

EASTERN ZONE BENCH, KOLKATA,

206
ORIGINAL APPLICATION NO. OF 2025/EZ

(Under Section 18 read with Sections 14, 15 of
 National Green Tribunal Act 2010)

IN THE MATTER OF:

Ram Nayak

.... Applicant

VERSUS

State of Odisha, And Ors

..... Respondents

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Paushali Banerjee
Advocate
7A, Kiron Shankar Roy Road
Kolkata-700001

**BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA,**

ORIGINAL APPLICATION NO. OF 2025/EZ
(Under Section 18 read with Sections 14, 15 of
National Green Tribunal Act 2010)

IN THE MATTER OF:

Ram Nayak

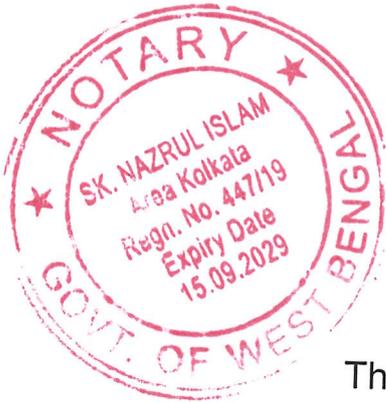
.... Applicant

VERSUS

State of Odisha, And Ors

..... Respondents

SYNOPSIS



That the Applicant States that your Applicant is a social worker residing in the District of Nabarangpur, a community health centre is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals. The nature and character of the

land over which the community center is constructed is "Pahada" in nature i.e hill. The aforesaid land was in the status of Forest Land having substantial forest/tree growth over it. To make the said land suitable for construction of Model CHC, respondent authorities have removed the forest/tree growth in phased manner and also polluting the nalla adjacent to the land over which construction is taking place, causing serious environmental impact. Hence this Application

Paushali Banerjee

Advocate

7A, Kiron Shankar Roy Road

Kolkata-700001



**BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA,**

ORIGINAL APPLICATION NO. OF 2025/EZ

(Under Section 18 read with Sections 14, 15 of National
Green Tribunal Act 2010)

IN THE MATTER OF:

Ram Nayak

.... Applicant

VERSUS

State of Odisha, And Ors

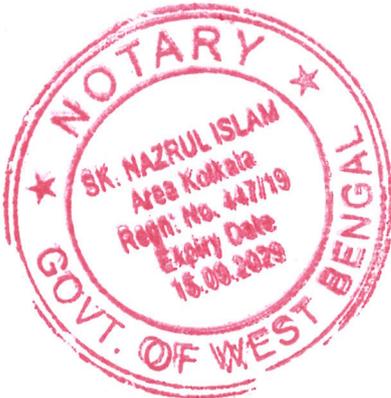
..... Respondents

LIST OF DATES

1.	20.06.25	The Applicant visited the area and found a community health centre is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals. The nature and character of the land
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		over which the community center is constructed is "Pahada" in nature i.e hill
2.	30.06.25	RTI reply of the respondent authorities
3.	22.09.25	Representation submitted by the Applicant before the respondent authorities

Paushali Banerjee
Advocate
7A, Kiron Shankar Roy Road
Kolkata-700001



**BEFORE THE NATIONAL GREEN TRIBUNAL EASTERN
ZONE BENCH, KOLKATA,**

ORIGINAL APPLICATION NO. OF 2022/EZ

(Under Section 18 read with Sections 14, 15 of National Green
Tribunal Act 2010)

IN THE MATTER OF:

Ram Nayak , son of late Khagapati Nayak, P.O.Dangarbheja,
District : Nabarangapur, Odisha -764078

.....APPLICANT

VERSUS

- 1) State of Odhisa through the Additional Chief Secretary,
Forest, Environment and Climate Change Department, Govt. of
Odisha, Kharavel Bhavan, Bhubaneswar, fesec.or@od.gov.in
- 2) State Pollution Control Board, through the Member
Secretary, Paribesh Bhawan, A/118, Nilakantha Nagar, Unit – VIII,
Bhubaneswar – 751012, Odisha, paribesh1@ospcboard.org
3. The Collector, Nabarangpur, PO & DIST-Nabarangpur,
PIN-764059, ODISHA. dm-nawarangpur@nic.in
4. Tahasildar, Tahasil Office, Kodinga, District: Nabarangpur-
764059, dm-nawarangpur@nic.in

