

**BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH, PUNE**

**Appeal No. 44 of 2016**

**IN THE MATTER OF**

Gujarat Khedut Samaj & Ors.

.. Appellants

Versus

Union of India & Ors

...Respondents

**I N D E X**

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**THROUGH**



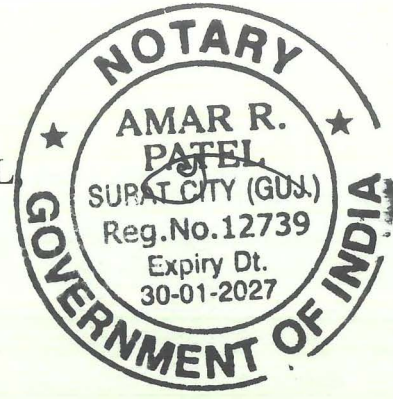
**MV KINI LAW FIRM  
ADVOCATES FOR THE RESPONDENT NO. 2  
MINISTRY OF ROAD TRANSPORT AND HIGHWAYS**

**PLACE: NEW DELHI**

**DATE: 20.01.2025**

Register Serial No. 137
Date:- 16 JAN 2025
My Commission Expires on 30th January 2027

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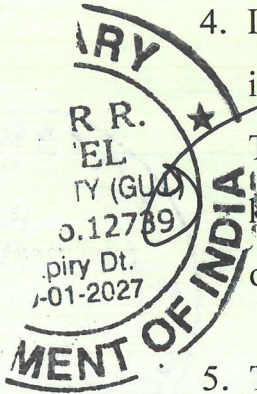
**ADDITIONAL REPLY ON BEHALF OF RESPONDENT NO. 2,  
MINISTRY OF ROAD TRANSPORT AND HIGHWAYS**

**Most respectfully submits as under:**

1. That the present Reply is being filed in compliance with Order of the Hon'ble Tribunal dated 24.10.2024, vide which the parties were granted the liberty to file an Additional Reply to bring on record latest developments in the matter.
2. It is submitted that Reply on behalf of the Respondent No. 2 and 4 has been filed on 19.10.2016 before the Hon'ble Tribunal and the same may be treated as part and parcel of this Reply to avoid prolixity. The Respondent herein seeks to bring on record, *interalia*, the developments in respect of the subject matter.
3. It is submitted that the NHAI has been entrusted with the construction of 400km long Vadodara Mumbai Expressway (hereinafter referred to as "VME"). It is most pertinent to mention that the Ahmedabad-Vadodara expressway is already constructed and is in operation. Hence, the implementation of the VME is of utmost importance for completion of the

  
Project Director  
National Highways Authority of India  
PIU - SURAT

Mumbai-Ahmedabad Road corridor. The said Mumbai-Ahmedabad Road Corridor carries the highest range of volume of traffic. In view of its national importance, the progress of the project is being reviewed by the Central Government, i.e. Prime Minister's Office (PMO), Govt. of Gujarat and Govt. of Maharashtra.



4. It is submitted that the VME project comprises of 471 kms to be developed in different phases. Phase I comprises of 274 kms from km 104 to km 378. The present Appeal is concerned with Phase I of the project alone. Out 274 kms of Phase I, all requisite clearances have been obtained for the stretch of 124 kms i.e. from Km 254 to Km 378.
5. That it is most pertinent to mention that significant progress has been made in the Project Stretch for which the Environmental Clearance was challenged. That Phase I of the Project Stretch comprises of 7 packages, out which, on 4 packages, substantial work has been completed, and in one package, 100% work is completed and the Completion Certificate was issued on 02.04.2024.
6. That the inter alia, the primary grievance of the Appellants is that public hearings were not conducted in a proper fashion. In this regard, it is submitted that an authorized officer of Respondent No. 4 was present at the public hearings held by Respondent No. 3 and this fact is borne out of the minutes of the public hearings annexed by the Appellants. Further, the allegation that the objections raised by the public during the public hearings were not addressed is false. Respondent. No. 4 as well as the correspondence on record confirm that the objections raised by the public, were addressed by the Respondent in their replies. It is submitted that Respondent No. 3 received various representations, and their objections were considered and addressed. Participants were allowed to speak and

