

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE
ORIGINAL APPLICATION NO. 106 OF 2022**

Vanashakti & Anr.

.....Applicants

Versus

Union of India & Ors.

.....Respondents

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Advocate for the Applicants

04.11.2025

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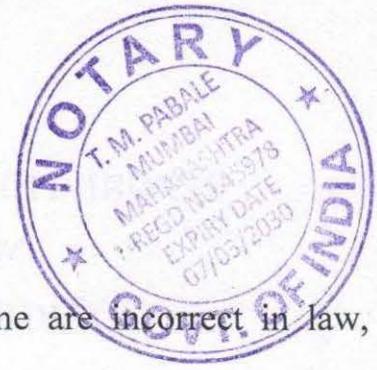
.....Respondents

**CONSOLIDATED AFFIDAVIT-IN-REJOINDER ON BEHALF OF
THE APPLICANTS**

I, Stalin Dayanand, s/o Late K. Dayanand, aged 59 years, Indian inhabitant, Applicant No. 2 and the Authorised Representative of Applicant No. 1 and having his office at Nandakumar Pawar House, Opp. Shri Jagannath Darshan Building, M.D. Kini Marg, Bhandup Village (East), Mumbai - 400 042 do hereby state on solemn affirmation as under:-

1. At the outset, I say that I have perused the Affidavit-in-Reply dated 10.05.2024 filed by Respondent No. 1 and various other replies filed by respective States and I am filing the present affidavit-in-rejoinder denying the submissions and contents of documents placed on record to support such





submissions by the Respondent No. 1 as the same are incorrect in law, misleading and involves suppression of relevant materials.

Rejoinder to the Affidavit in reply of R-1 dated 10.05.2024

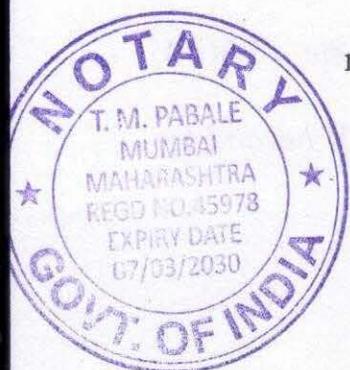
2. I say that Paras 1 to 3 of the Reply are formal in nature and do not warrant a response.
3. With respect to Para 4 of the Reply, I deny the contents therein as the same are false and misleading for the reason that the challenge to the CRZ Notification, 2019 (“**CRZ 2019**”) in the present application is entirely on the merits of the Notification, as finally notified, on the touchstone of constitutional principles, environmental jurisprudence and the precedents of the Hon’ble Apex Court. I deny that the CRZ 2019 is challenged by the Applicant after more than 5 years and I say that this contention of R-1 is misleading for the reason that after CRZ 2019 was notified on 18.01.2019, the Applicants had filed PIL No. 28 of 2021 before the Hon’ble High Court of Bombay on 25.03.2021 (*during the Covid-19 pandemic*) challenging the CRZ 2019. The present proceedings before this Hon’ble Tribunal are in continuation of the said proceedings filed before the High Court in light of the order dated 30.09.2022 passed by the Hon’ble Supreme Court in SLP No.

20495 of 2021 granting liberty to pursue the challenge before this Hon'ble Tribunal without raising the question of limitation. I say that although there is no limitation attached to a challenge to the *vires* of a delegated or administrative legislation/notification, no more than 12 months were passed in filing a challenge to CRZ 2019 before the High Court and therefore, it is absolutely false and misleading of R-1 to say that the present challenge is filed after 5 years of the notification.

4. With respect to Para 5 of the Reply, I say that the contention of R-1 that the CRZ 2019 will come into effect only after CZMPs of respective coastal states are published has no relation whatsoever with the challenge to the *vires* of CRZ 2019.

