

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
EASTERN ZONE BENCH, KOLKATA  
IN  
OA. No.151/2022**

**IN THE MATTER OF:**

SubhasDatta

Applicant

-Vs-

State of West Bengal and Others.

Respondents

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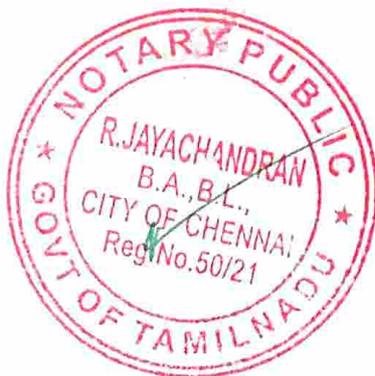
**Filed by:-**

*Ashok Prasad*

ASHOK PRASAD, ADVOCATE  
COUNSEL FOR NCSCM

Dated: 16/02/ 2023

Place: Chennai/Kolkata



BEFORE THE NATIONAL GREEN TRIBUNAL, EASTERN ZONE, KOLKATA

ORIGINAL APPLICATION No. 151 of 2022 (EZ)

IN THE MATTER OF:

SubhasDatta

Applicant

-Vs-

State of West Bengal and Others.

Respondents

COUNTER AFFIDAVIT ON BEHALF OFM/s. NATIONAL CENTRE FOR SUSTAINABLE COASTAL MANAGEMENT (RESPONDENT No. 13)

I, Dr. Purvaja Ramachandran, Daughter of Mr. G V Ramachandran, aged about 54 years, currently working as Director in the National Centre for Sustainable Coastal Management (NCSCM), Ministry of Environment, Forest and Climate Change, having office at Anna University Campus Chennai 600 025 and residing at No. 49/20, Hindi Prachara Sabha Street T Nagar, Chennai -600 017 do hereby solemnly affirm and state as follows:

1. I am working as Director in the National Centre for Sustainable Coastal Management (NCSCM), Ministry of Environment, Forest and Climate Change, having office at Anna University Campus, Chennai respondent and I am conversant with the facts of the case as borne out from the records. I am swearing



*Purvaja*

Director  
National Centre for Sustainable Coastal Management  
Ministry of Environment, Forest and Climate Change  
Government of India, Anna University Campus  
Chennai - 600 025, India

this affidavit on behalf of the National Centre for Sustainable Coastal Management (NCSCM), Respondent No. 13, as I am duly authorized to do so.

2. It is submitted at the very outset that the Respondent No. 13 denies each averment and/or submission made in the application which is contrary to and inconsistent with the averments made and facts stated in the present reply. It is submitted that the nothing stated in the application may be deemed to have been admitted by the Respondent No. 13 unless and until the same is expressly admitted in the present reply.

3. The National Centre for Sustainable Coastal management (NCSCM) (Respondent No. 13), Ministry of Environment, Forest & Climate Change (MoEF&CC), Anna University Campus, is an authorized agency authorized by the Ministry of Environment, Forest & Climate Change (MoEF&CC), Govt. of India, for demarcation of High Tide Line (HTL), Low Tide Line (LTL), Ecologically Sensitive Areas (ESAs), preparation of the Coastal Zone Management Plans (CZMPs) and Coastal Regulation Zone (CRZ) maps and reports.

4. The averments made in the Application and the prayers of the Applicant in the present case regarding alleged illegal constructions on the seashore/sea-beach of Digha, CRZ violations, causing massive deforestation in Digha beach/shore by destroying Casurina jungle, not taking appropriate steps as per the Municipal Solid Wastes (Management and Handling ) Rules 2016, indulging/allowing to

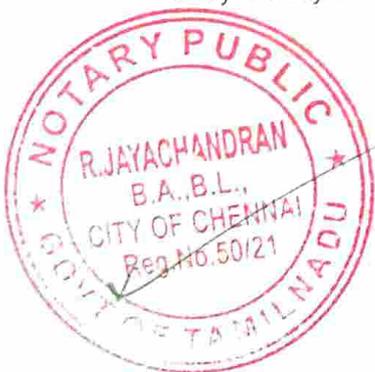


*K. Purraj*  
Director

National Centre for Sustainable Coastal Management  
Ministry of Environment, Forest and Climate Change  
Government of India, Anna University Campus  
Chennai - 600 025, India

extract underground sweet water illegally by violating the provisions of law, rampant conversions of sand dunes into concrete constructions in Digha, failing to take steps in Rain Water Harvesting, not prohibiting such activities which are aggravating or culminating Pollution in and around sea-beach of Digha, not taking immediate measures against discharge of untreated sewage and drainage water into the sea, not taking steps for pollution free atmosphere in Digha, failing to take steps as envisaged under the Water (Prevention and control of pollution) Act 1974, not taking any step as would have been taken under the Air (Prevention and control of pollution) Act 1981, not taking all measures under the Environment (Protection) Act, 1986, failing to make Digha as a plastic free zone and allowing the rampant use of such non-degradable items at the coastal areas etc are not related to NCSCM (Respondent No. 13). The same are dealt by the Respondents Nos. 1 to 6 and other concerned authorities / Respondents.

5. The Answering Respondent seeks liberty and reserves the right to file a detailed para-wise affidavit, as and when required and if directed by this Hon'ble Tribunal. The Answering Respondent denies each and every allegation contained in the Application, except as specifically admitted herein.
6. The answering respondent reserves the right to file the additional Information before the Hon'ble Tribunal till Pendente - lite.
7. In view of the aforementioned facts and circumstances, this Hon'ble Tribunal may kindly be pleased to pass appropriate order(s).



*R. Purraj*

**DEPONENT**

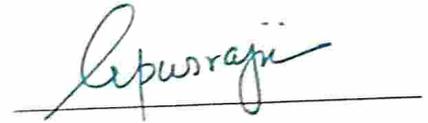
Director

National Centre for Sustainable Coastal Management  
Ministry of Environment, Forest and Climate Change  
Government of India, Anna University Campus  
Chennai - 600 025, India

## VERIFICATION

I, Dr. Purvaja Ramachandran, the above named deponent do hereby verify that the contents of the above affidavit are true and correct on the basis of official record maintained by the Respondent No. 13 in daily course of its business, no part of it is false and nothing material has been concealed there from.

Signed and verified on this 10<sup>th</sup> Day of February, 2023 at Chennai.

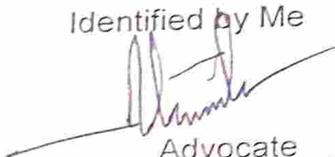


DEPONENT

Director

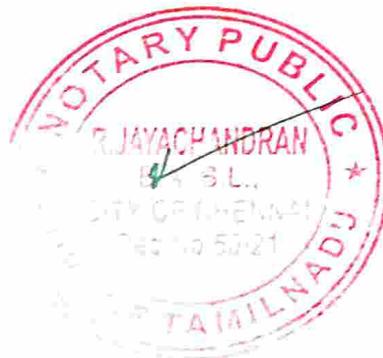
National Centre for Sustainable Coastal Management  
Ministry of Environment, Forest and Climate Change  
Government of India, Anna University Campus  
Chennai - 600 025, India

Identified by Me

  
Advocate

MS. 13A2/2013

10-02-2023


  
10.2.23

**R. JAYACHANDRAN**  
ADVOCATE & NOTARY  
Saidapet Bar Association  
Saidpet Court, Chennai - 15