express grievances. Summary of minutes were read out. The said objections and replies thereto are part of the final EIA Report and were therefore, duly considered as well as recorded. Minutes of the Public Hearing are annexed to the Appeal and more particularly the letters addressed by the Appellants were considered and form part of the Minutes at pages 181-186, 316-322, 378-393 of the Appeal. The questions raised by the present four Appellants in the Public Hearings and vide their letters are addressed in detail and replied to. Therefore, the said Environmental Clearance was granted in compliance with EIA Notification 2006. That the detailed reply filed by Respondent No. 2 and 4 may be read as part and parcel of the present Reply, the contents of which are not being repeated herein for the sake of brevity.

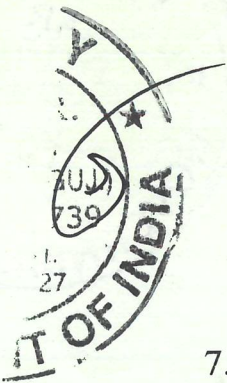
7. Therefore, in light of the foregoing, it is most humbly prayed that the Appeal as filed by the Appellants deserves to be rejected with exemplary costs to prevent such blatant abuse of law, in the interest of justice and equity.



**For Respondent No. 2**

**Ministry of Road Transport and Highways**

**Project Director**  
**National Highways Authority of India**  
**PIU - SURAT**



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VERIFICATION

Solemnly affirmed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 2025 that the contents of the above Affidavit are true to my knowledge. No part of it is false, and nothing material has been concealed therefrom.

*[Handwritten Signature]*

**DEPONENT**

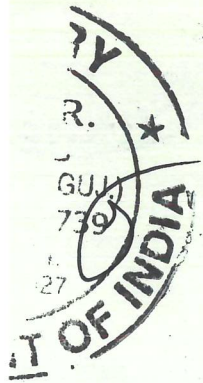
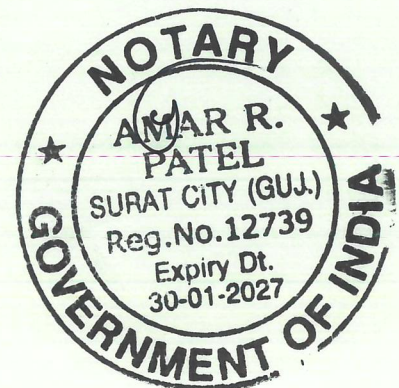
Project Director  
National Highways Authority of India  
PIU - SURAT



**BEFORE ME**

*[Handwritten Signature]*  
**AMAR R. PATEL**  
NOTARY  
SURAT CITY (GUJ.)  
GOVT. OF INDIA

Register Serial No. 137  
Date: 16 JAN 2025  
My Commission Expires  
on 30th January 2027



**From:** delhi@mvkini.com  
**Sent:** 20 January 2025 16:26  
**To:** 'shrestha.abhimanue@gmail.com'  
**Cc:** 'pushkal@mvkini.com'; 'Aravindakshan V. Nair'; 'litigation@mvkini.com'  
**Subject:** Additional Reply in Appeal No. 44 of 2016, Gujarat Khedut Samaj & ors. V/s. (1) The Secretary, MoEF&C & 3 others, before the Hon'ble National Green Tribunal, Pune Bench.  
**Attachments:** ADDITIONAL REPLY R-2 MORTH.pdf

Dear Sir/Ma'am,

We are the counsel for the Respondent No.2 – Ministry of Road, Transport and Highways (MoRTH) and Servicing the Additional Reply in the subject matter.

Copy of said Reply is attached herewith.

Kindly treat the present email as advanced service to you for the captioned matter.

Kindly confirm receipt of this email.

This is for your information and record.

Best Regards

Shrinkhla Tiwari,  
Associate



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Kini House | 6/39 Jangpura-B | New Delhi 110 014  
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