5. With respect to Para 6 of the Reply, I say that the said para provides detailed para-wise responses to each of the Paras in the OA in a tabular manner and within the table, it can be seen that R-1 has offered no comments *qua* certain submissions in the OA. Therefore, I shall proceed to respond in the present rejoinder to only those paras where R-1 has offered its comments to the relevant paras of the original application in the following manner:

(i) With respect to Paras 1 to 10 of the OA, I say that the R-1 has merely responded to the same by stating that a need was felt over time to



undertake a comprehensive revision of the notification on the basis of the representations received from various state governments and has thereby proceeded with the process of issuing a fresh notification for sustainable economic growth. I deny the said contention as the same is false and incorrect as CRZ 2019 is not sustainable in any form as it reduces the NDZ from 200 meters to 50 meters and the CRZ area in tidal influenced water bodies from 100 meters to 50 meters, changes the FSI norms to allow all kinds of development in the CRZ-II as per existing FSI, dispenses with EIA and Risk Assessment Report, dilutes protection of mangroves, deletes list of prohibited activities *et al*, which directly hinders the safety net of the coast making the Indian coast extremely vulnerable to the ever-increasing sea level rise and surging intense storms.

- (ii) With respect to Para 11 of the OA, R-1 has responded by stating that CRZ 2019 contains stringent provisions for environmental safeguards such as Para 4(x) (*prohibiting plastic into coastal waters*), 5.1.1(i); *allowing eco-tourism activities in CRZ-IA*, 5.2 (vi); *allowing temporary tourism facilities like shacks, toilets, change rooms, etc.*, 5.3(iii); *development of vacant plots, limestone mining in CRZ -III beyond the*

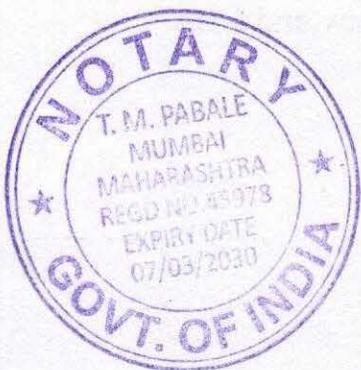


NDZ, 5.3 (v); development of airports in wastelands and non-arable lands in CRZ-III, 5.4 (vi); construction of memorials and monuments in CRZ-IV and 10.2(ii)(b); foreshore facilities such as fishing jetty, drying yards, net mending, boat repairs, etc. I say that the aforesaid provisions do not make CRZ 2019 any stringent as they, in fact, do the opposite by allowing more activities such as limestone mining in CRZ-III, reclamation in CRZ-IV to construction monuments, development of vacant plots in CRZ-III beyond NDZ, etc. and therefore, what was not permissible earlier in CRZ-III and CRZ-IV is now allowed in its entirety in CRZ 2019 and, therefore, none of the above provisions can be termed as 'stringent' for the protection of the coastal environment.

- (iii) With respect to Paras 13 to 18 of the OA, R-1 has responded by stating that it was the states such as Kerala who had sought relaxation in the NDZ of CRZ-III since local communities have been deprived of constructing or expanding in the NDZ and while stating so, R-1 has attempted to create parity with Clause 5.2(ii) of CRZ 2019 which allows for the construction on the landward side of the HTL, even at a distance of 10 meters if there is a presence of an existing road in CRZ-II areas. I deny the contents therein as the same are incorrect in law and I say

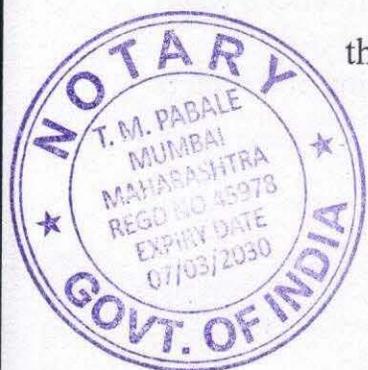


that this classification of reduction of NDZ area in CRZ-III in the same manner as any area of CRZ-II is irrational for the simple reason that a No Development Zone in a CRZ-III is an 'undeveloped' area so that it can act as a buffer in the case of natural hazards and no threat to life and property is caused in such an event while ensuring that no further pressure is mounted on the shoreline that would cause erosion and exacerbate the consequences of the rising sea level and climatic events due to global warming whereas CRZ-II areas are those areas that are 'already developed' with buildings and structures thereon and, therefore, both cannot be equated to the same level of natural consequences, although the threat to life and property may even be more in CRZ-II. I say that CRZ-III areas are required to be protected and cannot have the same fate of CRZ-II areas in the near future and that is the entire object and purpose of having an NDZ and the coastal regulation so that undeveloped areas do not become as vulnerable as the developed CRZ-II areas from the past. I further say that instead of responding to the NDZ reduction, R-1 has time and again contended that the notification favours protection by relying on other provisions relating to CRZ-I wherein an additional category of ESA has been added. However, that's not relevant to the issue relating to NDZ and



that R-1 has merely continued to deflect a response on reduction of NDZ, whilst ignoring the reliance on the Apex Court's judgment on *Indian Council for Environment-Legal Action*.