....Respondents

THE HUMBLE APPLICATION OF THE APPLICANT
ABOVENAMED

MOST RESPECTFULLY SHOWETH:



1. THAT the address of the Applicants is as given above for the service of notice of this Application.
2. THAT the addresses of the Respondents are as given above for the service of notice of this Application.
3. That the Applicant States that your Applicant is a social worker residing in the District of Nabarangpur, a community health centre is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals. The nature and character of the land over which the community center is constructed is "Pahada" in nature i.e hill. The aforesaid land was in the status of Forest Land having substantial forest/tree growth over it. To make the said land suitable for construction of Model CHC, respondent authorities have removed the forest/tree growth in phased

manner and also polluting the nalla adjacent to the land over which construction is taking place, causing serious environmental impact. Hence this Application

5. BRIEF FACTS OF THE CASE:

(A) The Applicant states that the Applicant is a social activists rendering our services mostly for the protection of environment and pollution free society and also indulge ourselves for different type of selfless services for the upliftment of the downtrodden and poor people of the society in as much as enhancement of the standard of the poor tribal population of Nabarangpur district

(B) The Applicant states that recently while doing some community work in Sarugada village that is around 4 to 5 kilometers from the village of the Applicant noticed that a community Health Center is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals.

(C) The Applicant states that the nature and character of the land over which the community center is constructed is "Pahada"



in nature i.e hill. The aforesaid land was in the status of Forest Land having substantial forest/tree growth over it. To make the said land suitable for construction of Model CHC, respondent authorities illegally removed the forest/tree growth in phased manner. The Copy of the ROR of Mouza- Soruguda, Tahasil-Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275 is annexed herewith and marked as Annexure A.

(D) The Applicant states that That, the "PAHADA" (Hill) over which model CHC of Saruguda is being constructed is a laterite stones hill and laterite stones were extracted previously. As per the provision for grant of environmental clearance in Environmental Impact Assessment (EIA) Notification, 2006, any extraction of laterite stone requires the miner to obtain environmental clearance. The construction project of Community health Centre required extraction of Laterite stone which was done without any Environmental Impact Study. The Photographs of the Hill before the construction work and after the construction work are annexed herewith and marked as Annexure B

E) That the Applicant states that there is a "NATURAL NALA" (Natural water Body) that is flowing at the bottom of the said land hill adjacent to the plot over which the construction work are being undertaken. The respondent authority have not yet established any waste purification plant for treatment of medical waste water to be generated from the medical. The Natural Nala is connected to RIVER INDRAVATI and a substantial population are depending on the river Indravati for bathing, washing of utensils and being a remote area, certain group of people are also using the said water for drinking purpose. In case untreated medical waste water mix with river Indravati through the said Nala it will create serious health hazard for the people and also lead to a serious water pollution problem.

E1) The Applicant states that the Indravati River is the most prominent in the district. It is a tributary of the Godavari and sustains perennial flow. It originates in the Kalahandi district flows through Nabarangpur and Koraput districts and enters in Bastar district of Chhattisgarh. It is pertinent to mention here that construction materials are dumped in the river polluting the river and effecting the environment at large. The photographs of the

construction site beside the river that have almost changed the land cover from forest to barren are annexed herewith and marked as Annexure C.

F) The Applicant states that the land is Deemed forest land as per dictionary meaning of 'Forest' as per the direction dated 12.12.1996 of the Hon'ble Apex Court in Writ Petition (Civil) No 202/1995.

G) The Applicant states that Nabarangpur District is venerable to drought as well as flood, in such a situation decline in forest cover will effect the environment as well as drought and flood situation in the District. The construction of Health Centre resulted in axing of more than thousand trees of various species which is illegal and the resultant effect is degradation of environment.

