

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE
Original Application No. 221/2024 (WZ)

Vanshakti & Ors ... Applicant

V/s.

Dist. Collector, Mumbai City And Ors. ... Respondents

INDEX

Sr. No	Exhibits	Particulars	Page No
1.	--	Memo of Affidavit in Reply	
2.	1	copy of said letter dtd. 22/12/2016 and 11/09/2020 as "EXHIBIT A" colly.	
	2	copy of letter dated 22/08/2019 and 14/10/2029 as "EXHIBIT B" colly.	
	3	copy of letter dated 02/01/2025 as "EXHIBIT C".	
	4	copy of letter dated 10/01/2025 as "EXHIBIT D".	
	5	"EXHIBIT E" the copy of minutes of meeting dated 03.04.2025.	
	6	"EXHIBIT F" is the copy of letter dated 16.04.2024.	
	7	"EXHIBIT G" is the copy of report dated 16.04.2025	

LAST PAGE _____



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Vanshakti & Ors ... Applicant

V/s.

Dist. Collector, Mumbai City And Ors. ... Respondents

AFFIDAVIT IN REPLY ON BEHALF OF
THE RESPONDENT NO. 1



I, Shri Pradip Ramchandra Taware, age 45 years, Indian Inhabitant, resident of Mumbai, working as Assistant Superintendent No. 1, Collector Officer, Mumbai City having address at Old Customs house, Shahid Bhagat Singh Marg, Mumbai 400 001, for and on behalf of the Respondent No. 1, do hereby state on solemn affirmation as under:-

1. I am filing this Affidavit on behalf of the Respondent No. 1 i.e. Collector Office, Mumbai City in compliance of the Orders passed by this Hon'ble National Green Tribunal, WZ, Pune.
2. I say and submit that, as per the letter sent from the registry of the Hon'ble Tribunal, Pune Dated. 1.3.2025 which was received to collector office on 5.3.2025 directing to file our reply along with translated copies in English. Therefore, in compliance with said letter, I am filing this affidavit in reply.
3. I say and submit that, as per the instructions regarding on the subject land that whether the subject area is Wetland or not ? and also it was enquire by the Hon'ble Tribunal to report the action taken on the email sent by Stalin D. Dtd. 21.08.2019. In this regard it is hereby submitted that, as per the brief documents published by the Environment Department, Government of Maharashtra as per Rule No. 6 (3) of the Wetlands (Conservation and Management) Rules, 2010, it does not appear that

-122-

the said land is declared as a wetland. Accordingly this office has submitted such report through letter dtd. 22/12/2016 and 11/09/2020 to the office of Director, Environment Department. Hereto annexed and marked copy of said letter dtd. 22/12/2016 and 11/09/2020 as "EXHIBIT A" colly.

4. I say that, the applicant herein informed that illegal filling is going in the wetland area in Wadala. Further perusal of the email sent by the applicant Shri Stalin D. on dt. 20/08/2019 who himself witnessed that two persons along with equipments were doing illegal fillings at Wadala (C.S. No. 210 of Salt Pan Division) and applicant caught them and brought them to the Wadala Police Station.

5. I say that, earlier the site inspection was conducted on 02/03/2019 and 14/08/2019 as per the compliant received from the applicant through email. After site inspection and referring the maintenance surveyor report dated 20/08/2019 our office has informed by letter dtd. 22/08/2019 and dtd. 14/10/2029 to Salt Department to register an F.I.R. against the concerned persons. Accordingly, the Salt Department has registered F.I.R. No. 265/2020 at Wadala Police Station, Mumbai. Hereto annexed and marked copy of letter dated 22/08/2019 and 14/10/2029 as "EXHIBIT B" colly.

6. I say that, with respect to the email dated 16.09.2024 received from Shri Stalin D., collector office has conducted site inspection on 20/12/2024 along with the applicant and forest dept. I say that, as per their report, the subject land was opposite to Khargesha Ganpati Mandir and adjacent to wall of the custom department and near to Wadala-Sewree road where debris was filled. I say that, as per the report it was observed that the broken tin shed and construction of patra shed was erected on the debris filled along with the road and the work of removal was going on. I say that, our office team inspected portable container belonging to



the MCGM in the said area. Conclusively, from the records of this office it was found that, the subject land i.e. C.S. No. 6 (Part) falls under the Revenue department.

7. I say that, on examining Google earth images over the past four years it was found that Wadala Shivdi Road, the area of C.S. No. 6 (Part) appears to the west, the wall of the Customs Department area appears to the north and the area of C.S. No 210 appears to the south and the lake area situated on the C.S.no. 210 have decreased due to unauthorized filling of debris. Also, I say that, as per the report received from Maintenance Surveyor dated 26.12.2024 the area from the western side of C.S.No 6 (Pt) and, compound wall of custom department from North side and C.S. no.210 from the side of South side was observed to be filled with debris in the side of the lake. I say that, the representatives of Mangrove Cell, Central Mumbai, submitted that the subject land I.e. land C.S.No. 6 (Part) and 210 (Part) does not falls under the jurisdiction of the Forest Department.

8. I say that, as per the report, we have intimated the observation to the Deputy District Collector (Ext./Nishka), Dharavi Division and Deputy Commissioner, Salt Department (Mithagare dept) by this office letter dtd. 02/01/2025, regarding the complaint of Stalin D. And directed to take immediate appropriate action and also submit a self-explanatory report in this regard. Hereto annexed and marked copy of letter dated 02/01/2025 as "EXHIBIT C".

