

**BEFORE THE HON'BLE NATIONAL GREEN  
TRIBUNAL SITTING AT PUNE.**

APPEAL No. <sup>303</sup>/2025 (WZ)

Sushi Café

.... Appellant

vs

Goa Coastal Zone Management

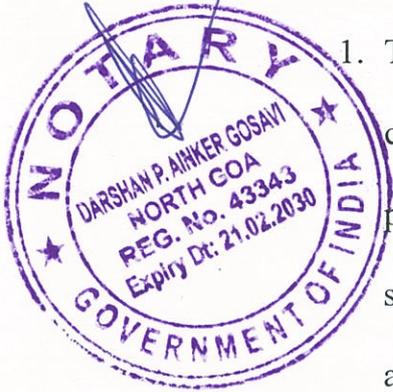
Authority & Anr.

.... Respondent

**ADDITIONAL AFFIDAVIT**

I, Harsha Pagi, widow of Late Santosh Pagi , r/o H.No. 263/1, Colomb, Cancona Goa., the Appellant herein, do hereby state and submit as under:-

1. The present additional affidavit is being filed to place on record certain additional facts and information which are essential for proper adjudication of the captioned matter. It is most respectfully submit to the same remained to be mentioned / stated in the appellant memo by inadvertence.
2. It is stated the appellant herein is a widow and the restaurant which is directed to demolished is the only source of income and livelihood for Appellant and her family. The family consist of daughter and a son who are presently studying. Further, the appellant belongs to the traditional fishing community and structure of traditional community are protected under CRZ notification

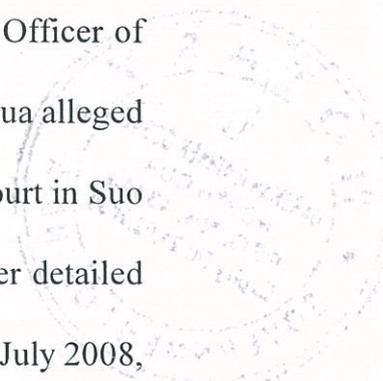


H.S. Page

2011. The documents which substantiate the fact that appellant and family belong to the fishing community are marked as **Annexure A colly.**

3. As regards the subject matter the structure the same is in existence much prior to coming in force of CRZ notification the perusal of form I & XIV of subject matter property clearly shows existence of subject matter property in as name of father -in-law is duly recorded in form I & XIV, more particularly mentions as house occupied by appellant family.
4. Further, in respect of subject matter structure, the Chief Officer of Canacona Municipal Council had initiated proceedings qua alleged CRZ violation in terms of directions of Hon'ble High Court in Suo Motu Writ Petition No. 2/2006 in which proceeding after detailed scrutiny of documents and order came to be passed on 2<sup>nd</sup> July 2008, clearly recording that subject matter structure is in existence prior to year 1991 and consequently the show cause notice was discharged. The said order has attained finality.
5. It is stated that if all the aforesaid document were considered by the Goa Costal Zone Management Authority, then there would be no reason and/or occasion for issuance of the impugned demolition order. It is also stated that the documents were provided to the

H.S. Paggi



Advocate of appellant, however, for the reason attributable the same were not placed on record before the Hon'ble Authority.

6. It is most respectfully submitted that appellant should not suffer for default of the advocate and the Authority should be directed to reconsider the matter after taking into consideration the above facts/ documents.

Solemnly affirmed and verified at Panaji on this 1<sup>st</sup> day of November, 2025.