G1) The Applicant states that one hundred Mango trees, one twenty five tamarind trees, eighty teak trees, 120 Banyan Trees, seventy jungle bamboo trees, seventy five different species of trees having medicinal benefits and hundred and ten Sal trees were felled for construction the Health Centre causing damage to the Environment.

h) The Applicant submitted an RTI before the revenue authority of the State and the reply of the state forwarded to the Applicant is vague. The revenue authority did not reply to the question of permission for cutting of the forest cover. The copy of the RTI reply dated 30/06/25 is annexed herewith and marked as annexure D.



I) The Applicant along with other villagers submitted representations dated 22/09/25 before the state board and the District Magistrate ventilating their grievances but till date no action is taken by the respondent authorities. Copies of both the representation is annexed herewith and marked as Annexure E.

(J) The Applicant states that there is no other alternative legal remedy and the remedy sought for herein would be adequate full and complete.

(K) The balance of convenience lies in favour of the Applicant and the Applicant shall suffer irreparable loss and injury if the relief as prayed before this Hon'ble Tribunal is not granted.

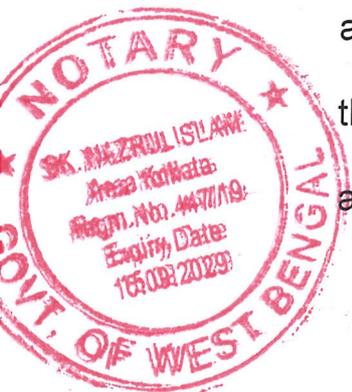
6. GROUNDS :

A. For that the respondent authorities failed to appreciate that . the nature and character of the land over which the community center is constructed is "Pahada" in nature i.e hill. The aforesaid land was in the status of Forest Land having substantial forest/tree growth over it.

B For that the respondent authorities failed to appreciate that it is illegal to remove the forest growth to make the said land suitable for construction of Model CHC.

C For that The respondent authority failed to appreciate that The construction project of Community health Centre required extraction of Laterite stone which was done illegally without any Environmental Clearance or any Environmental Impact Study

D For that the respondent authorities failed to appreciate that there is a "NATURAL NALA" (Natural water Body) that is flowing at the bottom of the said land hill adjacent to the plot over which the construction work are being undertaken. The respondent authority have not yet established any waste purification plant for



treatment of medical waste water to be generated from the medical. The Natural Nala is connected to RIVER INDRAVATI

E. For that the respondent authorities failed to appreciate that the land over which the Health Centre is constructed is Deemed forest land as per dictionary meaning of 'Forest' as per the direction dated 12.12.1996 of the Hon'ble Apex Court in Writ Petition (Civil) No 202/1995

F. For that the respondent authorities failed to address the grievances of the aggrieved villagers, the villagers submitted their representations dated 22/09/25 and till date no action is taken.

F. FOR THAT the acts and conducts of the respondent authorities are arbitrary, malafide and vexatious inasmuch as in violation to the Environment Protection Act.

G. FOR THAT the manner, in which the Respondent authorities have deliberately abused their respective delegated powers by indiscriminately felling one hundred Mango trees, one twenty five tamarind trees, eighty teak trees, 120 Banyan Trees, seventy

jungle bamboo trees, seventy five different species of trees having medicinal benefits and hundred and ten Sal trees for construction the Health Centre causing damage to the Environment.

7. LIMITATION

The Applicant declares that the cause of action in the instant case, accrues and continues from day-to-day, Such cause of action is renewing on a day-to-day basis and as such the question of applicability of the limitation prescribed in Section 14 (3) of the National Green Tribunal Act, 2010 does not arise.

8. INTERIM RELIEF:

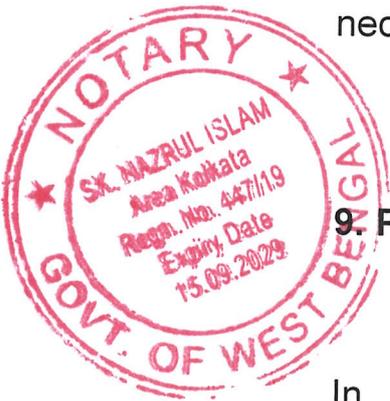
Pending disposal of the application, under the circumstances as aforesaid the applicant most humbly prays before this Hon'ble Tribunal may be pleased to:

1a. May direct constitution of a High level Independent Committee to assess i) damage caused to the Environment for

removing the forest growth ii) Cost of ecological restoration and environment compensation.