- (iv) With respect to Paras 19 to 21 of the OA which relate to the reduction in the CRZ for tidal influenced water bodies from 100m to 50m, R-1 has stated that the reduction is justified for the reasons that (i) CRZ boundary based on salinity ingress is highly confusing due to various hydrodynamic features, (ii) traditional families were finding it difficult to expand due to restrictions on dwelling units, (iii) *Indian Council for Environment-Legal Action* does not apply as sensitive areas are already marked as CRZ-IA (No Go areas), (iv) For the seafront, CRZ limit is 500 meters and not 50 meters. I say that the aforesaid reasons are entirely baseless, irrational and are without any scientific basis as the determination of the extent of tidal effects through salinity concentration can be found even in the present notification and has no direct relation with the figure of '50 meters' as when the width is less than 50 meters, then the determination will have to anyway be done through the assessment of salinity concentration of five parts per thousand (ppt). Further, I say that it is wholly incorrect of R-1 to



contend that the expansion of traditional dwelling units was earlier restrictive in nature for the reason that the rights of coastal communities *qua* expansion of dwelling units and provisions for fishing jetties, dry areas, etc. were adequately addressed in the CRZ 2011. Even if that needed a revisit, they were addressed by Regulation 5.3 (ii) (a) (c) and (d) of CRZ 2019. As regards the applicability of *Indian Council for Environment-Legal Action*, R-1's attempt to distinguish the ratio of the judgment by simply stating that ecologically sensitive areas are already covered by CRZ-I is entirely baseless as the specific issue is not about ecologically sensitive areas exclusively classified as CRZ-IA in Regulation 2.1.1 but areas such as drier portions of the creek, in the upper shore beyond the High Tide line, which may be even beyond 50 meters whose surface will include dead seaweed or rocks where are also habitats of crustacean species such as sand hoppers and crabs and hence, it is absolutely incorrect to state that reduction of 50 meters will not affect other important sensitive areas that may be located beyond 50 meters. I say that the entire issue being dealt in the concerned paras pertained to the reduction of the CRZ in the creek/tidal influenced water bodies alone and therefore the statement that CRZ remains 500 meters



for the seafront is unrelated to the issue of reduction of CRZ in the creek/tidal influenced water bodies.

- (v) With respect to Paras 22 to 26 of the OA which relate to the increase in FSI norms from those existing in 1991 to those existing as on 18th January, 2019, R-1 has merely stated that the change is necessary due to proliferation of slums in cities such as Mumbai and that uniformity is required in the CRZ and Non-CRZ areas to cater to the exploding population in Mumbai. I say that the aforesaid makes it clear that there are absolutely no environmental reasons provided by R-1 *qua* change in FSI norms and, therefore, such changes are regressive in nature as more population is being encouraged to live closer to the sea in CRZ-II areas, which are already developed and by virtue of such development, the coast already faces an ever-increasing pressure. Therefore, quality of life, air, water, open spaces, noise, population etc. will all catastrophically deteriorate/diminish. Indeed, in places like Mumbai, a drastic increase in FSI in coastal areas will have a disproportionate impact on the population that has not at all been considered when planning for DCR 2034 was done. I say that the coastal areas constitute 53.58 sq.km which is approximately 10% of the area of Mumbai and,



therefore, greater consideration is required to ensure that the pressure on the environment is not increased further. As regards slum redevelopment, it is reiterated that in CRZ 2011, an extensive regimen was set up especially considering Slum Rehabilitation Scheme; and dilapidated, cessed and unsafe buildings. Therefore. R-1's contention that the FSI change is made for slum rehabilitation cannot be said to furnish any valid reasoning at all. If the aim was to ensure redevelopment of slum areas as well as dilapidated, cessed and unsafe buildings, there was no need to make a general relaxation in the date on which relevant town and country planning norms shall apply.

