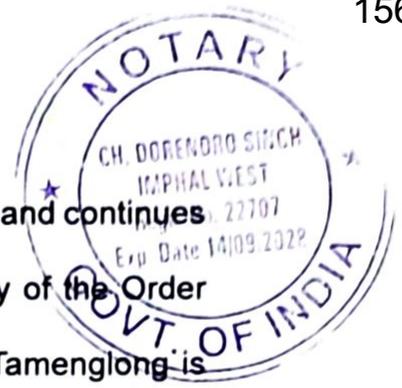

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Regn. No. 22707
Manipal West, Manipur-795113

evidence of natural regeneration is observed with multiple areas previously classified as "non-forest" now exhibiting vegetative growth.

13. It is further submitted that the forests in the Zeilad Wildlife Sanctuary comprises of a mix of Secondary Moist Bamboo Brakes, Cachar Tropical Semi-Evergreen Forest, and East Himalayan Sub-Tropical Wet Hill Forest, which naturally exhibit seasonal variation in canopy cover. Therefore, these forests appear as "open" in the dry season due to leaf shedding.
14. That with regard to Para 7 and 8 of the Affidavit dated 19.03.2025, it is most respectfully submitted that there is no change in the forest cover or density. On the contrary, there have been improvements in the condition of forest in the sanctuary.
15. That with regard to Para 10, the Respondent State, in compliance of the directions issued by this Hon'ble Tribunal, has taken up various measures to strengthen the protection and development of the Zeilad Wildlife Sanctuary. The steps taken by the State are reiterated hereafter: Fireline over 11 km to control forest fire has been created, aided natural regeneration has been carried out over 34 ha, awareness programme on livelihood enhancement has been conducted for surrounding villages and three local volunteers have been engaged for the protection of the sanctuary. Another five field functionaries headed by a Range Forest Officer has also been utilized for patrolling of the sanctuary vide the Order dated 27.12.2024 issued by the Divisional Forest Officer, Tamenglong. It is most respectfully submitted that the State of Manipur is committed to




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complying with the directions issued by this Hon'ble Tribunal and continues to take necessary steps in compliance of the same. A copy of the Order dated 27.12.2024 issued by the Divisional Forest Officer, Tamenglong is marked and annexed herewith as **ANNEXURE A-7 (PAGE NO. 15)**.

16. That with regard to Para 11, it is most respectfully submitted that the allegation put forward by the applicant stating that the State Respondent is not in compliance of the directions issued by this Hon'ble Tribunal is completely false. It is humbly submitted that there is no wide-scale felling of trees that is leading to the destruction of the sanctuary.
17. That with regard to para 12 and 13, it is most respectfully submitted that the State of Manipur is most diligently complying with the directions issued by this Hon'ble Tribunal and has been taking all possible measures to protect and develop the sanctuary. Furthermore, the State of Manipur is taking necessary steps to wean people away from the practice of shifting cultivation. It is humbly submitted that the State of Manipur, in its best efforts, is in compliance of the directions issued by this Hon'ble Tribunal in letter and spirit.
18. It is further submitted that once the process of settlement of rights is complete, the Respondent State will be in a better position to effectively protect, conserve and develop the rich flora and fauna diversity and the unique ecosystem of the sanctuary. It is further submitted that the State of Manipur is tirelessly taking necessary steps for protection and


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development of the sanctuary such as plantation of food, shelter tree species, capacity building programmes for local volunteers on firefighting, patrolling, poaching, fire line cutting, eradication of invasive species, alternate livelihood generation activities, etc. in and around the sanctuary.

19. It is humbly prayed that the present reply on behalf of the State of Manipur be taken on record.

20. It is humbly submitted that the answering Deponent further craves leave of this Hon'ble Green Tribunal to file a supplementary affidavit as and when required.



Deponent

[Handwritten signature]

(R.K. Amarjit Singh)
Spl. Secretary
(For., Evt.& CC)
Government of Manipur

VERIFICATION

Verified at Imphal on the 8th day of August, 2025 that the contents of the above compliance affidavit are true and correct to the best of my knowledge and belief and nothing material is concealed therefrom.