1b. Direct the respondent authorities to stop the construction work of the community Health Center is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals till the disposal of this Application.

1c. And such further order or orders as may be fit proper and necessary in the facts and circumstances of the case.



9. PRAYER

In view of the above facts and circumstances it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

A. Direct the respondent authorities to stop the construction work of the community Health Center is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under

Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals

C. Direct the Respondent authorities to demolish the illegal community Health Center is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals

D. Direct the Respondent authorities not to start the community Health Center is being constructed at Village Sarugada, Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area . 8.7500 decimals

D. And such further order or orders as may be fit proper and necessary in the facts and circumstances of the case

E. Cost of and/or incidental to the instant application;



VERIFICATION

Rama Nayak , son of late Khagapati Nayak, P.O.Dangarbheja,
 District : Nabarangapur, Odisha -764078, do hereby verify that
 the contents of paras ^{(1), (3), (5)} (A) (B) (F) (g) are true to my personal
 knowledge and rest of the paragraphs are my humble
 submissions and that I have not suppressed any material fact;

Date: ^{November} th day of ~~2025~~, 2025,

Place:

Rama Nayak

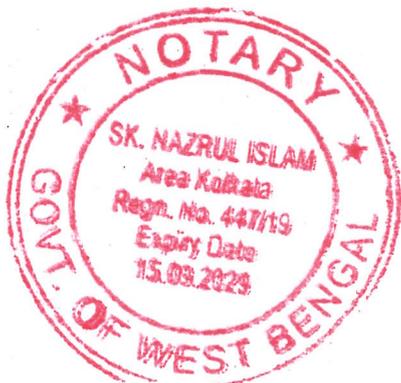
Signature of the applicant

Pausheli Banerjee
 Advocate

Solely Attended and
 Declared before me on the
 Identification of the Advocate.

Notary

SK. Nazrul Islam
 Notary, Govt. of W.B
 Govt. No. 447/19
 City Civil Court, Calcutt



03 NOV 2025

20

Amusement 'A'

Schedule I Form No.39-A

ଖତିୟାନ

ମୌଜା : ସରୁଗୁଡ଼ା
ଥାନା : ନବରଂଗପୁର
ଥାନା ନମ୍ବର : 53

ତହସିଲ : ନଦାହାଣ୍ଡି
ତହସିଲ ନମ୍ବର : 189
ଜିଲ୍ଲା : ନବରଂଗପୁର

ଜମିଦାରଙ୍କ ନାମ ଓ ଖେତାଚ ବା ଖତିୟାନର କ୍ରମିକ ନମ୍ବର		ଓଡ଼ିଶା ସରକାର ଖେତାଚ ନମ୍ବର 1				
1) ଖତିୟାନର କ୍ରମିକ ନମ୍ବର		582				
2) ପ୍ରଜାର ନାମ, ପିତାର ନାମ, ଜାତି ଓ ବାସସ୍ଥାନ		ଆବାଦ ଅଯୋଗ୍ୟ ଅନାବାଦି				
3) ସ୍ୱତ୍ୱ						
4) ବେଢ଼ :	ଜଳକର	ଖଜଣା	ସେସ୍	ନିଷ୍କାର ସେସ୍ ଓ ଅନ୍ୟାନ୍ୟ ସେସ୍ ଯଦି କିଛି ଥାଏ	ମୋଟ	5) କ୍ରମବର୍ଦ୍ଧନଶୀଳ ଖଜଣାର ବିବରଣୀ
6) ବିଶେଷ ଅନୁସଙ୍ଗ ଯଦି କିଛି ଥାଏ						
BLANK SPACE FOR STAMPING						
ଅତିମ ପ୍ରକାଶନ ତାରିଖ - 30/09/1993						
ଖଜଣା ଧାର୍ଯ୍ୟ ତାରିଖ - 01/04/1994						

