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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
(SOUTHERN ZONE, CHENNAI)**

Original Application No.75 of 2020 (SZ)

Tribunal on its own motion SUO MOTU  
based on the News Item in Hindu  
Newspaper dated 30.05.2020,"Kerala Forest  
"Department told to permit sand removal from pampa".

.... Applicant

Vs

The Chief Secretary of Kerala,  
Thiruvananthapuram, Kerala and others.

... Respondents

**RESPONSE REPORT OF PCCF & HOFF, KERALA, FILED BY THE  
4<sup>TH</sup> RESPONDENT HEREIN IN OA NO. 75 OF 2020 (SZ) BEFORE  
THE HON'BLE NATIONAL GREEN TRIBUNAL**

M/s. E.K.KUMARESAN  
STANDING COUNSEL FOR STATE OF KERALA  
Counsel for Respondent Nos. 1 to 7

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4<sup>TH</sup> RESPONDENT HEREIN IN OA NO. 75 OF 2020 (SZ) BEFORE  
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The Hon'ble National Green Tribunal (Tribunal) has initiated suo motu proceedings in the above case based on the news item that appeared in the Hindu Newspaper dated 30.05.2020, "Kerala Forest Department told to permit sand removal from Pamba". The main allegation in this report was that in the guise of using the provisions of National Disaster Management Act (the Act), State of Kerala is trying to carry out mining of sand in Pamba River, without getting any necessary clearances from the Forest Department. The Hon'ble Tribunal by order dated 02.06.2020 appointed a Joint Committee comprising of a Senior Officer of Regional Office, Ministry of Environment, Forest and Climate Change (MoEF & CC), Bangalore, a Senior Officer not below the rank of Chief Conservator of Forest deputed by the Principal Chief Conservator of Forest & Head of Forest Force, Kerala, the Chief Wildlife Warden, the District Collector, Pathanamthitta, a Senior Officer from the Department of Mining and Geology, Member Secretary, State Disaster Management

Authority, Kerala and the Divisional Forest Officer Pathanamthitta, to enquire into the issue and submit a factual and action taken report, if there is any violation found, including imposition of environmental compensation. The Committee was also directed to go into the question as to whether any study has been done as to how much sand will have to be removed for the purpose of meeting the requirement of free flow of water during monsoon, in case of anticipated flood due to the predicted heavy rain fall in the State. The Committee was directed to submit the report to the Tribunal within a period of two months debris and restoring the connectivity across river Pamba was entrusted to M/s. Tata Projects Limited (M/s.TPL) by the Government.

2. The Hon'ble Chief Minister, Kerala convened a high level meeting on 13.10.2018, in which several decisions were taken for facilitating the pilgrim season starting in November. Accordingly, the Forest Department was directed to make the site available for dumping the sand / debris being removed from Pamba and also to secure Government of India approval for disposing these materials for public purpose / tender. The copy of the minutes of the meeting dated 13.10.2018 is attached as Annexure-1.

3. Accordingly, the Principal Chief Conservator of Forests vide letter No. FC2 / 63200/2018 dated 13/12/2018, requested the Additional Principal Chief Conservator of Forests (Central), MoEF&CC, Regional Office, Bangalore for permission for immediate removal of sand collected and deposited in Pamba-Triveni after the

pilgrim season and before the onset of the monsoon so that it does not get washed down again into the river. It was specifically informed that the permission is not sought for mining of sand but for the removal of the sand already collected and dumped which is a hazard as it may aggravate the flooding in the next monsoon season. A copy of the letter is attached as Annexure-2. The Government of India vide letter F.No.8- 2/2019-FC dated 26.02.2019 granted one-time permission under F(C) Act, 1980 for the removal of sand and silt accumulated at Pamba — Triveni in 2018 floods and a copy of this order is attached as Annexure-3.

