

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI
Original Application No. 99 of 2024 (SZ)

In the matter of:

R. Narayanan Kovalam.

... Applicant(s)

Versus

Tamil Nadu Coastal Zone Management Authority

Rep. by its Member Secretary, Chennai and Ors.

...Respondent(s)

INDEX

S. No.	Date	Description	Page No.
1.	16.03.2026	Additional Report filed by the 1 st Respondent- The Tamil Nadu Coastal Zone Management Authority.	2-8

Note: The page numbers are at the top center of every page)



Through

Dr. D. Shanmuganathan

Standing Counsel for Government of Tamil Nadu

National Green Tribunal

Southern Zone, Chennai

Date: 01.05.2026

**BEFORE THE NATIONAL GREEN TRIBUNAL (SOUTHERN ZONE)
AT CHENNAI**

Original Application No. 99 of 2024

R. Narayanan,

Son of Raji,

No. 3/187, Bajanai Kovil Street,

Kovalam – 603112.

Ph: 9566254546 Email: yogeshwaranadv@gmail.com

..... Applicant

Versus

1. The Tamil Nadu Coastal Zone Management Authority,

Rep by its Member Secretary,

No.1, Jeenis Road, Panagal Building,

Ground Floor, Saidapet, Chennai - 15

Email: tndoe@tn.nic.in, Phone: 044-24336594

2. The Secretary,

Public Works Department,

Government of Tamil Nadu,

Department of Environment,

Fort St. George, Chennai.

Email: pwdsec@tn.gov.in, Phone: 25673040

3. The Central Institute of Brackishwater Aquaculture

Rep by its Director

No. 75, Santhome High Road, RA Puram, MRC Nagar,

Chennai, Tamil Nadu – 600028

Email: director.ciba@icar.gov.in, Phone: 044-24610311 Respondents



MEMBER SECRETARY
TAMIL NADU STATE COASTAL ZONE
MANAGEMENT AUTHORITY,
CHENNAI - 600 015.

(9/16)

Additional Report Filed by the 1st Respondent -
TAMIL NADU STATE COASTAL ZONE MANAGEMENT AUTHORITY

I, A.R. Rahul Nadh., I.A.S., S/o Regunadh A.K, aged about 38 years and having office at 9th floor, Metros, Anna Salai, Chennai – 600 035 solemnly affirm and sincerely state as follows,

1. I respectfully submit that I am the Director, Department of Environment and Climate Change, Government of Tamil Nadu, and also the Member Secretary, Tamil Nadu State Coastal Zone Management Authority (TNSCZMA) and as such am well acquainted with the facts and circumstances of the case from the records available in this office. I am filing this Additional Report on behalf of the 1st respondent.
2. It is respectfully submitted that the applicant has filed this Original Application stating that 3rd respondent has illegally constructed structures in the CRZ IB and IVB areas, blocking flow of water and obliterating fishing grounds.
3. It is respectfully submitted that, as per the instructions of the Director, Department of Environment and Climate Change, *vide U.O. Note No. P1/738/2024 Dated: 12.04.2024*, a site inspection was conducted by the Assistant Executive Engineer and Forest Range Officer of the Department on 25.04.2024.
4. It is respectfully submitted that, during the inspection, it was observed that,



**MEMBER SECRETARY,
TAMIL NADU STATE COASTAL ZONE
MANAGEMENT AUTHORITY,
CHENNAI - 600 015.**

(10/16)

“Circular structure erected at 12°48'24.58"N 80°14'50.64"E are essential for conducting research and development on hatchery operations for fish, crab, and shrimp seed production, targeting various species suitable for brackish water farming.”

5. It is respectfully submitted that, as per the site inspection report, apart from the above structure,

“In the vicinity of coordinates 12°48'21.80"N 80°14'52.40"E, a total of 12 temporary PVC tanks were observed. Among these, 4 were large tanks capable of holding up to 1 to 1.5 tons of shrimps, while 8 small tanks were capable of holding up to 1 ton of shrimps. Additionally, 4 more small tanks were found under construction. In addition to the tanks, there were 2 container offices and 2 single-storey structures with asbestos sheet roofs, all enclosed by a closed gate fencing and motion based detecting CCTV camera.”

6. It is respectfully submitted that the above constructions were found to fall within CRZ – IB and IVB, as per the approved Coastal Zone Management Plan (CZMP) prepared in accordance with the CRZ Notification, 2011.

7. It is respectfully submitted that, following the inspection and in compliance with the directions of this Hon'ble Tribunal, a Show Cause Notice was issued to the Central Institute of Brackishwater Aquaculture



MEMBER SECRETARY,
TAMIL NADU STATE COASTAL ZONE
MANAGEMENT AUTHORITY.
CHENNAI - 600 015.

(11/16)

(ICAR–CIBA), represented by its Director, No. 75, Santhome High Road, RA Puram, MRC Nagar, Chennai – 600028, *vide Letter No. P1/738/2024 dated 16.06.2025*, for unauthorized constructions.

8. It is respectfully submitted that, in response to the said Show Cause Notice, ICAR–CIBA submitted a reply dated 24.06.2025, stating inter alia that

“The reported structures – Circular tanks, Seed tanks, Container offices and Fencing are all temporary, prefabricated or semi-permanent hatchery facilities installed for experimental research on seed production and nursery rearing of Shrimp/ fish” and “These structures are located entirely within the legally allotted land to ICAR-CIBA and are situated on elevated terrain that became accessible following desilting and boulder armouring of the bar mouth area undertaken by the Public Works Department, Government of Tamil Nadu, in 2017”

9. It is further submitted that ICAR–CIBA stated that,

“Fencing and CCTV installations are essential for biosecurity and safeguarding research infrastructure. These are confined within institutional boundaries and do not encroach upon public or ecological zones.”

