

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

To,
The Registrar,
Hon'ble National Green Tribunal,
New Delhi.

O.A. No. 89 / 2020 (WZ)

Sama Siddik Osman

Vs

Ministry of Environment, Forest and Climate Change & Ors.

Vide order dated 11/12/2021 Hon'ble National Green Tribunal has directed to file a Joint Committee Report within two months.

IN COMPLIANCE THEREOF, Gujarat Coastal Zone Management Authority (GCZMA) instructed the District Collector (Chairman, District Level CRZ committee), Morbi to submit the factual report vide letter dated 12/01/2021. (Annexure-1)

The District Level CRZ committee carried out site inspection on 07/02/2021 and submitted its report vide email dated 10/02/2021(Annexure-2). With respect to this report GCZMA issued following directions to the District Level CRZ committee, vide letter dated 23/02/2021:-

- 1) File the case under Section 19 of EPAAct-1986 against responsible units for violation of CRZ notification 2011.
- 2) Break the illegal earthen bunds.
- 3) Cancellation of lease, if violating CRZ norms.

An interim action taken report was received from the District Level CRZ Committee, vide their email dated 10/03/2021 (Annexure-3).


12/3/2021

(S. J. Pandit)

Additional Secretary and
Member Secretay, GCZMA,
Department of Environment and Forest, Gujarat

Encl : As above



Dr. K. Ramesh, IFS
Director (Environment) &
Additional Secretary

GOVERNMENT OF GUJARAT
Forests & Environment Department
Block No. 14/8, Sachivalaya
Gandhinagar-382 010
Tel: 079 -23252660
Fax: 079 - 23252156
E mail : direnv@gujarat.gov.in

28111

Ref. No.ENV-10-2019-177-T

Date: 12.01.2021

- 1 **Collector & Chairman**
CRZ District Level Committee
District Collector Office,
Morbi.
- 2 **Regional Officer & Member Secretary,**
CRZ District Level Committee
Gujarat Pollution Control Board
Parishram. Nr. Mahavir Society,
Opp. New Bus Stand, Sanala Road,
Morbi-363641

Sub: About large scale destruction of mangroves forest. Mudflats (Damage to CRZ I A Ecological Sensitive Areas), Rivers, Estuaries by Salt lease holder companies in 31.29 Sq KMS illegally allotted area by Revenue Dept. Gujarat, at Bagasara vill: Maliya(Mi), Dist Morbi .(The site is actually near Jungi village Ta. Bhachau, Dist. Kutch.)

- Ref:** 1) This Department even number letter dated 09/11/2019.
2) Ministry of Environment, Forest & Climate Change letter dated 16/03/2019 & 17/06/2020.
3) Hon'ble National Green Tribunal , Principal Bench, New Delhi order dated 11/12/2020 in O.A. no. 89/2020 (WZ),

Dear Sir,

In context of above subject and above referred Hon'ble National Green Tribunal , Principal Bench, New Delhi order dated 11/12/2020 in O.A. no. 89/2020 (WZ). Copy of the order is attached herewith. It is evident that the issues raised in the NGT matter pertain to various violations of rules and regulations of CRZ areas with special emphasis on destruction of mangrove forest, mudflats, Rivers and Estuaries by different companies (1. Seaside Salt Pvt. Limited, 2. Real Refined Salt and Allied Industries Ltd., 3. Arav Brine Chem Pvt. Ltd.).

In context of above subject and above referred letters, you are requested to look into the matter and submit a factual report to this Department.

Thank you,

o/c
gsh
12/01/2021

સ્વામી કચું

12 JAN 2021

Yours sincerely

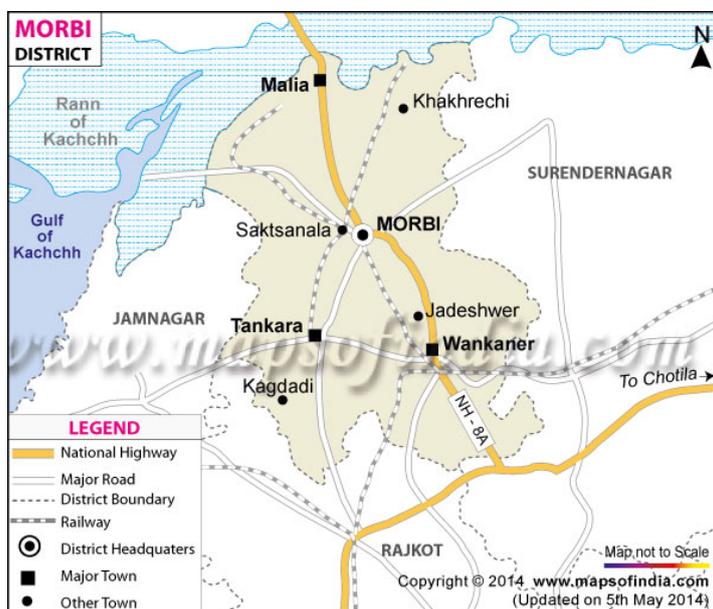
(Dr. K. Ramesh)

Copy To:

1. Scientist , "D" (CRZ) , Ministry of Environment Forest & Climate Change , Indira Paryavaran Bhavan, Jor Bagh Road, New Delhi - 110003.
2. Scientist , "D" , Ministry of Environment Forest & Climate Change , Regional Office, Western Region, Kendriya Paryavaran Bhavan, Link Road No, 3, Ravishankar Nagar, Bhopal-462016
3. Shri Sama Siddik Osman, Fisherman Leader, Cheravali, At- Surajbari, Post- Shikarpur , Ta- Bhachau, Di- Kutch..... kind your information please

Action Taken Report on Violation of CRZ regulations in the ecologically sensitive CRZ-IA area.

(As per order of Hon'ble NGT, Principal Bench, New Delhi
December 11, 2020 in OA 89 of 2020)



Prepared by

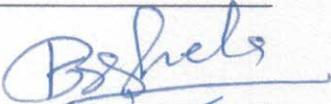
District Level CRZ Committee, Morbi

For submission to Hon'ble National Green Tribunal
(NGT), Principal Bench, New Delhi

Action Taken Report on Violation of CRZ regulations in the ecologically sensitive CRZ-IA area

(As per order of Hon'ble NGT, Principal Bench, New Delhi
December 11, 2020 in OA 89 of 2020)

The Committee

No.	Name	Designation	Signature
1.	Shri J. B. Patel, I.A.S.	Chairman and District Collector, Morbi	
2.	Shri K. B. Vaghela	Member Secretary and Regional Officer, Morbi	
3.	Shri Chirag Amin, IFS	Deputy Conservator of Forests, Morbi Division	
4.	Shri K. V. Ramani	Superintendent of Fisheries, Morbi	
5.		Chief Officer, Maliya-Miyana Nagarpalika	
6.		District Planning Officer	
7.	Capt. Kuldeep Singh	District Port Officer - Navlakhi	
8.		Members of Local Traditional Community.	

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1.0 Introduction

The Original Applications (OA) No. 89/2020 (WZ) (Sama Siddik Osman Vs Ministry of Environment, Forest and Climate Change & Ors.), were filed in Hon'ble NGT, Principal Bench, New Delhi with a plea to stop violation of CRZ regulations in the ecologically sensitive CRZ-IA area in District Kutch, Gujarat.

As per plea, it is submitted that allotting the CRZ-IA category land to the salt companies is against law. According to the applicant, illegal bunding and blocking of creeks will have adverse impact on the fishermen. There will be damage to the biodiversity in the coastal island at the mouth of creeks, estuaries, sub-creeks and creeklets and inter-tidal zone that forms Coastal Regulation Zone. There was no consultation with the Gujarat Coastal Zone Management Authority (GCZMA). The salt companies have established bunds to prevent tidal waters in violation of the CRZ Notification. There is potential for damage to the mangroves. Sanctuary for wild ass and migratory birds will also be adversely affected.

The subjected land parcel is allotted on lease/rent by Government of Gujarat, Revenue Department vide Resolution no. MaThaJa/3718/658/Ka dated 10/01/2019 to M/s. Real Refined Salt and Allied Industries Ltd. (1951 Ha.) and vide Resolution no. MaThaJa/3718/659/Ka dated 04/02/2019 to M/s. Seaside Salt Pvt. Ltd. (902.48 Ha.).