4. On request from the Forest Department, the National Centre for Earth Science Studies (NCESS) conducted a rapid survey of the material accumulated during the flood. NCESS reported that a total quantity of 1, As per this order of the Chairman DDMA, TDB was directed to remove and safely keep 20,000 M3 of sand accumulated near Arattukadavu (not from the material deposited by M/s.TPL) and this work was also directed to be completed before 25.05.2019 and also to safely keep it. Under the cover of this order, TDB started collecting sand deposited within the river / on the river banks, which was not covered under the permission granted by the Government of India. Therefore, this was objected to by the Forest

5. In view of the above submission made herein, the Forest department is of the firm belief that, though the Diaster Management Act has overriding effect on other statues, the debris collected could be transported outside the forest area only after

(4)

obtaining requisite permission as envisaged under the relevant provisions of Forest (Conservation) Act.

6. It is submitted that a Joint Committee has been constituted by this Hon'ble Tribunal vide order dated 02.06.2020, to enquire into the issue and submit a factual and action take report, in the above Original Application. Accordingly, The Joint Committee has been constituted and we are filing the independent Report of the Member Secretary, Kerala State Disaster Management Authority, for compliance before this Hon'ble Tribunal in the above Original Application.

To that effect this memo is filed and the same may be recorded

Dated at Chennai on this the      day of March 2021



M/s. E.K.KUMARESAN  
STANDING COUNSEL FOR STATE OF KERALA  
Counsel for Respondent Nos. 1 to 7



5

**A. S. KESAVAN IAS**  
Principal Conservator of Forests &  
Head of Forest Force, Kerala

Forest Headquarters, 'Vanalakshmi'  
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Office : 0471-2358609  
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No. FC2-61898/2018

Date : 29.12.2020

To

The Advocate General,  
High Court of Kerala,  
Ernakulam.

Sir,

Sub: Response of PCCF & HoFF, Kerala, 4<sup>th</sup> respondent in OA No.75 of 2020 (SZ) before the Hon'ble National Green Tribunal - regarding

- Ref: 1. This office letter even No.dated 09.12.2020  
2. Letter No.AAG-RT/6A75/2020, dated 15.12.2020 of the Additional Advocate General  
3. Government letter No.C2/47/2020-FWLD, dated 18.12.2020

Kind attention is invited to the subject. As advised vide reference (2) above, a meeting was convened by the Chief Secretary on 23.12.2020 in the matter. In line with the discussions at the said meeting, my response in OA No.75 of 2020 (SZ) has been revised and a copy of the same is enclosed herewith for filing it before the Hon'ble NGT on my behalf.

Enclosed: As above

Yours faithfully,

Head of Forest Force, Kerala

Copy to:

The Chief Secretary, Kerala - For information  
The Principal Secretary (Forests) - For information

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**Response of PCCF & HoFF, Kerala, 4<sup>th</sup> Respondent in OA No. 75 of 2020****(SZ) before the Hon'ble National Green Tribunal**

The Hon'ble National Green Tribunal (Tribunal) has initiated *suo motu* proceedings in the above case based on the news item that appeared in the Hindu Newspaper dated 30.05.2020, "Kerala Forest Department told to permit sand removal from Pamba". The main allegation in this report was that in the guise of using the provisions of National Disaster Management Act (the Act), State of Kerala is trying to carry out mining of sand in Pamba River, without getting any necessary clearances from the Forest Department. The Hon'ble Tribunal by order dated 02.06.2020 appointed a Joint Committee comprising of a Senior Officer of Regional Office, Ministry of Environment, Forest and Climate Change (MoEF & CC), Bangalore, a Senior Officer not below the rank of Chief Conservator of Forest deputed by the Principal Chief Conservator of Forest & Head of Forest Force, Kerala, the Chief Wildlife Warden, the District Collector, Pathanamthitta, a Senior Officer from the Department of Mining and Geology, Member Secretary, State Disaster Management Authority, Kerala and the Divisional Forest Officer Pathanamthitta, to enquire into the issue and submit a factual and action taken report, if there is any violation found, including imposition of environmental compensation. The Committee was also directed to go into the question as to whether any study has been done as to how much sand will have to be removed for the purpose of meeting the requirement of free flow of water during monsoon, in case of anticipated flood due to the predicted heavy rain fall in the State. The Committee was directed to submit the report to the Tribunal within a period of two months.

The Hon'ble Tribunal in its order dated 02.06.2020 did not stop the normal work of desilting of the river, considering it as a precautionary measure to avoid flood in the State, as monsoon is approaching soon and over flow of rivers is expected due to rain during monsoon.