ଖତିୟାନର କ୍ରମିକ ନଂ : 582		ମୌଜା : ସରୁଗୁଡ଼ା			ଜିଲ୍ଲା : ନବରଂଗପୁର	
ପୁଟ ନମ୍ବର ଓ ଚକର ନାମ	କିସମ ଓ ପୁଟର ଖଜଣା	କିସମର ବିସ୍ତାରିତ ବିବରଣୀ ଓ ଚୌହଦି	ରକବା			ମତବ୍ୟ
			ଏ.	ଡି.	ହେକ୍ଟର	
7	8	9	10	11	12	
28	ପଥର ବଣି	ଡରା ପଦର ପଥର	0	3000		
1279	ପଥର ବଣି	କୁପୁଲି ପଥର	0	2200		
1281	ପଥର ବଣି	କୁପୁଲି ପଥର	0	1600		
709	ନାଳ	ବେଲ ଯୋଡ଼ିପାଣିନାଳ	1	5500		
714	ନାଳ		0	1300		
715	ନାଳ	ବେଲଯୋଡ଼ି ପାଣିନାଳ	1	5500		
724	ନାଳ	ବେଲଯୋଡ଼ି ପାଣିନାଳ	1	0600		
1061	ନାଳ	ବେଲ ଯୋଡ଼ି ନାଳ	1	3000		
1071	ନାଳ	ବେଲ ଯୋଡ଼ି ନାଳ	4	5900		
1204	ନାଳ	ବେଲ ଯୋଡ଼ି ନାଳ	4	0000		
1212	ନାଳ		0	1300		
1216	ନାଳ	ପାଣି ନାଳ	0	2000		
1220	ନାଳ	ପାଣିନାଳ	0	1200		
1240	ନାଳ	ବେଲଯୋଡ଼ିପାଣିନାଳ	2	9200		
1242	ନାଳ	ବେଲଯୋଡ଼ିପାଣିନାଳ	1	8400		
1264	ପାହାଡ଼		0	4100		
1272	ପାହାଡ଼		1	5000		
1274	ପାହାଡ଼		0	1000		
1275	ପାହାଡ଼		8	7500		
757	ପାହାଡ଼	ମୁଣ୍ଡି କୁପୁଲି	2	4500		
758	ପାହାଡ଼		0	5600		
771	ପାହାଡ଼	ମୁଣ୍ଡି କୁପୁଲି	0	0500		

୧୩ ୧୨

893	ପାହାଡ଼		3	4700		
266	ପାହାଡ଼	ବନ୍ଧାପର୍ବତ	47	0000		
24 plots			84	3600		

ରାଷ୍ଟ୍ରୀୟ ସୂଚନା ବିଜ୍ଞାନ କେନ୍ଦ୍ର 16/10/2025 07:09:05 IP :49.42.136.68

22 A

Schedule I Form No.39-A

RECORD OF RIGHTS

MOUZA : SARUGUDA

TAHASIL: NANDAHANDI

P.S : NABARANGPUR

TAHASIL NO : 189

P.S NO: 53

DIST: NABARANGPUR

NAME OF THE LANDLORD AND SERIAL NO OF THE KHEWAT OR KHATIAN		GOVT OF ODISHA KHEWAT NO. 1				
1) SERIAL NUMBER OF THE INVOICE		582				
2) NAME OF THE PEOPLE,FATHER'S NAME CASTE AND PLACE OF RESIDENCE		ABAD IS UNWORTHY				
3) SELF						
PAYMENT	LIGHT UP	GUESS	SESS	PASSOVER CESS AND OTHER CESSSES,IF ANY	TOTAL	5)PROGRESSIVE PAYMENT SYSTEM
6) SPECIAL ATTACHMENTS,IF ANY						
BLANK SPACE FOR STAMPING						
LAST DATE OF PUBLICATION - 30/09/1993						
DUE DATE- 01/04/1994						

