



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
ORIGINAL APPLICATION NO. 02/2023/EZ

In The Matter of:
Kartik Majhi

... Applicant

Versus

West Bengal Mineral Development &
Trading Corporation Limited & Ors.

... Respondents

AFFIDAVIT-IN-OPPOSITION ON BEHALF OF THE ADDITIONAL DISTRICT
MAGISTRATE & DISTRICT LAND & LAND REFORMS OFFICER, DISTRICT
BANKURA RESPONDENT NUMBER 6.

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Filed by

Sibojyoti Chakrabarti

SIBOJYOTI CHAKRABARTI

Advocate

For The State of West Bengal

Email: subho.advocate@gmail.com

(M): 9007035534



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

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BANKURA, RESPONDENT NUMBER 6.

I, Priyadarshini S, D/o Srinivasan, aged about 34 years, by faith- Hindu, by
occupation –service and presently posted as the Additional District Magistrate
& District Land & Land Reforms Officer, District: Bankura, having office at
Machantala, Bankura, do hereby solemnly affirm and declare as follows:-

1. That, I am presently posted as Additional District Magistrate & District
Land & Land Reforms Officer, District: Bankura, having office at
Bankura and I am well acquainted with the facts and circumstances of
the case and as such I am competent to swear, sign and affirm this
affidavit.

2. That this affidavit-in-opposition is, filed in compliance to the solemn
Orders dated 10.01.2023 & 13.02.2023, passed by this Hon'ble Tribunal.



3. That at the outset it is submitted that the present original application has been filed on the basis of incorrect facts which have not been verified.
4. That with regard to the statements made in paragraph 5(a & b) this deponent does not comment on the same, those been matters of facts and record.
5. That with regard to the statements made in paragraph 5(c) of the original application it is stated that every thing is denied and dispute by this deponent save and except which are matter of records.
6. That with regard to the statements made in paragraph 5(d) of the original application this deponent does not comment on the same ,those been matter of facts and records.
7. That with regard to the statements made in paragraphs 5 (e &f) of the original application it is stated that the claim of the applicant as to violation of terms of District Survey Report and citing Old District Survey Report of 2021 downloaded from Bankura District portal to substantiate a point is deliberate with intent to misled the Hon'ble Tribunal as new District Survey report, 2022 has been published on Bankura District portal on 28.10.2022 as easily available.
8. That with regard to the statements made in paragraphs 5 (L) of the original application it is stated that the real facts as per available records are that on 11th March,2022 the West Bengal Mineral Development as Trading Corporation Ltd issued a memo being no MDTC/SAND/002(1)/512/(3) with ref letter dated MDTC/Adm/197/117 dated 09.03.2023 to this end from which it transpired vide RPF No. MDTC/SAND/002/030 dated 0312.2021 an agreement has been signed with M/S Northernexpress Infradevelopers Private Limited for carrying out dredging and desilting operation to maintain the natural flow and improve river health from Damodar River among others and direction was issued to District Land and Land Reforms Officers (DL&LRO) to issue permit in the online system for payment of statutory fees and generation of E-Challan as per the requisition of the agency and terms of agreement. Subsequently e-Challan has been issued in favour of Northernexpress Infradevelopers Private Limited.



With regard to the point of the apathetic interest of the District Administration it is further humbly stated that District Administration repeatedly communicated with the Block level along with concerned departments to take appropriate measure for redressal of grievance. So it is reiterated that District Administration never ever shirk from their duties rather they have taken remedial measures pro actively for the sake of people in one hand and environment .

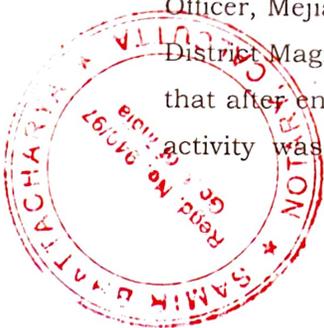
Photocopies of the letter dated 11.03.2022 and letter of Intent dated 02.02.2022 are collectively annexed herewith and marked with the letter **'R-1'**.

9. That with regard to the statements made in paragraphs 5(J) & (H) of the original application the petitioner does not comment on the same.
10. That with regard to the statements made in paragraph 5 (M) of the original application it is matter of record.
11. That with regard to the statements made in paragraph 5(O) of the original application vide notification no S.O 1224(E) issued by Ministry Of Environment, Forest and Climate Change as mentioned in Appendix-IX on point no 07 that dredging and de-silting exempted from requiring Environment Clearance .