DEPONENT

[Handwritten signature]

(R.K. Amarjit Singh)

Spl. Secretary
(For., Evt.& CC)
Government of Manipur

Solemnly affirm before me on 08-08-25 at 03:00 P.M. at the Court Premises by the Deponent/Deponents who is identified by N. Sashikanta Singh, Advocate the Deponent seems to understand the contents fully well on he/she/their being read over and explained to him/her/them

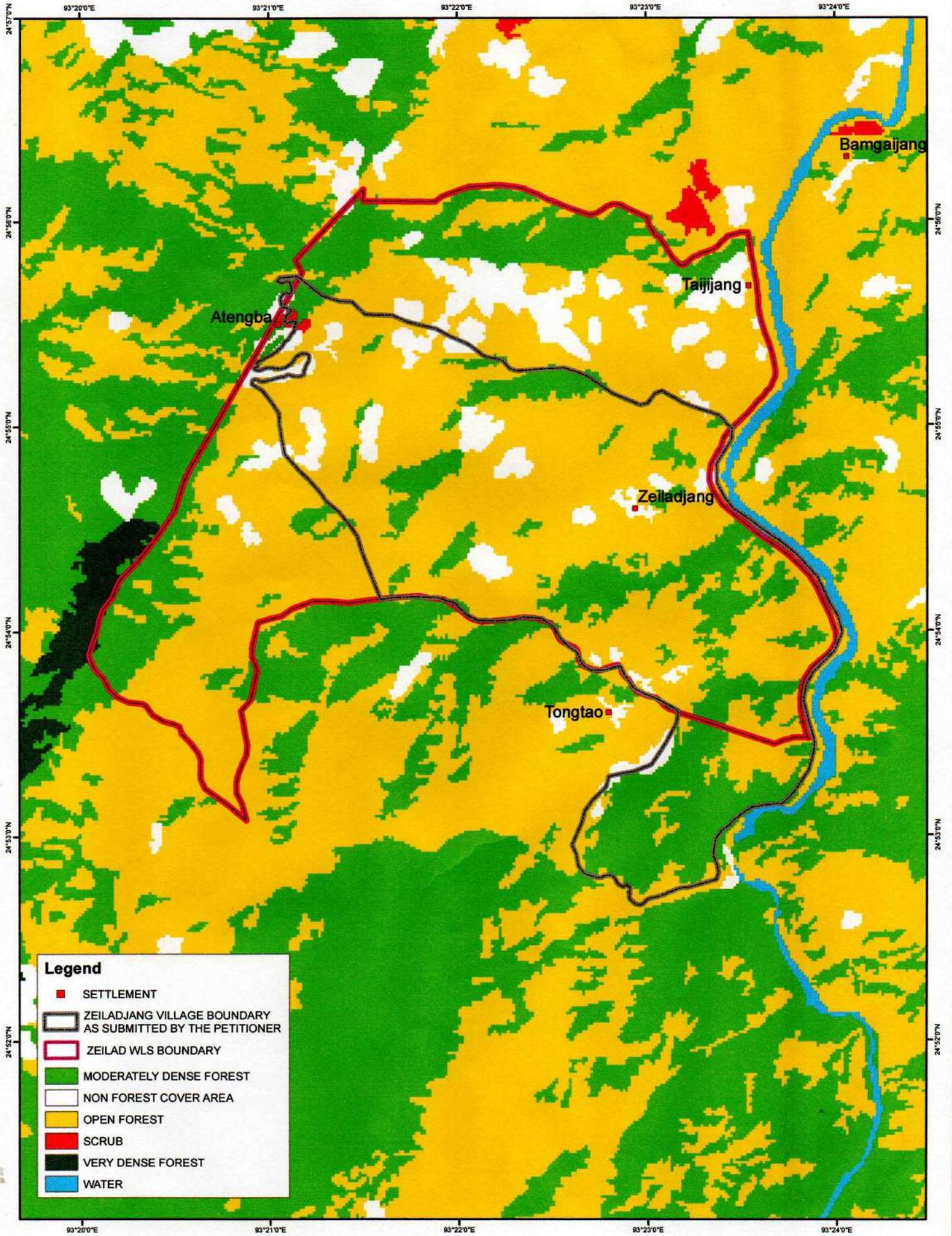
[Handwritten signature]
N. Sashikanta Singh
Advocate
High Court of Manipur
Regd. No. 769 of 2008