9. I say that, with respect to our letter, the Deputy District Collector (Ext./Nishka), Dharavi Division send a report dated 10/01/2025 described the action taken by their department and stated that, the action has been initiated against the unauthorized construction at S.no. 6 (pt). Hereto annexed and marked copy of letter dated 10/01/2025 as "EXHIBIT D".

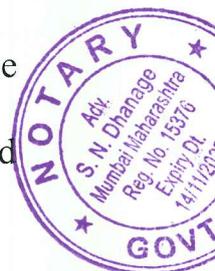


10. I say that, this Hon'ble Tribunal by order dated 19.03.2025, directed the Collector Mumbai as under,

"In view of the constitutional and statutory obligations of the State and its officers/instrumentalities to protect and improve environment, the District Collector, Mumbai City/Chairman, District Coastal Zone Monitoring Committee is directed to take all remedial measures for ensuring compliance with environmental norms and also remediation of the environmental damage caused and to file further action taken report within four weeks.."

I say that, in view of the order, the Collector office called meeting of all concerned departments On 03.04.2025 and directed them to take necessary action and to file report before this office. I further stated that, as per the order of Hon. High Court, Bombay in Public Interest Litigation No. 87 06 2006 dt. 17.09.2018, In view of the Para no. 8 of (xiii) (c) of the order, in the said matter the Brihanmumbai Municipal Corporation was expected to take action regarding removal of debris from the site. In the said meeting the Collector has directed to Brihanmumbai Municipal Corporation, Salt Department and Mangrove Cell to carry out a joint site inspection and to identify that how much debris is there on the site? And further directed to carry out procedure of debris removal immediately. Also, the report of the ACTION PLAN WITH ASSOCIATED COST should be submitted to the Mangrove Cell Mumbai and a copy of the same should be submitted to this office. Hereto annexed and marked as "EXHIBIT E is the copy of minutes of meeting dated 03.04.2025.

11. I say that accordingly spot inspection has been done of the C.S. No. 210 and C.S. no. 6 (pt) wherein it has been found that, the C. S.no. 210 was falls under the jurisdiction of Salt Department and hence by letter dated 16.04.2024 this office directed to Salt department to remove the debris filled illegally from the place and



file report of Action Plan with associated Cost to the office. So that the debris will be removed with the help of environmental consultant by adopting necessary procedure. This activity will be completed within four weeks. Hereto annexed and marked as "EXHIBIT F" is the copy of letter dated 16.04.2024.

12. I say that, regarding C.S. no. 6 (pt), Dy. Collector encroachment department Dharavi by its report dated 16.04.2025 stated that, unauthorized vehicle parking on one side of the Eastern Freeway at C.S. No. 6 (Part) has been removed and 25 shacks (huts) erected illegally with iron sheets on the other side of the Eastern free Way have been removed with the help of police machinery. Hereto annexed and marked as "EXHIBIT G" is the copy of report dated 16.04.2025.

13. I say that, to avoid further encroachment in future on the Govt.Land, the collector office Mumbai asked PWD to submit detail estimate of erecting compound wall from all side of the subject land i.e. C.S. no. 6 (pt). After getting the same, the Collector office will erect compound wall through PWD office around the said Govt land.

14. In view of the aforesaid facts and circumstances, it is humbly stated that, the present affidavit in reply is to be taken on record on behalf of Respondent No. 1. Further it is humbly submitted that, the English translated annexures may taken on record which are annexed herewith and I hereby apologize for not submitting the translated documents earlier.

I say that, considering the above, this Hon'ble Tribunal may dispose this O.
A. with necessary directions.

Hence this Affidavit dated 21st April 2025.

Mumbai

Dated: 22.04.2025.



S. N. Chanage
22/04/25
For respondent no. 1

VERIFICATION

-126-

I, Shri Pradip Ramchandra Taware, age 45 years, Indian Inhabitant, resident of Mumbai, working as Assistant Superintendent No. 1, Collector Office, Mumbai City, on behalf of the Respondent-1 herein above, do hereby solemnly declare that what is stated in paragraphs 1 to 14 of the above reply is true to our knowledge, and is based on information, belief and legal advice, which I believe to be true.

Solemnly affirmed at Mumbai)

Pradip Ramchandra Taware
22/08/24
(Pradip Ramchandra Taware,) Assistant Superintendent

This day of *22/04* 2025

22 APR 2025

Identify the deponent

DEPONENT

(Adv S.B. Vaidya-Pandit)

BEFORE ME

S. N. Dhanage

Adv. S. N. Dhanage
Notary Govt. of India
Regd. No. 15376, MUMBAI (MS)
404-405, 4th Floor, Davar House,
197/199, Near Central Camera Bldg.,
D. N. Road, Fort, Mumbai - 400001.
Mob.: 8591897834

