

①

BEFORE THE NATIONAL GREEN TRIBUNAL  
EASTERN ZONAL BENCH, KOLKATA, WEST BENGAL  
FINANCE CENTRE, 3<sup>RD</sup> FLOOR, NEW TOWN

**MEMORANDUM OF APPLICATION/APPEAL**

[Under section 18(1) read with sections 14, 15 & 17 of the National Green Tribunal Act, 2010]

BEFORE THE NATIONAL GREEN TRIBUNAL SITTING AT KOLKATA

Original Application/Appeal No. **144** of 2025/EZ

BETWEEN

Shri. Khuraijam Athouba Singh,

**Applicant**

-VS-

The Union of India represented by the Secretary (Forest),  
Ministry of Environment, Forest and Climate Change  
(MoEFCC), Indira Paryavaran Bhawan Jorbagh Road, New  
Delhi – 110 003 INDIA and Ors.

**Respondents.**

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A

**-SYNOPSIS-**



The present Application is being filed challenging the unauthorized construction of a so-called "Ring Road" across forest and hilly areas in the districts of Churachandpur, Kangpokpi, Noney, and Ukhrul in Manipur etc., allegedly undertaken by members of the Kuki-Zo community, as revealed through a Memorandum dated 05/02/2025 submitted by the World Kuki-Zo Intellectual Council. In such a way, the applicant's members of the Coordinating Committee on Manipur Integrity (COCOMI) have started making queries through RTI etc. to obtain the concerned information.

As a result of which applicant's members started collection of information from the appropriate authority as such from the subsequent RTI replies from the Directorate of Environment and Climate Change, the Rural Engineering Department, and the Forest Department confirm that no official approval, no-objection certificate, or forest clearance has been issued for such construction. Satellite imagery further corroborates the unauthorized activity in ecologically sensitive zones.

The applicant seeks judicial intervention to hold the responsible individuals accountable under environmental and constitutional laws and to ensure protection of forest land and ecological integrity. Hence this Application is being filed for the safeguard of the future generation

**25 JUL 2025**

B (3)

BEFORE THE NATIONAL GREEN TRIBUNAL  
EASTERN ZONAL BENCH, KOLKATA, WEST BENGAL  
FINANCE CENTRE, 3<sup>rd</sup> FLOOR, NEW TOWN



**MEMORANDUM OF APPLICATION**

[Under Section 18(1) read with Sections 14, 15 and 17 of the National  
Green Tribunal Act, 2010]

Original Application No. of 2025/EZ

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v/s

The Union of India represented by the Secretary (Forest),  
Ministry of Environment, Forest and Climate Change  
(MoEFCC), Indira Paryavaran Bhawan Jorbagh Road, New  
Delhi – 110 003 INDIA and Ors.

**Respondents.**

**LIST OF DATES**

1.	05.02.25	Applicant being a public spirited person on coming to know the memorandum dated 05/02/2025
2.	01.04.25	RTI Application
3.	07.04.25	RTI Application
4.	22.04.25	RTI Application
5.	07.07.25	Representation address to Chief Secretary, Manipur
6.	20.07.25	Times of India online news portal report dated 20/07/2025

**25 JUL 2025**

MEMORANDUM OF APPLICATION/APPEAL

[Under section 18(1) read with sections 14, 15 & 17 of the National Green Tribunal Act, 2010]

BEFORE THE NATIONAL GREEN TRIBUNAL SITTING AT KOLKATA

Original Application/Appeal No. of 2025/EZ

BETWEEN

Shri. Khuraijam Athouba Singh, aged about 43 years, S/o. Kh. Narendrajit Singh, a resident of Khwai Nagamapal Paonam Leirak, P.O. & P.S. Imphal, Imphal West District, Manipur, Pin - 795001.

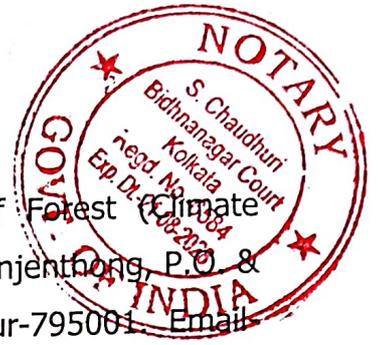
**Applicant**

-VS-

1. The Union of India represented by the Secretary (Forest), Ministry of Environment, Forest and Climate Change (MoEFCC), Indira Paryavaran Bhawan Jorbagh Road, New Delhi – 110 003 INDIA, email – [secy-moef@nic.in](mailto:secy-moef@nic.in).

2. The State of Manipur represented by the Chief Secretary, Government of Manipur, Secretariat Building, P.O. & P.S. Imphal, Imphal West District, Manipur-795001., email – [cs-manipur@nic.in](mailto:cs-manipur@nic.in)

2/ (5)



3. The Principal Chief Conservation of Forest (Climate Change & FCA), Government of Manipur, Sanjenthong, P.O. & P.S. Imphal, Imphal West District, Manipur-795001. Email-

pccf-min@nic.in

4. The Director, Directorate of Environment & Climate Change, Government of Manipur, Mini Secretariat Road, Porompat Imphal East, Manipur – 795005. Email- moefro.shillong@gov.in

5. World KUKI-ZO Intellectual Council (WKZIC), Headquarters Songpi-Lamka, Post & P.S. – Lamka, PIN – 795126, Service through President Dr. T.S. Haokip. Email- wkzic822@gmail.com

**Respondent (s)**

**Most Respectfully Sheweth:**

1. The addresses of the Applicant is/are as given above for the service of notices of this application and that of their representative.
2. The addresses of the Respondents are as given above for service of notices of the application.
3. The Applicant above-named begs to present the Memorandum of this Application against the Memorandum dated 05/02/2025 submitted by the World Kuki-Zo Intellectual Council addressed to the Shri. Nitin Gadkari, Hon'ble Union Minister of Road Transport & Highways, Chairman of North Eastern Council (NEC), Government of India and its subsequent RTI Reply(s) dated 01/04/2025, 07/04/2025, 22/04/2025 of Respondents on the grounds set-out hereunder:

**FACTS IN BRIEF:**

4. That, the present applicant is the Convener of the civil society organization of the current term namely Coordinating Committee on Manipur Integrity (in short COCOMI) which is one of the leading voluntary organization operating in the state

**25 JUL 2025**

~~3~~ (6)

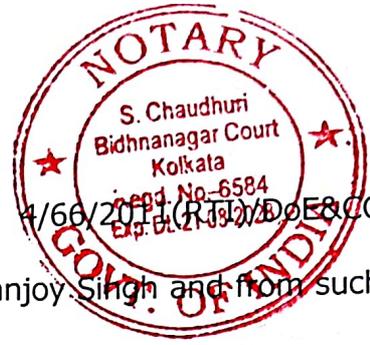
of Manipur to deliver/provide common justice for the people of Manipur to maintain the rule of law.

5. That, it is to state that the present applicant being a public spirited person on coming to know the Memorandum dated 05/02/2025 issued by one Dr. TS Haokip, President and the T. Samuel Zou, General Secretary, World Kuki-Zo Intellectual Council (WKZIC), headquarter Songpi-Lamka addressed to the Shri. Nitin Gadkari, Hon'ble Union Minister of Road Transport & Highways, Chairman of North Eastern Council (NEC), Government of India and from the perusal of the said Letter it is learnt/established that community members of Kuki-Zo group have constructed some Ring Road and any other nature of illegal road without any authorities of the Central Government as well as State Government, in few places in the hills of Manipur particularly within the districts of Churachandpur, Kangpokpi, Noney and Ukhruel etc. and making request to do the needful to those concerned authorities of India and such letter was also endorsed to the concerned authorities which are mentioned in the Memorandum dated 05/02/2025 itself.