Photocopies of the said Notification annexed hereto marked as Annexure **'R2'**

12. It is also stated that with regard to the statements made in paragraph 5 (n) of the original application every thing is denied and disputed which are matter of facts and records.

However an enquiry was held by the Block Land and Land Reforms Officer, Mejia Block as per letter dated 14.03.2023, issued by the office of the Additional District Magistrate (LR) & District Land & Land Reforms Officer, Bankura and subsequently the Block Land and Land Reforms Officer, Mejia Block vide letter dated 16.03.2023 informed the Additional District Magistrate (LR) & District Land & Land Reforms Officer, Bankura that after enquiry and visiting the bank of river Damodar no sign of any activity was found at the mouzas' as alleged in the original application.



A

Photocopies of the letters dated 14.03.2023 and 16.03.2023 are collectively annexed herewith and marked with the letter 'R-3'.

13. That with regard to the statements made in paragraph 5(p) (q) (r) of the original application this deponent does not comment on the same.

14. That it is therefore respectfully prayed that Hon'ble Tribunal may pass such order/orders as it deems fit and proper in the interest of justice.

Identified by me

Sibojyoti Chakrabarti
Advocate *10/04/2023*

[Signature]
Deponent
**D.L. & L.R.O.
BANKURA**

For The State of West Bengal
Enrolment No. WB/1730/2010



VERIFICATION

10 / Verified at Kolkata by the deponent above named on this the *10th* day of *April* March, 2023 and say that the contents of this affidavit made in paragraph nos. 1 is true to my knowledge and those made in paragraphs no. 2 to, are true to my information derived from records and rest are my respectful submission before this Hon'ble Tribunal.

Identified by me

Sibojyoti Chakrabarti
Advocate *10/04/2023*

[Signature]
Deponent
**D.L. & L.R.O.
BANKURA**

For The State of West Bengal
Enrolment No. WB/1730/2010

Solemnly Affirmed and
Declared before me U/S 139
CFC / U/ S297 (C) CRPC

Notary
Samir Bhattacharya
Notary, Govt. of India
Regd. No. 940/97
City Civil Court, Calcutta

10 APR 2023



**WEST BENGAL MINERAL DEVELOPMENT &
TRADING CORPORATION LTD.**
(A Govt. of West Bengal Undertaking)

CIN : U14219WB1973SGC028707
Regd. Office : WBIDC Building, 3rd Floor
DJ-10, Sector-II, Salt Lake, Kolkata-700091
Phone : 033-2359-0073
Email : wbmtdcltd@gmail.com
Website : mdtdl.wb.gov.in

Date : 11th March, 2022

Memo No. : MDTC/SAND/002(I)/512/(3)

To,

1. The Secretary, Irrigation & Waterways Department
2. The District Magistrate, Paschim Bardhaman
3. The District Magistrate, Bankura

Sub : Agreement with M/S. Northernexpress Infradevelopers Private Limited for Dredging / Desilting operations from Damodar River at Tirat RFP No. MDTC/SAND/002/030 dated 03.12.2021.

Ref : Our letter dated MDTC/Adm/197/117 dt. 09.03.2022.

Madam / Sir,

This is to bring to your kind attention that agreement has been signed with M/S. Northernexpress Infradevelopers Private Limited for carrying out Dredging / Desilting operations from Damodar River at Tirat RFP No. MDTC/SAND/002/030 dated 03.12.2021 (copy enclosed).

You are requested to kindly nominate one nodal officer from the end of Irrigation & Waterways Department for periodical technical supervision of the Dredging/Desilting works and intimate the contact details to the undersigned at the earliest.

The details of M/S. Northernexpress Infradevelopers Private Limited have been entered into the centralized webs portal for issuing of permit and generation of E-challan as is being done under permission holder module District Magistrates are requested to issue directions to the District Land and Land Reforms Officers (DL&LRO) to issue permit in the online system for payment of statutory fees and generation of E-challan as per the requisition of the agency and terms of agreement.