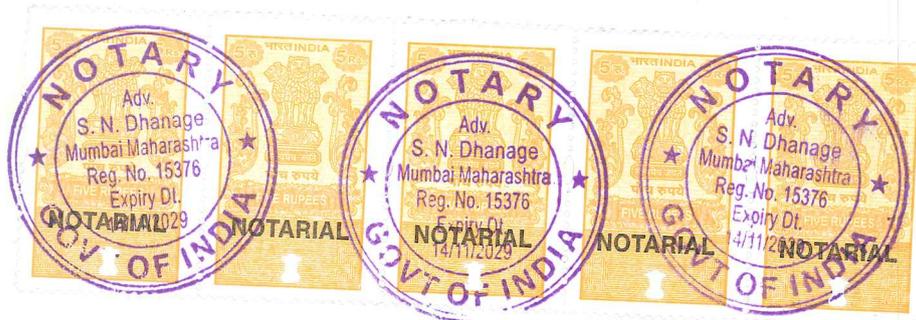
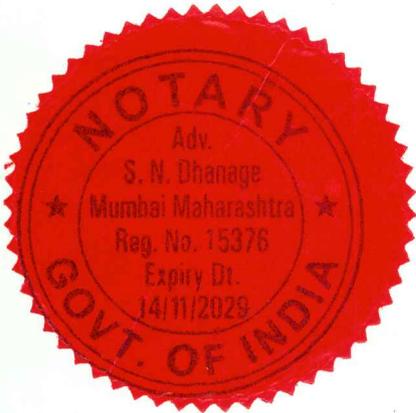


EXHIBIT A COLLY

OFFICE OF THE COLLECTOR MUMBAI CITY
FORT, MUMBAI-40001

No.CSLR/S
DT. 22 /12/2016



To,
Hon. Additional Chief Secretary,
Environment Department, New Administrative Building
15th Floor, Mantralaya, Mumbai-400 032.

Subject:- Preparation of Brief Document for the Wet Lands exists in the state of Maharashtra (out of forest areas) having an area equal to or more than 500 hectares.

Reference: 1. Your Letter dated D.O.No.PIL-2013/CR-290/TC-4, dated 21/12/2015. Also dated having same number. 12/04/2016. Reminder dated 11/08/2016, 03/10/2016 and 16/11/2016.
2. Chief Secretary, Department of Environment.
Letter no. PIL-2013/CR 290/TC-4, letter dated 19/07/2016.

Respected Sir,

According to the above reference letter, it is submitted that when the map received from SAC Alumedabad to make Brief Document according to Wet Land in Mumbai city district, Wet Land is visible in the revenue department Kulaba, Salt Pan, Mahim, Dharavi, Dadar-Naigaon, Parel-Shivadi and Fort.

As per Rule 6 (3) for year 2010 of The Conservation of the said land as indicated in the map/observation of Fort Revenue Department land tax no. 1187 of the area and the name of the holder of the said land is registered as "The Trustee of the Fort of Bombay (DOC)". A copy of the property card has been submitted along with this. Also, when inspecting the actual situation of the place from Google map, since there is a place for mooring a ship on the said place, it will not be appropriate to mark as a wetland. Therefore, it would be advisable to take the opinion of Mumbai Port Trust regarding the said place. Therefore, this office asked to (Estate Manager) Mumbai Port Trust by letters dated 22/09/2016, 13/10/2016, 26/10/2016, 16/11/2016 and 13/12/2016, to submit the current status of land property no. 1187 regarding the status of the said property as soon as possible so that it will be convenient to take further action. Correspondence to this effect was transacted, vide Superintending Engineer, General Works, Mumbai Port Trust letter no. CE. L/1-46800, dated 15/12/2016 Regarding the said property it is mentioned in your letter that, Indira Godi in charge of Mumbai Port is not Wet Land but falls under Wet Basin having area of 24.03 hectares. The said Wet Basin used mostly in Mumbai Port where one comes for upliftment.

The map prepared by Space Application Center Ahmedabad and the MRSAC Nagpur 2006 map shows that it matches The below mentioned area is shown in the map of MRSAC Nagpur in the map of Kandalvan affected area and possession also handed over. Therefore, it is not advisable to protect the same number from the map as wetland again. Also Kandalwan from Kulaba, Salt Pan Mahim, Dharavi, Dadar-Naigaon, Parel-Shivadi from revenue department has been given to Irrigation Department on 2008 and the said area decalred as protected forest/ reserved forest .Hence the information of wet land in that Mumbai city district is Nill.

The watershed area under Kandalvan has been declared as Reserve forest under Notification No. FLD/8990/1948/CR and/Ep:-3/2013, dated 02/09/2013 of s. numbers as follows with the approval of the Government. A copy of the notification is submitted for perusal. Upon perusal of the letter of Chief Conservator of Forests, Kandalwan Cell, Mumbai and Member Secretary, State Watershed Management Committee No. Room-3/Ground/2974/2016-17 dated 16/11/2016, it is mentioned that, the Hon'ble High Court has ordered in Public Interest Litigation No.87/2013 to preparation of "Brief Document" and fix the area of Wet land from State. The Forest Department was entrusted with the responsibility of determining the Wetland in the area under the jurisdiction of their Department and preparing their "Brief Document". Accordingly, the Forest Department has prepared a "Brief Document" of the Wetland in the possession of the Forest Department. In the meeting held under reference no. 4 of the said letter, the example of "Brief Document" was discussed. Based on the "Brief Document" of Wetland prepared by the Department of forest department, instructions were given to the Collector to prepare "Brief Document" of Wetland having an area of 500 hectares and more in its jurisdiction. Also instructions were given to the Collector to provide the example of Wetland's "Brief Document" prepared by the said department. Accordingly, the area ofKandalvan from the Revenue Divisions of Kulaba, Salt Pan, Mahim, Dharavi, Dadar-Naigaon, Parel-Shivadi Revenue Divisions of Mumbai City District is 285.88 Hectares of which the notified area is 276.65 Hectares.