**Annexure A/1** is the true and correct copy of the Memorandum dated 05/02/2025.

6. That, it is to state that as a result of the aforesaid Memorandum dated 05/02/2025, the applicant learnt from Shri. Mayengbam Dhananjay Singh that he had already approached to request for information under the RTI Act, 2005 to the authority of the Director of Environment and Climate Change, Porompat, Imphal, Manipur. As accordingly, Shri. Th. Alexander Singh, Development Officer cum SPIO of Directorate of Environment and Climate Change, Porompat, Imphal issued

4- (7)



an official letter dated 01/04/2025 bearing No. 4/66/2013-RTI/DoE&CC addressed to the above named Shri. Mayengbam Dhananjoy Singh and from such reply it is confirmed that the Directorate has not issued no objection certificate or any other Certificate related to the construction of the said Ring Road.

**Annexure A/2** is the true and correct copy of the Official Letter dated 01/04/2025.

7. That, further it is to state that from such official Letter of the Government of Manipur dated 07/04/2025 being No. 6/50/2013-MSRRDA(RED)/RTI/2025/10 issued by the H. Shantakumar Singh, Chief Engineer Cum E.O., Rural Engineering Department (RED), Government of Manipur addressed to the Shri. Mayengbam Dhananjoy Singh and from such reply it is also cleared that such Ring Road are not covered under the Pradhan Mantri Gram Sadak Yojana (PMGSY) PMGSY as such the said Ring Road are not constructed by the Rural Engineering Department, Manipur.

**Annexure A/3** is the true and correct copy of the Official Letter dated 07/04/2025.

8. That, further from the official Letter dated 22/04/2025 being No. 7/77/2025/Forests/19 of the Addl. Principal Chief Conservator of Forest & Nodal Officer/FCA, Government of Manipur, it is also clear that for construction of the Ring Road from Molnoi (Pallen to Laloiphai) via Tolbung-Leinata(Churachandpur) via Joujangtek (Noney) to Khengjang Via Saikul (Kangpokpi) to Litan (Ukhrul) through Tengnopoal has not yet been applied. Therefore, Forest Clearance

12 5 JUL 2025

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Certificate or No Objection Certificate has not been issued by Department.



**Annexure A/4** is the true and correct copy of the Official Letter dated 22/04/2025.

9. That, it is to state the present applicant already approached the authority of the State of Manipur by filing/submitting a representation dated 07/07/2025 addressed to the Chief Secretary, Government of Manipur thereby request for initiating legal action in accordance with law against the Organization and its responsible Leaders/Office Bearers for destroying the Forest and Forest Land in the name of illegal construction of Ring Road without the approval of the competent authority of the Government of Manipur as well as Government of India. The said representation is still pending before the concerned authority without setting any process.

**Annexure A/5** is the true and correct copy of the Representation dated 07/07/2025.

10. That, it is to state that it is learnt from the Times of India online News Portal dated July 20, 2025 that by violating the relevant Act and Rule and without the approval of the appropriate authorities such illegal road has constructed; which is known as German-Tiger Road connecting from Churachandpur to Kangpokpi. Therefore, there is no any dispute and controversy that such illegal construction of German-Tiger Road is being reported. Hence, this petition.

12 5 JUL 2025

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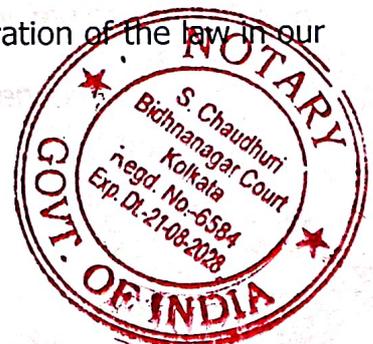
**Annexure A/6** is the true and correct copy of the Time of India online dated July 20, 2025.

11. That, from the close reading and examination of the relevant Satellite Picture speaks/shows that the Tribal people are residing in the District of Kangpokpi, Noney, Churachandpur, Chandel, Tengnoupal and such alleged Ring Road was illegally constructed by those villagers without the authority of the Government of Manipur. Such intention and action and execution of the works in the forest area and nearby area are very much illegal, unfair and unconstitutional thereby violated the provisions of the relevant law and caused serious threat to the environment. Therefore, the alleged authority whose names and signatures are given in the Memorandum dated 05/02/2025 are required to be punished in accordance with the provision of law in our Country to protect, preserve and maintain to the ecology and environmental, region, society for the sake of future generation.

**Annexure A/7** is the true and correct copy of the Photograph of Satellite Picture.

12. That, it is humbly and respectfully submitted that such Road connecting to Churachandpur to Kangpokpi within the state of Manipur are being illegally constructed by those members of the group(s) which can be ascertained from the relevant documents annexed herewith. It is hope and believes that official respondents who are the responsible authorities/officials of the State as well as Union of India can easily initiate legal action as per the operation of the law in our

12 5 JUL 2025

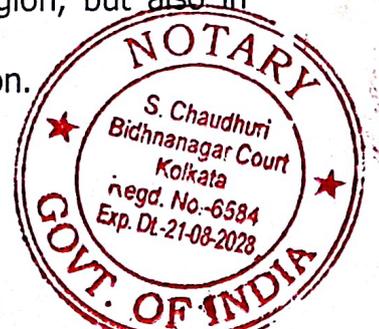


country. However, if the need arises the Hon'ble Tribunal may be permitted to implead them as parties/respondents.

**GROUND:**

- A. Because, the construction activity which is being carried out is in violation of the Environmental Protection Act, 1986 and is proceeding without mandatory environmental clearances.
- B. Because, the construction has lead to severe environmental degradation, including deforestation, unscientific hill cutting, and unsafe dumping of construction debris.
- C. Because, as per the Forest Laws as well as Environmental Laws in such in the areas of the forest land any citizen of India including the authorities of Government such relevant law cannot be ignored in other words, any development/construction cannot be carried out by violating of such Forest Laws and Environmental Laws.
- D. Because, there is a failure to follow the Indian Road Congress (IRC) guidelines for hill roads and the MoEF's directives regarding hill-slope stabilization and debris management.
- E. Because, the inaction of the authorities amounts to a violation of Articles 14 and 21 of the Constitution of India and other relevant provision of law, infringing upon the right to equality, life, and a healthy environment.
- F. Because, the ongoing nature of works posses a threat to human life, public property, and the ecological imbalance not only in the hilly region, but also in nearby valley of Manipur which requires urgent judicial intervention.

25 JUL 2025



G. Because, the applicant has exhausted all alternative remedies by approaching authorities but received no redressal, making this petition maintainable under Article 226.

**LIMITATION:**

That, the applicant states that the cause of action is continuing and recurring in nature. The construction work is still ongoing as of the date of filing this petition. Therefore, the present petition is well within limitation, and no part of it is barred by delay, laches, or limitation under any law.

13. That, the present applicant humbly further submits that since the applicant have already approached the concerned authorities by submitting a written representation which is enclosed as Annexure A/5. But, such authorities have not yet translated the request of the applicant into the action against those who involved in such illegal construction. Hence, this Application in the nature of Public Interest Litigation.