Shri Ranajit Pal, Dy. General Manager (Project), Phone: 09800150421, has been appointed as the local site-in-charge from the end of WBMdTCL. Shri Raghvendra Dubey, Project Co-ordinator, Phone : 7004578731 has been nominated as the nodal officer from the end of M/S. Northernexpress Infradevelopers Private Limited.

Your cooperation in this regard is highly solicited to make the project a success.

Thanking You.


Chairman & Managing Director, WBMdTCL

Date : 11th March, 2022

Memo No. : MDTC/SAND/002(I)/512/(3)/1(9)

Copy forwarded for information and necessary action to :

1. The Senior Special Secretary (Mines), Govt. of West Bengal, Industry, Commerce & Enterprises Department.
2. The Commissioner of Police, Asansol-Durgapur Police Commissionerate.
3. The Superintendent of Police, Bankura.
4. The District Land & Land Reforms Officer, Paschim Bardhaman & Bankura.
5. PS to the Principal Secretary, Irrigation & Waterways Department to place it before the authority.
6. PS to the Secretary, Industry, Commerce & Enterprises Department to place it before the authority.
7. Shri Raghvendra Dubey, Project Co-ordinator, M/S. Northernexpress Infradevelopers Private Limited.
8. Shri Ranajit Pal, Dy. General Manager (Project) & OIC Durgapur, WBMdTCL.


Chairman & Managing Director, WBMdTCL



**WEST BENGAL MINERAL DEVELOPMENT &
TRADING CORPORATION LTD.**

(A Govt. of West Bengal Undertaking)

CIN : U14219WB1973SGC028707
Regd. Office : WBIIDC Building,
3rd Floor, DJ-10, DJ Block, Sector-II,
Salt Lake, Kolkata-700 091

Ph. : 033-2359-0073 Email : wbmtdctd@gmail.com

MDTC/SAND/002(1)/184(3)

Date : 2nd February, 2022

To,

1. The Secretary to the Government of West Bengal,
Irrigation and Waterways Department,
Salt Lake City, Kolkata – 700091.
2. The District Magistrate, Paschim Bardhaman.
3. The District Magistrate, Bankura.

Sub: Letter of Intent (LOI) issued in favour of M/s. Northernexpress
Infradevelopers Private Limited - regarding

Sir/Madam,

This is for your kind information that M/s. Northernexpress Infradevelopers Private Limited has been awarded the Letter of Intent after Selection as Contractor for Desilting/Dredging/Removal of River Bed materials from Damodar River at Tirat vide RFP no: MDTC/SAND/002/030 dated: 03.12.2021 by the Competent Authority of this Corporation.

You are requested to kindly extend all co-operation in this regard.

Thanking you.


Executive Director

MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE**NOTIFICATION**

New Delhi, the 28th March, 2020

S.O. 1224(E).—WHEREAS, *vide* the Mineral Laws (Amendment) Act, 2020 (2 of 2020), the Mines and Minerals (Development and Regulation) Act, 1957 (67 of 1957) (hereinafter referred to as MMDR Act) has been amended with effect from the 10th day of January, 2020 and, *inter alia*, new section 8B relating to the provisions for transfer of statutory clearances has been inserted;

AND WHEREAS, sub-section (2) of section 8B of the MMDR Act provides that notwithstanding anything contained in this Act or any other law for the time being in force, the successful bidder of mining leases expiring under the provisions of sub-sections (5) and (6) of section 8A and selected through auction as per the procedure provided under this Act and the rules made thereunder, shall be deemed to have acquired all valid rights, approvals, clearances, licences and the like vested with the previous lessee for a period of two years;

AND WHEREAS, sub-section (3) of section 8B of the MMDR Act provides that notwithstanding anything contained in any other law for the time being in force, it shall be lawful for the new lessee to continue mining operations on the land, in which mining operations were being carried out by the previous lessee, for a period of two years from the date of commencement of the new lease;

AND WHEREAS, in pursuance of the aforesaid amendment to the MMDR Act, the Central Government deems it necessary to align the relevant provisions of the notification of the Government of India in the erstwhile Ministry of Environment and Forests number S.O. 1533 (E), dated the 14th September, 2006 (hereinafter referred to as the EIA Notification, 2006);

AND WHEREAS, the Ministry of Environment, Forest and Climate Change is in the receipt of representations for waiver of requirement of prior environmental clearance for borrowing of ordinary earth for roads; and manual extraction of lime shells (dead shell), shrines, etc., within inter tidal zone by the traditional community;