Further, the State Respondents were directed to file their independent responses as well regarding the circumstances under which the National Disaster Management Act has been invoked for the purpose of de-silting and the circumstances which led to take such an immediate action without following the necessary procedure, before the next hearing date apart from coordinating with the Committee in submitting the joint report. The sequence of events, facts and circumstances of the above case are briefly presented below;

**Sequence of events and the facts & the circumstances of the case as known to Kerala Forest Department**

1. It is submitted that, during the heavy rainfall in August, 2018, the shutters of Anathode Dam across the Kakki River were opened which, along with the excessive rain water in the forest downstream, resulted in flash flood. This water also brought huge quantities of debris along with it. The narrow Foot Over Bridge (FOB) at Pamba having low height with closely arranged pillars was blocked due to the incoming debris. This caused the river to overflow above the bridge level and in its course destroyed constructions made along the river bed, depositing debris all along its bank. The FOB was fully covered under several meters of sand / silt / debris (debris). The connectivity between Pamba and Sannidhanam was totally cut-off due to this deposit of debris. Post – flood emergency relief works like clearing the

- debris and restoring the connectivity across river Pamba was entrusted to M/s. Tata Projects Limited (M/s.TPL) by the Government.
2. The Hon'ble Chief Minister, Kerala convened a high level meeting on 13.10.2018, in which several decisions were taken for facilitating the pilgrim season starting in November. Accordingly, the Forest Department was directed to make the site available for dumping the sand / debris being removed from Pamba and also to secure Government of India approval for disposing these materials for public purpose / tender. The copy of the minutes of the meeting dated 13.10.2018 is attached as **Annexure-1**.
  3. Accordingly, the Principal Chief Conservator of Forests vide letter No. FC2 / 63200/2018 dated 13/12/2018, requested the Additional Principal Chief Conservator of Forests (Central), MoEF&CC, Regional Office, Bangalore for permission for immediate removal of sand collected and deposited in Pamba-Triveni after the pilgrim season and before the onset of the monsoon so that it does not get washed down again into the river. It was specifically informed that the permission is not sought for mining of sand but for the removal of the sand already collected and dumped which is a hazard as it may aggravate the flooding in the next monsoon season. A copy of the letter is attached as **Annexure-2**. The Government of India vide letter F.No.8-2/2019-FC dated 26.02.2019 granted one-time permission under F(C) Act, 1980 for the removal of sand and silt accumulated at Pamba – Triveni in 2018 floods and a copy of this order is attached as **Annexure-3**.
  4. On request from the Forest Department, the National Centre for Earth Science Studies (NCESS) conducted a rapid survey of the material accumulated during the flood. NCESS reported that a total quantity of 1,

- 20,240 M<sup>3</sup> of sand, gravel, cobbles and other deposits were available at Thriveni-Chakkupallam –Kakki portion.
5. The sand, silt and debris at Pamba – Triveni collected by M/s.TPL was deposited at places such as Chakkupalam in front of the Inspection Bungalow, Hill Top Station, Chakkupalam main road side, etc. The initial estimation of the quantity of such material deposited was about 90,000 M<sup>3</sup>.
  6. In pursuance to the permission from the Government of India, the State Government issued G.O.(Rt) No.48/2019/F&WLD, dated 06/02/2019 (**Annexure-4**) allotting part of this materials to Travancore Devaswom Board (TDB) and permitting the remaining to be disposed in auction. Subsequently, vide G.O. (Rt) NO.169/2019/ F&WLD, dated 13.05.2019 Govt. had directed the TDB to remove 20,000 M<sup>3</sup> of sand immediately (**Annexure – 5**). Forest Department had conducted 12 e-auctions for the bulk sales using the MSTC platform, but three lots having a total of 3,000 M<sup>3</sup> alone could be sold. The Department had also transported 1,000 M<sup>3</sup> of sand to Areekakavu Depot along the periphery of the forests for auction to the retail users. The e-auction attempts for the retail sale also did not attract much interest. On the other hand, the TDB removed only 2287.1 M<sup>3</sup> sand even though they were allotted 20,000 M<sup>3</sup>, free of cost. The said removed items were deposited within the forest land in possession of Travancore Devaswom Board.
  7. In spite of our best efforts so far we could remove only less than 10% of the sand / debris deposited by M/s.TPL within the forest area in and around Pamba. Over the past two years, this material which was continuously exposed to sun and rain got compacted and has got reasonably stabilized and

become part of forest land which is now very hard to be separated and removed.