**PRAYER**

In view of the facts and grounds stated hereinabove, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to:

1. To pass an order/direction to the Respondents to immediately halt/prevent the construction activities related to the Ring Road project in the hilly region, pending a full environmental and geological safety measures;

2. To pass an appropriate order to preserve the Forest and Forest Land and to maintain the Environment and Climate in the region;
3. Direct the Respondents to constitute a High-Level Committee of experts including environmental engineers, geologists, and road safety experts to inspect the project site and submit a detailed report before this Hon'ble Court within a stipulated period;
4. Declare the ongoing construction is illegal and in violation of applicable environmental and construction norms if found to be proceeding without valid statutory clearances;
5. To direct the respondents to provide adequate and reasonable punishment against anybody who have committed such illegal activities in accordance with law; and further to carry out the assessment of the damages to the environment and ecology in the matter in issue involved in the application and to impose environmental compensation on the person/group responsible for illegal construction of ring road.
6. Pass such other and further appropriate orders as this Hon'ble Court may deem fit and proper in the interest of justice and environmental protection.

12 5 JUL 2025



-10 → (13)



**VERIFICATION**

I, Shri. Khuraijam Athouba Singh, aged about 43 years, S/o. Kh. Narendrajit Singh, a resident of Khwai Nagamapal Paonam Leirak, P.O. & P.S. Imphal, Imphal West District, Manipur do hereby verify that the contents of paras ...01... to ...13... are true to my personal knowledge and paras ...01... to ...06... are true believed to be true on legal advice and that I have not suppressed any material fact.

Date .25/7/2025

*Kh. Athouba*  
Signature of the applicant

Place .KOLKATA

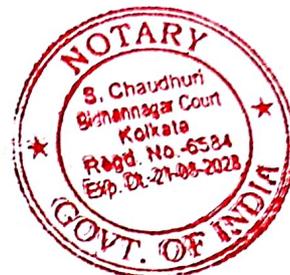
*Dipankar Thakur*

**DIPANKAR THAKUR**  
Advocate  
E No.F/1809/2023  
Mob. - 9434214268

*[Signature]*  
**S. CHAUDHURI**  
★ NOTARY ★  
GOVT. OF INDIA  
Regd. No.-6584/08  
Bidhannagar Court  
Dist.-North 24 Pgs.

**25 JUL 2025**

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**- AFFIDAVIT -**

I, Shri. Khuraijam Athouba Singh, aged about 43 years, S/o. Kh. Narendrajit Singh, a resident of Khwai Nagamapal Paonam Leirak, P.O. & P.S. Imphal, Imphal West District, Manipur do hereby make oath and solemnly affirm as hereunder:-

1. That, I am the Applicant/Appellant in the accompanying Memorandum of Application/~~Appeal~~ and well acquainted with the facts and circumstances of the case. As such, I am competent to swear this Affidavit. This is true to the best of my knowledge.
2. That, the statements made in para Nos. 1 to 14 are true and correct to the best of my knowledge and are based on records make available to me and those legal submissions are based on the advice given by the counsel which I verily believe to be true and correct to the best of my knowledge.
3. That, the Annexure enclosed as Annexure - A/1 to A/7 are true and correct copies of the Originals. This is true to the best of my knowledge.

Verified that the contents of the statement made in the above Paras of this Affidavit are all true and correct to the best of my knowledge and nothing has been conceal therein.

Dated/.....  
The 25/7/2025

By:- *Sipankar Thaker*  
Advocate.

*Kh. Athouba*  
Signature of the Deponent  
**S. CHAUDHURI**  
**★ NOTARY ★**  
**GOVT. OF INDIA**  
**Regd. No.-6584/08**  
**Bidhannagar Courtt**  
**Dist.-North 24 Pgs.**

25 JUL 2025

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Annexure -A/1



**WORLD KUKI-ZO INTELLECTUAL COUNCIL (WKZIC)**  
(Former Kuki-Zo Intellectual Forum)

**HEADQUARTERS : SONGPI-LAMKA, INDIA -795128**

(Conglomerate of Chas, Kuki, Mizo, Zomi, Hmar, Lhasama, Marani, Churri, Bodo, Ethar)  
Email : [wkzic833@gmail.com](mailto:wkzic833@gmail.com)

Ref.No. 59/WKZIC/(Memo)/2023-25

Date: \_\_\_\_\_

**MEMORANDUM**

The 5<sup>th</sup> February 2025

RECEIVED NO. 1298  
DATE 05/03/2025  
DC'S OFFICE, LCPUR

To,

**Shri Nitin Gadkari ,**  
**Hon'ble Union Minister of Road Transport & Highways,**  
**Chairman of North Eastern Council (NEC),**  
**Government of India.**  
Address: Room No. 123, Transport Bhavan -1,  
Parliament Street, New Delhi -110001.

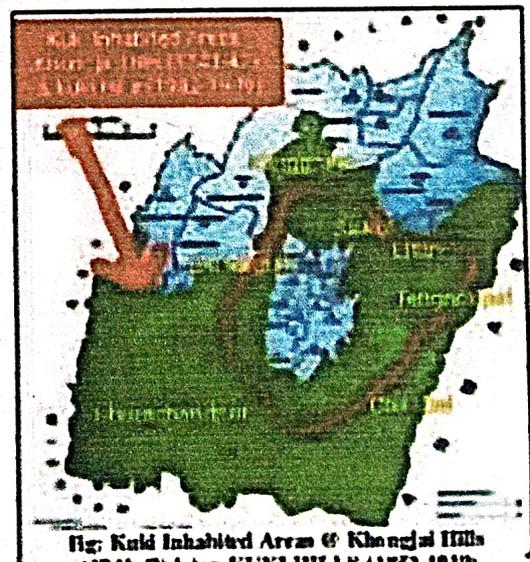
*Through: Deputy Commissioner (DC), Churachandpur,*  
*Tuibong, Songpi-Lamka, Churachandpur.*

**Subject: Appeal for black topping of locally constructed Ring Road from Molnoi (Pallel) to Lalolphai via Tolbung-Leimata, (Churachandpur) via Joujungtek (Noney) to Khengjung via Saikul (Kangpokpi) to Litan (Ukhrul) through Tegnoupal of Khongjai Hills (1741-42) later Kuki Hills (1852-1949) of Outer Manipur, India stretching approximately 343 Kms, as the Kukis could no longer access to IMPHAL and use the existing Highways in Inner Manipur since the 3<sup>rd</sup> May 2023.**

**Hon'ble Sir,**

With utmost regards, we humbly submit this Memorandum to bring to your kind attention the urgent humanitarian crisis in terms of road connectivity, the need for black topping of locally constructed ring road connecting Tegnoupal-Chandel districts to Churachandpur-Noney via Kangpokpi-Ukhrul to Tegnoupal districts, from the point starting from Molnoi-Pallel of Chandel district via Tolbung and Leimata of Churachandpur district and Joujungtek of Noney district to Khengjung via Saikul of Kangpokpi district, through Litan of Ukhrul district and Tegnoupal of Tegnoupal district respectively, in outer Manipur. This lifeline ring-road will not only enhance the economic development of Kuki Hills region but also improve the overall quality of life for the minority Kuki people, who have done our part in constructing the ring-road manually through man power.

Page-01



**Fig: Kuki Inhabited Areas of Khongjai Hills (1741-42) later KUKI HILLS (1852-1949) (Ring Road approximately 343 Kms).**

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**WORLD KUKI-ZO INTELLECTUAL COUNCIL (WKZIC)**  
(Former Kuki-Zo Intellectual Forum)

**HEADQUARTERS : SONGPILAMKA, INDIA -795126**

(Conglomerate of Chin-Kuki-Mizo-Zomi-Pinai-Manihai-Romero-Khumi-Daoud Ethnic)  
Email : [wkzic822@gmail.com](mailto:wkzic822@gmail.com)

This locally constructed ring road spanned across several districts, including Tengnoupal, Chandel, Churachandpur, Noney, Kangpokpi and Ukhrul, and will play a crucial role in boosting trade, commerce, and tourism in the area. Moreover, it will provide better connectivity to the local population, facilitating easier access to markets, schools, hospitals, and other essential services.

