



**BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT DELHI**

ORIGINAL APPLICATION NO.91/2025 (WZ)

IN THE MATTER OF:

**IN RE: "20K SQM PILERNE HILL CONVERSION RISKS
LANDSLIDES, THREATENS LAKE"**

**AFFIDAVIT-IN-REPLY ON BEHALF OF RESPONDENT
NO. 3- GOA STATE POLLUTION CONTROL BOARD**

MAY IT PLEASE YOUR HONOUR

I, Shri. Sanjeev Joglekar, major of age, Indian National, holding charge as Member Secretary of Goa State Pollution Control Board, having office at Goa State Pollution Control Board, Near Pilerne Industrial Estate, Opp. Saligao Seminary, Saligao - Bardez, Goa - 403511, the Respondent No. 3 herein, do hereby on solemn affirmation state and submit as under:

Sanjeev Joglekar

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1. I say that I am presently holding charge as Member Secretary of the Goa State Pollution Control Board, Respondent No. 3 herein and I have been authorized to file the present Affidavit-in-Reply on behalf of the Respondent Board.
2. I say that this Hon'ble Tribunal has registered a *Suo-Moto* application on the basis of a news item titled "20k sqm Pilerne Hill conversion risks landslides threatens lake" appearing in Times of India dated 19.07.2025.
3. I say that the Respondent Board was impleaded as party Respondent No. 03 in the matter vide Order dated 28.07.2025 and thereafter Board was in receipt of a Notice dated 22.08.2025 from the Hon'ble NGT stating that the matter is fixed for hearing on 23.09.2025.
4. Pursuant to which an Order dated 02.02.2026 was passed calling upon the Respondent No. 3 herein along with other respondents to file a reply.
5. I say that the present Affidavit is filed in compliance to the Order dated 02/02/2026 passed by this Hon'ble Tribunal, wherein the Tribunal has directed to file an affidavit-in-



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reply, stating the fact that the respondent Board could not locate the site in question.

6. I say that the Notice dated 22.08.2025 from the Hon'ble NGT received by the Respondent Board did not contain sufficient identifying details, supporting documents, or any GPS coordinates thereby rendering identification of the site impossible.

7. Pursuant to which, it is most respectfully submitted that the officials of the Respondent Board were unable to identify or locate the site of the reported hill cutting.

8. I say that, no prior complaints relating to hill cutting in Pilerne Village in close proximity to lake has been received by the Respondent Board.

9. I say that, hill cutting by itself does not fall directly under the routing, regulatory purview of the Board unless the said activity is undertaken as part of an industrial operation, construction project, mining activity or any other process requiring prior Consent to establish or Consent to Operate from the Board under the Air and Water Act. However,



been mentioned in the Order dated 23.09.2025 that there exists a Saulem Lake also known as Pilerne Lake which was said to be notified as protected wetland. In this regard, the views of concerned regulatory authorities may be taken into consideration by this Hon'ble National Green Tribunal.

10.I say that, what is stated in the proceeding paras are as per records maintained by the Goa State Pollution Control Board which I believe to be true.

SOLEMNLY AFFIRMED AT
ON THIS 1 DAY OF APRIL 2026]

I LSM
DEPONENT

Member Secretary
Goa State Pollution Control Board

Identified by me:-



SOLEMNLY AFFIRMED AND VERIFIED BEFORE ME
Mr. Jaynar Jagdekar
WHO IS IDENTIFIED BEFORE ME

BY ADV. _____
WHOM I KNOW Personally known
SERIAL NO 102 DATED: 01/04/2026
VALID UPTO: 19.05.2029

JOAQUIM GODINHO NOTARY PANAJI-GOA
Jagdekar
01/04/2026

JOAQUIM GODINHO
Advocate
& Notary
Navelkar Trade Centre
C/S-3, 2nd Floor, M.G.Road,
Panjim-Goa. Ph.: 2422113

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