

**1438**

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
(WESTERN ZONE AT PUNE)**

**APPEAL NO. 20 OF 2022 (WZ)**

**IN THE MATTER OF:**

**PAUL LOBO & OTHERS**

**... APPELLANTS**

**VERSUS**

**GOA COASTAL ZONE  
MANAGEMENT AUTHORITY  
& OTHERS**

**...RESPONDENTS**

**ADDITIONAL AFFIDAVIT  
ON BEHALF OF RESPONDENT NO. 1  
GOA COASTAL ZONE MANAGEMENT AUTHORITY**

**(KINDLY SEE INDEX INSIDE)**

**ABHAY ANIL ANTURKAR  
ADVOCATE FOR RESPONDENT NO. 1**

## INDEX

<b>Sr. No.</b>	<b>Particulars</b>	<b>Pages</b>
1.	Additional Affidavit on behalf of Respondent No. 1	1 – 4
	<b>LAST PAGE</b>	

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
[WESTERN ZONE, AT PUNE]

APPEAL NO. 20 OF 2022 (WZ)

**IN THE MATTER OF:**

PAUL LOBO & OTHERS

... APPELLANTS

VERSUS

GOA COASTAL ZONE  
MANAGEMENT AUTHORITY  
& OTHERS

...RESPONDENTS

**ADDITIONAL AFFIDAVIT  
ON BEHALF OF RESPONDENT NO. 1  
GOA COASTAL ZONE MANAGEMENT AUTHORITY**

I, Sachin S. Desai, being the Member Secretary, Goa Coastal Zone Management Authority, having my office at: 4<sup>th</sup> Floor, Dempo Towers, Patto, Panaji, Goa, do hereby solemnly affirm and state as under:

1. I am the Member Secretary of the Respondent No. 1 Goa Coastal Zone Management Authority (hereinafter referred to as *GCZMA* for the sake of brevity and convenience) in the present Special Leave Petition. I am well-conversant with the facts and circumstances from which the present Appeal arises and am, as such, capable of affirming the present Affidavit.
2. The answering Respondent has filed Affidavits dated 1.01.2023, 16.10.2024 and 11.11.2024 in the captioned Appeal. The contents of these Affidavits may be read to be part of the present Affidavit and are not being repeated for the sake of brevity.



3. The Appellants have filed an Additional Affidavit in Rejoinder dated 02.04.2025 in the captioned Appeal. The *answering Respondent is filing the present Affidavit for the limited purpose of opposing the contents of the Appellants' Additional Affidavit pursuant to the liberty granted by this Hon'ble Tribunal's order dated 04.04.2025.*
4. Nothing in the present Affidavit may be deemed to be any admission of any content of the Appellants' Additional Affidavit in Rejoinder, unless the same is categorically admitted herein. Nothing in this Additional Affidavit in Rejoinder may be deemed to have been admitted for want of specific denials.
5. The contents of the Appellants' Additional Affidavit in Rejoinder do not warrant a paragraph-wise rebuttal. However, the answering Respondent expresses its strongest opposition to the following paragraph pleaded by the Appellants in the Additional Affidavit:

*"7. I say that the conduct of the Respondents is reprehensible and should not be entertained by this Hon'ble Tribunal. I say that this Hon'ble Tribunal should also take serious note of the collusion between the Respondent Authorities, particularly the Respondent GCZMA and the Respondent No. 2 in relation to the present project, and must consider issuing appropriate directions to ensure that such blatant irrefutable instances of collusion and corruption do not occur in the future."*
6. At the outset, the contents of the aforesaid paragraph are *outrightly denied*. The Appellants have levelled baseless and outrageous allegations against the answering Respondent without providing even a shred of evidence in support of their claims. These unfounded allegations have been put up by the Appellants for the first time in this Additional Affidavit in Rejoinder, and were not pleaded in any manner in the



captioned Appeal. Hence, the only inference that can be drawn from the Appellants' Additional Affidavit is that they have resorted to these unsubstantiated claims at this stage only to prejudice and mislead this Hon'ble Tribunal since the captioned Appeal is otherwise devoid of any merit.

7. I say that as provided in CRZ Notification, 2011 procedure for Revision of Coastal Zone Management Plans is prescribed as follows:

*V. Revision of Coastal Zone Management Plans*

*1. Whenever there is a doubt the concerned State or Union territory Coastal Zone Management Authority shall refer the matter to the National Centre for Sustainable Coastal Management who shall verify the CZMP based on latest satellite imagery and ground truthing.*

*2. The rectified map would be submitted to MoEF for its record.*

8. I say that procedure followed is as listed below:

-On receipt of representation, Authority conducts inspection through Expert Member.

-The representation along with report is referred to NCSCM.

-NCSCM based on satellite imagery and ground truthing makes recommendation to GCZMA.

-GCZMA recommends same to National Coastal Zone Management Authority.

- National Coastal Zone Management Authority refers same to Technical Scrutiny Committee.

-Technical Scrutiny Committee makes recommendations to National Coastal Zone Management Authority.

- National Coastal Zone Management authority makes recommendations to MoEF.

-MoEF grants approval.

In view of above procedure, the allegations made by the Appellant are baseless.

- 9. Such conduct on the part of the Appellants is completely reprehensible and condemnable. The Appellants have categorically named the answering Respondent in its false assertions with the sole intention to deflect this Hon'ble Tribunal's attention. Hence, the aforesaid paragraph of the Appellants' Additional Affidavit deserves to be disregarded in its entirety.
- 10. In light of the aforementioned facts and circumstances, this Hon'ble Tribunal may kindly be pleased to dismiss the present Appeal with exemplary costs.



DEPONENT

MEMBER SECRETARY

VERIFICATION GOA COASTAL ZONE MANAGEMENT AUTHORITY  
PANAJI, GOA

I, the abovenamed Deponent, do hereby state on solemn oath and affirmation that the facts stated hereinabove in this Affidavit are true and correct to the best of knowledge, information and belief, and nothing has been concealed.

Verified at Panaji on this 24<sup>th</sup> day of April, 2025.

DEPONENT

MEMBER SECRETARY  
GOA COASTAL ZONE MANAGEMENT AUTHORITY  
PANAJI, GOA

Solemnly affirmed before me  
*Achin Desai*

Witnessed before me by  
Chitambar

At Panjim - Goa

Sr. No, 50/04/2025  
Dated, 24/04/2025

*V. P. Gracias*  
Venefradz C. P. P. B Gracias  
Advocate & Notary Goa State