- (vi) With respect to Paras 27 and 28 of the OA which relate to dispensing with EIA, risk assessment report and disaster management plan in certain cases such as building proposals below 2,00,000 sq. ft., R-1 has only responded to the same by merely stating that this change is based on the provisions of EIA Notification, 2006. I say that neither any scientific or environmental reasons vis-à-vis the sensitive nature of coastal stretches have been provided by R-1 nor has there been any explanation as to why the said provision was not in the 2018 Draft Notification, thereby contravening Rule 5(3) of the Environment

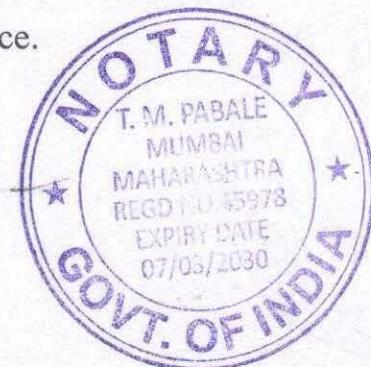


(Protection) Rules, 1986. I further say that coastal stretches require greater scientific enquiry due to its dynamic and more vulnerable nature and therefore, the earlier notification; CRZ 2011 sought preparation of an EIA Report even for all those projects which were outside the ambit of EIA Notification, 2006 but were falling within CRZ areas. I say that without any scientific or environmental reasons relating to the coast and by merely stating that CRZ 2019 follows the EIA 2006, the dispensation provided in the CRZ 2019 is absolutely regressive and defeats the object and scope of the CRZ Notification.

- (vii) With respect to Paras 29 and 30 of the OA which relate to the dilution of essential components in preparation of CZMPs such as (i) demarcating polluted areas, landward berm crest, rocks, cliffs, seawalls, embankments, (ii) no protection of dwelling units and (iii) absence of methodology on ground truthing, R-1 has merely stated that the OM dated 26.06.2019 provides for the states to submit a separate chapter on Pollution (*Para 2.4, Pollution and Waste Management Issues*) for the 'CZMP Report' that the states have to submit to the Technical Scrutiny Committee of NCSCM and the same cannot be equated with the provisions of CRZ 2011 for two reasons. *Firstly*, the information that



has to be provided under the Pollution and Waste Management Issues is vague and does not state what are such issues that are to be covered in the CZMP Report and *secondly*, the information shall be only given in the CZMP Report and that the same does not require under the law to be published in the final CZMPs. In fact, a perusal of the finally approved CZMPs of Maharashtra shows that no polluted waters are marked in the CZMPs of Palghar District or Mumbai Suburban District which establishes that such markings are not essential or mandatory to be published in the final CZMPs. I say that the aspect on how field mapping is required to be conducted has been left entirely to the State without any methodology stated and, therefore, it is crucial that certain prerequisites/standards are identified and notified by R-1 to ensure uniformity, which entirely lacks in CRZ 2019. I say that the directions passed by this Hon'ble Tribunal, Southern Zone Bench to expedite CZMPs have no relation with the instant proceedings as the challenge to the *vires* of CRZ 2019 was not the subject matter in the Southern Zone proceedings. I say that as long as the CRZ 2019 is in operation and effect, the states will have to comply with the notification, irrespective of the extent of its compliance.



(viii) With respect to Paras 31 and 32 of the OA which relate to the dilution of protection for mangroves and mangrove buffer, R-1 has stated that (a) addition of the word 'etc.' to permissible activities in the 50 meter mangrove buffer zone applies only to the eco-tourism activities and public utilities such as laying of pipelines, transmission lines, conveyance systems/mechanisms and construction of road on stilts, etc and (b) reduction in the mangroves compensatory afforestation has been reduced to a *minimum* of three times. As a response to the above, I say that R-1 has once again remained vague in explaining the non-exhaustive nature of "etc." within an 'eco-tourism activity'. I reiterate that the word 'etc.' is designed to expand to include activities above and beyond what could be termed as eco-tourism and it's open to a misuse. I say that the Notification uses the word "etc" and not "or the like" which would have clearly brought in the *ejusdem generis* principle. As regards allowing public utilities inside the 50-meter buffer zone, R-1 has failed to consider the importance of the buffer zone as observed in PIL No. 87 of 2006 (*Bombay Environmental Action Group & Anr. v/s State of Maharashtra & Ors.*), especially when SCZMAs such as Maharashtra CZMA had decided that there should be a policy to manage the 50-meter buffer as a green belt. Further, the *Bombay*



Environmental Action Group's direction to strictly preserve the 50 meter buffer zone also has been given a go-by in Regulation 5.1.1(i) of CRZ 2019.