We believe that the black topping of this life-line ring road is essential for the growth and development of Kuki Hills in outer Manipur, India and we kindly request that you consider our appeal. We are confident that under your able leadership, the Ministry of Road Transport and Highways will take up necessary steps to make this project a reality, at the earliest before rainy season of the current Calendar Year 2025, on humanitarian ground.

Thanking you in anticipations

With regards

  
(T. SAMUEL ZOU)  
General Secretary

  
(DR. TS HAOKIP)  
President



Copy to:

1. Shri Jyotiraditya Scindia, Hon'ble Union Minister & Vice Chairman of Development of North Eastern Council (DoNER).
2. Shri Santosh Kumar Yadav, Chairman, National Highways Authority of India (NHAI).
3. Lieutenant General Shri Raghav Srinivasan, Director General of Border Road Organisation (BRO).
4. Shri Ajay Kumar Bhatta, His Excellency, the Governor of Manipur.
5. Shri. Takhebamnam Ranjit Singh, IAS, Commissioner, Public Works Department (PWD), Manipur.
6. Shri Dharun Kumar, IAS, Magistrate of District, Churachandpur/ Deputy Commissioner.
7. Pa. V. Jamkhanmang, Executive Engineer (EE), PWD, Churachandpur.
8. Pa Paolenlal Haokip, Hon'ble MLA, District Headquarter AC/Saikot, Churachandpur.
9. Pa Henlambang Thanglet, Chairman, Kuki-Zo Council (KZC).
10. Pa. Ch Ajang Khongsai, President, Kuki Inpi Manipur (KIM).
11. Pa N. Vamsam, Chairman, Zomi Council (ZC).
12. Pa R. Sangkawin, President, Zo Re-unification Organisation (ZoRO).
13. Relevant File/ Guard File.

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**TYPE COPY**

**MEMORANDUM**

**The 5<sup>th</sup> February, 2025**

To,  
Shri Nitin Gadkari,  
Hon'ble Union Minister of Road Transport & Highways,  
Chairman of North Eastern Council (NEC)  
Government of India,  
Address Room No.123, Transport Bhavan-1,  
Parliament Street, New Delhi - 110001.

Through: Deputy Commissioner (DC), Churachandpur  
Tuibong, Songpi-Lamka, Churachandpur

Subject:- Appeal for black topping of locality constructed Ring Road from Moinoi (Pallel) to Laloiphal via Tolbung, Leimata, (Churachandpur) via Joujangfek (Noney) to Khengiang via Saikul (Kangpokpi) to Manipur, India stretching approximately 343 Kms, as the Kukis could no longer access to IMPHAL and use the existing High ways in Inner Manipur since the 3<sup>rd</sup> May, 2023.

Hon'ble Sir,

With utmost Regards, we humbly submit this Memorandum to bring to your kind attention the urgent humanitarian crisis in terms of road connectivity, the need for black topping of locality constructed ring road connecting Tengnoupal-Chandel to Tengnoupal districts, from the point starting from Moinoi-Pullei of Chandel District via Tolbung and Leimata of Churachandpur district and Joujangtek of Noney district to Khengiang via Saikul of Kaugpokpi district through Litan of Ukhrul district and Tengnoupal of Tengnoupal district respectively, in outer Manipur. This lifeline ring-road will not only enhance the economic development of Kuki Hills region but also improve the overall quality of life for minority Kuki people, who have done out part in constructing the ring road manually through man power.

The locally constructed ring road spanned across several districts, including Tengnoupal, Chundel, Churachandpur, Noney, Kangpokpi and Ukhrul and will play a crucial role in boosting trade, commerce and tourism in the area moreover, it will provide better connectivity to the local pollution, facilitating easier access to markets, schools, hospitals and other essential series.

We believe that the black topping of this life-line ring road is essential for the growth and development of Kuki Hills in outer Manipur, India and we kindly requests that you consider our appeal. We are confident that under your able leadership, the Ministry of Road Transport and Highways will take up necessary steps to make this project a reality, at the earliest before rainy season of the current calendar year 2025, on humanitarian ground.

Thanking you in anticipations

With regards

(T. SAMUEL ZOU)  
General Secretary

(DR. TS HAOKIP)  
President

Copy to:

1. Shri Jyotiraditya Scindle, Hon'ble Union Minister & Vice Chairman of Development of North Eastern Council (Doner)
2. Shri Santosh Kumar Yadav, Chairman, National Highways Authority of India (NHAI).
3. Lieutenant General Shri Raghu Srinivasan, Director General of Border Road Organization (BRO)
4. Shri Ajay Kumar Bhalla, His Excellency, the Government of Manipur.
5. Shri Takhellambhu Ranjit Singh, IAS, Commissioner, Public Works Department (PWD), Manipur.
6. Shri Dharun Kumar, IAS, Magistrate of District, Churuchandapur Deputy Commissioner.
7. Pa. V. Jamkhanamang Executive Engineer (EE), PWS, Churuchandapur.
8. Pa Paolenlul Haokip, Hon'ble MLA District Headquarter AC/Saikot, Chruruchandapur.
9. Pa Henilanthang Thanglet. Chairman, Kiki -Zo Coulcil (KZC).
10. Pa. Ch Ajung Khongsai, President, Kiki Inpi Manipur (KIM).
11. Pa. N. Vumsunn Chuiman, Zorni Council (ZC).
12. Pa. R. Sangkhawin, President, Zo Re-Unification Organization (ZoRo).
13. Relevant File/Grand File.

~~14~~

(19)

Annexure -A/2

GOVERNMENT OF MANIPUR  
DIRECTORATE OF ENVIRONMENT & CLIMATE CHANGE  
POROMPAT, IMPHAL-05

No. -1/66/2011 (RTI)/DoE&CC

Imphal, the 1<sup>st</sup> April, 2025

To,

Mayengbam Dhananjoy Singh  
Keishamthong Elangbam Leikal,  
P.O & P.S-Imphal, Imphal West  
Manipur-795001

Subject: Request for Information under Section 6(1) of the Right to Information Act (RTI), 2005

Sr.

With reference to your RTI application dated 28<sup>th</sup> March, 2025. I am directed to furnish herewith the required information as under:

SN	Information sought	Reply
S(a)	Whether your Department has issued No Objection Certificate or any Certificate for construction of the Ring Road from Molnoi (Paliel) to Lalophal via Tolbung-Leimata (Churachandpur) via Joujangtek ( Noney) to Khengjang Via Saikul ( Kangpokpi) to Litan (Ukhrul) through Tengnoupal or not?	The Directorate has not issued No Objection Certificate, or any Certificate related to the construction of the said ring road.

With regards,

Yours faithfully,

*Th. Alexander Singh*

(Th. Alexander Singh)  
Development Officer cum SP/O

20

**TYPE COPY**

**GOVERNMENT OF MANIPUR  
DIRECTOR OF ENVIRONMENT & CLIMATE CHANGE  
POROMPAT, IMPHAL-05**

No.4/66/2011 (RTII)/DoE&CC

Imphal, the 1<sup>st</sup> April 2025

To  
Mayendbam Dhananjoy Singh  
Keishamthong Elangbam Leikai,  
P.O. & P.S. – Imphal, Imphal West,  
Manipur -795001

Subject:- Request for information under Section 6(1) of  
the Right to Information Act, (RTI), 2005.