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08-08-25
CH. DORENDRO SINGH
Advocate & Notary, Govt. of India
Regn. No. 22707
Imphal West, Manipur-795113

FSI FOREST COVER MAP OF ZEILAD WILDLIFE SANCTUARY (2019)



1:30,000



Legend

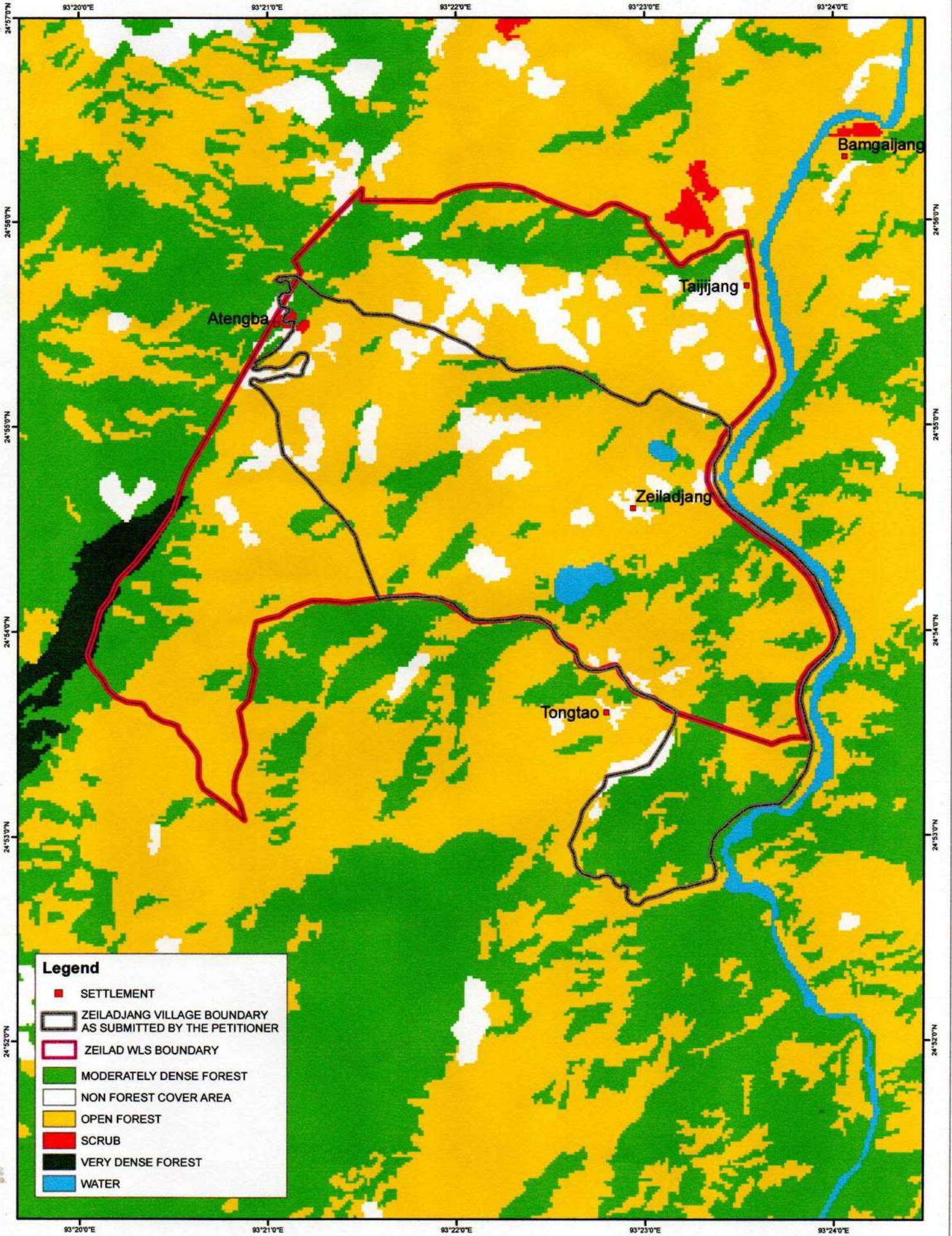
- SETTLEMENT
- ZEILADJANG VILLAGE BOUNDARY AS SUBMITTED BY THE PETITIONER
- ZEILAD WLS BOUNDARY
- MODERATELY DENSE FOREST
- NON FOREST COVER AREA
- OPEN FOREST
- SCRUB
- VERY DENSE FOREST
- WATER