- (ix) With respect to Paras 33 to 44 of the OA which relate to the changes in the regulation of permissible activities such as hotels, port development, airports in CRZ-III, R-1 now contends that tourism development projects ought not be read in isolation and though the words 'tourism development projects' are used, they refer only to beach resorts or hotels and not to other projects such as casinos, opera houses, museums, art galleries, etc. I say that on this admission alone, the said regulation ought to be struck down to the extent of usage of words "Tourism Development Projects". As regards relaxation of FSI relating to hotels, the FSI restrictions on construction of hotels upto a distance of 200 meters are now restricted only to CRZ-III areas and not to CRZ-II areas, R-1 has merely stated that this is being done to align with the other provisions relating to development in CRZ-II areas to permit tourism activities without providing any specific ecological factors/reasons for the need of such a relaxation. For a similar relaxation that was earlier done *qua* NDZ areas, the Hon'ble Apex Court had struck down a similar provision in *Indian Council for Environment-*



Legal Action. As regards allowing airports without exceptions, R-1 has merely stated that the Applicant has not provided any details as to why the airports should not be constructed in the non-arable lands and wastelands of CRZ-III. At the outset, I reiterate that the draft notification of 2018 did not include such a provision. I further say that other than the fact that the term 'wastelands' is not defined, even such wastelands are used for grazing in CRZ-III and since the same are open spaces, they play a crucial buffer in the event of a natural calamity. It is a given fact that airports require last swathes of lands with a concretised base for runway, terminals, parking bays, fire stations, etc. and if allowed in CRZ-III, it will heavily impact the water carrying capacity as well as the buffer zone in the event of a natural calamity, and such instances are only going to increase with more adverse climate events expected this decade.

- (x) With respect to Paras 45 to 53 which relate to permitting units for waste disposal, warehousing units for fish processing and deletion of the provision of prohibiting dressing or altering the sand dunes, hills and natural features, R-1 is attempting to mislead this Hon'ble Tribunal by conveniently referring to an entirely different provision which does not

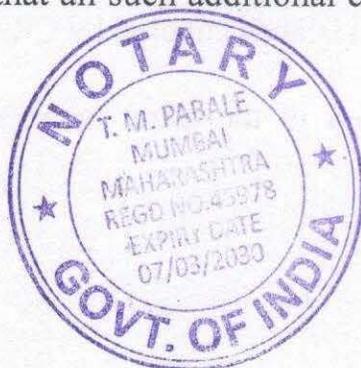


deal with permitting units for waste disposal, viz. prohibition on 'discharge of untreated waste and effluents from industries, cities or towns and other human settlements' under Regulation 4(v) of CRZ 2019. The issue in hand relates to removal of the provision relating to "*prohibition on setting up mechanism for disposal of waste and effluents*", such as solid waste treatment facilities, dumping grounds, etc. in CRZ areas and not relating to "*discharge of untreated waste and effluents from industries*". I say that the prohibition on setting up mechanism for disposal of waste and effluents is necessary under the precautionary principle for the reason that in case of a natural calamity such as floods or earthquakes or Tsunamis or cyclones, there is a danger of the waste system becoming non-functional and/or lead to spill over of the entire untreated/hazardous waste from such units into the sensitive coastal stretches and pollute the entire coastal system causing grave socio-ecological damage. As regards the deletion of the prohibition on setting up of fish processing units including warehouses in CRZ areas, R-1 has merely stated that as per para 5.1.2 (viii) of CRZ 2019, existing fish processing units may utilise 25% additional plinth area for modernisation purposes but I say that it does not deal with the extent of constructing a built-up area for a warehouse of unlimited size



