

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN  
ZONE BENCH AT CHENNAI**

**Original Application No. 264 of 2024 (SZ)  
(Earlier O.A. No. 691 of 2024(PB))**

**WITH**

**Original Application No. 265 of 2024  
(SZ) (Earlier O.A. No. 679 of 2024(PB))**

**IN THE MATTER OF:**

**Chittibabu Bheemaneni.**

**...Applicant(s)**

**Versus**

**Director Mines and Geology, Andhra Pradesh and ors.**

**...Respondent(s)**

**REJIONER FILED BY THE APPLICANT TO THE REPORT FILED BY  
THE JOINT COMMITTEE DATED - 10.01.2025**

**M/s.Ananda Gomathy, Ms.No: 827/1998  
K.Jayaganga, Ms.No: 905/2013  
J.Padma Priya Ms.No: 7118/2021  
Advocates,  
Flat No.1, Shrinivas Apartment,  
Turn Bulls 1st Cross Street,  
Nandanam, Chennai-600035.  
Cell No: 9840980854**

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Signed and verified on this the 24<sup>th</sup> day of February, 2025 at CHENNAI.

  
Counsel For Applicant

  
Applicant

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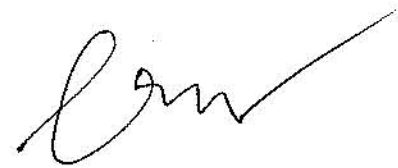
**Director Mines and Geology, Andhra Pradesh and ors.**

**...Respondent(s)**

**REJIONDER FILED BY THE APPLICANT**

I, Chittibabu Bheemaneni, S/o Late B.Subramaniyam Naidu, aged 57 years, residing at No:1/38, Palasamudram Viilage, Chittor District, Andra Pradesh-517599, presently comedown to Chennai, do hereby solemnly affirm and sincerely state as follows:

1. I am the applicant herein and fully aware of the facts and circumstances of the case. Hence competent to swear this affidavit.



2. I humbly submit that I have sent a letter petition to the Hon'ble National Green Tribunal, New Delhi regarding illegal sand mining. The petition has been numbered as Original Application 691 of 2024 (PB) LP with 679 of 2024 (PB) LP. The Tribunal heard the application on 19.07.2024 and redirected it to the southern zone with an order that a joint committee should be formed by the state. and to submit a report within two months of this order.

*"The said Committee shall visit the site and collect relevant information and if finds any illegal sand mining in violation of environmental laws, take appropriate punitive, prohibitive and remedial action and file Report/action taken Report with Registrar, Southern Bench, Chennai of Tribunal within two months."*

*"Since the matters relate to State of Andhra Pradesh, we direct Registry to transmit record of these Original Applications to Southern Bench of this Tribunal at Chennai for further orders."*

3. I humbly submit that although the matter had been transferred to the southern zone and the 1<sup>st</sup> hearing pertaining to Hon'ble National Green Tribunal, Southern Zone took place on 30.09.2024, the joint committee report should have been filed by then. However, only an interim report was filed stating that authorities are appointed and they will soon arrive at a date to visit the site and the matter was posted to 13.11.2024 and then to 02.01.2025 at request of the respondent who just claimed they have visited the site but had not filed any report.



6. I further submit that the officials did not inform the complainant about their visit, which would have allowed the Applicant to guide them directly to the locations where illegal sand mining is being conducted. As such, the report cannot be relied upon.

7. I further submit that however I am filing the pictures and videos took by me to demonstrate the extent of river sand mining by mechanized means, the Photographs are appended herewith. This clearly shows that illegal mining had occurred contrary to the report claimed by the Respondents that there are no mechanized or manual illegal mining carried out in various reaches. It is evident from the images in the report filed by the Respondents that they did not conduct a thorough investigation at the site. Based on the images submitted by the Respondents in their report it can be inferred that the authorities spent no more than 10 to 15 minutes at each site, which would have only allowed them to take pictures rather than properly investigate the matter.

Hence it is most humbly prayed before this Hon'ble Tribunal that the report submitted by the Respondent cannot be relied upon, as the officials have not visited the site as per the orders of the National Green Tribunal, New Delhi Principal Bench dated 19.07.2024. The visit, as claimed, took place on 30.10.2024, yet the report was prepared on 6th January 2025, which raises doubts due to the excessive time taken to prepare it. Furthermore, the authorities did not properly investigate the matter but merely took pictures and compiled a report. For the reasons stated above, it is most humbly prayed that the affidavit be



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recorded and such further orders as deemed fit and proper in the circumstances of the above case and thus render justice.

Solemnly affirmed at Chennai  
and signed before me on this the  
24<sup>th</sup> day of February 2025

\*

  
Before Me

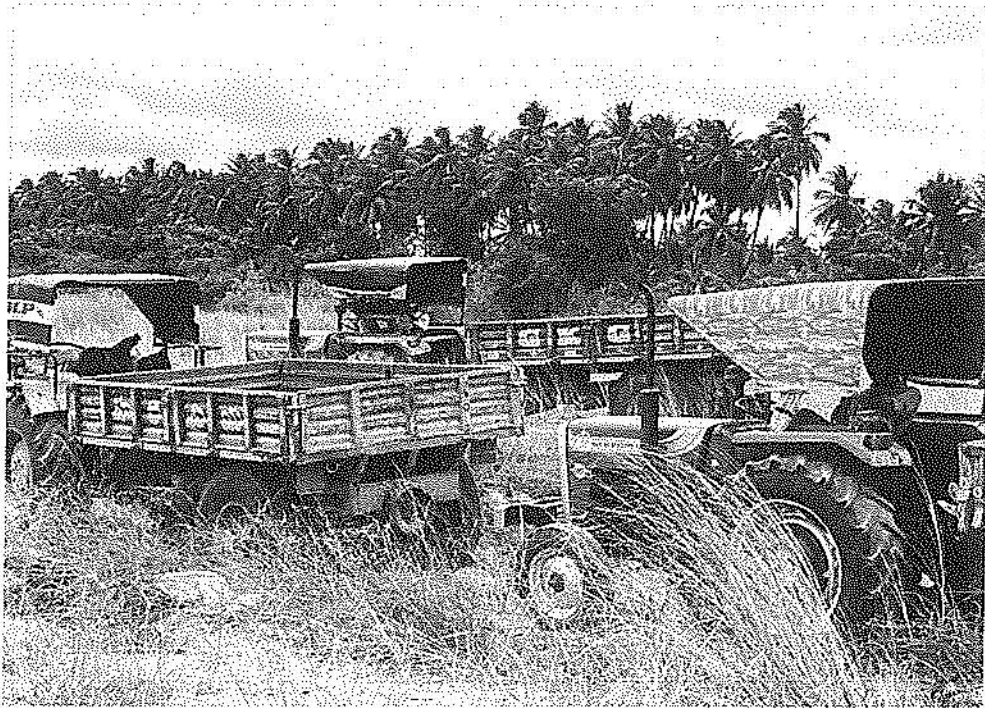


Advocate, Chennai

E. GOPI

MSno: 1108/07

No: 193, Law Chambers,  
High Court, Cheloy



*Q. J. W.*



*Qgn*



*Low*



*Q*