*Source:- FSI FOREST COVER, 2019

FSI FOREST COVER MAP OF ZEILAD WILDLIFE SANCTUARY (2021)



1:30,000

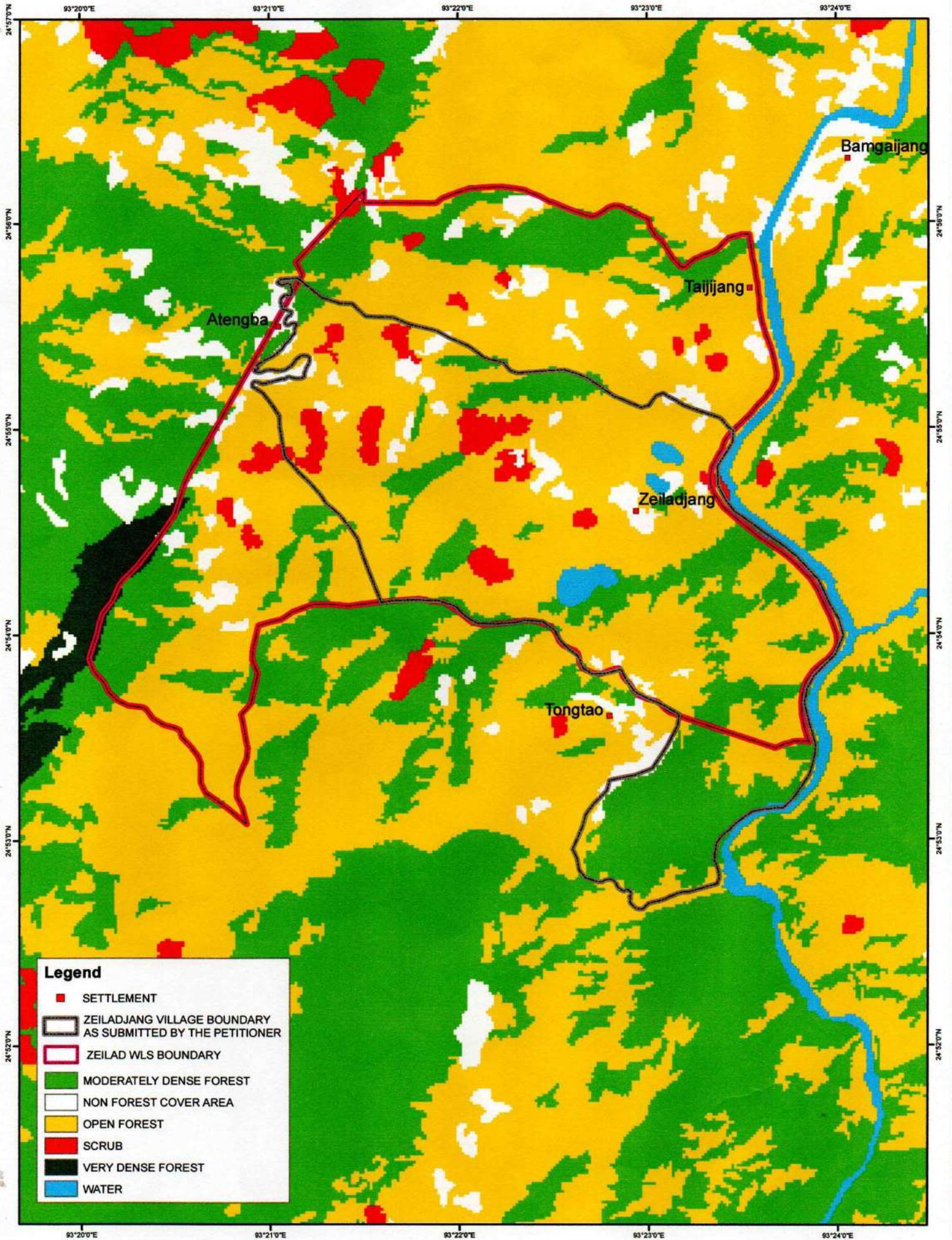


*Source:- FSI FOREST COVER, 2021

FSI FOREST COVER MAP OF ZEILAD WILDLIFE SANCTUARY (2023)



1:30,000



Legend

- SETTLEMENT
- ZEILADJANG VILLAGE BOUNDARY AS SUBMITTED BY THE PETITIONER
- ZEILAD WLS BOUNDARY
- MODERATELY DENSE FOREST
- NON FOREST COVER AREA
- OPEN FOREST
- SCRUB
- VERY DENSE FOREST
- WATER