The relevant order of the Hon'ble NGT, Principal Bench, New Delhi is reproduced below:

“2 *Before considering the issue, we find it necessary to require response of the concerned parties which may be furnished in the form of a factual and action taken report by the GCZMA, Additional Chief Secretary, Forest and Environment Deptt., Gandhinagar and Gujarat Pollution Control Board (GPCB). GPCB will be nodal agency for the purpose. The report may be furnished within two months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF.*

2.0 Timeline of this issue.

As per Forest and Environment Department, GoG vide G.R.No.ENV-10-2011-800-E dated 14/10/2013 regarding Constitution of District Level Committee to assist the GCZMA (Gujarat Coastal Zone Management Authority) for Enforcement and Monitoring of Coastal Regulation Zone 2011, District Level CRZ Committee for District Morbi was formed vide Letter no. GPCB/R.O.Morbi/Technical-29/1431 dated 21/09/2015 under Chairmanship of District Collector.

- M/s. Deendayal Port Trust sent to District Collector, Bhuj Kutchhh vide Letter no. LW/PL/3434/79 dated 31/01/2019 regarding Allotment of Land belonging to M/s. Deendayal Port Trust by the Government of Gujarat.
- First Complaint from Shri Sama Siddik Osman was received at GPCB Office Morbi dated 03/07/2019 vide Inward No. 17253.
- The same complaint was forwarded to Morbi District by District Level CRZ committee, Kutch vide letter no. GPCB/RO/Kutch-West/T-55(E)/562 dated 01/08/2019 with Minutes of Meeting of the said District Level CRZ Committee meeting dated 26/07/2019 and Remarks that ‘as

lease was granted by District Collector and District Magistrate, Morbi, this case is transferred to Morbi District’.

- In meeting of District Level CRZ Committee, Morbi dated 27/08/2019, the said complaint was discussed and a Sub-committee was formed as under to carry out Joint Inspection and submit its report. Members of Sub-committee is as follows:
 - Regional Officer, GPCB, Morbi,
 - Superintendent of Fisheries, Morbi
 - Assistant Conservator of Forests, Morbi
 - Mamlatdarshri, Maliya(Mi)
 - District Inspector of Land Records, Morbi
- The sub-committee carried out inspection on dated 04/09/2019 but as per their Note dated 04/09/2019, due to Low Tide during start of inspection, Non availability of GPS machine as stated by DILR officer and bad weather during monsoon season this inspection is postponed and it is decided that next date for Joint Inspection will be arranged as soon as possible in consultation with Gujarat Maritime Board (port authority) regarding tide table and other parameters.
- Meanwhile Additional Chief Secretary, Forests & Environment Department, GoG issued Directions under Section 5 of the Environment (Protection) Act, 1986 to Chairman, Deendayal Port Trust (DPT) vide Reference No. ENV-10-2018-20-NGT-27 dated 12/06/2019 and similar Directions under Section 5 of the Environment (Protection) Act, 1986 to M/s. Real Salt & Industries Ltd, Vill. Bagasar, Ta. Maliya, Dist. Morbi and M/s. Sea Side Salt Pvt. Ltd, Vill. Bagasar, Ta. Maliya, Dist. Morbi and vide Reference No. ENV-10-2019-122-E(T cell)/431688 dated 16/08/2019.
- Letter sent by M/s. Deendayal Port Trust vide reference no. LW/PL/3434/79 dated 02/02/2019 to District Collector, Kutch regarding allotment of land belonging to M/s. Deendayal Port Trust and similar Letter sent by M/s. Deendayal Port Trust vide reference no. LW/PL/3434/934 dated 11/10/2019, to Settlement Commissioner and Director of Land Records, Gandhinagar regarding inspection and Survey of Land/area allotted for salt production by Revenue Department, Gandhinagar in Village Bagasara, Maliya (Miyana), Morbi, Near Village Jungi (Kutch).
 - The letter has Annexure containing Inspection Report of Land Section from DPT Officials dated 13/07/2019. A portion of report states ‘The vast stretch of land has been occupied by the salt land parties and it is noticed that wide Earthen Bunds, admeasuring in a periphery length of 8-10 kms. approx. are formed on and around the allotted land. The said land is located between village Jungi (Kutch) and Navlakhi Port and is situated in intertidal zone, which appears as an Island and seems to fall under the sensitive CRZ area. This land/area is accessible only by sea route and there is no land route connectivity. The vacant land is being developed for the purpose of salt production, wherein machinery & equipment's such as 04 Hitachi Machines, 06 Tractors, etc. and labours have been deployed and the work of forming of Huge Earthen Bunds/Boundaries, is in progress.’
 - Another Inspection Report of Land Section from DPT Officials dated 01/07/2019 in which it is stated that Dr. Suresh Kumar N. Agravat, Regional Officer, GPCB and

Member Secretary, District Level C.R.Z. Committee, Gujarat Pollution Control Board, Bhuj has filled an F.I.R. under section 154 Cr. P.C. (as per Section 447, 283) before the Samakhayali Police Station on 24/06/2019. Thereafter, on the instructions of Police Inspector Samakhayali, site inspection was jointly undertaken on 01/07/2019 by the officials of Land section, Deendayal Port Trust; Regional Officer & Member Secretary, District Level CRZ Committee, GPCB, Bhuj & Gandhidham, Police personnel, Samakhayali & representatives of complainant (M/s Kachchh Camel Breeders Association, Bhuj & Bhachau), by 02 nos. of hired fishing motor boats from the Creek nearby Vandiya Village. During said visit, it was observed that long straight Earthen Bunds were formed at 2 to 3 places. Further, destruction of Mangrove plantation, blocking of creeks, formation of earthen approach roads, etc. was noticed at site. The Police Panchnama in respect of FIR lodged by the Regional Officer & Member Secretary (District Level CRZ Committee), GPCB on 24/06/2019 was prepared at site.

- In District Level CRZ committee dated 03/02/2020, it is decided that individual departments has to submit ATR of all complaints pertaining to then in this committee within 30 days. Brief of reply of Individual departments is as follows:
 - Deputy Conservator of Forests, Morbi vide Letter no. B/jamana/Te-10/8000/2019-20 dated 02/03/2020: The said land parcel is outside of The Cher Forest region of Morbi District. They have no objection if there is no destruction of Cher vegetation in allotted land.
 - Superintendent of Fisheries, Morbi vide letter no. mam0/tatrak/mitha udhyog/20-21 dated 10/07/2020: Issue of illegal land occupancy is not pertaining to their jurisdiction.
 - District Inspector of Land Records vide letter no HQA/vashi-73/2020-21 dated 22/07/2020: Both lands are pre-measured on basis of signed and stamped sketches of land and based on this by the order of District Collector, Land Measurement is done for said land parcels allotted for salt manufacturing. As this is coastal land and outside any Revenue survey it cannot be considered in any village area.

Additionally, GMB's Comments on Draft CZMP Map prepared by NCSCM for Morbi district is received vide letter no. GMB/ENV/CZMP/1/8148 dated 10/10/2018 addressing to The District Collector to clearly demarcate area other than CRZ-1A within port limits as CRZ-1B area. It states 'As there are various area other than mangroves shown within Navlakhi port limit, the same needs to be shown as CRZ-1B.'

3.0 Action taken by the committee.

Meeting of District Level CRZ Committee for District Morbi is held on 30/12/2020 and Discussion on this matter is carried out. In this Meeting, it is decided to carry out joint inspection of the Sub-committee formed dated 27/08/2019.