Sir,

With reference to your RTI application under 28<sup>th</sup> March,  
2025. I am directed to furnish herewith the required information as  
under:

SN	Information Sought	Reply
5(a)	Whether your Department has issued No Objection Certificate or any Certificate for construction of the Ring Road from Molnoi (Pallel) to Lalophai via Tolbung-Leimata, (Churachandpur) via Joujangtek (Noney) to Khengjang via Saikul (Kangpokpi) to Litan (Ukhrul) through Tengenoupal or not?	The Directorate has not issue No Objection Certificate, or any certificate related to the construction of the said ring road.

With regard

Yours faithfully

(Th. Alaxander Singh)  
Development officer cum SPIO

~~-15-~~ (21)

Annexure -A/3



02/04/2025



Government of Manipur  
Rural Engineering Department (RED)  
Manipur State Rural Roads Development Agency  
4<sup>th</sup> Floor, Secured Office Complex, AT Line, North AOC, Imphal, 795001.

No.6/50/2013-MSRRDA(RED)/RTI/2025/10

Imphal, the 7<sup>th</sup> April, 2025

To,

✓ Shri Mayengbam Dhananjay Singh  
of Keishamthong Flangham I eikal,  
P.O.&P.S. Imphal, Imphal West District,  
Manipur Pin No.795001 (Mobile No.9862565238)

**Sub :-** Request for providing information under Section 6 (1) of the Right to Information Act, 2005.

Sir,

In inviting to your RTI application dated 28.03.2025 which was duly received on 02.04.2025 it is to furnish the following information under Section 6 (1) of the Right to Information Act, 2005 that :-

Sl.No.	Particulars of information required	Reply
1.	Whether your Department have constructed the Ring Road from Molnoi (Pallel) to Laloiphah via Tolbung – Leimata (Churachandpur) via Joujangtek (Noney) to Khengjang via Salkul (Kangpokpi) to Ltan (Ukhrul) through Tengnoupal or not?  If the above question is Yes.  Kindly furnish the certified copy of the Forest Clearance Certificates or No objection Certificates obtained from the Forest Department, Manipur or from a competent authority for construction of the said Ring Road.	The Rural Engineering Department/MSRRDA, Manipur is implementing PMGSY Scheme by providing connectivity to the unconnected villages and habitations in rural areas only and the Ring Road are not covered under PMGSY, as such, the Ring Road are not constructed by this office.

Yours faithfully,

(H. Shantakumar Singh)  
Chief Engineer Cum F.O.  
Rural Engineering Department (RED)  
Government of Manipur.

Copy to :-

1. Chief Information Commissioner, Manipur Information Commission, Manipur.
2. P.S. to Commissioner cum Secretary (RD&PR), Government of Manipur.
3. File concerned.

22

**TYPE COPY**

Government of Manipur  
Rural Engineering Department (RED)  
Manipur State Rural Roads Development Agency  
4<sup>th</sup> Floor, Secured Office Complex, AT Line, North AOC,  
Imphal -795001

No.6/50/2013-MSRDA(RED)/RTI/2025

Imphal, the 7<sup>th</sup> April 2025

To  
Shri Mayengbam Dhananjay Singh  
Of Keishamthong Flangbam Elkai  
P.O. & P.S. Imphal, Imphal West District  
Manipur Pin No.795001 (Mobile No.9862565238)

**Sub:-** Request for providing information under Section 6(1) of the  
Right to Information Act, 2005.

Sir,

In inviting to your RTI application dated 28.03.2025 which was duly  
received on 02.04.2025 it is to furnish the following information under Section  
6(1) of the Right to Information Act, 2005 that:-

Sl No.	Particulars of Information required	Reply
5(a)	<p>Whether your Department have constructed the Ring Road from Molnoi (Palle) to Lalophai via Tolbung-Leimata, (Churachandpur) via Joujangtek (Noney) to Khengjang via Saikul (Kangpokpi) to Litan (Ukhrul) through Tengnoupal or not?</p> <p>If the above question is Yes.</p> <p>Kindly furnish the certified copy of the Forest Clearance Certificates or no objection Certificates obtained from the Forest Department, Manipur or from a competent authority for construction of the said Ring Road.</p>	<p>The Rural Engineering Department/MSRDA, Manipur is implementing PMGSY Scheme by providing connectivity to the unconnected villages and habitations in rural areas only and the Ring Road are not covered under PMGSY, as such, the Ring Road are not constructed by this office.</p>

Yours faithfully

(H. Shantakumar Singh)  
Chief Engineer Cum Fo.  
Rural Engineering  
Department (Red)  
Government of Manipur

Copy to:

1. Chief Information Commissioner, Manipur Information Commission, Manipur.
2. P.S. to Commissioner Cum Secretary (RD& PR), Government of Manipur.
3. File concerned.

-16-<sup>23</sup>

Annexure -A/4

Government of Manipur  
Office of the Addl. Principal Chief Conservator of Forests  
(Climate Change & FCA)  
Sanjenthong, Imphal

No. 7/77/2025/Forests /19

22nd  
Imphal, the 24<sup>th</sup> April, 2025

To  
✓ Mr. Mayengbam Dhananjoy Singh  
Kelshamthong Elangbam Leikai  
Imphal West- 795001

Sub:- Request for information under Section 6 (1) of the Right to Information Act, 2005.

Sir,

With reference to your letter dated 28<sup>th</sup> March, 2025 on the subject cited above, I am to submit herewith the information being sought as follows.

Particulars of information required	Remarks
Whether your department has issued the Forest Clearance Certificates or No Objection Certificates for construction of the Ring Road from Molnoi (Pallel to Laloiphai via Tolbung-Leinata (Churachandpur) via Joujangtek (Noney) to Khengjang Via Saikul (Kangpokpi) to Litan (Ukhrul) through Tengnoupal or not?	Forest Clearance proposal for construction of the Ring Road from Molnoi (Pallel to Laloiphai via Tolbung-Leinata (Churachandpur) via Joujangtek (Noney) to Khengjang Via Saikul (Kangpokpi) to Litan (Ukhrul) through Tengnoupal has not yet been applied. Therefore, Forest Clearance Certificates or No Objection Certificates has not been issued.

Yours faithfully,

Sphy  
22/4/2025

(Soreiphy Vashum)  
Addl. Principal Chief Conservator of Forests &  
Nodal Officer/FCA

Copy to:

1. The Dy. Conservator of Forests (Admin & Plg) cum SAPIO, Government of Manipur.

24

~~-16-~~  
**TYPE COPY**

Government of Manipur  
Office of the Addl. Principal Chief Conservator of Forests  
(Climate Change & FCA)  
Sanjenthong, Imphal

No.7/77/2025/Forest/19

Imphal, the 22<sup>nd</sup> April 2025

To  
Mr. Mayengbam Dhananjay Singh  
Keishamthong Elangbam Leikai  
Imphal West -75001

**Sub:-** Request for information under Section 6(1) of the Right to Information Act, 2005.

Sir,

With reference to your letter dated 28<sup>th</sup> March, 2025 on the subject cited above, I am to submit herewith the information being sought as follows:-

<b>Particulars of Information required</b>	<b>Remarks</b>
Whether your Department has issued the Forest Clearance Certificates or No Objection Certificates for construction of the Ring Road from Molnoi (Pallel) to Lalophai via Tolbung-Leimata, (Churachandpur) via Joujangtek (Noney) to Khengjang via Saikul (Kangpokpi) to Litan (Ukhrul) through Tengnoupal or not?	Forest Clearance proposal for construction of the Ring Road from Molnoi (Pallel) to Lalophai via Tolbung-Leimata, (Churachandpur) via Joujangtek (Noney) to Khengjang via Saikul (Kangpokpi) to Litan (Ukhrul) through Tengnoupal has yet been applied. Therefore, Forest Clearance Certificates or No Objection Certificates has not been issued.