*Source:- FSI FOREST COVER, 2023

GOOGLE MAP SHOWING

ZEILAD WLS AND ZEILADJANG VILLAGE
IMAGERY DATE:- 28/02/2017

Legend

Feature 1

1. 93 22 13.451e 24 55 11.951n

3. 93 23 8.481e 24 54 57.001n

2. 93 21 46.79e 24 54 50.123n

4. 93 23 17.065e 24 54 17.271n

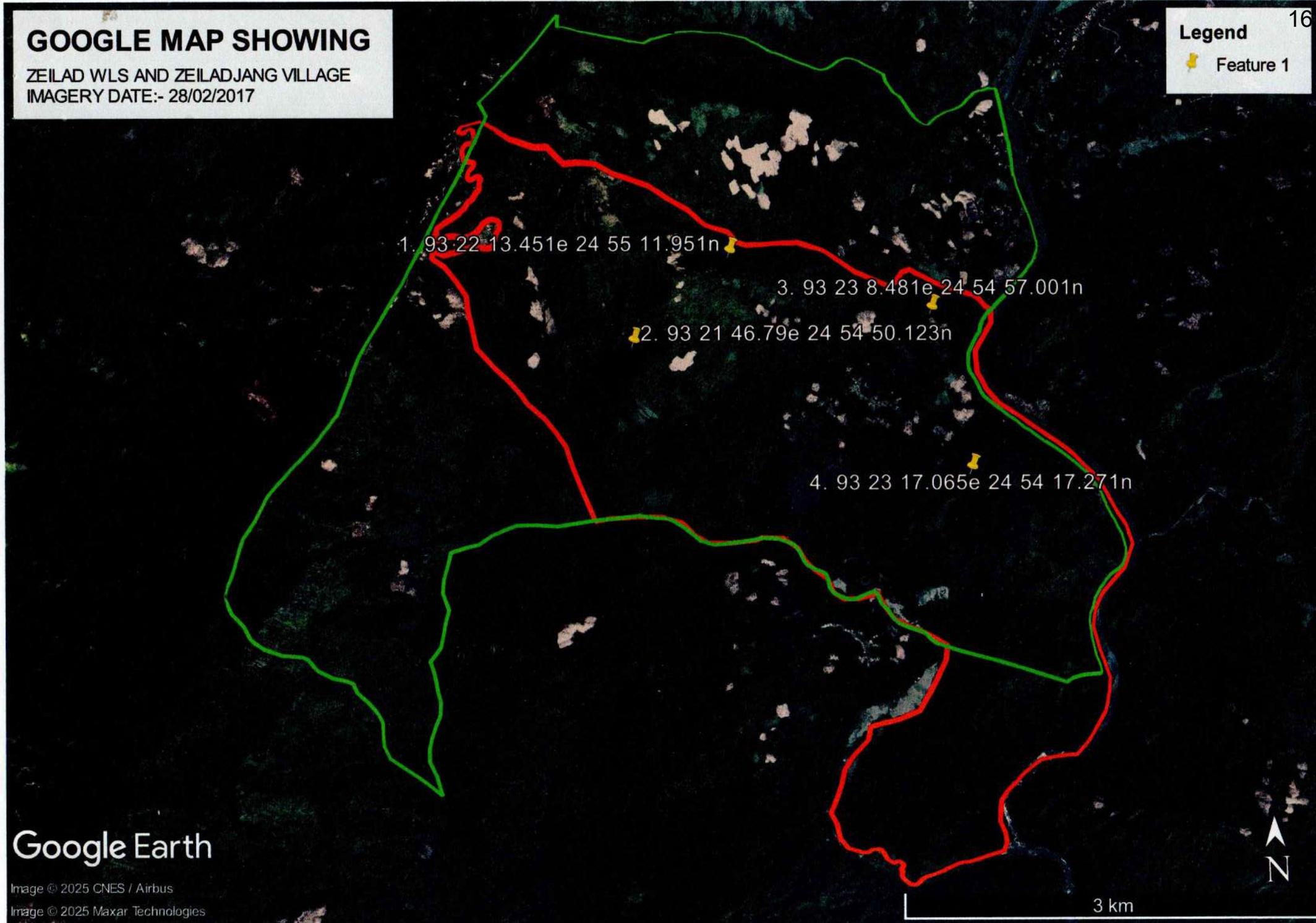
Google Earth

Image © 2025 CNES / Airbus

Image © 2025 Maxar Technologies



3 km



GOOGLE MAP SHOWING

ZEILAD WLS AND ZEILADJANG VILLAGE
IMAGERY DATE:- 19/10/2019

Legend

Feature 1

1. 93 22 13.451e 24 55 11.951n

3. 93 23 8.481e 24 54 57.001n

2. 93 21 46.79e 24 54 50.123n

4. 93 23 17.065e 24 54 17.271n

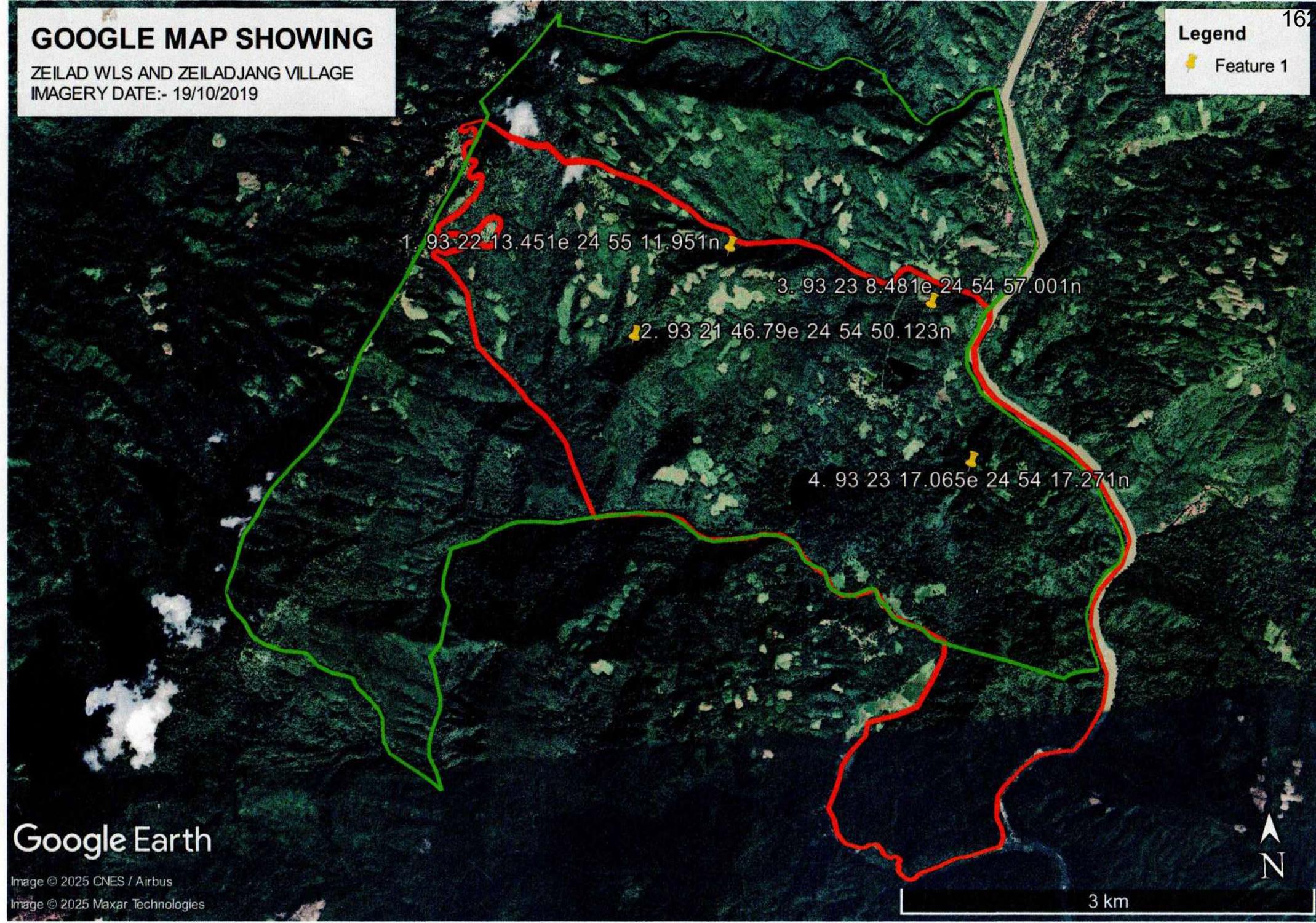
Google Earth

Image © 2025 CNES / Airbus

Image © 2025 Maxar Technologies



3 km



GOOGLE MAP SHOWING

ZEILAD WLS AND ZEILADJANG VILLAGE
IMAGERY DATE:- 29/01/2024

Legend
Feature 1

1. 93 22 13.451e 24 55 11.951n

3. 93 23 8.481e 24 54 57.001n

2. 93 21 46.79e 24 54 50.123n

4. 93 23 17.065e 24 54 17.271n

Google Earth

Image © 2025 Airbus



