

BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE
ORIGINAL APPLICATION NO. 80 OF 2024 (WZ)

IN THE MATTER OF:-

Scheduled Tribe Association & Ors.

... Applicants

Versus

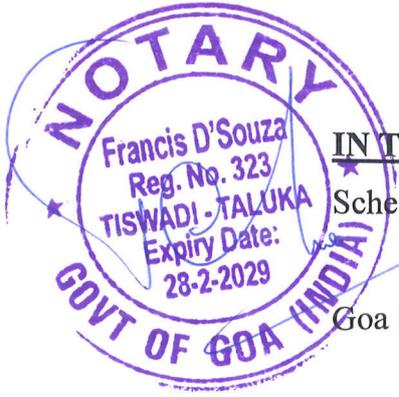
Goa State Pollution Control Board & Ors.

... Respondents

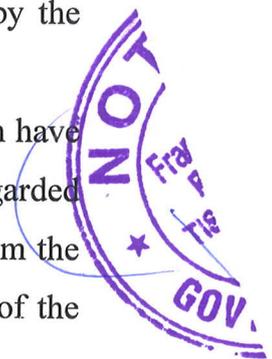
**AFFIDAVIT ON BEHALF OF RESPONDENT NO.4 IN
RESPONSE TO THE DOCUMENTS SUBMITTED BY
THE APPLICANTS ON 31.07.2025**

I, Pravin Satardekar, S/O Late Rajendra Satardekar, C/o, Goa Carbon Limited, Dempo House, Campal, Panaji – Goa 403 001, the Authorized Representative of Respondent No. 4, do hereby solemnly affirm and state as follows:

1. That I am duly authorized by the Respondent No. 4 Company, i.e., M/s Goa Carbon Limited in the above manner and as such am fully conversant with the facts and circumstances of the case based on the records maintained by the Respondent No. 4 Company and am, therefore competent to affirm this Affidavit.
2. That this Hon'ble Tribunal is presently seized of the above-mentioned Original Application No. 80/2024 which raises completely unsubstantiated and bald allegations in relation to air pollution being allegedly caused by the Respondent No. 4 in violation of the Consent to Operate granted to it.
3. That on 31.07.2025, the Applicants filed two sets of documents before this Hon'ble Tribunal without any supporting affidavit or any pleadings in support of the same.
4. That this Hon'ble Tribunal vide order dated 21.11.2025 recorded the Respondent No. 4's objections to the two sets of documents filed by the Applicant and granted an opportunity to place on record its formal objections to the same.



5. At the outset it is most respectfully submitted that the documents have been filed by the Applicant as an afterthought to the Sur-rejoinder filed by the Respondent No. 4 on 24.07.2025. It is most respectfully contended that the filing of the aforementioned documents is in violation of the principles enshrined in Order VII Rule 14 of the Code of Civil Procedure inasmuch as the same are being filed at a belated stage without the prior leave of the Hon'ble Tribunal, and thus the same ought not to be relied upon to cause prejudice to the Answering Respondent.
6. That without prejudice to the argument that the documents filed without prior leave of this Hon'ble Tribunal ought not to be considered, the Respondent No. 4 seeks leave of this Hon'ble Tribunal to object to the documents filed on 31.07.2025 by the Applicant.
7. It is most respectfully submitted that these documents which have been placed in the absence of any pleadings ought to be disregarded as the same is just a mere attempt to divert the attention from the compliance done by the Answering Respondent in respect of the Joint Inspection Committee Report dated 28.05.2024.
8. That it is respectfully submitted that in terms of the order dated 24.04.2024, a Joint Inspection Committee had been constituted which had furnished its report dated 28.05.2024. The Respondent No. 4 has fully complied with all recommendations of the aforesaid report dated 28.05.2024, as is evident from its Compliance Affidavit dated 18.09.2024 filed before this Hon'ble Tribunal. The Respondent No. 4 therefore prays that the present Original Application be closed taking on record the said Compliance Affidavit dated 18.09.2024 filed by the Respondent No. 4 in compliance with the Joint Inspection Committee Report dated 28.05.2024.



9. The Appellant through the list of additional documents, (which are filed without prior leave of this Hon'ble Tribunal and without supporting application or pleadings) is attempting to mislead this Hon'ble Tribunal by portraying that the Respondent No. 4's Consent to Operate already stands expired. This is completely incorrect and disputed and denied. As already stated in its various pleadings, the Respondent No. 4 has always carried out its operations in accordance with law. The Respondent No. 4 currently has a valid CTO which was granted on 24.07.2025, which is currently valid till 31.03.2029.
10. The Respondent No. 4 accordingly prays that the present Original Application be dismissed.
11. That the facts state above are true and correct to the best of my knowledge.

[Signature]
 DEPONENT

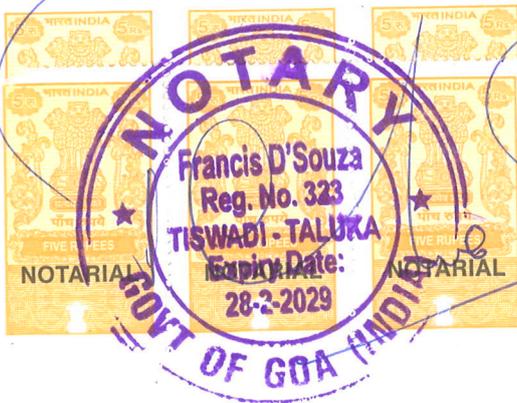
VERIFICATION

I, the deponent above named, do hereby verify the contents of the above affidavit as being true and correct. I state that nothing material has been concealed therefrom.

Verified at Panaji Goa on this, the 7th day of January 2026.



[Signature]
 DEPONENT



BEFORE ME

SHRI FRANCIS D'SOUZA
 NOTARY FOR TISWADI TALUKA
 STATE OF GOA (INDIA)

hereby attest the above signature/initials of Shri/Smt./Miss. Pravara Satadeker The Dependent above named

Who has been identified before me by

.....who is personally known to me registered under No 57/2026

Old: 7-01-2026

ADV. FRANCIS D'SOUZA
 NOTARY
 KAMAKSHI PRASAD BLDG
 THIRD FLOOR, FLAT NO. 304
 PATTO, PANAJI
 TISWADI GOA - 403 001

[Signature]