During the meeting, the committee was appraised of the actions already taken at various Levels:

- Directions under Section 5 of the Environment (Protection) Act, 1986 issued by Additional Chief Secretary, Forests & Environment Department, GoG to Chairman, Deendayal Port Trust (DPT) vide Reference No. ENV-10-2018-20-NGT-27 dated 12/06/2019.
- Similar Directions under Section 5 of the Environment (Protection) Act, 1986 issued by Additional Chief Secretary, Forests & Environment Department, GoG to M/s. Real Salt & Industries Ltd, Vill. Bagasar, Ta. Maliya, Dist. Morbi and M/s. Sea Side Salt Pvt. Ltd, Vill. Bagasar, Ta. Maliya, Dist. Morbi and vide Reference No. ENV-10-2019-122-E(T cell)/431688 dated 16/08/2019
- Dr. Suresh Kumar N. Agravat, Regional Officer, GPCB and Member Secretary, District Level C.R.Z. Committee, Gujarat Pollution Control Board, Bhuj has filed an F.I.R. under section 154 Cr. P.C. (as per Section 447, 283) before the Samakhayali Police Station on 24/06/2019

4.0 Field visit of the committee to Morbi region

Joint inspection of the CRZ Sub-committee is carried out dated 07/02/2021. Earlier this joint inspection was to be carried out dated 12/01/2021 but due to some un-avoidable circumstances, it was postponed. Outcome as per Joint inspection Report of the CRZ Sub-committee is as follows:

- At the said location, earthen bunds are observed of approx. 4-5 ft height in some area. These bunds are created at approx. 50 ft. away from coast.
- During visit, wet soil is observed hence, the constructed earthen bunds may or may not block flow of tidal waters to mangrove areas.
- Scattered mangroves, Cher vegetations is observed and wet soil is observed near it.
- No any salt manufacturing activity is observed during inspection.
- Good growth of mangrove vegetation is observed along coast with new mangrove growth.
- In South West of the said location, dense mangrove growth with Cher vegetation of height 3-4 ft is observed and in North of the said location, scattered mangroves are observed.
- Presence of Russel's viper is observed at said site. Some migratory bird species are observed on coast and this is breeding ground for them.
- Till date, approved CZMP Maps are not finalized and as per available Pre Draft Czmp Map, the said area falls between Sheet No. : NCSCM/ F 42 E 4 / SE and NCSCM/ F 42 E 12 / SW, hence, Pre draft maps specifically for the said area is also not available. But looking to land pattern in both referred Pre draft maps, it seems that this area falls in CRZ 1-A area of Mudflats and Mangroves.

5.0 Measures proposed

- Since during Joint inspection dated 07/02/2021, no any activity is observed going on. But already created earthen bunds as also described in Inspection Report of Land Section from DPT Officials dated 13/07/2019 are still there and they must be erased down.
- Recommendation of Deputy Conservator of Forests, Morbi vide Letter no. B/jamana/Te-10/8000/2019-20 dated 02/03/2020 must be considered while taking Final Decision.

CRZ subcommittee Joint Investigation Report

Subject	: CRZ subcommittee Joint Investigation w.r.to Complaint received from Shri Sama Siddik Osman.
Reference	: Original Applications (OA) No. 89/2020 (WZ) (Sama Siddik Osman Vs Ministry of Environment, Forest and Climate Change & Ors.)
Grievances	: 1) Allotting the CRZ-IA category land to the salt companies. 2) Illegal bunding and blocking of creeks. 3) Salt companies have established bunds to prevent tidal waters. 4) Potential for damage to the mangroves. 5) Sanctuary for wild ass and migratory birds will also be adversely affected.
Location	: West Side of Surajbari Creek, North of Navlakhi Port in Gulf of Kutch.
Date of Inspection	: 07/02/2021, Time: 07.30 a.m. onwards

Observations:

- CRZ subcommittee Joint Investigation is carried out w.r.to minutes of District Level CRZ Committee meeting dated 30/12/2020. Earlier this joint inspection was to be carried out dated 12/01/2021 but due to some un-avoidable circumstances, it was postponed.
- All the Members and/or Representatives of subcommittee are present and Journey from Navlakhi Port is Started at 07.30 a.m.
- We reached the location referred in complaint/plea at around 09.30 a.m by hired fishing motor boat.
- The location Details are as follows:
 - Approx Latitude: 23°06'26"N and Longitude: 70°29'40"E
 - Jungi Village of Bhachchau Taluka, District Kutch is in North Direction.
 - Location is surrounded by creek in East and South Direction.
 - Mudflats and Mangrove Land in West Direction, most probably area of Kutch District.
- The subjected land parcel is allotted on lease/rent by Government of Gujarat, Revenue Department vide Resolution no. MaThaJa/3718/658/Ka dated 10/01/2019 to M/s. Real Refined Salt and Allied Industries Ltd. (1951 Ha.) and vide Resolution no. MaThaJa/3718/659/Ka dated 04/02/2019 to M/s. Seaside Salt Pvt. Ltd. (902.48 Ha.).
- As per Land records, and available Co-ordinates map of 1) Limit of Port Navlakhi, 2) M/s. Real Refined Salt and Allied Industries Ltd. and 3) M/s. Seaside Salt Pvt. Ltd., the land parcel is under jurisdiction of Morbi District (Attached as Annexures).
- At the said location, earthen bunds are observed of approx. 4-5 ft height in some area. These bunds are created at approx. 50 ft. away from coast.
- Scattered mangroves, Cher vegetations is observed and wet soil is observed near it.
- In South West direction of the said location, Two large heaps of soil are observed and it seems that this soil is excavated from the channel to collect and pump in sea water into earthen bund.
- No any salt manufacturing activity is observed during inspection.
- Good growth of mangrove vegetation is observed along coast with new mangrove growth.

- In South West of the said location, dense mangrove growth with Cher vegetation of height 3-4 ft is observed and in North of the said location, scattered mangroves are observed.
- Presence of Russel's viper is observed at said site. Some migratory bird species are observed on coast and this is breeding ground for them.
- Till date, approved CZMP Maps are not finalized and as per available Pre Draft CZMP Map, the said area falls between Sheet No. : NCSCM/ F 42 E 4 / SE and NCSCM/ F 42 E 12 / SW, hence, Pre draft maps specifically for the said area is also not available. But looking to land pattern in both referred Pre draft maps, it seems that this area falls in CRZ 1-A area of Mudflats and Mangroves.

Conclusion:

- Said area allotted to salt companies.
- No any salt manufacturing activity is observed during inspection.
- During visit, wet soil is observed hence, the constructed earthen bunds may or may not block flow of tidal waters to mangrove areas.
- As per Land records, and available Co-ordinates map of 1) Limit of Port Navlakhi, 2) M/s. Real Refined Salt and Allied Industries Ltd. and 3) M/s. Seaside Salt Pvt. Ltd., the land parcel is under jurisdiction of Morbi District.

No.	Name	Designation
1.	Shri K. B. Vaghela	Member Secretary, CRZ Committee and Regional Officer, Morbi
2.	Shri Chirag Amin, IFS	Deputy Conservator of Forests, Morbi Division
3.	Shri K. V. Ramani	Superintendent of Fisheries, Morbi
4.	Shri D. C. Parmar	Mamlatdar, Maliya – Miyana
5.	Shri N. U. Chavda	A. DILR, Morbi
6.	Shri G. H. Ramanuj	D.E.E, Gujarat Maritime Board (Navlakhi Port)

List of members present during Joint inspection of sub-committee formed by District Level CRZ Committee.

Dated of Inspection: 07/02/2021 and Time: 06:30 Hrs onwards.

Sr. No.	Name of committee Members	Organization & Designation	Mobile No.	Email ID	Sign
1	D. C. Parmar	Mamlatdar - Mahiya	7069625122	dc_6559@yahoo.com	
2	K. B. Vaghda	Regional officer GPCB	7874410 299	kbvaghda.11@opnsma	 7/2/2021
3	Chitrag Amin	DCF Morbi	8780817019	chitragamin.007@gmail.com	 07-02-21
4	N. U. Charde	For D.I.L.R. Morbi	9437046555	-	 7/2/21
5	K. V. RAMANI	A. D. I. L. R. Morbi Supdt. of Fisheries	8141789262	srmorbi@gmail.com	
6	G. H. Ramani	G.M.B. Dt. Exe. Eng. (C)	8238057975	ramani24167@gmail.com	
7	R. M. Sidg	RFO. Morbi	9428943090	-	 7/2/21
8	K. K. Poojari	AEE, GPCB-Morbi	9033947392	rb-gpcb-morb@gujarat.gov.in	 7/2/21
9	M. N. Soni	AEE, GPCB-Morbi	9925309325	rb-gpcb-morb@gujarat.gov.in	 M. N. Soni
10					
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Photographs showing condition during CRZ subcommittee Joint Investigation dated 07/02/2021.