8. Subsequently, on the request of the Forest Department, NCESS assessed the quality of the materials deposited by M/s.TPL. According to their report of May 2020, this material deposited at Chakkupalam is described as “cobbles, pebbles, sand, soil, organic and construction debris”. Materials deposited at Hill Top Station “is also a mix of cobbles, pebbles, organic and construction debris and sand”. The study also reported that the materials deposited by M/S.TPL at Chakkupalam and HillTop areas can only be considered as debris accumulated during the flood, which cannot be considered as saleable sand.
  
9. While these efforts were being made by the Forest Department, the District Collector & the Chairman District Disaster Management Authority, Pathanamthitta (DDMA) issued orders on 18.05.2019 (**Annexure – 6**). This order reads the direction of Chief Secretary in the Video Conference dated 05.05.2019 to the effect that the sand deposited at Pamba which could not be removed by the Forest Department is a potential hazard during the forthcoming monsoon and had directed the DDMA to take an early decision. As per this order of the Chairman DDMA, TDB was directed to remove and safely keep 20,000 M3 of sand accumulated near Arattukadavu (not from the material deposited by M/s.TPL) and this work was also directed to be completed before 25.05.2019 and also to safely keep it. Under the cover of this order, TDB started collecting sand deposited within the river / on the river banks, which was not covered under the permission granted by the Government of India. Therefore, this was objected to by the Forest

- Department. The TDB raised their objections before the State Government which was explained and the matter was not pursued by them.
10. The State Government had constituted a Committee under the Chairmanship of Chief Secretary with ACS (Water Resources), ACS (LSGD), ACS (Forests and Wildlife), Principal Secretary (Revenue), Principal Secretary (Environment) and the Director (Mining & Geology) as members, in order to look into matters relating to dredging of rivers. The Committee in its meeting held on 07.11.2019 decided to entrust respective District Collectors to conduct de-silting and removal of debris in flood affected rivers in the context of the massive floods that happened in 2018 and 2019.
  11. The State Government in the Revenue Department, vide G.O. (Rt) No.3880/2019/ RD dated 24.12.2019 took the stand that as per Section 24, 34 of the Disaster Management Act, 2005, State Disaster Management Executive Committee, District Disaster Management Authority can take necessary steps to remove debris, conduct search and carry out operations. With regard to the authority of Section 33 of the Disaster Management Act 2005, the Hon'ble High Court, Uttarakhand in W.P (C) No.93/2015 has ordered that "if the dredging is undertaken for the purpose of maintaining water bodies, no clearance of Ministry of Environment & Forest is required". As per Section 72 of the Disaster Management Act, this Act overrides the other Acts. The Government also accorded sanction to all District Collectors for removing silt and the debris in flood affected rivers, as an immediate measure to accommodate flood waters and to utilize the capacity of river channels. The District Collectors were also given the

liberty to dispose of the silt and the debris in the appropriate matter  
(Annexure - 7)

12. The Chairman, DDMA, Pathanamthitta vide DCPTA 454/2018/DM,-3, dated 15.05.2020 issued orders invoking Section 34 (d) of the Disaster Management Act for removal of 75,000 M3 of sand, silt, plastic and other debris from Pamba – Triveni by M/s.Kerala Clays and Ceramic Products Limited, Kannur (M/s.KCCPL) subject to the conditions, *inter alia* that they should obtain necessary permission / pass from the Departments concerned, the work should be completed before 30.06.2020 and if any land has to be used along the Pamba River for storing and processing the materials, the necessary permission will be facilitated. The above order is seen to be issued on the assessment made by the Chairman, DDMA that it is necessary to restore the natural flow of the river, enhance its storage capacity and for avoiding chances of flood (Annexure - 8).