Now, therefore, in exercise of the powers conferred by sub-section (1) and clause (v) of sub-section (2) of section 3 of the Environment (Protection) Act, 1986 (29 of 1986), read with sub-rule (4) of rule 5 of the Environment (Protection) Rules, 1986, the Central Government, after having dispensed with the requirement of notice under clause (a) of sub-rule (3) of the rule 5 of the said rules, in public interest, and in supersession of the notification number S.O. 4307(E), dated the 29th November, 2019, hereby makes the following further amendments in the EIA Notification, 2006, namely:-

In the said notification,-

(i) in paragraph 11, after sub-paragraph (2), the following sub-paragraph shall be inserted, namely:-

“(3) The successful bidder of the mining leases, expiring under the provisions of sub-sections (5) and (6) of section 8A of the Mines and Minerals (Development and Regulation) Act, 1957 (67 of 1957) and selected through auction as per the procedure provided under that Act and the rules made thereunder, shall be deemed to have acquired valid prior environmental clearance vested with the previous lessee for a period of two years, from the date of commencement of new lease and it shall be lawful for the new lessee to continue mining operations as per the same terms and conditions of environmental clearance granted to the previous lessee on the said lease area for a period of two years from the date of commencement of new lease or till the new lessee obtains a fresh environmental clearance with the terms and conditions mentioned therein, whichever is earlier:

Provided that the successful bidder shall apply and obtain prior environmental clearance from the regulatory authority within a period of two years from the date of grant of new lease.”;

(ii) in the Schedule, against the item 1(a), in the column (5), after clause (2) of the Note, the following clause shall be inserted, namely:-

“(3) The evacuation or removal and transportation of already mined out material lying within the mining leases expiring under the provisions of the Mines and Minerals (Development and Regulation) Act, 1957 (67 of 1957), by the previous lessee, after the expiry of the said lease, shall not form the part of the mining capacity so permitted to the successful bidder, selected through auction as per the procedure provided under that Act and the rules made thereunder.”;

(iii) for Appendix-IX, the following Appendix shall be substituted, namely:-

“APPENDIX-IX

EXEMPTION OF CERTAIN CASES FROM REQUIREMENT OF ENVIRONMENTAL CLEARANCE

The following cases shall not require Prior Environmental Clearance, namely:-

1. Extraction of ordinary clay or sand by manual mining, by the Kumhars (Potter) to prepare earthen pots, lamp, toys, etc. as per their customs.
2. Extraction of ordinary clay or sand by manual mining, by earthen tile makers who prepare earthen tiles.
3. Removal of sand deposits on agricultural field after flood by farmers.
4. Customary extraction of sand and ordinary earth from sources situated in Gram Panchayat for personal use or community work in village.
5. Community works, like, de-silting of village ponds or tanks, construction of village roads, ponds or bunds undertaken in Mahatma Gandhi National Rural Employment and Guarantee Schemes, other Government sponsored schemes and community efforts.
6. Extraction or sourcing or borrowing of ordinary earth for the linear projects such as roads, pipelines, etc.
7. Dredging and de-silting of dams, reservoirs, weirs, barrages, river and canals for the purpose of their maintenance, upkeep and disaster management.
8. Traditional occupational work of sand by Vanjara and Oads in Gujarat vide notification number GU/90(16)/MCR-2189(68)/5-CHH, dated the 14th February, 1990 of the Government of Gujarat.
9. Manual extraction of lime shells (dead shell), shrines, etc., within inter tidal zone by the traditional community.
10. Digging of wells for irrigation or drinking water purpose.
11. Digging of foundation for buildings, not requiring prior environmental clearance, as the case may be.
12. Excavation of ordinary earth or clay for plugging of any breach caused in canal, nallah, drain, water body, etc., to deal with any disaster or flood like situation upon orders of the District Collector or District Magistrate or any other Competent Authority.
13. Activities declared by the State Government under legislations or rules as non-mining activity.”

[F. No. Z-11013/47/2018-IA.II (M)]

GEETA MENON, Jt. Secy.