Yours faithfully

(Soreiphy Vashum)  
Addl. Principal Chief  
Conservator of Forest &  
Nodal Officer/FCA

Copy to:

1. The Dy. Conservator of Forest (Admin & Pig) cum SAPIO, Government of Manipur.

~~17~~

25

Annexure -A/5

To

The Chief Secretary,  
Government of Manipur

Chief Secretary's Office  
RR No .....3.3.93.....  
Date .....2.7.25..

3/7/2025

- Ref: (i) Memorandum dated 05/02/2025 of the World Kuki-Zo Intellectual Council (WKZIC) addressed to the Shri. Nitin Gadkari, Hon'ble Union Minister of Road Transport & Highways.
- (ii) Government Letter dated 01/04/2025 addressed to Shri. Mayengbam Dhananjoy Singh issued by the Development Officer cum SPIO, Directorate of Environment & Climate Change, Porompat, Imphal-05.
- (iii) Government Letter dated 07/04/2025 addressed to Shri. Mayengbam Dhananjoy Singh issued by the Chief Engineer cum E.O., Rural Engineering Department (RED), Government of Manipur.
- (iv) Government Letter dated 22/04/2025 addressed to Shri. Mayengbam Dhananjoy Singh issued by the Addl. Principal Chief Conservator of Forests & Nodal Officer/FCA, Office of the Addl. Principal Chief Conservator of Forests (Climate Change & FCA), Sanjenthong, Imphal.
- Sub: Request for initiating legal action in accordance with law against the Organization and its responsible Leaders/Office Bearers for destroying the Forest and Forest Land in the name of illegal construction of Ring Road without the approval of the competent authority of the Government of Manipur as well as Government of India.

Contd..P/2

~~18~~ 26

-2-

Sir,

With reference to the above cited reference and subject matter, I have to state that from the reply of the RTI Application(s), it is learnt that the members of the World Kuki-Zo Intellectual Council (WKZIC) (Former Kuki-Zo Intellectual Forum), Head Quarters: Songpi-Lamka, India -795128 have already constructed illegal Ring Road which are quoted and mentioned in such Memorandum dated 05/02/2025 without the approval of the concerned competent authority and against the public interest.

As such, I on behalf of the Indigenous People of Manipur as well as responsible Civil Society Organization Leader, Manipur request you to initiate legal action forthwith for violating the relevant law(s) and to protect and preserve the forest and forest land in the larger public interest for the ends of justice.

Dated/Imphal  
The 7<sup>th</sup> July, 2025

Yours faithfully,

  
(Khuraijam Athouba Singh)  
Convener, COCOMI

S/o. Kh. Narendrajit Singh,  
Khwai Nagamapal Paonam Leirak,  
P.O. & P.S. Imphal, Imphal West District, Manipur

Enclosed:

As stated above in the references.

27

~~17-~~  
**TYPE COPY**

Chief Secretary's Office 7.7.2025  
RR No.3323  
Date 3.7.25

To  
The Chief Secretary  
Government of Manipur

Ref: (i) Memorandum dated 05.02.2025 of the World Kuki-Zo Intellectual Council (WKZIC) addressed to the Shri. Nitin Gadkari, Hon'ble Union Minister of Road Transport & Highways.

(ii) Government Letter dated 01.04.2025 addressed to Shri Mayengbam Dhananjay Singh issued by the Development Officer Cum SPIO, Directorate of Environment & Climate Change, Prompat, Imphal-05.

(iii) Government Letter dated 07.04.2025 addressed to Shri Mayengbam Dhananjay Singh issued by the Chief Engineer Cum E.O., Rural Engineering Department (Red), Government of Manipur.

(iv) Government Letter dated 22.04.2025 addressed to Shri Mayengbam Dhananjay Singh issued by the Addl. Principal Chief Conservator of Forest & Nodal Officer-FCA, Office of the Addl. Principal Chief Conservator of Forest (Climate Change & FCA), Sanjenthong, Imphal.

Sub: Request for initiating legal action in accordance with law against the Organization and its responsible Leaders/Office Bearers of destroying the Forest and Forest Land in the name of illegal construction of Ring Road without the approval of the competent authority of the Government of Manipur as well as Government of India.

Sir,

With reference to the above cited reference and subject matter, I have to state that from the reply of the RTI Application(s) it is learnt that the members of the World Kuki-Zo Intellectual Council (WKZIC) (Former Kuki-Zo Intellectual Forum). Head Quarters : Songpi -Lamka, India -795128 have already constructed illegal Ring Road which are quoted and mentioned in such Memorandum dated 05.02.2025 without the approval of the concerned competent authority and against the public interest.

As such, I on behalf of the Indigenous People of Manipur as well as responsible Civil Society Organization Leader, Manipur request you to initiate legal action forthwith for violating the relevant law(s) and to protest and preserve the forest and forest land in the larger public interest for the ends of justice.

Dated/Imphal  
The 7<sup>th</sup> July, 2025

Yours faithfully

(Khuraijam Athouba Singh)  
Convener, COCOMI  
S/o. Kh. Narendrajit Singh,  
Khwai Nagamanpal Paonam Leirak,  
P.O. & P.S. Imphal, Imphal West District, Manipur

**Enclosed:**  
As stated above in the reference.

Sir,

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Dated/Imphal  
The 7<sup>th</sup> July, 2025

Yours faithfully,

(Khuraijam Athouba Singh)  
Convener, COCOMI  
S/o Kh. Narendrajit Singh,  
Khwai Nagamapal Paonam Leirak,  
P.O. & P.S. Imphal, Imphal West District, Manipur

**Enclosed :**

As stated above in the references.

Printed from

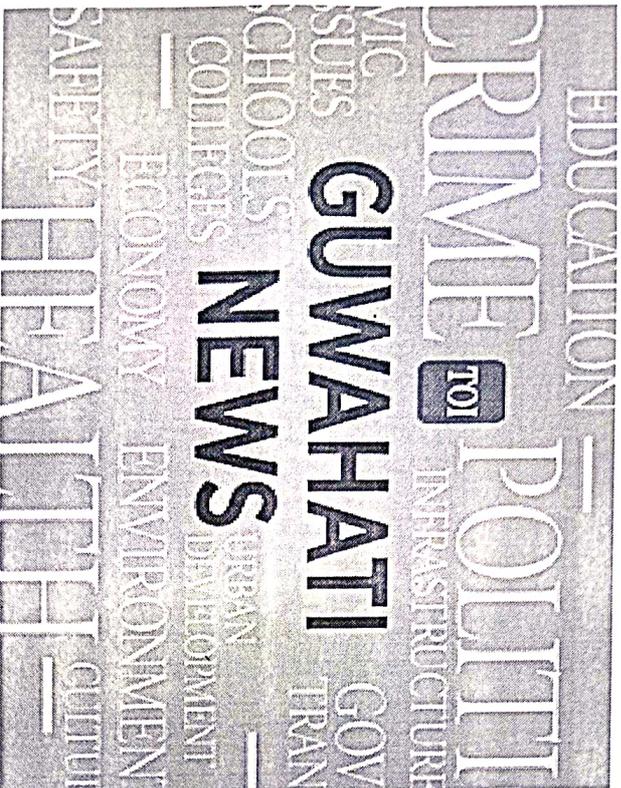
THE TIMES OF INDIA

*Amesha - A/16*

**29**

# Kuki-Zo seeks Centre's help to improve disputed German-Tiger Road

Jul 20, 2025, 11:40 PM IST



Guwahati: Kuki-Zo Council (KZC), the apex body of Kuki-Zo tribals in Manipur, appealed to the Centre on Sunday to improve the German-Tiger Road — earlier an inter-village path connecting Churachandpur and Kangpokpi districts. The community-led initiative for the road, funded through public donations, has sparked disputes, drawing opposition from the Naga community and escalating ethnic tensions.

prior consultation.