10. It is respectfully submitted that, upon examination of the reply, the Director, Department of Environment and Climate Change instructed



MEMBER SECRETARY,
TAMIL NADU STATE COASTAL ZONE
MANAGEMENT AUTHORITY,
CHENNAI - 600 015.

(12/116)

the Deputy Director (Land Use) and the Assistant Executive Engineer to conduct a detailed field inspection to verify whether any permanent structures had been erected within CRZ-IB and CRZ-IVB areas, *vide U.O. Note No. P1/738/2024 Dated: 11.07.2025.*

11. It is respectfully submitted that, accordingly, a site inspection was conducted on 28.07.2025 by Deputy Director (Land Use) and the Assistant Executive Engineer during which the following were observed:

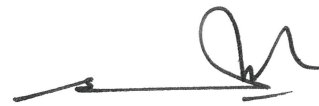
“In CRZ-IB:

- *One single-storey structure with concrete pile basement and asbestos roofing*
- *Two small tanks with concrete base*
- *Twelve medium PVC tanks (1-ton capacity)*

In CRZ-IVB:

- *Four large PVC tanks (1–1.5 tons capacity)*
- *Fifteen small PVC tanks*
- *Two container offices”*

12. It is respectfully submitted that, subsequent to the inspection, ICAR-CIBA was called for a Personal Hearing to present their case and submit relevant records and supporting documents, *vide Letter No. P1/738/2024 dated 13.08.2025.*



MEMBER SECRETARY,
TAMIL NADU STATE COASTAL ZONE
MANAGEMENT AUTHORITY,
CHENNAI - 600 015.

(13/16)

13. It is respectfully submitted that a Personal Hearing was conducted on 20.08.2025, during which the representatives of ICAR-CIBA made the following submissions and furnished supporting documents:

- a. *“ICAR-CIBA is a national R&D institute mandated to promote environment-friendly and sustainable aquaculture, and the facilities established on the above-referred land are exclusively for hatchery purposes and seed production research.*
- b. *Hatcheries are expressly permitted activities under the CRZ Notification, 2011 and CRZ Notification, 2019.*
- c. *The Coastal Aquaculture Authority (Amendment) Act, 2023 provides explicit statutory exemption of hatcheries from CRZ restrictions, with retrospective effect from 19.02.1991.*
- d. *The CAA Rules, 2024 operationalize this exemption by confirming that hatcheries operated and registered with CAA do not require separate CRZ clearance.*
- e. *The land portion in question is well-elevated and has never been inundated even during major flood events; hence, a reclassification is requested to reflect its correct geomorphological and hydrological character.*
- f. *ICAR-CIBA is fully compliant, holds valid CAA registration, and operated entirely within the legal framework.”*



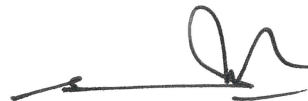
MEMBER SECRETARY,
TAMIL NADU STATE COASTAL ZONE
MANAGEMENT AUTHORITY,
CHENNAI - 600 015.

(14/16)

14. It is respectfully submitted that, in view of the submissions made by the 3rd Respondent (ICAR-CIBA) regarding the applicability of the Coastal Aquaculture Authority (Amendment) Act, 2023 and the Coastal Aquaculture Authority Rules, 2024, and considering the apparent overlap with the provisions of the CRZ Notification, 2011, the 1st Respondent has sought clarification from the National Coastal Zone Management Authority (NCZMA) on the permissibility of hatchery-related activities and associated structures in CRZ-IB and CRZ-IVB areas, *vide Letter No. P1/738/2024 dated 05.03.2026*. The clarification from NCZMA is presently awaited.

15. It is respectfully submitted that the 1st Respondent has undertaken all necessary actions in compliance with the directions of this Hon'ble Tribunal, including conducting site inspections, issuing a Show Cause Notice, examining the explanation submitted by the 3rd Respondent, and affording an opportunity for personal hearing in adherence to the principles of natural justice. The matter has been examined with reference to the approved Coastal Zone Management Plan and the applicable provisions of the CRZ Notification, 2011.

16. It is respectfully submitted that, in view of the clarification sought from the National Coastal Zone Management Authority (NCZMA) regarding the permissibility of hatchery-related activities in CRZ-IB and CRZ-IVB



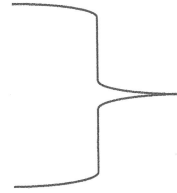
MEMBER SECRETARY,
TAMIL NADU STATE COASTAL ZONE
MANAGEMENT AUTHORITY,
CHENNAI - 600 015.

(15/16)

areas, further action in the matter will be taken by the competent authority upon receipt of the clarification, in accordance with law.

It is therefore humbly prayed that this Hon'ble Tribunal may be pleased to record the above-mentioned facts and pass such further order or orders as this Hon'ble Tribunal may deem fit and proper in the interest of justice.

Solemnly affirmed at Chennai
 This the 16th day of March 2026
 and signed his name in presence



MEMBER SECRETARY,
 TAMIL NADU STATE COASTAL ZONE
 MANAGEMENT AUTHORITY,
 CHENNAI - 600 015.

(16/16)

Before Me
 Motiur Rahman
 (A437/2024)
 No. 4, Law officers chambers,
 Madras High Court, ch-104