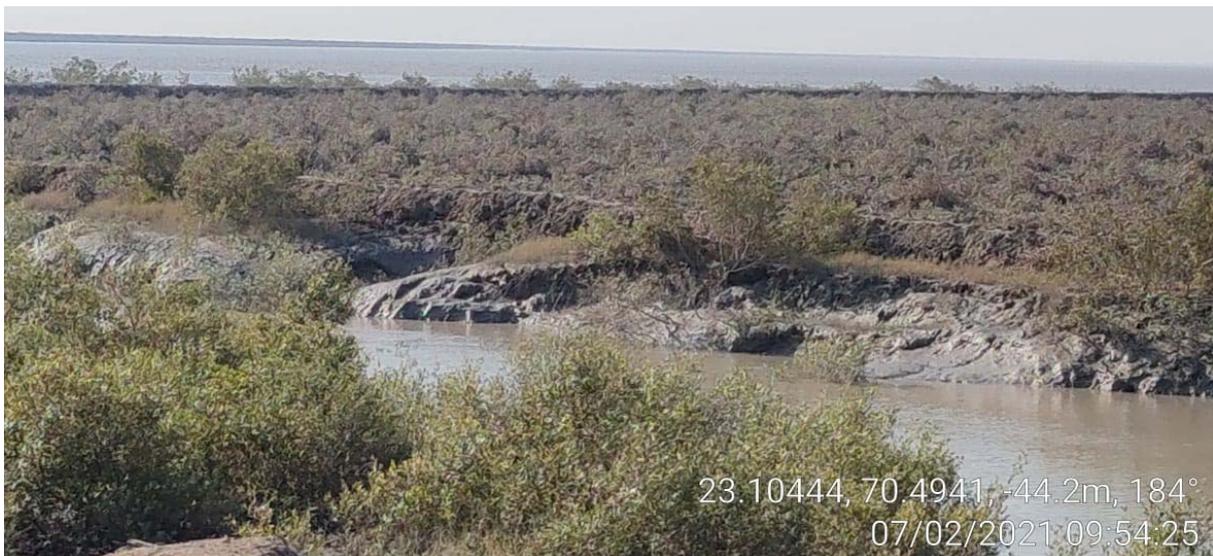
Earthen bunds are observed of approx. 4-5 ft height.



Two large heaps of soil.



Mangrove vegetation inside created earthen bunds.



In South West Direction, dense mangrove growth with Cher vegetation of height 3-4 ft is observed.



In South West Direction, dense mangrove growth with Cher vegetation of height 3-4 ft is observed.

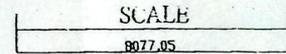


Some migratory bird species are observed on coast and this is breeding ground for them.

LIMIT OF PORT NAVLAKHI



AREA-39996.20 HACTORS

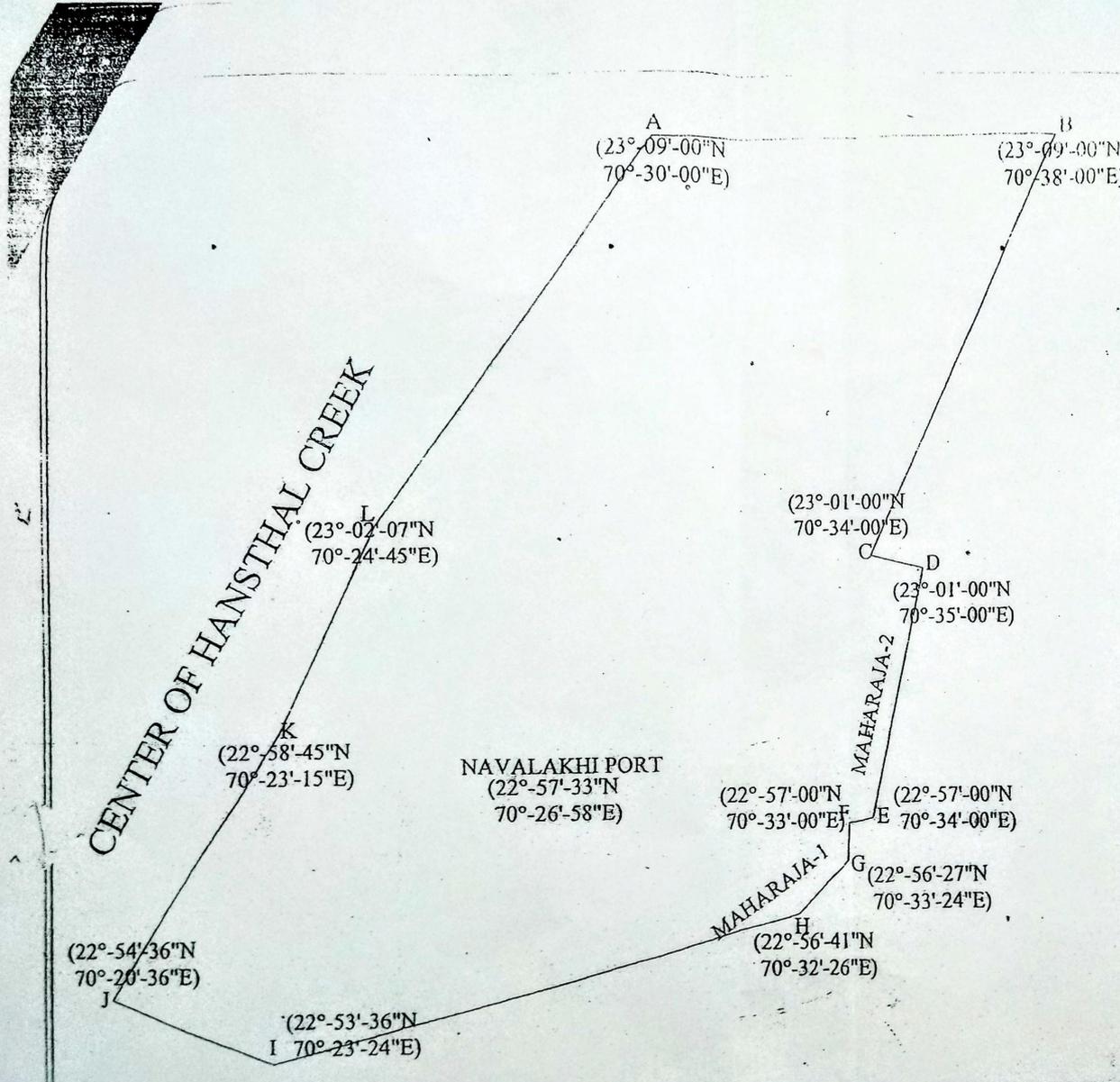


AS PER GOVT. OF SAURASHTRA
COMMUNICATION DEPTT. NOTIFICATION
CDG/4-2-46 DATED 21-11-1955, UNDER SEC...4 OF
INDIAN PORT ACT, 1908



K. Singh
PORT OFFICER
NAVLAKHI PORT
GUJARAT MARITIME BOARD
MORBI

M. I.
EXECUTIVE ENGINEER-CIVIL
CONSTRUCTION DIVISION
GUJARAT MARITIME BOARD
MORBI



મોજે બગસરા, તાલુકે માળીયા (મી), જીલ્લે મોરબી ના અનસર્વેડ પેકી માં
 હે. ૧૯૫૦-૦૦-૦૦ ચો.મી. જમીન મીઠા ઉત્પાદનની લીઝ માટે કરવા માંગણી કરેલ વિસ્તાર
 દર્શાવતો નકશો.

અરજદાર શ્રી :- REAL REFINED SALT & ALLIED INDUSTRIES PVT. LTD.