The Foothills Naga Coordination Committee (FNCC) announced an indefinite bandh on Friday midnight banning the movement of Kukis in the foothills of Naga-inhabited areas, objecting to the road's development through ancestral territories of Nagas without

This situation has created tension between Kuki-Zo people and Nagas, while conflicts persist between Kuki-Zos and Meiteis since the ethnic unrest began in Manipur in May 2023.

While on Sunday, KZC cautioned that attempts to obstruct Kuki-Zo community connectivity reflect an intention to isolate them. However, Meiteis remain the primary focus of Kuki-Zo peoples' grievances, rather than the Nagas

though the latter have been largely neutral in the tribal Kuki-Zo and non-tribal Meitei conflict in Manipur over the last two years.

"Kuki-Zo Council strongly condemns the baseless and malicious accusations being circulated by certain Meitei groups branding the German-Tiger Road and Singheu Road as 'drug routes'. These claims are entirely unfounded and without any legitimate evidence," Ginza Vualzong, secretary, information & publicity at KZC, said on Sunday.

Despite Naga objections and restrictions, KZC has sought central govt's support to develop both the routes. While Nagas worry about potential land losses, KZC argues that the roads are essential for the community during the ongoing conflict and blockades. The council stressed that the German-Tiger Road provides a safe travel alternative by bypassing Meitei-dominated regions.

Sources said some camps of Kuki outfits that are under suspension of operation are in proximity to Naga villages, raising concerns that an upgraded German-Tiger Road would facilitate the groups' movements further. "Nagas fear potential encroachment into their territories by Kuki-Zo people," the source said. Through public contributions, work has commenced to develop basic roads (mostly kutcha), with vehicles already using both routes.

According to KZC, improvement of the German-Tiger Road was necessary, as after ethnic violence, it was unsafe for Kuki-Zo people to travel through Meitei-dominated areas. The Singheu Road now connects Churachandpur, Chandel, and Tengnoupal in absence of viable infrastructure. "We call upon the central govts to reject these divisive and baseless allegations and, instead, take steps to improve German-Tiger Road and Singheu Road as essential inter-district lifelines," Ginza said.

"We urge the Centre to reject divisive rhetoric and recognize these roads as lifelines—not criminal pathways," Ginza added.

"Accusing the German-Tiger Road and Singheu Road of being a conduit for illicit activities without presenting credible evidence is nothing short of a deliberate attempt to criminalise the Kuki-Zo community and to isolate us further. This tactic may also reflect a broader political effort to shift discourse away from the unfolding Biren Audio Tape case," Ginza alleged.

Guwahati: Kuki-Zo Council (KZC), the apex body of Kuki-Zo tribals in Manipur, appealed to the Centre on Sunday to improve the German-Tiger Road — earlier an inter-village path connecting Churachandpur and Kangpokpi districts. The community-led initiative for the road, funded through public donations, has sparked disputes, drawing opposition from the Naga community and escalating ethnic tensions.

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This situation has created tension between Kuki-Zo people and Nagas, while conflicts persist between Kuki-Zos and Meiteis since the ethnic unrest began in Manipur in May 2023.

While on Sunday, KZC cautioned that attempts to obstruct Kuki-Zo community connectivity reflect an intention to isolate them. However, Meiteis remain the primary focus of Kuki-Zo peoples' grievances, rather than the Nagas though the latter have been largely neutral in the tribal Kuki-Zo and non-tribal Meitei conflict in Manipur over the last two years.

"Kuki-Zo Council strongly condemns the baseless and malicious accusations being circulated by certain Meitei groups branding the German-Tiger Road and Singheu Road as 'drug routes'. These claims are entirely unfounded and without any legitimate evidence," Ginza Vualzong, secretary, information & publicity at KZC, said on Sunday.

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the ongoing conflict and blockades. The council stressed that the German-Tiger Road provides a safe travel alternative by bypassing Meitei-dominated regions.

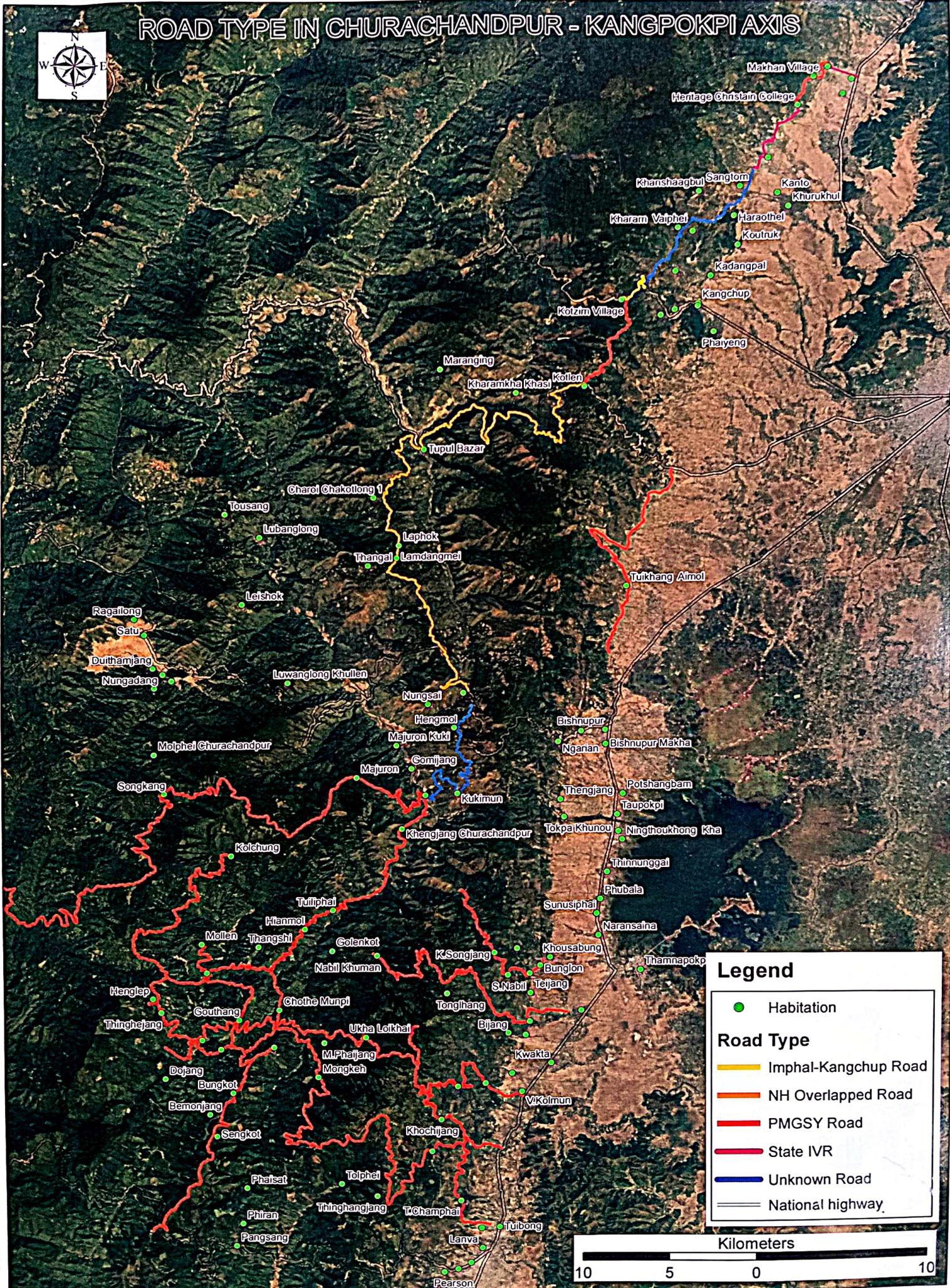
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"We urge the Centre to reject divisive rhetoric and recognize these roads as lifelines—not criminal pathways," Ginza added.