without ascertaining or discussing environmental consequences of such an expansion on the coastal environment. As regards deletion of the provision prohibiting dressing or altering hills and other natural features of the coast through landscape changes, beautification, rectification and other purposes, R-1 has merely stated that there is no explicit provision permitting the same. I say that the deletion of an express prohibition amounts to allowing the same, albeit through a regulation, but allowing altering of the hills next to the coast affects the coastal morphology that will increase coastal erosion. In the absence of any environmental and scientific reasons, I say that that the deletion of such a prohibition is environmentally regressive and is hit by the Doctrine of Regression.

- (xi) With respect to Paras 54 to 56 of the OA which relate to the increase in the number of petroleum and chemical products permitted to be stored in CRZ areas (except for CRZ-IA), R-1 has vaguely stated that the increase has been brought in for increasing efficiency in new processes and products due the change in technology. I say that R-1 has failed to provide the risk assessment of storage of such highly toxic new chemicals such as Acetic Acid, Ethylene Glycol, Xylene, Bitumen and that all such additional chemicals have been allowed to be stored near



the coasts without conducting any scientific study on the impact of storing such chemicals in any adverse climatic event, especially when the coasts of India are more vulnerable to varied natural calamities than the inland areas.

(xii) With respect to Para 57 of the OA that deals with deletion of the terms 'associated biodiversity' from coral reefs, R-1 has stated that associated biodiversity includes all the biodiversity of the coral reefs as well as all of ESAs in CRZ-IA. I say that in view of the admission on the part of R-1, this Hon'ble Court may strike down the deletion of the terms associated biodiversity and restore it so that there is clear protection granted to the entire biodiversity of the coral reef system both the coral reefs and its biodiversity live in a symbiotic relationship with each other and protecting the biodiversity is as important as protecting the coral reefs themselves.

(xiii) With respect to Paras 58 to 60 of the OA which deal with reduction in CRZ from 50 meters to 20 meters on islands (except for Andaman and Lakshadweep islands), R-1 has stated that because Integrated Island Management Plans (IIMPs) for all islands covered by CRZ Notification 2019 are required to be prepared in the same manner as they are



required under the ICRZ Notification, the reduction to 20 meters is in consonance with ICRZ Notification and is valid. I say that such a contention is absolutely incorrect. A perusal of Clause 10.2(iii) of the 2022 amendment as reproduced by R-1 in its reply only states that the manner of preparation of IIMPs for islands under CRZ Notification has to in accordance with the ICRZ Notification and this by no stretch of imagination can mean that the provisions of ICRZ Notification will *mutatis mutandis* apply to islands covered under the CRZ Notification. Therefore, mere consonance with ICRZ Notification only because IIMPs are required to be prepared as per ICRZ cannot be the basis of such an enormous reduction from 50 meters to 20 meters. I reiterate that no scientific rationale has been provided to show the basis of reducing the CRZ limits to a mere 20 meters is environmentally benign or based on rational scientific study, especially when sea level rise due to climate change is now certain in the near future. No expert study for such a reduction has been undertaken.

- (xiv) With respect to Paras 61 to 63 of the OA which relate to the issue of allowing construction of statues, monuments and memorials, R-1 has merely stated that the entire process of EIA, public hearing, risk



assessment, Disaster Management Plan, etc. will be applicable. I say that this still does not justify the large-scale environmental consequences of reclamation of sea bed, especially with zero limits placed on the built-up area permissible for construction of monuments and therefore, such large-scale unregulated projects do not fulfil the objective of the CRZ Notification.

- (xv) With respect to Paras 64 to 68 of the OA which relate to the deletion of special provisions for Koliwadadas and Gaothans in Greater Mumbai, R-1 has merely relied upon the general provisions relating to fishermen communities and fishing villages *qua* the infrastructure and housing needs that the fisherfolk may require to contend that the Applicant's apprehensions are unfounded. However, it still does not justify removal of the protectionist regime for the Koli community of Mumbai whose villages (Koliwadadas) have time and again been wrongly declared as slums so that the developers and builders can move into such Koliwadadas whose lands are treated as prime areas for development in Mumbai. I say that the Shailesh Nayak Committee Report completely disregards the fact that it was only because the traditional communities of Mumbai demanded for Koliwadadas to be protected under CRZ-III and be treated



differently from slum areas of Mumbai did the relevant protectionist provision was drafted in CRZ, 2011.