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માંગણી વિસ્તાર

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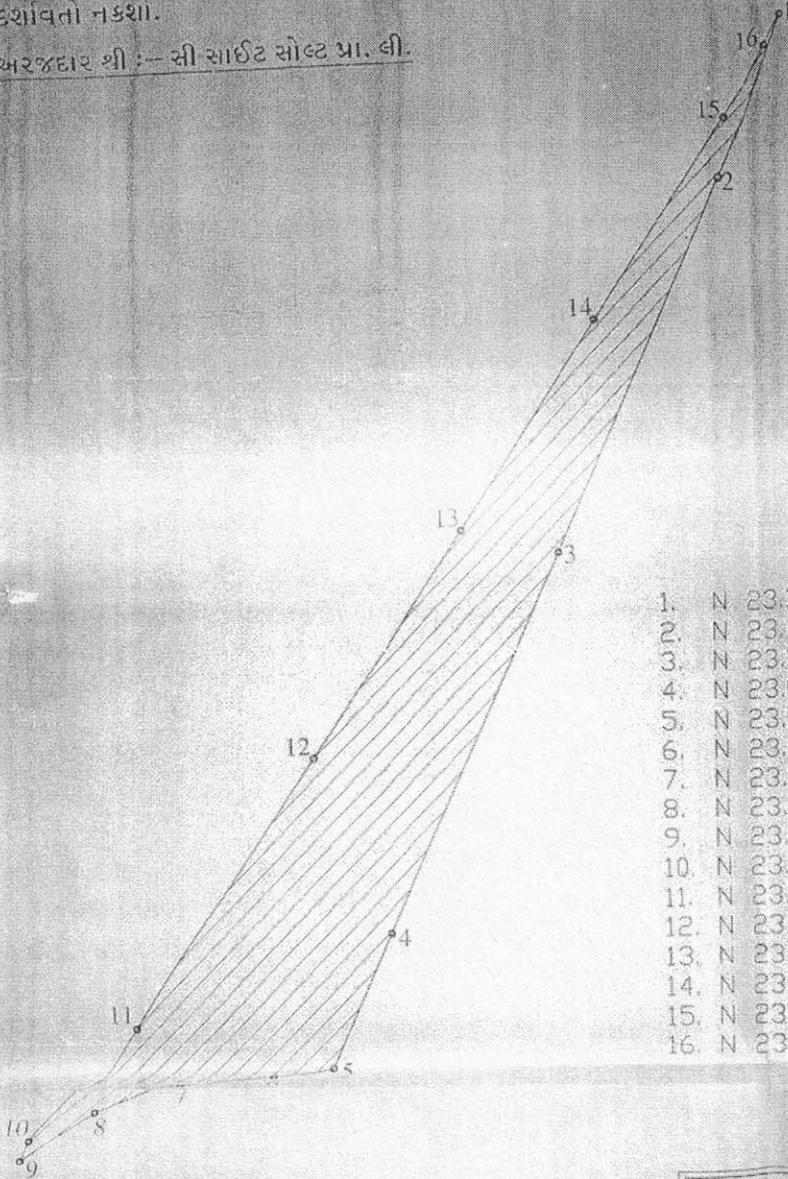
આ નિશાની માંગણી કરેલ વિસ્તાર દર્શાવે છે.

REAL REFINED SALT AND ALLIED INDUSTRIES PVT. LTD.

અરજદાર શ્રીની સહી :- DIRECTOR
 REAL REFINED SALT & ALLIED INDUSTRIES PVT. LTD.

મોજે બગસરા, તાંબુકે માળીયા (મો), જીલ્લે મોરબી ના અનસર્વેડ પેકી માં
એકર ૨૨૩૦ - ૦૦ ગુંઠા જમીન મીઠા ઉત્પાદનની લીઝ માટે કરવા માંગણી કરેલ વિસ્તાર
દર્શાવતો નકશો.

અરજદાર શ્રી :- સી સાર્ઠટ સોલ્ટ પ્રા. લી.



1.	N	23.145376,	E	70.496511
2.	N	23.133806,	E	70.490509
3.	N	23.106143,	E	70.476162
4.	N	23.077363,	E	70.461245
5.	N	23.066906,	E	70.455826
6.	N	23.066226,	E	70.450877
7.	N	23.064999,	E	70.443372
8.	N	23.062425,	E	70.436667
9.	N	23.058693,	E	70.431115
10.	N	23.060222,	E	70.431597
11.	N	23.070629,	E	70.439606
12.	N	23.090985,	E	70.455131
13.	N	23.108082,	E	70.468101
14.	N	23.123498,	E	70.479844
15.	N	23.138330,	E	70.491123
16.	N	23.143384,	E	70.494965



આ નિશાની માંગણી કરેલ વિસ્તાર દર્શાવે છે.

Sarath

અરજદાર શ્રીની સહી :-

DEENDAYAL PORT TRUST**LAND SECTION**

Sub: - Un-authorized occupation of DPT Area including Encroachment on Coastal Land for the purpose of Salt Production and Damage to Mangroves by salt manufacturers, near village Jungi, Vandiya, at Taluka Bhachau – Reg. Inspection Report.

With reference to above, it is stated that Dr. Rajiv Kumar Gupta, IAS, Additional Chief Secretary, Government of Gujarat, Forests & Environment Department, Gandhinagar – Gujarat, had issued the “Direction under Section 5 of the Environment (Protection) Act, 1986”, to the Chairman DPT, vide letter No. ENV-10-2018-20-NGT-27 dated 12/06/2019 and copy endorsed to (i) the Collector & District Magistrate and Chairman, District level CRZ Committee, Bhuj (ii) Regional Officer, GPCB and Member Secretary, DLC, Gujarat Pollution Control Board, Bhuj and (iii) Member Secretary Gujarat Pollution Control Board, Gandhinagar, with a request to ensure that the said directions are complied with, by Deendayal Port Trust and also to file the F.I.R. against known or unknown persons who are found to be indulging in illegal activity of cutting Mangrove and to ensure that there shall be no violations of C.R.Z. Notifications 2011, taking place in their respective jurisdictions.

Accordingly, Dr. Suresh Kumar N. Agravat, Regional Officer, GPCB and Member Secretary, District Level C.R.Z. Committee, Gujarat Pollution Control Board, Bhuj has filed an F.I.R. under section 154 Cr. P.C. (as per Section 447, 283) before the Samakhayali Police Station on 24/06/2019.

Thereafter, on the instructions of Police Inspector Samakhayali, site inspection was jointly undertaken on 01/07/2019. by the officials of Land section, Deendayal Port Trust; Regional Officer & Member Secretary, District Level CRZ Committee, GPCB, Bhuj & Gandhidham, Police personnel, Samakhayali & representatives of complainant (M/s Kachchh Camel Breeders Association, Bhuj & Bhachau), by 02 nos. of hired fishing motor boats from the Creek nearby Vandiya Village During site visit, it was observed that long straight Earthen Bunds were formed at 2 to 3 places. Further, destruction of Mangrove plantation, blocking of creeks, formation of earthen approach roads, etc. was noticed at site. The Police Panchnama in respect of FIR lodged by the Regional Officer & Member Secretary (District Level CRZ Committee), GPCB on 24/06/2019 was prepared at site.

The area is accessible only by sea route and is situated in inter tidal zone which seems to fall under CRZ area. Also there is no land route connectivity.

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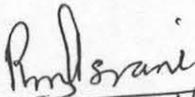
Contd.-2

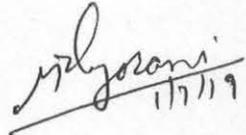
2

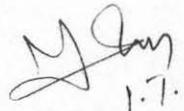
The bunds were formed to obstruct the flow of water and to develop the land for the purpose of salt production. In the context of the subject matter it was observed that apart from unauthorized occupation of DPT land, the Environmental norms too had been violated by the salt land parties.

The photographs of the aforesaid land were recorded and a copy of the same is enclosed.

The aforesaid inspection/verification report dated 01/07/2019 is submitted to Executive Engineer (Kandla Land), DPT for kind information and further necessary action in the matter please.


(Rajesh Israni)
Jr. Engr. (C) (Gr-I)
11/7/2019


(Manish Hingorani)
Jr. Engr. (C) (Gr-I)
11/7/19


(A.P. Trivedi)
Executive Engineer (K.L.)
1.7.2019

979
2/7/2019

DEENDAYAL PORT TRUSTLAND SECTION

Sub : Inspection and Survey of Land / Area allotted on Lease Basis to the two parties for the purpose of salt production, by Revenue Department, Govt. of Gujarat, Gandhinagar at village Bagasara, Malliya (Miyana), District: Morbi, near village Jungi (Kutch) – Reg. Verification Report

The fishermen and grazers of the Malliya (Miyana), Surajbari and Jungi region (Coastal Areas between Kutch & Morbi Districts, Gujarat) under the leadership of one Shri Sama Siddik Osman, Cherawadi village, Surajbari, Kutch have lodged an official complaint dated 08/05/2019, addressed to the concerned Ministries, Statutory Bodies, Govt. of Gujarat, G.P.C.B. and other Organisations. In this regard, a copy alongwith enclosures has also been endorsed to Deendayal Port Trust, alleging the destruction of Mangrove Plantation, Violation of CRZ & Environmental Norms, etc., by the two Salt Land Parties.

