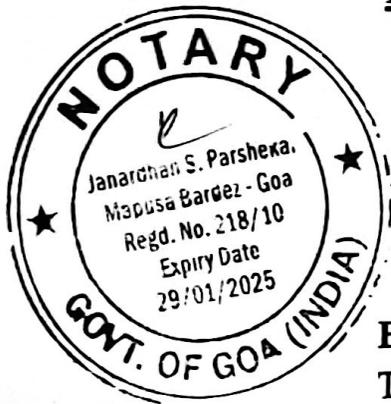


**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
WESTERN ZONE BENCH AT PUNE**



APPEAL NO. 38 / 2021 [WZ]

BETWEEN

The Goa River Sand Protectors Network

...APPELLANT

AND

The Goa State Environment Impact
Assessment Authority and Others

...RESPONDENTS

ADDITIONAL AFFIDAVIT OF THE APPELLANT

I, Dr. Claude Alvares, Indian national, Director of the Goa Foundation, which is a member of the above network of activists set up to bring a halt to illegal sand mining in the state of Goa, do solemnly state on oath as under:

1. The Appellant is an organization of individuals who are deeply concerned about the erosion of the river banks and destruction of the ecology of the rivers, owing to illegal sand mining. Its address is % the office premises of the Goa Foundation for purposes of personal security of the members.
2. The members of the Appellant organization have been pursuing the issue of illegal sand mining in the State of Goa for more than 5 years, in the form of filing P.I.L. W.P. 14/2018 in the Hon'ble High Court of Bombay at Goa, and thereafter, Contempt Petition No. 06/2021 in the H.C., wherein the issue of continuing illegal sand mining is being actively monitored on a regular basis by the Hon'ble High Court of Bombay at Goa.
3. Members of the Appellant network have been extensively documenting the cases of illegal sand extraction and have been

bringing it to the notice of concerned authorities in the form of hundreds of complaints/letters and emails, along with photographs and GPS coordinates when available.

4. It is due to the continuous watchdog activity of the network that illegal sand mining has now virtually come to a full and final halt in the state.

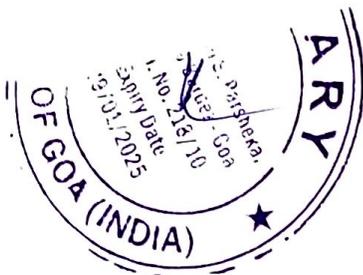
5. I verify that the contents of paras 1, 2(p), 3 and 4(p) of this affidavit are in the nature of facts which are true to my own knowledge and belief, and that the contents of para 2(p) and 4(p) are my submissions, based on legal advice, which I believe to be true and correct. No part of it is false and nothing material has been concealed therefrom.

Solemnly affirmed at Mapusa, Goa, this the 13th day of May 2023.

APPELLANT /DEPONENT

STATEMENT AFFIRMED AND WITNESSED
BEFORE ME BY
19/05/2023

JANARDHAN S. PARSHEKAK
TARY AT MAPUSA, BARDEZ - GOA.
STATE OF GOA INDIA.



VERIFICATION

I hereby verify that the contents of paras 1 - 5 of my above affidavit are true to my knowledge and belief, and that no part of it is false and nothing material has been concealed therefrom.

Solemnly affirmed at Mapusa, Goa, this the 13th day of May 2023.

APPELLANT/ DEPONENT

STATEMENT AFFIRMED AND WITNESSED
BEFORE ME BY
19/05/2023

JANARDHAN S. PARSHEKAK
TARY AT MAPUSA, BARDEZ - GOA
STATE OF GOA INDIA.