Note: The principal notification was published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (ii) vide number S.O. 1533 (E), dated the 14th September, 2006 and subsequently amended vide the following numbers:-

1. S.O. 1949 (E), dated the 13th November, 2006;
2. S.O. 1737 (E), dated the 11th October, 2007;
3. S.O. 3067 (E), dated the 1st December, 2009;
4. S.O. 695 (E), dated the 4th April, 2011;
5. S.O. 156 (E), dated the 25th January, 2012;
6. S.O. 2896 (E), dated the 13th December, 2012;
7. S.O. 674 (E), dated the 13th March, 2013;
8. S.O. 2204 (E), dated the 19th July, 2013;
9. S.O. 2555 (E), dated the 21st August, 2013;
10. S.O. 2559 (E), dated the 22nd August, 2013;
11. S.O. 2731 (E), dated the 9th September, 2013;
12. S.O. 562 (E), dated the 26th February, 2014;
13. S.O. 637 (E), dated the 28th February, 2014;



Government of West Bengal
Office of the District Land & Land Reforms Officer
Bankura

Memo No: 342/MM/LR/23

Dated: 14/03/2023

To
The Block Land & Land Reforms Officer,
Mejhia, Bankura.

Sub: Enquiry report in connection with sand extraction by Northernexpress Infradevelopers Pvt. Ltd from the sand ghats situated at six (06) mouzas namely Balarampur, Purunia, Dighalgram, Japamali, Banjora & Jalanpur under P.S - Mejhia, District - Bankura.

Ref: Order dated 13/02/2023 of Hon'ble National Green Tribunal, Eastern Zone Bench, Kolkata in connection with OA 02/2023/EZ (in the matter of Kartik Majhi -vs- West Bengal Mineral Development & Trading Corporation Ltd. & Ors.).

In reference to the above you are requested to conduct an enquiry regarding extraction of sand caused by Northernexpress Infradevelopers Pvt. Ltd from the sand ghats situated at six (06) mouzas namely Balarampur, Purunia, Dighalgram, Japamali, Banjora & Jalanpur under P.S - Mejhia, District - Bankura and submit a detailed report in this regard by 17/03/2023 positively.

This is extremely urgent in compliance of order of Hon'ble National Green Tribunal, Eastern Zone Bench, Kolkata in connection with OA 02/2023/EZ.

Shob
16.03.2023
Additional District Magistrate &
District Land & Land Reforms Officer
Bankura

Memo No: 342/1(1)/MM/LR/23

Dated: 14/03/2023

Copy forwarded to:-
C.A. to D.M., for placing it before The District Magistrate, Bankura.

Shob
16.03.2023
Additional District Magistrate &
District Land & Land Reforms Officer
Bankura



Government of West Bengal
Office of the Block Land & Land Reforms Officer
Mejhia, Bankura

Tel. No. - 03241-250503

Email ID:- bllromejhia@gmail.com

Memo No. 126 /LR /Mejhia/23

Date: 16 /03/2023

To
The Additional District Magistrate
&
District Land & Land Reforms Officer
Bankura

Sub: Enquiry report in respect of complaint regarding illegal sand extraction by Northernexpress Infradevelopers Pvt. Ltd from the Sand Ghat situated at Balarampur, Purunia, Dighalgram, Japamali, Banjora & Jalanpur mouza under P.S- Mejhia.

Ref: Your good office memo no: 342/MM/LR/23, dated: 14/03/2023.

Madam,

In respect to the above noted subject and reference, the undersigned alongwith other officials of this office enquired into the matter and visited the bank of Damodar river at above stated mouzas, but no sign of such illegal extraction of sand found there at above stated mouzas by any Northernexpress Infradevelopers Pvt. Ltd.or any others.

In this regard this is to inform that at Bhara mouza one Northernexpress Infradevelopers Pvt. Ltd has been leased out for dredging / desilting and transportation work.

This is for favour of your kind information and taking necessary action.


Block Land & Land Reforms Officer
Mejhia, Bankura.

VAKALATNAMA

BEFORE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH AT KOLKATA

ORIGINAL APPLICATION NO. 02/2023/EZ

KARTICK MAJHI

Appellant /
Petitioner / Plaintiff

--VERSUS--

WEST BENGAL MINERAL DEVELOPMENT &
TRADING CORPORATION LIMITED & ORS.