It has been mentioned in the above representation that the Collector, Morbi has allotted land admeasuring 2230.00 acres and 4818 acres & 15 guntha to M/s Seaside Salt and M/s Real Refined Salt, Gandhidham respectively, which includes portion of land under the ownership of Deendayal Port Trust. In this connection, also a Letter – cum - reminder / complaint dated 28/06/2019 has also been received from them by DPT on similar issues.

In the context of the subject matter, it is submitted that initially the work was started in December 2018, by the salt land parties on DPT Land, located near ex- lessee M/s Kanoria Chemicals (DPT Salt land / plot admeasuring 919.00 acres), near village Jungi, on the other side of the creek. During joint inspection of the area, it was observed that apart from un-authorized occupation of DPT land, the Environmental Norms too had been violated by the salt land parties in the adjoining areas. In this regard, 2 Inspection Reports dated 24/12/2018 & 01/07/2019 are submitted and enclosed, which are self-explanatory in the related matter.

In this regard, it is further stated that initially a complaint dated 18/11/2018 and another letter dated 20/02/2019, alongwith image of Google Earth of the aforesaid area duly identifying the location, was also received

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from one Shri Haresh Kumar J. Balasara, RTI Activist, Morbi, alleging wrongful allotment of the aforesaid DPT Salt land.

As such, the District Collector's, Kutch and Morbi had been requested by Deendayal Port Trust, to get the matter enquired from the concerned authorities and keep the procedure of land allotment in abeyance, vide C.E., DPT's letter dated 02/02/2019. A Copy of the letter is enclosed for kind reference. However, no response/reply has been received from the State Govt./ Govt. of Gujarat authorities, till today.

Accordingly, the site inspection was jointly undertaken by the Officials of Land Section, alongwith Surveyor of H.E. Section, Deendayal Port Trust; D.I.L.R., Bhuj & representatives of complainant, by a hired fishing Motor Boat from Kandla sea, on 13/07/2019. It is pertinent to mention here that the D.I.L.R. official / surveyor had accompanied the inspection team informally, on the personal request of DPT. The observations/findings of the site visit are furnished, as under:

- 1) The vast stretch of land has been occupied by the salt land parties and it is noticed that wide Earthen Bunds, admeasuring in a periphery length of 8-10 kms. approx. are formed on and around the allotted land. The said land is located between village Jungi (Kutch) and Navlakhi Port and is situated in intertidal zone, which appears as an Island and seems to fall under the sensitive CRZ area. This land/area is accessible only by sea route and there is no land route connectivity.
- 2) The vacant land is being developed for the purpose of salt production, wherein machinery & equipment's such as 04 Hitachi Machines, 06 Tractors, etc. and labours have been deployed and the work of forming of Huge Earthen Bunds/Boundaries, is in progress. Moreover, the Tents for the residence of labours, other temporary structures, Storeroom for spare parts of machinery, Stocking of fuel, etc., have been erected and established on site.
- 3) The land has been converted into plain ground, wherein destruction of Mangrove plantation, blocking of creeks, filling of small streams/subsidiaries, formation of earthen bunds & approach roads, etc. is evident at site. The joint visit of the concerned authorities such as District Level CRZ Committee, G.P.C.B., Forest Department, Fisheries Department, Dy. Collector / Mamlatdar, D.I.L.R. and other Statutory / Regulatory bodies is utmost necessary, to prevent further violation of

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Environment norms. Hence, they may be requested for carrying out necessary inspection of the affected area.

- 4) Necessary assistance of Police Department may be essentially sought for providing Police Bandobast during the site visit and to take needful / remedial action.
- 5) The survey of entire periphery area was carried out by the team and 23 nos. of reference points/UTM co-ordinates through GPS devices were recorded jointly by D.P.T. & D.I.L.R. to ascertain the location, specific ownership of land and identify the boundaries i.e. to determine whether land falls under Kutch or Morbi District and also to confirm whether the land belongs to DPT or Govt. of Gujarat.
- 6) A copy of the various 'Photographs' of the aforesaid land, depicting the site conditions and ongoing activities/movement, duly recorded and taken during site visits are enclosed for reference.

The work of Survey and Demarcation of DPT Land Boundaries, including marking / fixing of 205 Nos. of Reference Points, in a total length of 110.00 Kms. from village Veera to Jungi, by D.I.L.R., Bhuj has been jointly undertaken and is in progress, since January 2019. Presently, the work is temporarily stopped due to the ongoing monsoon season.

The Demarcation Report and Drawing of the aforesaid land and authenticity of the area, falling under DPT land or otherwise is yet to be received from D.I.L.R., Bhuj. In this connection, it is proposed that if agreed to. the matter may be taken up on priority, with the respective Collectors and concerned offices of D.I.L.R., to enable detailed scrutiny and investigation of the matter, pursue the early submission of the Demarcation Report and resolve the sensitive issue regarding identification and ownership of land.

The aforesaid Inspection/Verification Report dated 13/07/2019 is submitted to Executive Engineer (Kandla Land), DPT for kind information and further necessary action in the matter please.

Rajesh Israni
13/7/2019

(Rajesh Israni)
Jr. Engr. (C) (Gr-I)

Manish Hingorani
13/7/19

(Manish Hingorani)
Jr. Engr. (C)(Gr-I)

Sarthak Choudhury
13/7/19

(Sarthak Choudhury)
Jr. Engr. (Civil)

1066
15/7/2019

DA
Pl. prepare a letter
for information of collector
Y.S.
18.9.17



Important

GMB/ENV/CZMP/1/ **8148**
 10th October 2018

To,
 District Collector,
 Morbi District

Sub: GMB's Comments on Draft CZMP Map prepared by NCSCM for Morbi District

Sir,

With reference to public hearing organized on 11/10/2018, we hereby attach the following representation with respect to the Navlakhi Port limit marked in CZMP Maps of Morbi district showing necessary correction to be made over it.

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 zone
 man.
 Autho

- (1) Please refer to the draft CZMP map showing the Navlakhi Port limit which is attached herewith as **Annexure-I**. We are also attaching the Navlakhi port limit notification for your reference (**Annexure-II**). Further in this reference we would like to draw your kind attention that the areas within the Port limit other than CRZ-IA needs to be clearly demarcated as CRZ-IB area. As there are various area other than mangroves shown within the Navlakhi Port limit and the same needs to be shown as CRZ-IB.

21/10/18

Accordingly our representation may be considered in final CZMP.

Regards,

કલેક્ટર પતી
 મોરબી જિલ્લો

22/10/18

Yours faithfully

(Dr. Manan Shukla)
 Manager (Env.)