ROR KHATA NO:582		MOUZA : SARUGUDA			DIST:NABARANGPUR	
PLOT NO	KISSAM	DETAILED DESCRIPTION OF THE VARIETY AND ITS CHARACTERISTICS	AREA			REMARK
			AC	DECIMAL	HECTO R	
7	8	9	10	11	12	
28	PATHARA BANI(STONE)	TARA PADARA PATHARA	0	3000		
1279	PATHARA BANI(STONE)	KUPULI PATHARA	0	2200		
1281	PATHARA BANI(STONE)	KUPULI PATHARA	0	1600		
709	NALA	BELA JODI PANI NALA	1	5500		
714	NALA		0	1300		
715	NALA	BELA JODI PANI NALA	1	5500		
724	NALA	BELA JODI PANI NALA	1	0600		
1061	NALA	BELA JODI NALA	1	3000		
1071	NALA	BELA JODI NALA	4	5900		
1204	NALA	BELA JODI NALA	4	0000		
1212	NALA		0	1300		
1216	NALA	PANI NALA	0	2000		
1220	NALA	PANI NALA	0	1200		
1240	NALA	BELA JODI PANI NALA	2	9200		
1242	NALA	BELA JODI PANI NALA	1	8400		
1264	PAHADA		0	4100		
1272	PAHADA		1	5000		
1274	PAHADA		0	1000		
1275	PAHADA		8	7500		
757	PAHADA	MUNDI KUPULI	2	4500		

22 c

758	PAHADA		0	5600		
771	PAHADA	MUNDI KUPULI	0	0500		
893	PAHADA		3	4700		
266	PAHADA	BANDA PARBATA	47	0000		
24 plots			84	3600		

NATIONAL CENTER FOR INFORMATION SCIENCE 17/10/2025 07:23:16 IP :49.42.143.158

BEFORE



AFTER







28

Amranda D



OFFICE OF THE TAHASILDAR, NANDAHANDI
DISTRICT: NABARANGPUR, (ODISHA)

E-mail : tah.nanda-od@nic.in

No. 2404 /2025(RTI)

Dated:- 04.07.2025

To

Shri Rama Nayak,
S/o- Late Khagapati Nayak,
At/Po:- Dangarbheja,
PS, Dist:- Nabarangpur.

Sub: - Supply of information under RTI Act-2005.

Ref :- Your application Dated: - 06.06.2025.

Sir,

With reference to your application dated 06/06/2025 on the subject cited above, I am to send herewith the required information received from concerned section for point no. 1 and 4 of your asked information. The information sought in point 2 and 3 should be obtained from concerned office .

Yours faithfully,

Encl: As above

By 4.7.25
P.I.O.
Public Information officer,
Tahasil Office Nandahandi.

~~28~~ 27
OFFICE OF THE REVENUE INSPECTOR DANGARBHEJA'

Letter No- 52/25

Date- 30/06/25

To

The PIO, Nandahandi .

Sub- Submission of information as called for by Sri Rama Nayak under
RTI act 2005.

Sir,

With Reference to the subject cited above I am to submit herewith the required information called by Sri Rama Nayak under RTI act 2005 as Follow.

SI No	Information Details	Reply
01	Since there was massive forest growth over the khata no- 582 plot no- 1275 Kissam-Pahada Extent of Ac -8.75 cents of Mouza- Saruguda under Nandahandi Tahasil of Dist- Nabarangpur. whether the status of land was forest prior to the year 1980	On verification of Hal record it reveals that the khata no- 582 Plot no- 1275 Kissam-Pahada Extent- Ac 8.75 in the name of Govt. Khata(ଆବାଦ ଅନ୍ତରାଳ୍ୟ ଅନାବାଦି).That the RoR of the village- Saruguda has been finally published on dated 30.09.1993. The sabik status prior to the year 1980 may be obtained from settlement office, Jeypore.
02	When did the forest growth removed	NA
03	Whether the permission of the forest department was obtained prior removal of forest growth over the said land	NA
04	Furnish the date when the land comes under the revenue department.	That the RoR of the village- Saruguda has been finally published on dated 30.09.1993. The sabik status prior to the year 1980 may be obtained from settlement office, Jeypore.