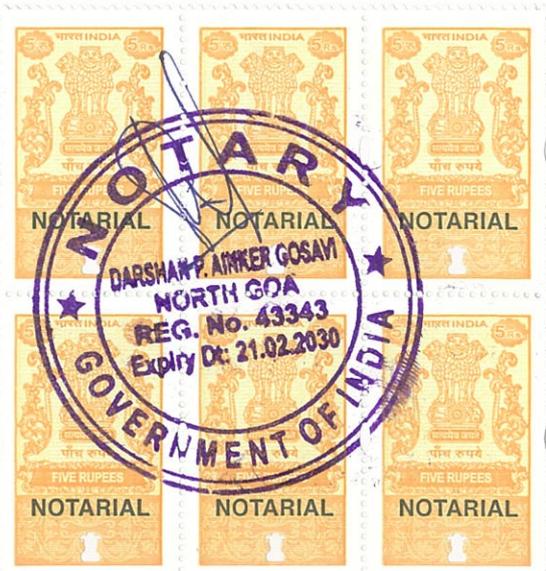


*H.S. Pagi*  
DEPONENT

Identified by

*G. Kerkar*

Adv. G. Kerkar



Solemnly affirmed and verified before me by Shri / Smt. Harsha Pagi

who has been identified by Adv. Gaurang Kerkar

whom I personally know

Reg. No. 169/2025

Date: 1/11/2025

DARSHAN P. AINKER GOSAVI  
Advocate & Notary  
North Goa  
Govt. of India  
Reg. No. 43343

GOVERNMENT OF GOA

**DIRECTORATE OF FISHERIES**

PANAJI

FORM "E"

*(See sub-rule (12) of rule 11)*

**Block Development Officer**

CANACON - GOA

**FISHING NET LICENCE**

Reg. No. C. 124

Santosh Yeshwant Pagi  
Colomb - Canacona

**DIRECTOR OF FISHERIES**

(Facsimile Signature)

*Signature & Designation of  
Issuing Officer at Block Level*

Block Development Officer

Office of Registration ..... CANACONA-GOA.....

Licence No. (New) C. 124.

I. Particulars of Licence ..... Santosh Geshwan

1. Name of Licensee ..... Santosh Geshwan  
Pagi

..... Pagi, S/o Geshwan Focru Pagi

2. Address ..... Columba - Canacona

..... Goa

II. Particulars of Net .....

1. Type of Net ..... Sea gill net

2. Specification of Net .....

Length ..... 150 mts

Breadth ..... 5.2 mts

Mesh Size ..... 5 cm

Other particulars, if any .....

— 2 —

Place of operation of net .....

Name of the specified area *Arabeau*.....

for operation of net *Sea of Goa*.....

Schedule for operation of net .....

No. ....

Change in size of net .....

Length .....

— 3 —

AMOUNT PAID

Year	Licence Fee		Registration Fee		Fine		Total		Receipt No.	Total
	Rs.	P.	Rs.	P.	Rs.	P.	Rs.	P.		
94	80	00	20	00	-	-	100	00	2(3894)	Rs. 100 = 00
94	20	00	-	-	-	-	20	00	19274 11(3911)	100/
95	80	00	-	-	40	00	120	00	22714 32(3930)	23.3.95 M.

GOVERNMENT OF GOA, DAMAN AND DIU

**DIRECTORATE OF FISHERIES**

PANAJI

FORM "E"

*(See sub-rule (12) of rule 11)*

**Block Development Officer**  
CANACONA - GOA

**FISHING NET LICENCE**

Reg. No. C-360

Santosh Lashwant Pagi.  
Colomb-Canalona

DIRECTOR OF FISHERIES

(Facsimile Signature)

*Signature & Designation of  
Issuing Officer at Block Level*

Block Development Officer

Office of Registration

CANACONA - GOA

Licence No. (New)

C-360

## I. Particulars of Licence

1. Name of Licensee

Shri Santosh

Yeshwant Pagi

2. Address

Colomb Palolem

Post Palolem Canacona

## II. Particulars of Net

1. Type of Net

Trawl net

2. Specification of Net

Length

25 mts

Breadth

15 mts

Mesh Size

25 mm

Other particulars, if any

III. Place of operation of net

1. Name of the specified area Goa  
for operation of net Coast

2. Schedule for operation of net

No.

IV. Change in size of net

1. Length

AMOUNT PAID

Year	Licence Fee		Registration Fee		Fine		Total		Receipt No.	Total
	Rs.	P.	Rs.	P.	Rs.	P.	Rs.	P.		
1992	60	00	15	00	-	-	75	00	1613292	111
1993	60	00	-	-	-	-	60	00	41612	
1994	105	00	-	-	-	-	105	00	373598	6100
<del>1994</del>	20	00	-	-	-	-	20	00	2412/92	
1995	125	00	4	-	63	00	188	00	31121321 (3893)	23390
									333990	23395