

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
WESTERN ZONE BENCH, PUNE**

**OA NO. 03 OF 2026 (WZ)**

**IN THE MATTER OF**

IBRAHIM A KADAR TURK

...APPLICANT

VS


GUJARAT POLLUTION CONTROL BOARD & Ors.

...RESPONDENTS

**INDEX FOR AFFIDAVIT-IN-REPLY ON BEHALF OF  
RESPONDENT NO. 4 - STATE OF GUJARAT THROUGH  
FOREST AND ENVIRONMENT DEPARTMENT**

<b>Sr. No.</b>	<b>Particulars</b>	<b>Annexure</b>	<b>Pg Nos.</b>
1.	Affidavit -in- Reply for Respondent No. 4	-	
2.	Affidavit	-	

Filed Through,



Parth H. Bhatt, Advocate

For Respondent No. 4

office@bhattandco.in

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**AFFIDAVIT-IN-REPLY ON BEHALF OF RESPONDENT NO. 4 -**

**STATE OF GUJARAT THROUGH FOREST AND ENVIRONMENT**

**DEPARTMENT**

I, Dipali Tank, an Adult, I/C Director & Ex-Officio Deputy Secretary (Environment), Forest and Environment Department, Block No. 14, 8<sup>th</sup> Floor, New Sachivalaya, Gandhinagar, Gujarat being authorized signatory and representative of State of Gujarat through Forest and Environment Department do hereby solemnly state on oath and submit that:-

1. The captioned Application is initiated by the Applicant against Respondent No. 6 M/s Sea Leaf Resort Private Limited; pertaining to violation of the provisions of the Coastal Regulation Zone Notification, 2011 for developing and constructing a five star Resort namely Sea Leaf Beach Resort at Maska Village, Mandvi Taluka of Kachchh, Gujarat. It is alleged that the project construction was commenced prior to

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SR. NO. - 377 -  
DATE. 17/04/2026

NILESH R. PANDYA  
NOTARY  
GOVT OF INDIA  
17 APR 2026



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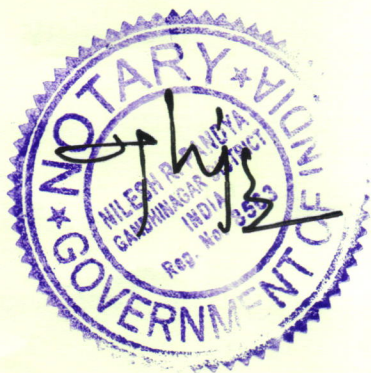


any CRZ Clearance was obtained and moreover, construction has been done within No Development Zone (NDZ) of CRZ – II.

2. The answering Department respectfully states that it has no direct role, or a limited role, in taking any legal action for violation of CRZ Notification, 2011 issued under the Environment (Protection) Act 1986. Further the appropriate authorities are authorised to take enforcement measurements for demolishing the illegal constructions; and further to determine and levy the Environment damage compensation.
3. The answering Respondent respectfully states that, in the captioned matter, neither there is any specific prayer against the answering department, nor has any substantive averments, allegations, or contentions implicating the answering Respondent. Therefore, the answering Department is merely a formal party to the present proceedings.
4. The answering Respondent states that in the event the Hon'ble Tribunal gives any direction to the Answering Respondent to render any reasonable assistance to any regulatory agency or other agency the administration shall extend all reasonable co-operation and assistance to concerned regulatory and enforcement agencies. I further submit that the Answering Respondent shall at all times abide by the legal orders passed by the Hon'ble Tribunal, and execute all and any directions as may be issued by the Hon'ble Tribunal in the present application.



*[Handwritten signature]*



5. The Answering Department craves leave to file additional affidavits, documents and submissions, as may be necessary, for the proper adjudication of the present Application, and reserves its right to do so as and when required.

