

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

**MISC. APPLICATION NO. : 01/2024**

**APPLICANT : MADHURA RAJESH TAWDE**

**VS**

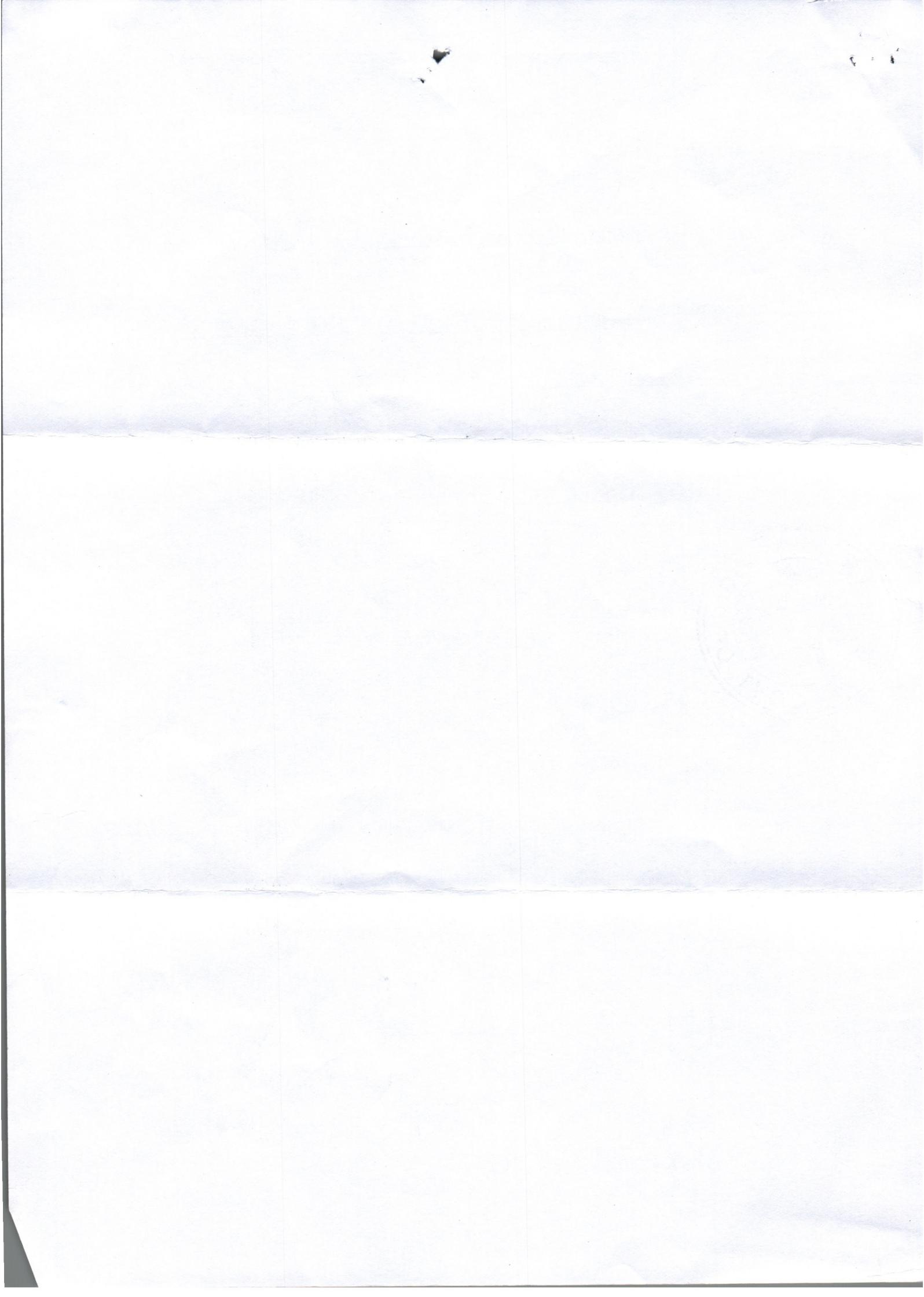
**RESPONDENTS : STATE OF MAHARASHTRA &  
ORS**



**AFFIDAVIT ON BEHALF OF THE  
RESPONDENT NO.4**

The Respondent No.4 in the instant matter most humbly states;

1. That Respondent No. 9, namely Hormoz Salt Works, was originally granted a license on 10th February 1914 under the Bombay Salt Act, 1860. Thereafter, upon the enactment of the Central Excise & Salt Act, 1944 on 28th February 1944, the said licence continued to remain valid and was deemed to have been granted under the provisions of the 1944 Act.



2. In general, at any Salt Works, internal earthen roads are constructed for transporting the manufactured salt from the salt pans to elevated stacking areas within the premises, so that the salt remains protected and unaffected during the monsoon season. The harvested salt is heaped on designated platforms, and the stacking grounds are accessed through internal connecting roads. These roads require periodic maintenance by the salt manufacturers to ensure the safe and uninterrupted movement of salt. Such routine maintenance of internal roads is a standard practice and does not ordinarily require specific permission from the Salt Department. The road in question is one such internal road which may have existed since the inception of the Salt Works.

3. During the monsoon season, salt heaps are generally sold, and therefore the internal roads must be maintained to prevent any untoward



incidents such as vehicle slipping or sinking while transporting salt from the salt works. It appears that, during the course of repairing these internal roads, the manufacturer may have used C&D waste to keep the roads intact.

4. That if the salt manufacturers have used construction and demolition (C&D) waste or any unapproved material for maintenance or strengthening of these internal roads, the same has been done without any permission or approval from the Salt Department. No such permission has been granted by Respondent No. 4 to respondent No. 9 for the use of C&D waste within the salt works area. In fact, Respondent No. 4 was unaware of such activity.

5. That Respondent No. 4 is therefore not responsible for the deposition, management, or removal of any C&D waste or debris brought in or used by the salt manufacturer. It is solely the



responsibility of the salt manufacturers to remove such C&D waste and restore the area in accordance with applicable laws and environmental norms.

HENCE THIS AFIDAVIT

MUMBAI

DATED:



FOR THE RESPONDENT NO.4





V E R I F I C A T I O N

I, Ashwani Kumar, aged about 35 years, Deputy Salt Commissioner, presently working as an Under Secretary, DPIIT, also holding additional charge as Deputy Salt Commissioner and having my office at Udyog Bhavan, New Delhi- 110011, do hereby verify that the contents of the above Affidavit herewith are true and correct to the best of my knowledge, no part of it is false and nothing material has been concealed therefrom.

Solemnly affirmed at Mumbai )

On this day of 11 DEC 2025, 2025 )

Identified by me

Advocate for the Respondent No. 4

*(Signature)*  
DEPONENT

**BEFORE ME**  
*Bhange*

Adv. S. N. Dhangre  
Notary Govt. of India  
Regd. No. 15379, MUMBAI (MS).  
407-405, 4th Floor, Davar House,  
197/199, Near Central Camera Bldg,  
N. Road, Fort, Mumbai - 400001.  
Mob.: 8788385738

**NOTED & REGISTERED**  
Page No. 117 Sr. No. 973  
Date 11 DEC 2025



11/18/20

Diary

11/18/20