13. In the meanwhile, the Forest Department made its own internal assessment and felt it necessary to keep the 300 M stretch between Triveni Bridge and the confluence of Njunangar clear of any debris so as to reduce the chance of flood related damages. Accordingly vide FC2-61898/18, dated 22.05.2020, recommendation was made to the State Government to permit M/s. KCCPL to remove the balance quantity of the debris deposited by M/s.TPL and also the approximately 500 M3 of sand / debris from the Pamba River. In pursuance to this, the Government in Forest Department vide letter No.C2/47/2020 / F&WLD, dated 02.06.2020 permitted the agency fixed by District Collector to remove the material collected and dumped by M/s.TPL if the order of the District Collector specify that this

material need to be removed to avoid a disaster during the monsoon (Annexure - 9). It was also informed that if the DDMA is of the view that sand is to be removed from the river bed other than what is collected by M/s.TPL, the same should be deposited at sites identified by the Forest Department within the forests and it can be transported outside forests after procuring the necessary approvals under the Forest (Conservation) Act. Subsequently, M/s. KCCPL started removing sand / silt from the Pamba River and instead of depositing it in the nearby forests, attempted to remove it outside the forests without the permission of the Forest Department which is at variance with the orders of the Chairman, DDMA.

14. In the meanwhile, District Collector and Chairman DDMA vide his order No.DCPTA-455/2018/DM3, dated 30.05.2020, invoking Section 34 (d) of the Act issued orders to the effect that the sand, silt etc. accumulated along the 2290 M stretch from the Valiyanavattom VCB to KSRTC VCB, and assessed as 1,28,193 M3 be removed and taken out by M/s.KCCPL so as to restore the natural flow and improve the water storage capacity. This order was also subject to the condition that it should be completed before 30<sup>th</sup> June 2020 and if any land is required for processing the material, it will be facilitated.
15. The Chairman DDMA, Pathanamthitta vide his letter No.DCPTA-454/2018/DM, dated 03.06.2020 has informed the DFO, Ranni that in view of the directions from the Additional Chief Secretary (Forests), dated 02.06.2020 he may make necessary arrangements for dumping the sand to be collected from the 2290 M stretch of Pamba from Valiyanavattam VCB to KSRTC VCB (Annexure - 10).

16. In pursuance of the order of the Chairman DDMA, dated 30.05.2020, a total of 74248.11 M3 of sand and debris has been removed from the Pamba River and in compliance with the Government directions in Annexure 9 it is deposited within the forest area.

**The circumstances which lead to the above situation, as known to the Forest Department, is summarized below;**

1. There are no human habitations nor any man made physical infrastructure over the 18 KM stretch of the Kakki river from Anathode dam to Pamba – Triveni. Similarly, on the downstream stretch of 30 KM from Pamba to the outer periphery of the reserved forests, there is no human habitations or infrastructure, except those created for the purpose of Sabarimala pilgrimage.
2. During the heavy rains of August 2018, huge quantity of water was released from the Anathode dam which, along with the rain water accumulated in the downstream of the dam, caused extensive erosion of the river banks including erosion of small hillocks.
3. All these water along with the sand, silt and other debris would have flown down the river but for the block caused by the narrow FOB at Pamba – Triveni. The narrow passage under this FOB was blocked by the uprooted trees and other debris brought down by the flood waters at an early stage of the flood. Because of this blockage, the flood waters took a right turn totally destroying / seriously damaging various pilgrimage related constructions in the river bed / river bank, moved further downwards, changed course and forcefully hit the left bank causing serious erosion there. Blockage of the

passage under the FOB resulted in deposit of silt to the extent of several meters in depth. Had the FOB not been blocked, the flood water would have carried the silt / debris load further down and deposited at various Ghats all along its course.