Date - 17/4/2026  
Place - Gandhinagar

Dipali Tank  
Deponent

### VERIFICATION

I, Dipali Tank, an Adult, I/C Director & Ex-Officio Deputy Secretary (Environment), Forest and Environment Department, Block No. 14, 8<sup>th</sup> Floor, New Sachivalaya, Gandhinagar, Gujarat being authorized signatory and representative of State of Gujarat through Forest and Environment Department; solemnly states that the contents of the Affidavit are true and correct and best of my knowledge, nothing stated therein is false and nothing material has been concealed therefrom.

Date - 17/4/2026  
Place - Gandhinagar

Dipali Tank

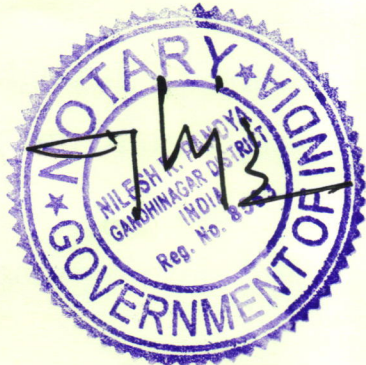
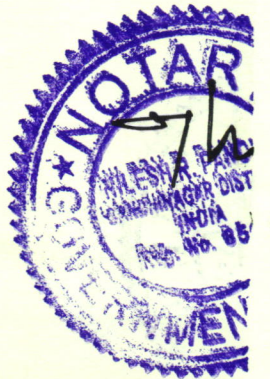
Deponent

Director (Environment) &  
Member Secretary, GCZMA  
Forests & Environment Department  
Government of Gujarat  
Gandhinagar



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Director (Environment)  
Member Secretary, GEMA  
Forest & Environment Department  
Government of Gujarat  
Gandhinagar

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**AFFIDAVIT**

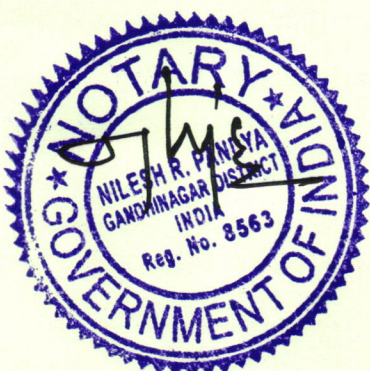
I, Dipali Tank, an Adult, I/C Director & Ex-Officio Deputy Secretary (Environment), Forest and Environment Department, Block No. 14, 8<sup>th</sup> Floor, New Sachivalaya, Gandhinagar, Gujarat being authorized signatory and representative of State of Gujarat through Forest and Environment Department. I have gone through the Reply and I state that the reply is drafted under my instructions. Contents and statements made herein the above in para 1 to 5 of reply are true and correct to the best of my knowledge and belief; and as per the datas available on the record.

Solemnly affirmed on 17 day of April 2026 at GANDHINAGAR

Dipali Tank

Deponent

Director (Environment) &  
Member Secretary, GCZMA  
Forests & Environment Department  
Government of Gujarat  
Gandhinagar

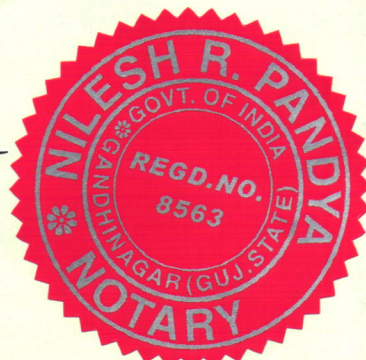


IDENTIFIED BY ME

ADVOCATE/PERSON  
NAME: H. J. Testa  
ADD: Gandhinagar  
DATE: 17/04/26  
17 APR 2026

SOLEMNLY AFFIRMED  
BEFORE ME

NILESH R. PANDYA  
NOTARY  
GOVT. OF INDIA  
17 APR 2026



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Director (Environment) 2  
Member Secretary GEMA  
Pollution & Environment Department  
Government of Gujarat  
Gandhinagar

17 APR 2020  
GOVT. OF INDIA  
NOTARY  
MILESH R. PANDYA  
BEFORE ME  
SOLEMNLY AFFIRMED

IDENTIFIED BY ME  
NAME OF PERSON  
ADDRESS  
DATE