- (xvi) With respect to Paras 69 to 72 of the OA which relate to the dilution of special protection granted to Greater Mumbai on subject matters ranging from construction of roads, solid waste disposal sites, Slum rehabilitation schemes to open spaces, parks and Koliwadass, R-1 has merely relied on Clause 3.3 of CRZ, 2019 to simply say that special protection has been retained in CRZ 2019 as well. I say that a perusal of Clause 10.3 of CRZ 2019 with the earlier regime on special provisions of Greater Mumbai under CRZ 2011 shows the stark difference as provisions only relating to open spaces and setting up of STPs in CRZ-I have been retained in the CRZ 2019 whereas specific governing provisions on construction of roads, solid waste disposal sites, slum rehabilitation schemes, redevelopment of dilapidated, cessed and unsafe buildings and Koliwadass have been arbitrarily removed without providing any environmental reasons that show an intervening change. I reiterate that Mumbai, is unique in the sense of its size; shape; population; population density; location; urbanization. Therefore, cognizant of this, special provisions were advisedly made.

There has been no change in this on account of intervening



developments. In fact, the need for special provisions has increased. The earlier protections were made keeping in mind the developmental pressure on the sensitive coastal ecology of the Mumbai and that no circumstances are reflected in the Committee Reports or in the reasons given by R-1 in its affidavit that suggest otherwise.

(xvii) I say that as there in response of R-1 to Paras 73 to 78, no further response is warranted at Applicant's end.

6. With respect to Paras 7 to 14 of the Reply, I say that implementation of CRZ 2019 by preparation of CZMPs, either on the basis of an order of this Hon'ble Tribunal expediting its preparation or otherwise, is completely unrelated and immaterial to the present proceedings that pertain to the challenge to the *vires* of CRZ 2019. I say that in view thereof, reliance of R-1 on the orders of this Hon'ble Tribunal directing expeditious preparation of CZMPs have no bearing on the merits of the present proceedings.

Rejoinder to the Affidavit in reply of all states

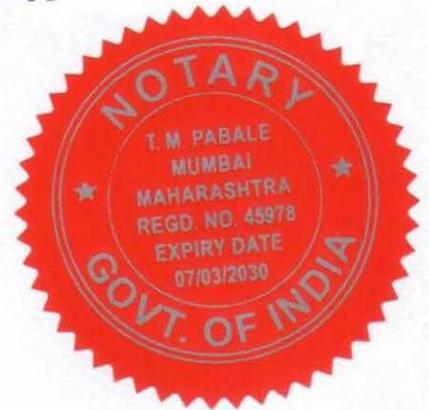
7. I say that the Applicants have received/downloaded the replies of Kerala CZMA (R-8) dated 11.07.2025, TNCZMA (R-9) dated



01.09.2025, Odisha CZMA (R-11) dated 16.07.2025, Dadra & Nagar and Daman & Diu CZMA (R-13) dated 19.07.2025 and Puducherry CZMA (R-15) dated 12.06.2025 and all such replies are only concerned with the enforcement of CRZ 2019 by way of preparation of respective CZMPs and that no averments as regards the merits of the challenge to CRZ 2019 have been made by any of the aforesaid SCZMAs other than Puducherry CZMA which has cursorily mentioned at Para 16 that CRZ 2019 ought to be allowed to be implemented as it facilitates environmental protection without providing any specific response to any of the grounds and averments made by the Applicants in the OA.

Solemnly Affirmed at Mumbai)

Dated this 4th Day of November, 2025)



Identified by me

Zaman Ali

Advocate for the Applicants

Deponent
BEFORE ME

TUSHAR M. PABALE
B.Sc., LL.B.

ADVOCATE & NOTARY (GOVT. OF INDIA)
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Janmabhoomi Marg, Fort, Mumbai - 400 001.

NOTED & REGISTERED

Page No. 1515 Sr. No. 158

Date 04 NOV 2025



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Dated this 11th day of November, 2025

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