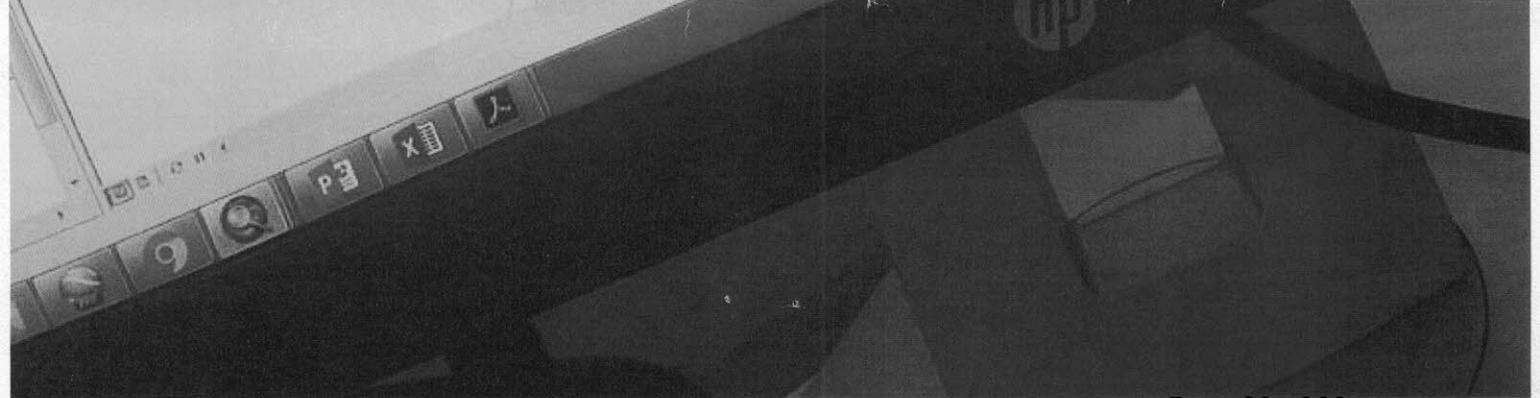
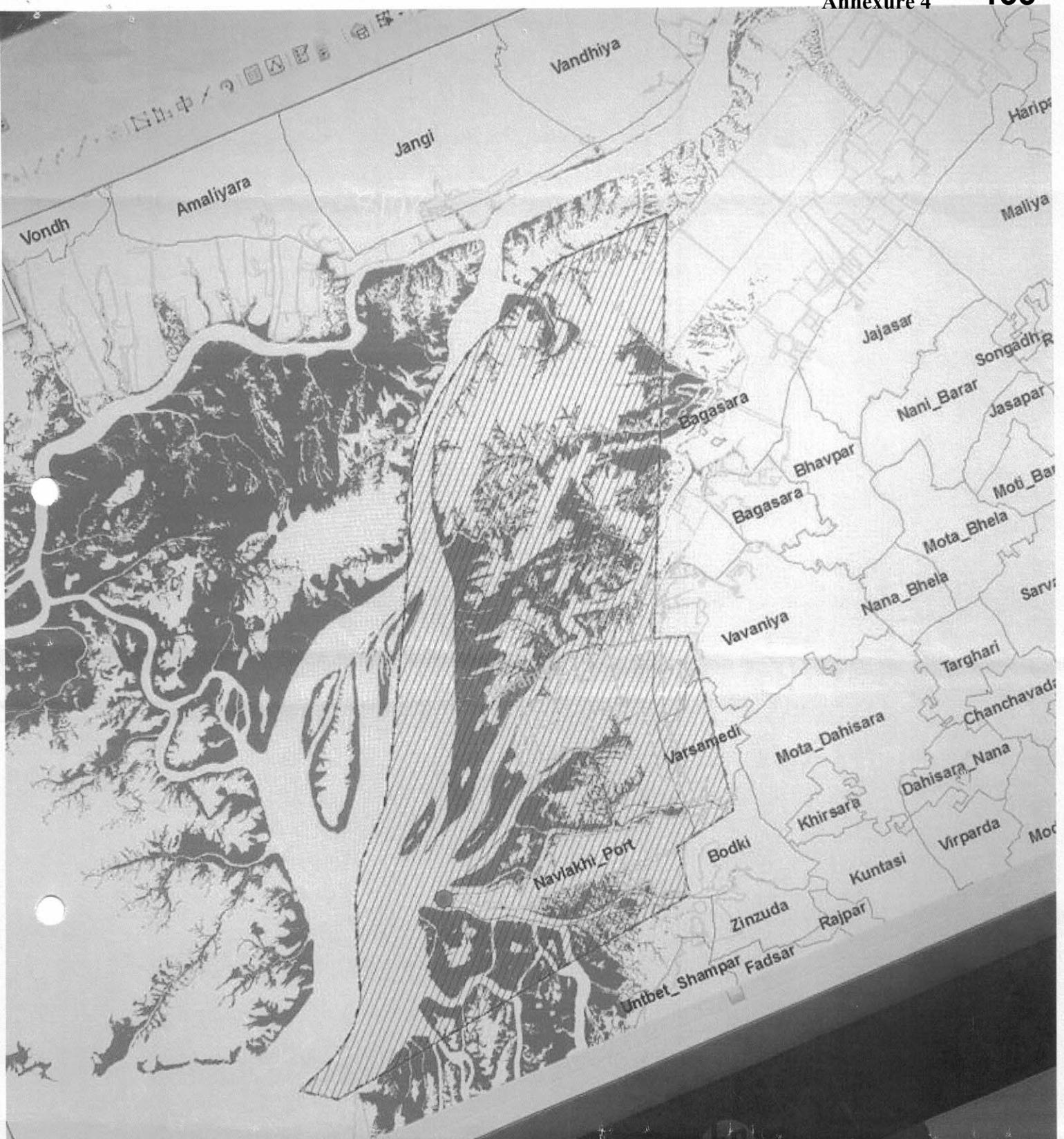
5/11/18
 15/10
 10/10/18

કલેક્ટર પતી મોરબી જિલ્લો
 28/10/18
 866
 17/10/18

Copy Submitted to:

- Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector-10A, Gandhinagar

જિલ્લા માધ્યમથી GPC B ને જણાવી છે.
 નવલખી પોર્ટ



(2)

(3)

(4)

(5)

: 3 :

NO NAVLAKHI
PORT NOTIFICATION

Navlakhi
*dt. 21st
Nov. 1955
Notification No. CDG/4-2/46*
Published by Government of
Saurashtra (Communication
Department).

West:-

The Port limit runs from Dobe creek Lat. 21°-48'-20". Long. 72°-8'-37" through several points 50 yds. above high water mark. The direction through which the limit line runs is as under.

From Dober Creek a line runs along West Bank of Dober Creek upto a point (B) Lat. 21°-48'-17", Long. 72°08'-35" (distance one mile) then the line turning towards south-east-ward along the existing Dock Estate fence and then runs along south of Concrete Jetty Road upto a milestone marked No. 3/2, the line then turns south-ward near the Revenue Field Stone 1/2 mile from the beginning of Aerodrome Road.

North:-

The north limit of the Port follows a line starting from the centre of mouth of Chach creek long 70°-30' extending all along the centre of Chhach creek upto the interesting point of the long 70°-38' and latitude 23°-9"-0.

East:-

The Eastern limit runs due North & South from the North limit line from the point of the end of Chach creek where the line from

Anchorage
Port.

(2)

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(4)

(5)

NARAYANAKHILL

70°-38' E and 23°-9' meets upto the boundary stone NLK as put upon the road berm thence it extends in the South across the above road upto the North boundary bank of the Mah' araja Salt Works" No.2.

Thence, it runs along the north boundary of the above Salt Works upto its North East boundary corner stone and then further up, it runs along straight line joining to the point, the Rly. mile stone 22 mile (from Nazarber) thence it runs towards "Lavanpur Station" along a line parallel to Railway-line at a distance 30 ft. from the centre of the track upto a stone Marked NLK located at a distance $\frac{1}{2}$ mile from above 22 Rly. Mile stone-thence it runs along a straight line across the railway line joining the extreme North East corner of Salt works No.1 from where it follows the eastern boundary of the above Salt Works No.1 upto beadyary of its extreme South East boundary corner.

Southern- The Southern limit of the port runs along the South boundary of the Maharaja Salt Works No.1 upto its south West Boundary corner from where it runs generally along a straight line extending upto into upto the centre of the Hanshal

(1) (2)

(3)

(4)

(5)

4 Mahuva

Notification No. CDG/4-5/
29 dt. 16-10-1956 published
by Government of Saurashtra
(Comm-unication Department)

NOTICE

Creek passing through the Hansthal
Banglow.

West:-
The Port Limit on the West is upto
the line ranged in the sea from
the Central of the Hansthal Creek
in South centrally passing through
Muragha Bet & Mammalia Bet upto the
length 70'. 30' E line in the
central of the mouth of Chech creek
as defined before.

North:-
The Port Limit of Mahuva Port starts from
a point along Kalan River off Gadhada
village boundary. from this point Kalan
River runs south and south-east ward
meeting Mahuva Bay.

East:-
The limit line starts from road to
Katpur from Mahuva at the junction
point of Mahuva boundary West and
Katpur road. The line then turns
south-westward and passes along
Revenue Field Stone No. 145, 105, 106,
high water mark.

Andaman
Port

KANDI
MIRGARA

Supplementary Report of Action taken w.r.to Hon'ble NGT OA No. 89/2020 (WZ).