Pursuant to the said letter, the information regarding the land in Kandalavan in Mumbai city district is mentioned in the following table and submitted.

Sr. No.	Village Name	C. S. No.	Survey No.	Total Area (Hec)	Notified Area (Hec)	Boudaries(**)			
						North	South	East	West
(1)	(2)	(3)	(3A)	(4)	(4A)	(5)	(6)	(7)	(8)
1.	Colaba	6/600		4.6100	4.6100	C.S.NO. 2/23 597	C.S.NO.3 /600 /600 Khadi	C.S.NO./ 600 Khadi	C.S.NO .20, 1/22, 22
		653		7.6100	7.6100	B.B.R.-5 Khadi	B.B.R.-7 Khadi	B.B.R.-6 Khadi	B.B.R.-6 Khadi
		654		1.3100	1.3100	Khadi	Khadi	Khadi	Khadi
		655		1.7400	1.7400	C.S.NO.	Khadi	B.B.R.-8	Khadi



						1			
		656		19.2100	19.2100	C.S.NO. 3/479	Khadi	Khadi	Khadi
2.	Dadar Naigaon	358 Part		0.3100	0.3100	358 Dadar-Naigaon	358 Dadar-Naigaon	358 Dadar-Naigaon	18/358 Dadar-Naigaon
		2/358 Part		0.0400	0.0400	6 Salt Pan	6 Salt Pan	2/C 358 (Dadar-Naigaon)	2/B 358
		1032		18.7400	18.7400	358 Dadar-Naigaon	255 Salt Pan	Khadi	358 Dadar-Naigaon
3.	Parel Shivdi	359/145		0.0600	0.0600	Khadi	Khadi	Khadi	358/145 Parel Shivdi
		865		16.92	14.82	1032 Dadar-Naigaon	Khadi	Khadi	145 and other parel shivdi
4.	Salt Pan	6		46.27	39.2800	254 Salt Pan 145 Salt Pan	358 Dadar-Naigaon/1032 Dadar-Naigaon	255 Salt Pan	358 Dadar-Naigaon
		83		11.60	11.4600	6 Salt Pan	83 Salt Pan	6 Salt Pan	83 Salt Pan
		117		4.6100	4.6100	6 Salt Pan	144 Salt Pan	117 Salt Pan	117 Salt Pan
		144		4.3700	4.3700	6 Salt Pan	Khadi	254 Salt Pan	117 Salt Pan
		2/144		1.3000	1.3000	254 Salt Pan	6 Salt Pan	6 Salt Pan	254 Salt Pan
		145		9.5900	9.5900	145 Salt Pan	6 Salt Pan	6 Salt Pan	6 Salt Pan
		1/145		0.0600	0.0600	6 Salt Pan	6 Salt Pan	145 Salt Pan	254 Salt Pan
		2/145		0.0200	0.0200	6 Salt Pan	24 Salt Pan	2/145 Salt Pan	2/145 Salt Pan



		210		8.3100	8.3100	6 Salt Pan	6 Salt Pan	6 Salt Pan	210 Salt Pan
		254		0.06	0.06	6 Salt Pan	6 Salt Pan	6 Salt Pan	210 Salt Pan
		255		101.3600	101.3600	6 Salt Pan	Khadi	Khadi	6 Salt Pan
5.	Mahim	1502		0.1200	0.1200	1506	1/1505	Mahim Khadi	Marathi Shala
		1505		1.1000	1.1000	Mahim Khadi	2/1502	1506	Marathi Shala
6.	Dharavi	704		0.8900	0.8900	Khadi	Khadi	1506	Khadi
		501*		13.2300	13.2300	V. B. Parik Khadi, Mumbai Sub District	Mahim, Sion, Dharavi Mumbai Sub District	1/501	Western Railway
		5/2		5.6000	5.6000	Khadi	Khadi	Khadi	Khadi
		330		0.0900	0.0900	Khadi	340	Dharavi Road	Khadi
		705		0.6800	0.6800	Khadi	Khadi	Khadi	Khadi
7.	Mahim Dharavi	1505/347		6.0700	6.0700	Khadi	Khadi	1462	1502
Total Area				285.88	276.65				

The total area of the above Kandalavan affected area is **285.88 hectares** and the notified area is 276.65 hectares.

Information about wetlands in Mumbai city district (Wet Land) is being presented in revenue department Colaba, Salt Pan, Mahim, Dharavi, Dadar-Naigaon, Parel-Shivdi.,

(Hiralal Sonavne)
Collector, Mumbai City

Copy to,
Hon'ble Divisional Commissioner, Konkan Division, Yogan Bhawan, CBD, Belapur, Navi Mumbai-400 614
Office of the Collector and Magistrate, Mumbai City
Old Fast House, Sh82- SingleXXX11
Fax 22661239, Tel. 226652.1.1, Email: collector_mumbaicity@maharashtra.gov.in



To,
DIRECTOR, ENVIRONMENT DEPARTMENT
NEW ADMINISTRATIVE BUILDING.
15th Floor, Mantralaya, Mumbai - 400 032.