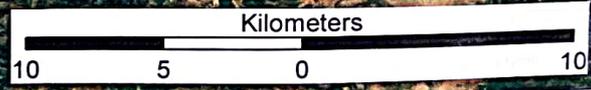
"Accusing the German-Tiger Road and Singheu Road of being a conduit for illicit activities without presenting credible evidence is nothing short of a deliberate attempt to criminalise the Kuki-Zo community and to isolate us further. This tactic may also reflect a broader political effort to shift discourse away from the unfolding Biren Audio Tape case," Ginza alleged.

# ROAD TYPE IN CHURACHANDPUR - KANGPOKPI AXIS

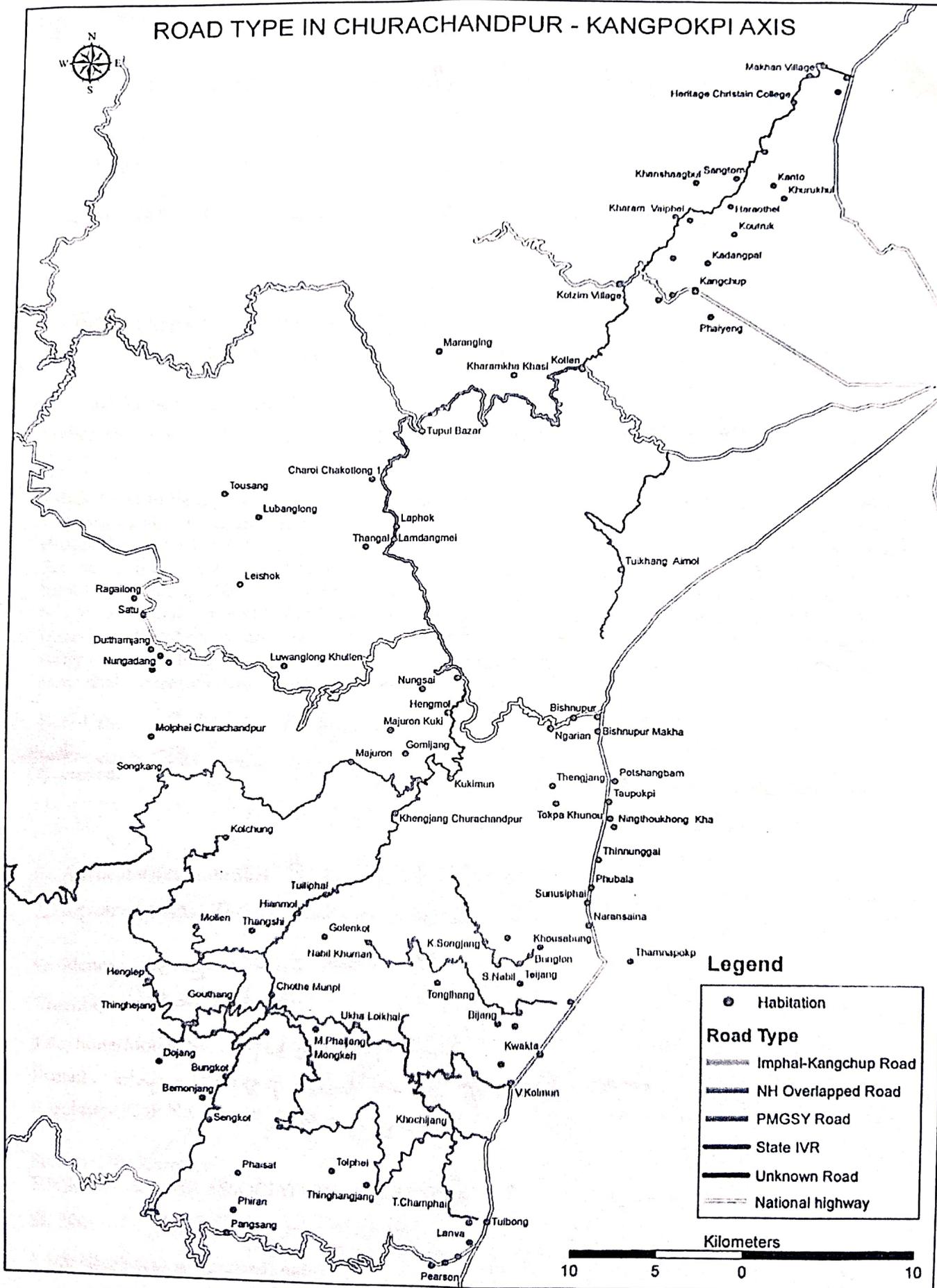


**Legend**

- Habitation
- Imphal-Kangchup Road
- NH Overlapped Road
- PMGSY Road
- State IVR
- Unknown Road
- National highway



# ROAD TYPE IN CHURACHANDPUR - KANGPOKPI AXIS





27 35

PASTE COURT  
FEES HERE

# VAKALATNAMA

IN THE NATIONAL GREEN TRIBUNAL - EZBO.A No. .... of 2025Shri Khuraijam Athouba Singh PETITIONER(S)/  
PLAINTIFF(S)/APPELLANT(S)/APPLICANT(S)/CAVEATOR(S)

- Versus -

The Union of India & Or's RESPONDENT(S)/  
DEFENDANT(S)/ACCCUSED/OPP. PARTY(IES)/PROSPECTIVE PETITIONER(S)I/We, the undersigned, the above named .....  
do hereby appoint and retain Mr./Miss/Mrs ..... Dipankar Thakur

Advocate(s) to be my/our true, Lawful Attorney(s) for me/us on my/our behalf to act & appear in the Case noted above and in connection therewith to conduct, to prosecute (to defend) the same and all Proceeding(s) arising out or connected with the same or any Decree(s) or Order(s) passed therein or any Proceeding(s) in Execution, Review, Revision, or Restoration or Compromise etc. AND to file & receive back Document(s) AND to deposit & receive Money, Cheques on my our behalf in the above matter AND to sign or amend & present Complaint or any Pleadings, Applications & Petitions for me/us AND to take all necessary step(s) which are deemed expedient on my/our behalf in the above matter(s). I/We agree to ratify all acts & things lawfully done by the aforesaid Advocate(s) in pursuance of this Authority, and the same shall be treated to have been done personally by me/us for all intents & purposes.

Dated, the 25 day of 07 2025.Dipankar Thakur  
Accepted.

Signature (s) of the Party (ies)

Kh. Athouba.Sr. Advocate/Advocate Shri S. Lalit Kumar,  
Dipankar Thakur shall lead the hearing.Residence: Rajarhat, KolkataChamber: RajarhatTelephone/Mobile No.: 9434214268E-mail: dipak1989thakur@gmail.comEnrolment/CoP No.: F/1809/2023Secretary/Jt. Secretary  
HIGH COURT BAR ASSOCIATION OF MANIPURSl. No. **2916** Joint Secretary  
High Court Bar Association  
₹ 100 (Rupees One hundred) only Manipur