This is for your kind information and necessary action.

Yours faithfully ,
Revenue Inspector

To,

The Chairman,
State Pollution Control Board, Odisha
Bhubaneswar

Sub :- Representation highlighting the grievances regarding seer illegality and violation of law in construction of model CHC at Village Soruguda.

Sir,

With due respect and sincere reverence, we the undersigned beg to draw the following facts and grievances for your kind consideration and immediate action in this matter.

1. That, we the undersigned are social activists rendering our services mostly for the protection of environment and pollution free society and also indulge ourselves for different type of selfless services for the upliftment of the downtrodden and poor people of the society in as much as enhancement of the standard of the poor tribal population of Nabarangpur district.
2. That, it is a matter of great concern that your good offices in consultation with the Revenue Department has proceeding with the construction work to establish a model CHC by shifting the existing CHC located in the village Dangarbheja. In this context, we humbly beg to draw your kind attention to the fact that the land over which construction work of the model CHC at Soruguda is continuing for shifting of existing CHC of village Dangarbheja Pertains to Mouza- Soruguda, Tahasil- Nandahandi under Nabarangpur District having Khata No.- 582, Plot No.- 1275, measuring to an area Ac. 8.7500 decimals. The kissam of the said land is "PAHADA" (Hill). To our information, year 1980 the aforesaid land was in the status of Forest Land having substantial forest growth over it. To make the said land suitable for construction of Model CHC, your authority have removed the forest growth in phase manner and there is destruction of forest causing serious environmental impact.
3. That, the "PAHADA" (Hill) over which model CHC of Saruguda is being constructed is a laterite stones hill and laterite stones were extracted previously. As per the procedure envised under mining law governing the

major minerals as well as minor minerals, no project over the laterite stone hill can be proceeded with without obtaining necessary environmental clearance as well as the report pertaining to Environmental Impact Assessment Study. The project which is being undertaken by your authority concern is clearly against law and contrary to the law laid down to protection of environment. It is categorically stated here that the project under taken by your authority and the construction work continued for the said purpose is clearly against law and having no legal sanctity.

4. That, it is further humbly begs to state before your good offices that there is a "NATURAL NALA" (Natural water Body) is flowing at the bottom of the said land hill and the plot over which the construction work are being undertaken and the nala are adjacent to each other. The authority have not yet established any waste purification plant for treatment of medical waste water to be generated from the medical. In such event polluted medical waste water will mix with the Natural Nala, the said Natural Nala is connected to RIVER INDRAVATI and a substantial population are depending on the river Indravati for bathing, washing of utensils and being a remote area, certain group of people are also using the said water for drinking purpose. In case untreated medical waste water mix with river Indravati through the said Nala it will create serious health hazard for the people and also lead to a serious water pollution problem.
5. That, the proposed action of your authority concern in taking steps for shifting of the existing CHC of village Dangarbheja to said newly constructed Model CHC immediately generate medical waste water. Your authority have proceeded with the project without environmental clearance and environmental impact assessment which is not permissible in the eye of law. As on today the status of the land is still continuing as PAHADA and the status of the land can not be changed without environmental clearance as the land is a laterite hill.
6. That, even if there is serious latches and illegality in construction of the said Project and land has not been converted and handed over to the medical, but your authority is taking steps for shifting of the CHC in a hurried way to cover up your latches and illegal action contrary to environmental law for establishment of said project proponent.
7. That is humble stated here that entire aspect pertaining as to whom project has been entrusted, project cost and observation of all legal and environmental formalities has been kept hide to the general people to cover

up the said illegality and to project the said action as a lawful one. Facts remains that the project in question has been undertaken in clear contravention of environmental law and will led to serious water pollution in immediate future.

Under the aforesaid premises we humbly request your good authority may kindly refrain from said illegal act and humbly request that should be immediate direction to stop the project as the same has no legal sanctity and also lead to serious environmental and health hazard thereby causing serious impact as the society as well as the people at large.

Thanking You.