Subject :- Information about Wetlands in District

Reference :- Your letter no.D.O.No. Wetland 2020/CR-92/TC-1 dt.3/09/2020

Pursuant to the reference letter on the above subject, the Union Ministry of Environment, Forestry and Climate Change has issued no. GSR-1203 (3). The Wetland (Relationship and Management) Rules, 2017 have been published vide notification dated 26/09/2019. According to the provisions of the said rules, it is mandatory to publish a brief document showing the watershed area, for which the facility was provided by your good office to maintain the information through mobile app. In this wetland app, a total of 9 places in the Mumbai city district have been shown and when the wetland site was actually inspected, as per notification from the Ministry of Environment, Forest and Climate Change, Government of India, under the suspicion of wetland, was not found. According to the directive dated 26/09/2017, the elements under the term Wetland were not found at the said place. Therefore, the information about wetlands in Mumbai city district is incomplete and the said information has been updated in the wetland mobile app received from the environment department. The detailed information of the six water bodies that have been received in the said application app for water bodies to be updated. The same has been submitted to your good office on 31/12/2019. Also on the Wetland website. On 14/01/2020 Mumbai City District 03 Wetlands have been newly identified has been shown on the Map, out of which two wetlands are in this district and its information has been updated in Brief Document Wetland App. As the wetland area falls within the limits of Mumbai Suburban District, the information about it was sent by e-mail from this office on 14/01/2020 portal support has been notified on the website of MPCB.

Hence the information regarding total 9 Wetland places is updated on the wetland App. Information from the Wetland Mobile App, which was previously provided by this office is sending along with this.

(Rajeev Niwatkar)
Collector, Mumbai City

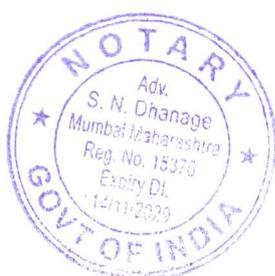


EXHIBIT B COLLY

Office of the Collector and District Magistrate, Mumbai City
Old Custom House, Shahid Bhagatsingh road, Fort, Mumbai, 40001
Dated:- 22/08/2019

To,
Hon ble, Deputy Salt Commissioner, Exchange Building, 4th Floor, Sir Shivsagar
Ram Ghulam Marg, Baylord Estate, Mumbai 400 001.

Subject:- Unauthorized filling is taking place under Kandalvan area in Survey No.
210 of Salt Pan Revenue Division,

The concerned conservator, Kandalvan Conservation Unit informed this office through telephone dated 20/08/2019 that, while filling illegally in the above mentioned area, two persons were seized along with the contents and the said persons were taken to Wadala Police Station and this office has submitted a report in this regard. According to the entries in record of rights (Milkat Patrika) No. 17, the interest of your good is being seen with the said property. Since such unauthorized filling was noticed at the said place, the concerned police station was immediately contacted and action was taken to file a case against the concerned as per appropriate rules.

The said fact is very important and Mr. Stalin Di, Vanshakti was also present at that time, hence strict action be taken against those concerned and the report of the same was immediately submit to Member Secretary, Kokan Wetland Grievance Redressal Committee, Deputy Conservator of Forests Cell, Mumbai and copy of the same should be submitted to this office

(Shivaji Jondale)
Collector, Mumbai City,

Copy :- 1. Hon. Member Secretary, Kokan Watershed Grievance Redressal Committee and Deputy Conservator Kandalvan Desk, Mumbai. Additional Principal Chief Conservator of Forests, Kandalavan Ward, Mumbai, Office 302, TheField House, 3rd floor, near Britannia Restaurant, Malord Estate, Fort, Mumbai-400 001,

2. Shri. Stalin d. Vanshakti for information.



Office of the Collector and District Magistrate, Mumbai City
Old Custom House, Shahid Bhagat Singh road, Fort, Mumbai, 40001

Dated:-14.10.2019

To,

1. Hon'ble Commissioner,
Shiwadi Police Station, Mumbai 400 037.
2. Senior Police Inspector,
Vadala Police Station (east)
3. Senior Police Inspector,
Vadala Police Station (east)



Subject:- F.I.R in unauthorized Filling of Salt under Kandalwan / Wetland Area as per letter of Wetland department about to be filed at the area of S. no. 210 of the Salt Pan Revenue Division.

Reference :-1. Revenue and Forest Department Government Decision No. S-10/2017/Aan-30/Pro.No. 462/F-3, Mantralaya Mumbai Dt. 16 October 2018.

2. Hon ble Divisional Commissioner Divisional Division letter no. Naga/Kayan-V/Public Interest Litigation No. 87/2006/2018 dt. 23/12/2018.

3. Deputy Commissioner, Salt Division, Government of India vide C.No. 9 (2) Land/W41/2017 2855-163 dt. 09/20/2020.

According to the said reference letter no. 1, in view of Hon. High Court, Bombay in Public Interest Litigation No. 87/2006 Pursuant to the judgment given on 17/09/2018, protection and conservation of Kandalwan for the coastal districts of Mumbai, Mumbai Suburban Thane, Phalar, Ratnagiri and Sindhudurg monitoring committee has been established under the chairmanship of the Divisional Commissioner, Konkan Division, and Collector, Mumbai City is its founding member.

As per referred to the above letter no. 2, formation of a district level committee from every community to protect and conserve the Wetlandhas been formed. Accordingly Mumbai City District Committee was formed with.