Respondent /
Opposite Party / Defendant

Vakalatnama on behalf of STATE OF WEST BENGAL

Know all men by these presents that by the Vakalatnama I/We appoint the Advocates noted below or any one of them, my/our lawful Advocate/Advocates for filing Memorandum of Appeal or Petition for entering appearance in the above matter for appearing in, conducting and arguing in the same for depositing or withdrawing any money in connection therewith, for moving the Court in any matter connected therewith, for preparing the paper-book in the case and for putting the papers, petition, etc. on my/our behalf for filing or taking back fresh suits etc. for signing and filing petitions of compromise in connections with the said matter and for taking copies of paper from the record and I/We further say that any act done by my/our said Advocate or Advocates or by any of them after accepting this Vakalatnama, shall be considered as my/our own true and lawful act.

And I/We further hereby agree and undertake to pay the said Advocate/Advocates his or their fees as settled all other sums that may be necessary to carry out his requisitions of the Court and otherwise to enable the Advocate/Advocates to conduct the case properly. Failing which the Advocate/Advocates after notice to me/us will be at liberty to withdraw from the further conduct of the case.

IN WITNESS WHEREOF I/We sign and execute this Vakalatnama, on this 17th day
of February, 2023.

NAME OF ADVOCATES

Sibgyoti Chakrabarti
Advocate
For The State of WB

Enrollment No: WB/1730/2010

Email: subho.advocate@
gmail.com

Ph: 900703 5534

Ananda Kumar Tiwari
PLAINTIFF(S)/ APPELLANT(S)/ RESPONDENT(S)
DEFENDANT(S)/ RESPONDENT(S)/ OPPOSITE PARTY(S)

Legal Remembrancer (I/c)
West Bengal

Government of West Bengal
Office of the Legal Remembrancer, W.B.
2 & 3, K.S. Roy Road, Kolkata-700001
Email : lrwb2013@gmail.com

Memo No. 868 -A/N.G.T.-03/23

Dated: Kolkata, 16.02.2023

From: The Office of the Legal Remembrancer, West Bengal.

To: Sri Sibojyoti Chakrabarti, Id. Advocate,
109, Sarat Chatterjee Road, P.O.-Lake Town
Borat, Kolkata-700 089. (Mob: 9007035534)

Sub: O.A.No.02/2023/EZ in the matter
KARTICK MAJHI

-Vs-

WEST BENGAL MINERAL DEVELOPMENT AND
TRADING CORPORATION LIMITED AND ORS.

Sir,

I am to inform you that you have been engaged to plead in the aforesaid matter on behalf of the State of West Bengal before the Hon'ble National Green Tribunal, Principal Bench at New Delhi.

'Vakalatnama' duly signed is enclosed herewith for this purpose.

You are requested to send all the communications, copy of Court's orders relating to the matter directly to the concerned department with intimation to this office.

Your bills in the matter will be paid from this office.

Yours faithfully,

for Legal Remembrancer,
West Bengal

Encls:- As above

Memo No. 868 /1(4)-A /N.G.T.-03/23

Dated: Kolkata, 16.02.2023

Copy forwarded for information and taking necessary action to:-

1. The Principal Secretary, Environment Department, Nabanna, Prani Sampad Bhavan, 5th floor, LB-2, Sector-III, Salt Lake, Kolkata-700106
2. The Principal Chief Conservator of Forests & HoFF, West Bengal, Aranya Bhawan, LA-10A Block, Sector-III, saltlake, Kol-700 106.
3. The District Magistrate, Bankura, Administrative Building, Bankura Collectorate, Bankura, West Bengal- 722101
4. Office Copy

for Legal Remembrancer,
West Bengal

BEFORE THE HON'BLE NATIONAL GREEN
TRIBUNAL

EASTERN ZONE BENCH, KOLKATA

O. A. NO. 02/2023/EZ

In The Matter of:

Kartick Majhi

... Applicants

Versus

West Bengal Mineral Development &
Trading Corporation Limited & Ors.

... Respondents

AFFIDAVIT ON BEHALF OF THE
RESPONDENT No. 06, ADDITIONAL
DISTRICT MAGISTRATE & DISTRICT LAND
& LAND REFORMS OFFICER, DISTRICT
BANKURA

SIBOJYOTI CHAKRABARTI

Advocate

For The State of West Bengal

Email: subho.advocate@gmail.com

(M): 9007035534.