Yours faithfully,

Rama Nayak

1) Rama Nayak
At/po- Dangarbheja
Dist- Nabarangpur-764078

Mohan Kumar Nayak

2) (Mohan Kumar Nayak)

Binayak Dhakada

3) (Binayak Dhakada)

Gupta Nayak

4) (Gupta Nayak)

Umashankar Dash

5) (Uma Sankar Dash)

22/9/2025
Dangarbheja

Copy forwarded to The Collector, Nabarangpur, Odisha for your kind consideration and necessary action.

To,

The Collector & Dist Magistrate, Nabarangapur.

Sub :- Representation highlighting the grievances regarding seer illegality and violation of law in construction of model CHC at Village Soruguda.

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Thanking You.

22/9/25
Dangarbheja

Yours faithfully,

Rama Nayak

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At/po- Dangarbheja

Dist- Nabarangpur-764078

Mohan Kumar Nayak
2) (Mohan Kumar Nayak)

Binayak Dhakada
3) (Binayak Dhakada)

Gupta Nayak
4) (Gupta Nayak)

Uma Sankar Dash
5) (Uma Sankar Dash)

Copy forwarded to Chairman Odisha State Pollution Control Board,
Paribesh Bhawan, A/118, Nilakantha Nagar, Unit-VIII, Bhubaneswar -
751012, Odisha

35 34

INDIA POST

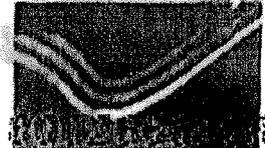


Dongerbheja S.O (764078)
 RL R0237729172IN, IVR No:18002665868
 22/09/2025 11:35:14. Counter No:1
 To: THE CHAIRMAN STATE POLUTION CONTROL
 Nayapalli S., ODISHA - 751012
 From: RAMA NAYAK-764078
 Base Amt: 22.00,
 WL:20 (Actual)gms
 P.Mode:Cash,

India Post

POB:No www.indiapost.gov.in

भारतीय डाक



Dongerbheja S.O (764078)
 RL R0237729172IN, IVR No:18002665868
 22/09/2025 11:37:29, Counter: Mohana Post
 To: THE COLLECTOR
 Mahanayagar, ODISHA - 764053
 From: RAMA NAYAK-764078
 Base Amt: 33.00,
 WL:20 (Actual)gms
 P.Mode:Cash,

POB:No www.indiapost.gov.in

VAKALATNAMA

IN THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA

District: _____

ON MA / RA / Contempt No. _____ of 20 _____

Ram Nayak

(Appellant
(Petitioners)

- Versus -

State of Odisha & Ors

(Respondent
(Opposite Party)

Vakalatnama on behalf of _____

Know all men by these presents that by Vakalatnama, I/We appoint the Advocates noted below or any one of them my/our lawful Advocate or Advocates for filing the petition and all or some of the acts of entering appearance

In the above matter for appearing conducting and arguing the same for depositing or withdrawing any money in connection therewith for moving the Court in any matter connected therewith, for preparing the paper book in the case and for putting in papers, petitions etc. On my/ our behalf for filing, taking back any documents for withdrawing suits or appeals or petitions with permission to institute fresh suit etc. For signing and filling petitions of compromise in connections with the said matter and for taking copies of paper from the Record and I / We further say that any act. Done by my / our said Advocate or Advocates or by any one of them after accepting this Vakalatnama, shall be considered as my/our own true and lawful act.

And I/We further hereby agree and undertake to pay the said Advocates his or their fees as settled and all others sums that may be necessary to carry out the requisition of the Court and otherwise to enable the said Advocates to conduct the case properly. Failing which the said Advocates after notice to me/us will be at liberty to withdraw from further conducting the case.

IN WITNESS WHEREOF I/WE sign and execute this Vakalatnama on this the 3rd day of November 2025

Pausali Banerjee
Name of Advocates
Mr. Pausali Banerjee,
High Court, Calcutta,
NPS Business Centre,
Ground Floor, Kolkata - 700001
M. 9433253274

Ram Nayak
a behalf of _____

advocati.pausali@gmail.com

Rama Nayak