According to formation of said committee, regarding Wetland/ Kandalwan , to dispose the complaints,meeting has been taken on 21.09.2020 under the chairmanship of Hon ble Divisional Commissioner Kokan Division have been discussed. The Hon ble Commissioner directed to the concerned to file FIR against those persons. Complaint regarding filling in Wetland area has been received to this office. The Said Survey no. 210 is connected with the Salt department, hence the Deputy Commissioner has issued his letter dt. 22/07/2019 under P 8.205/07/2019 and you have been informed that the said case should be prosecuted, As well as in the meeting held under the chairmanship of Collector, Mumbai City dt. 30/09/2020 P dt. 06/10/2020, concerned officers from Deputy Superintendent, Deputy Superintendent, Vadala, Deputy Superintendent of Forestry and Forestry Department, stated that the correspondence regarding the filing of the crime against the concerned persons in the police station. And as well as a letter requesting that the crime to be file was written to the Senior Police Inspector, Vadala Police Station dated 01/10/2020 [Received via E-mail.

Hence regarding the unauthorized filling of Debris, it has been communicated by the salt pan department to file a criminal case against the concerned. Accordingly,

according to the said letter issued by salt pan Department, the legal proceedings regarding the filing of FIR against the concerned should be initiated immediately, and in this regard as per Hon. High Court Public Interest Litigation No. 87/2006, order dated 17/09/2019, further action should be taken promptly and the same should be brought to the notice of this office.

Annexed herewith 1. reference letter no. 3

2. Copy of record of right of S. no. 210.

(Rajiv Nivatkar)

Collector Mumbai City,

Copy to,

1. Divisional Commissioner, Konkan Division Kokan Bhawan, C.B. D. Belapur, New Mumbai-400
2. Secretary, of Masya Madhya, Konkan Watershed Grievance Redressal Committee and Deputy Conservator of Forests Kandalyan Mumbai Additional Principal Chief Conservator-ship Cell, Mumbai. 302, peck
Near Brritania Restaurant Navpanlaistate, Fort, Mumbai-400001
3. Deputy Commissioner, Epapen Building, 4th Floor, Sir Shivsagar Rath Ghulam Marg, Loi Estate, Mumbai 400 001 for appropriate action.



EXHIBIT C

-135-

Office of the Collector and District Magistrate, Mumbai City
Old Custom House, Shahid Bhagat singh road, Fort, Mumbai, 40001

Dated: 02.01.2025

Important

To,

1. Deputy Salt Commissioner

Exchange Building, 4th Floor, Sir Shivsagar Ramgulam Marg, Melai Estate,
Mumbai- 400 001

□ Subject :- Last Complaint before filling legal case (wadala lake reclamation/land reclamation/Illegal constructions)

Ref:- complaint of Shri Stalin Di. Dated 16/09/2024.

As per the above reference, Mr. Stalin D has complained about wadala lake reclamation/land reclamation/illegal constructions in reference mail. Pursuant to the said complaint dt. On 19/12/2024 the complainant Mr. Stalin D. While inspecting the site along with the police, the place situated at, in front of the Ghargasha Ganapati Temple, near the wall of the fifth section, the Wadala Shivdi road was blocked and the debris was dumped at the place. Amid the piles of road debris, the construction of the road was seen in a broken state. They were working to remove it. Also, a portable container containing MCGM was found at the said spot. However, looking at the records of this office, it is seen that the said place is occupied by S. No. o. 6 in Salt Pan Division. Also, Vadala Shipdi Road, S.No. 6 (Part) Part area in the west, customs department area wall in the north and S.No. 210 area in the south. It was also seen , that the road was made by filling up the side of the lake. The said land comes under S.no. No. 6 (Part) P 210 (5) and the office representative of Kandalwan Forest, Mumbai stated that, said area does not come under the purview of the Forest Department.

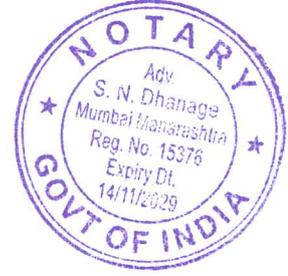
Accordingly, in the present case, it is informed that as per the entry in the book no. 17 of the salt pan revenue department's book no. 210 of the Record of right, the said land is seen to be the interests of the Mithagar department. Hence as the land S. no. 6 is Govt Land, Deputy Collector (encroach/Nishka), Dharavi Division and regarding Land S No. 210 Deputy Commissioner Mithagare both were directed to take immediate appropriate action in view of the complaint filed by Stalin D. and a self-explanatory report should be submitted to this court immediately.



(Sanjay Yadav)
Collectorate, Mumbai City

EXHIBIT-D

OFFICE OF THE DEPUTY COLLECTOR (ENROACHMNET/ENFORCEMENT)
DHARI DIVISION OLD JAKAT GHAR,
GROUND FLOOR, SHAHEED BHAGATSINGH ROAD,
FORT, MUMBAI-400 001
(Phone- 2002022624740 - dyentuhataavotermal.com)



TO,
Hon. Collector, Mumbai City

SUBJECT: Last complaint before filling legal caste (Wadala lake reclamation/land reclamation/illegal constructions)

REF. 1. SodLR-1/2-1/ Kandalvan Rajar/202-4-25

2) Site inspection report from this office dt. 10/10/2024

3) Joint Survey Report 11.10. 20024 with Survey Surveyor, Gami Archives and Report of Land Surveyor, Land Archives dt. .16 10.2024