- Subject : Supplementary Action taken Report w.r.to Original Applications (OA) No. 89/2020 (WZ) (Sama Siddik Osman Vs Ministry of Environment, Forest and Climate Change & Ors.) filed in Hon'ble NGT, Principal Bench, New Delhi.
- Reference : 1) Hon'ble NGT order dated 11.12.2020 in OA no. No. 89/2020(WZ).
 2) Letter received from Director, Environment and Additional Secretary, Forest & Environment Dept., GoG vide Ref No. ENV-10-2019-177-Tcell dated 23/02/2021.
 3) Letter received from Director, Environment and Additional Secretary, Forest & Environment Dept., GoG vide Ref No. ENV-10-2019-177-Tcell dated 08/03/2021.

District level CRZ Committee meeting was held on 04/03/2021, under Chairmanship of Hon'ble District Collector, Morbi & Chairman of District CRZ Committee for discussions regarding issues pointed out in agenda.

Field visit of sub-committee is carried out dated 07/02/2021 and its report was submitted to DoEF on date 10/02/2021. Action taken report was prepared as per Hon'ble NGT [Original Application No. 89/2020(WZ)] Sama Siddik Osman (Applicant) Versus Ministry of Environment, Forest and Climate Change & Ors.] regarding violation of CRZ regulations in the ecologically sensitive CRZ-IA area and sent for further submission dated 10/02/2021.

After submission of the report, Letter Ref No. ENV-10-2019-177-Tcell dated 23/02/2021 is received from Director, Environment and Additional Secretary, Forest and Environment Department, Government of Gujarat in which certain actions were proposed and action taken report is stated to be submitted till 02/03/2021. But due to work related to Local Body elections, actions could not be carried out as suggested in said letter.

As soon as the elections were over, meeting of District level CRZ committee was held dated 04/03/2021 and discussions for further course of action were carried out. It is discussed that as the site in question is accessible by sea route only, it takes about 2.5 to 3 hours to reach the site from Navlakhi Port and site can only be visited during favorable high tide condition as there is danger of boat getting struck in mud till next high tide which is generally 10 to 14 hours apart. This leaves a window of only 2 to 4 hours for site inspection. Also as the land area in question is very large (28.52 sq km), it is not possible to carry out visit of whole area in short time.

Tide table i.e, Permissible draft declared for inner working anchorage for ships less than 225 Mtr.(LOA) for Month of March is obtained from Gujarat Maritime Board, Navlakhi Port vide circular No. GMB/PON/T/2094 dated 25/02/2021. As per the same, suitable date as per site accessibility is after 08/03/2021. Hence it is decided to start breaking of earthen bunds on 09/03/2021.

As per Rojkam dated 09/03/2021, team of Mamlatdar, Maliya (Mi), Regional Officer, GPCB and representative from Forest Department, Morbi visited the site. The journey started from 9.00 a.m. from Navlakhi Port and reached the site at 11.30 a.m. The team reached the site at Latitude 23°06'29"N and 70°29'51"E Longitude and started removing /breaking of earthen bunds using Tractor with plough. Photograph of the same are as attached as Annexure - I. Earthen bunds breaking activity is started considering earthen bunds that are about 50 ft. from shore and with possibility of blocking sub-creeks. As the land area in question is very large (28.52 sq km), bund breaking work may require many number of days due to site accessibility constrains.

Regarding Case to be filed under section 19 of EAct-1986 against responsible units for violation of CRZ notification 2011, approved CZMP Maps are not yet finalized/available showing clear demarcation of CRZ areas for the said area as per CRZ notification 2019. Also it is suggested to carry out extensive study of the area first, also to find out earthen bunds block tidal waters or not, which will require more time hence more time is to be sought for the same.

Regarding revocation of Lease if there is violation of CRZ notification due to salt production activity, no any apparent salt manufacturing or any related activity observed during joint visit of the sub-committee dated 07/02/2021 or during site visit dated 09/03/2021.

Additionally, GMB's Comments on Draft CZMP Map prepared by NCSCM, Chennai for Morbi district is received vide letter no. GMB/ENV/CZMP/1/8148 dated 10/10/2018 addressing to The District Collector to clearly demarcate area other than CRZ-1A within port limits as CRZ-1B area. It states 'As there are various area other than mangroves shown within Navlakhi port limit, the same needs to be shown as CRZ-1B.' As per point 5.1 (xvii) of CRZ notification 2019, Salt harvesting and associated facilities are permitted in CRZ-1B. As the land area in question is very large (28.52 sq km) and when approved CZMP Maps are not yet finalized/available showing clear demarcation of CRZ areas as per CRZ notification 2019, clarity regarding the area falling under CRZ 1A or CRZ 1B is not there, hence revocation of lease cannot be recommended at present. It may be decided after extensive study of the area is carried out as pointed above and after Final approved CZMP Maps are available.

(A. D. Bhimani)
Member Secretary,
District CRZ committee
& I/c. Regional Officer,
GPCB, Morbi.

(J. B. Patel), (I.A.S)
Chairman,
District CRZ committee
& District Collector, Morbi.

Photographs showing site condition during visit of sub-committee dated 09/03/2021.





સ્થળ: જવલખી બોર્ડ થી
ઉત્તરે કચ્છનો બાકી
વિસ્તાર.

સમય: સવારે ૯:૦૦ કલાકે થી
તા. ૦૮/૦૩/૨૨

રોજકામ

આજરોજ અમો નીચે સહી કરનાર CR2 સહ
કમીટી ના સભ્યો તથા તેના પ્રતિનિધીઓ ઉપરોક્ત સ્થળે
હાજર થયેલ હીશે. માનનીય એન.જી.ટી. ના કેમ્પ નં ૦૧/૧૫/૨૦૨
ના તા. ૧૨/૧૨/૨૦ ના હુકમ તથા નિવાસકમી (પર્યાવરણ) અને
અધિક સમિતિ, વન અને પર્યાવરણ વિભાગ, ગુજરાત સરકાર
ના પત્ર ક્રં - ENV-10-2019-177-TCWH તા. ૨૩/૦૨/૨૦૨૧ તથા
સમા સીદ્ધીકી આંસમાન ની રજૂઆત ધ્યાને લેતા તા. ૦૭/૨/૨૨
ના રોજ સહ કમીટી ના સભ્યો દ્વારા રૂબરૂ સ્થળ તપાસ
કરતા કિનારા થી આશરે ૫૦ ફુટ ના અંતરે જમીન ના
ભાગમાં જ થી ૫ ફુટ ઉંચાઈના પાખા બનાવેલ ધ્યાને આવેલ
હતા, જે આજરોજ તા. ૮/૦૩/૨૨ ના સવારના
૬ કલાકે જવલખી બંદર થી બોટ મારફતે સવાળા થઈ
સ્થળ પર ૧૧.૩૦ કલાકે પહોંચી સહ મીઠાના ઉત્પાદન
માટે બનાવવામાં આવેલ દરીયા કિનારા થી આશરે
૫૦ ફુટ અંતરે આવેલ તથા આસપાસ ના સહ-ક્રિત ના
પાણી નો વહેવા ને અટકાવી શકે તેવા પાખાઓ તોડી
પાડવાની કાર્યવાહી શરૂ કરવામાં આવેલ. જે અંગે ના
ફોટોગ્રાફ્સ પાડવામાં આવેલ તથા જેનો સમાવેશ
Supplementary રીપોર્ટ નાં કરવામાં આવશે.
મંજુર કરેલ લીઝ વિસ્તાર ખુબજ વિશાળ હોય, અન્ય
CR2 વિસ્તારમાં આવતા અને એર/મેન્યુઅલ પુષો ને ભુકશાન
કરતા તથા ક્રિકના પાણીને શીતતા બાકી રહેતા પાખા દુર
કરવા મીઠા ઉદ્યોગકારો ને સમજુત તથા જાણ કરવામાં આવેલ

ઉપરોક્ત હકીકત અમો નીચે સહી કરનારે

(પાણી)

इसके अथवा नया भी न्याय के का नये से ही करी करी करी
 कीये.

x Baldeo
 (न.न.न.न.)
 (सि.ग.स.स.स.)

x

x Askenani
 (सि.डी. न.न.न.)
 ए/ए प्रो.प्रो.प्र.प्र.प्र.
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Patel
 (डी. एन. एन.)
 ए/ए न.न.न.न.
 न.न.न.न.)