4. Necessary passage across the river was opened by M/s.TPL as part of emergency flood relief work and the materials so collected was deposited within the forests well before the Sabarimala pilgrim season which started in November 2018. Under the direction of the Hon'ble Chief Minister, approval of Government of India under the Forest (Conservation) Act was obtained for the removal of this sand / silt to outside the forest area. However, only less than 10% of the quantity so deposited could be removed out of the forests, primarily due to the poor quality of sand which resulted in very poor response for the several rounds of public auctions. The need for transport through the forests, by road over a long distance of more than 35 KM also impacted on the response.
5. Using a thumb rule of 5 M<sup>3</sup> of sand per truck load would indicate that more than 15,000 trips (about 10.5 lakh KM) have to be made through the dense forests of Ranni division for removing the balance quantity of sand, silt and debris already collected by M/s.TPL. This is likely to heavily pollute the air within these dense natural forests which even otherwise is seriously impacted by the huge number of pilgrims to the Sabarimala temple during the 100 days of darshan. This stretch of the road also seriously suffered during the floods of 2018. The overlap between the movement of sand laden trucks and the pilgrim vehicles will also seriously impact the strength of this road within the forests.

6. The balance quantity of sand, silt and the debris that was deposited in the forests by M/s.TPL for about two years has by now compacted itself and has more or less merged with the forest ecosystem. In view of all the above, it may not have to be removed any more and instead, could be left for further stabilizing at site.
7. Over the last two years, significant part of the debris that was left behind in the river bed and river banks at Pamba – Triveni has already been washed downstream by the flowing water and the remaining quantity has also partially stabilized.
8. Heavy rainfall was predicted during the 2020 monsoon, especially the south-west monsoon which will soon come to an end. In view of the experiences of 2018 and 2019 floods, the narrow FOB has to be always kept clear of any debris, at least for 300 M upstream and downstream.
9. The Chairman DDMA had ordered removal of 75000 M<sup>3</sup> of sand / silt / debris from the river at Pamba – Triveni. Even when the order of the Chairman DDMA was to remove the material and transport it only with the due permissions, M/s KCCPL, the Agency, was trying to transport it outside the forests without approval under the Forest (Conservation) Act. While the interpretation of the Chairman, DDMA that the removal of material from the course of the river so as to avoid the disaster is within the purview of Section 34 (d) of the Act, the interpretation that this section also empowers him to order its removal to outside the reserved forests is well outside its purview. It is submitted that such removals will definitely attract the relevant provisions of the Forest (Conservation) Act.

10. In view of this, the Government in the Forest Department has issued directions that only the material collected immediately after the flood and deposited in the forests for which the clearance under the Forest (Conservation) Act is issued should be removed outside the forests. This has been complied with, except for the 49.5 M<sup>3</sup> that was removed on the orders of the Chairman, DDMA and under Police protection.
11. Based on the orders of the Chairman, DDMA a total of 74248.11 M<sup>3</sup> of sand, silt and the debris have been removed from the 2290 M stretch of the river and it is dumped inside the forests at sites identified by the Forest Department. If the disaster risk caused by this debris was assessed in advance and informed to the Forest Department, early action for permission under the Forest (Conservation) Act could have been taken.
12. In view of the submissions made herein before, the Forest department is of the firm belief that, though the Disaster Management Act has overriding effect on other statutes, the debris collected could be transported outside the forest area only after obtaining requisite permissions as envisaged under the relevant provisions of Forest (Conservation) Act.

  
30/11/2018  
P. K. Kesavan, IFS

Head of Forest Force, Kerala

List of Annexures

1. Minutes of High Level Meeting dated 13.10.2018 in the Chairmanship of Hon'ble Chief Minister of Kerala
2. Letter No.FC2-63200/2018 dated 13.12.2018 of PCCF addressed to APCCF (Central), MoEF & CC, Regional Office, Bangalore

3. Letter No. F.No.8-2/2019-FC dated 26.02.2019 of MoEF & CC
4. GO (Rt) No. 48/2019/F & WLD dated 06/02/2019
5. GO (Rt) No. 169/2019/F & WLD dated 13/05/2019
6. Order No. DM-3-454/2018, dated 18.05.2019 of District Collector & Chairman, DDMA, Pathanamthitta
7. GO (Rt) No. 3880/2019/RD, dated 24/12/2019
8. Order No. DCPTA-459/2018/DM3 dated 15/05/2020 of District Collector & Chairman, DDMA, Pathanamthitta
9. Government Letter No.C2/47/2020-FWLD, dated 02.06.2020
10. Letter No. DCPTA-454/2018, dated 03.08.2020 of District Collector & Chairman, DDMA, Pathanamthitta