4. This office Notice 3/M.M.R.M.H.A. Sumoto 4 Petition 2024 dt. 12/10/2024 Ja.No. 528

5) notice from this office no. Un. Yandh/M.J.M./1966/Phalam 50(3) Order 2024 dt. 15/10/2024

6) This office public Notice Go.No. Division of Ati/Nishka/Dhara Nabhukra. 117 2024 Ja.No. 380 d. 11/12/2024

7) Go to office order from PA office. No. M.M.R.M.H.A. Sumoto/2024 dt.10 12 2024 no. 576

8) Letter from this office Ja.No. Upgi/Ati/Nishka/Dharavi Division/No.G.No. 70) 2024. 16:12:2024 Ja.No. 585

9) Deputy Tehsildar and Revenue Inspector. 12/12-2024 Encroachment Eviction Proceedings Report.

Res sir,

In view of the above reference letter no. 1. It is hereby informed that, through this office no. 6(Part) Revenue Inspector in the office of Unauthorize construction on Government Premises at Dayashankar Chowk, Vadala, Mumbai - 37, Near Eastern Free and no Reference through Tehsildar 2 on dt. 10.10.2024 Site inspection was done on 10/10/2024 and report was submitted to this office. Also, as per the reference, a joint site inspection was done through Inspection Land Surveyor, Land Archives, Mumbai City and the report of the said site inspection was submitted to this office through Inspection Land Surveyor, Land Archives Branch, Mumbai City. After that through this office under reference letter no. 4 issued notices to all encroachment holders on 12/10/2024 and asked to file reply. However as they failed to prove their ownership on the said land, this office with reference letter no. 5 placed demolition process on 24.10.2024 at 11.00 am. In view of Assembly Elections 2024 as there was code of conduct and hence Police protection cannot Received, the process of demolition was postponed on that day.

In view of References no. 5 to 7 on 12/12/2024 demolition process from S. no. 6 (pt) was placed. During the eviction proceedings, 7 out of 10 huts belonging to

eastern Free way were evicted and 0.3 huts were not removed due to heavy bearings filled with diesel fuel and chemicals in 03 huts. The Mandam erected with Bamboo and iron Arch erected at second side of Eastern free way was evicted with the help of JCB. It has been communicated to BMC to carry one dumper filled with broken bamboos, debris etc in their vehicle. There were 40 Truck/Trailer/dumper were removed to another place. 04 vehicles was found to be closed and the driver of the said vehicle was instructed to remove it. However, as the said vehicles were not found elsewhere, reference letters were sent to the office of Regional Transport Officer Wadala, Mumbai 37 to submit the details of the said vehicles to this office to file a case against the said vehicle owners.

After the completion of removal of encroachment eviction committee, with reference letter no. 9 this office. Naib Tehsildar and Revenue Inspector have submitted detail report to this office that, the encroachment eviction proceedings have been completed on 12/12/2024.

Accordingly as stated above the action has been taken against unauthorized construction at C.S.no. 6 (pt)

Your faithfully.
(Dr. Jaykrishn. Phad)
Dy-Collector (Ati/Nishkasan)



EXHIBIT-E

Minutes Of Meeting

Meeting has been held under the chairmanship of Hon. of Collector, Mumbai City On 03/04/2025 at 12.00 PM regarding Original Application No. 221/2024. Approved notes of minutes of the said meeting is as under, Attendance in the said meeting is as follows :-



Sr. No.	Officer Name	Designation
१.	Smt. Aanchal Goyal, Collector, Mumbai City	Collector
२.	Shri Dhanajirao Dhaygude, Collector Office, Mumbai City	Superintendent, City Survey Land Records
३.	Shri Jaikrishna Phad, Collector, Mumbai City	Deputy Collector, Dharavi Division (Rem/Enc)
४.	Shri Prashant Panvekar, Collector, Mumbai City	Deputy Collector, Colaba Division (Rem/Enc)
५.	Shri Prafull Kumar Singh, Salt Dept.	Superintendent
६.	Shri Gajanan Jadhav, Mangrove Cell	Round Forest Officer
७.	Shri Sunil Dethe, BMC	Executive Engineer, (Solid Waste Management)
८.	Shri J. H. Mujawar, BMC	Assistant Engineer, (Solid Waste Management)

Firstly Hon. Collector, Mumbai City, welcomed the participants and started the proceedings of the meeting. The following issues were discussed in the said meeting:

Firstly: The complainant in Original Application No. 221/2024 Shri Stalin D. contacted through VC by Hon. Collector and asked him to submit his statement. There is a complaint about dumping of debris on C. S. No. (Bhukar No) 210 in Salt Pan Division of Wadala. Earlier two to three times the operation of lifting debris has been done. However, after removing the debris, the process of putting the debris again is done. Debris is frequently dumped there by trucks. Also, since the said place belongs to Salt Department. The said place is not protected through their office. In this regard, the complainant Stalin D. expressed strong displeasure.

Upon this Hon. Collector said that he will discuss this with the concerned authorities and give a report. It has been discussed further that, as per the order of Hon. High Court, Bombay in Public Interest Litigation No. 87 06 2006 dt. 17.09.208, In view of the Para no. 8 of (xiii) (c) of the order, in the said case the Brihanmumbai Municipal Corporation was expected to take action regarding

removal of debris from the site. But no action has been taken yet. Regarding this, Hon'ble Collector through the office of Brihanmumbai Municipal Corporation gave the following instructions to the attendees.