3 km



Government of Manipur
Office of the Divisional Forest Officer: Tamenglong Forest Division
Tamenglong

ORDERS

Tamenglong, the 27th December, 2024

No. 3/23/TFD/2018-19: In compliance with the Order of the Hon'ble National Green Tribunal (NGT), Eastern Zone- Kolkota Bench dated 12.09.2024 in O.A. NO. 53/2024/EZ (Mathew Gonmei Vs State of Manipur & Others) pertaining to the protection and preservation of the proposed Zeilad Wildlife Sanctuary and the lakes within the Sanctuary, wherein the Divisional Forest Officer, Tamenglong is included as one of the Respondents, and as a follow up to the meeting held in this regard under the Chairmanship of the PCCF & HoFF, Manipur in his office on 27th December, 2024, the following officers/staffs are hereby directed to conduct regular patrolling and general protection of the Sanctuary areas, in addition to their normal duties.

Sl. No.	Name	Designation
1	A. Promeshwor Singh	Range Forest Officer, Tousem Range
2	Mark Kamei	Forester
3	Kunganang Gonmei	Forest Guard
4	P. Dinkhaibou	Forest Guard
5	Md. Zakir Hussain	Forest Guard

Furthermore, RFO/Tousem is directed to coordinate with Shri Chongtham Robertson, RFO/Western Wildlife Range, Wildlife Division in executing the work and submit patrolling report and others, if any, to this office on weekly basis, without fail.

The matter is to be taken seriously and shall be complied with from the date of issue of this order.

(Kh. Hitler Singh)

Divisional Forest Officer, Tamenglong Forest Division
 Government of Manipur

Copy to:

1. The Principal Chief Conservator of Forests, Wildlife & Chief Wildlife Warden, Manipur.
2. The Chief Conservator of Forests, T-II, Government of Manipur.
3. The Conservator of Forests/Western Circle, Government of Manipur.
4. The Divisional Forest Officer, Wildlife Division, Government of Manipur, for kind information and necessary direction to the concerned staffs under Wildlife Division.
5. Persons concerned.
6. Guard File.