

**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

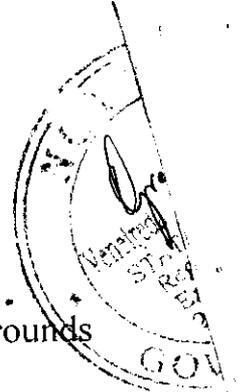
Versus

The Goa State Environment Impact

Assessment Authority and Others ...Respondents

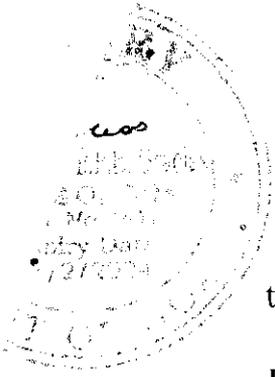
**ADDITIONAL AFFIDAVIT IN REPLY  
OF THE RESPONDENT NO. 1.**

I, Dr. Geeta S. Nagvenkar, major of age, Indian National, Member Secretary, Goa State Environment Impact Assessment Authority (GSEIAA), Respondent No.1 joined from 22/12/2022 herein above, having office at 4th Floor Dempo Tower Patto, Panaji-Goa do hereby on solemn affirmation state on oath as under:



1. At the outset, I state that I herein reiterate the contentions/grounds averred by the Respondent No. 1 in its Affidavit in Reply dated 24/04/2022.
2. I say that I am in receipt of the Additional Affidavit of the Appellant dated 23/12/2022 whereby the Appellant has brought on record the Judgment and Order dated 28/09/2022 passed by the Hon'ble NGT Principal Bench, New Delhi on the ground that the same would be material to the determination of the instant appeal.
3. I say that the Appellant vide the said Additional Affidavit, has not made any averments or raised any contentions, therefore the Affiant is not aware as to what is the ground/stand that is sought to be canvassed by the Appellants vide the said Additional Affidavit dated 23/12/2022. As such, I say that this Hon'ble Tribunal ought not to look into the said Additional Affidavit dated 23/12/2022.
4. Be that as it may, and without prejudice I state that the report prepared by the CSIR-NIO is a comprehensive document that in detail covers all

A handwritten signature is located at the bottom right of the page.



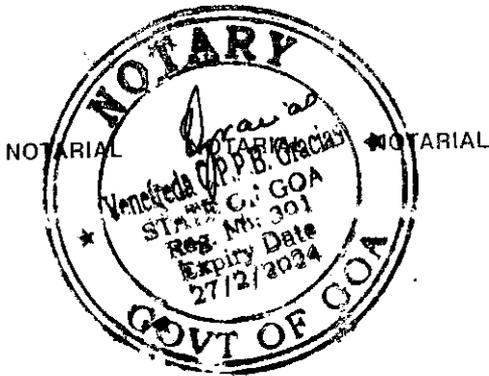
the aspects which are expected to be dealt with in a District Survey Report.

5. I therefore submit that the Appellant is not entitled to any relief as prayed for in the present petition.

6. I say that what is stated by me in paragraph Nos.2-5 of the Additional Affidavit in reply are true to my knowledge and based on the records maintained by my office.

Solemnly affirmed at Panaji Goa  
On this 13<sup>th</sup> day of January, 2022

*[Signature]*  
**DEPONENT**



NOTARIAL      NOTARIAL      NOTARIAL

Executed Before Me  
At Calangute - Goa  
Reg. No. 029/01/23  
Date: 10/01/23

*[Signature]*  
Venefreda C.P.P.B. Gracias  
Advocate & Notary