1. On 04/04/2025 Collector Office, Brihanmumbai Municipal Corporation, Salt Department and Mangrove Cell, Mumbai should carry out a joint site inspection as per Original Application 221/2024, at the end of site inspection, and inspect that how much debris is there on the site? And procedure of debris removal should be done immediately. Also, the report of the ACTION PLAN WITH ASSOCIATED COST should be submitted to the Mangrove Department and a copy of the same should be submitted to this office. The said information has to be submitted before 16/04/2025 to Hon'ble National Green Tribunal, Pune, care should be taken to submit the information before that.

(Anchal Goyal)

Collector Mumbai City



EXHIBIT F

Office of the Collector and District Magistrate, Mumbai City
Old Patratam House, Shahid Bhagatsingh road,
Fort, Mumbai, 40001

Sr No.:-CSLR/S&LR-1/T-/Salt Pan/2025.

Date: 16/04/2025. O. W. No. 966

To,
Hon. Deputy Commissioner Mithagare
(Deputy Salt Commissioner) Exchange Building,
4th Floor, Sir Sivasagar Ramgoolam Marg,
Ballard Estate, Mumbai-400 001.

Subject :- Original Application No. 221/2024
Vanshakti & Anr. V/s
District Collector, Mumbai City & Ors.

Ref:- 1) This office's letter No.655 dated 26/03/2025.
2) This office's letter No.811 dated 03/04/2025.

Respected Sir,

According to the above subject, Van Shakti and others through Stalin D., O.A No. 221/2024 has been filed before the Hon ble National Green Tribunal, Pune regarding filling is taking place illegally at Wadala. Accordingly, a meeting was organized in the office of Collector, Mumbai City on 03/04/2025 at 12.00 noon as per reference letter. During the said meeting the joint site inspection of the Mithagar Department, Revenue Department, Brihanmumbai Municipal Corporation and Kandalvan department was conducted on 04/04/2025 at 11.00 am. After the site survey, C.S. No. 210 comes under the jurisdiction of the Salt Department and the action to remove the debris from the said place should be prepared by the said department and the report of Action Plan with Associated Cost should be submitted immediately. So that it would be convenient to submit the said report to National Green Tribunal, Pune before 19/04/2025.

(Pradeep Taware)

Assistant Superintendent No. 1

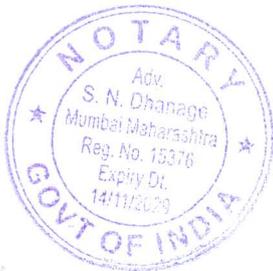


EXHIBIT G

OFFICE OF THE DEPUTY COLLECTOR (ENROACHMNET/ENFORCEMENT)
DHARAVI DIVISION OLD JAKAT GHAR, GROUND FLOOR, SHAHEED
BHAGATSINGH ROAD, FORT, MUMBAI-400 001
(Phone- 2002022624740 - dyentuhataavotermal.com) Dt.16.04.2025

TO,
Hon. Collector,
Mumbai City

SUBJECT: Original Application No. 221/2014 Vanshakti & Anr.

Vs District Collector, Mumbai city & Ors. \

(Regarding removal of encroachments on both sides of Eastern
Expressway, Dayashankar Chowk, Vadala and submission of report)

REF. 1) Hon. Letter No. CSL from Collector Mumbai City. RL 01 and 02/2-
01/NGT O.A.221 OF 24/25 Dt.3-4-2025 J.No

2) Joint site inspection report dated 7-4-2025 through the team of this office,

3) This office. 15-4-2025. Ja.No.330

4) This office. 15-4-2025. Ja.No.331

5) C.S.No. 6 (Pt) and 210 regarding removal of unauthorized constructions
Report of the Regional Officer to the Office dt. 16-4-2025.

Res Madam,

As per letter of reference-1 in salt pan section no. 6 (Pt) and 210 were
directed to submit a report regarding the action taken by site inspection regarding
unauthorized filling.

Accordingly, on 4-4-2025, the field officer of this office, Deputy Salt
Commissioner, Mumbai, Circle Forest Officer, Second Engineer (Solid Waste
Management) F: North Division and Parikhsaran Bhumapak Nagar Land Survey
Branch, Mumbai city, jointly inspected the site in question. (A copy of the report is
attached) as well as unauthorized vehicle parking and unauthorized building
removal proceedings of the above mentioned place held on 16-4-2025. Similarly,
as per letter of reference 3 adequate provision was sought for removal proceedings
and as per letter of reference no. 4 Assistant Commissioner F/North Division for
removal, 3 J.C.B. 2 dumpers and 30 workers (including removal materials) were
requisitioned along with adequate police arrangement and removal proceedings in
the case. Due to availability of 2 dumpers and 30 workers (including removal
materials) today on 16-4-2025 unauthorized vehicle parking on one side of the
Eastern Freeway at 6(Pt) has been removed and 25 shacks built illegally with teen
sheets on the other side of the Eastern Key Way have been evicted.

However, the detailed report of the proceedings as mentioned above.

Respectfully submitted for your information.



Your faithfully.
(Dr. Jayakrishna Mr. Phad)
Deputy Collector
(Additional/Special)
Dharavi Division Mumbai City

