

BEFORE THE HON'BLE NATIONAL GREEN
TRIBUNAL, PRINCIPAL BENCH AT NEW DELHI

ORIGINAL APPLICATION NO. 99 OF 2025

IN THE MATTER OF:

Sovran Singh

... Applicant

Versus

State of Uttar Pradesh & Ors.

... Respondents

REJOINDER TO RESPONSE FILED ON BEHALF OF
DIVISIONAL FOREST OFFICER (DFO), JHANSI.

MOST RESPECTFULLY SHOWETH:

1. That the applicant has gone through the contents of the response filed on behalf of Divisional Forest Officer (DFO), Jhansi and have understood the contents thereof. At the outset the applicant denies each and every averment of law and facts made in the said reply save and except specifically admitted hereinafter. The denial made herein shall be treated as specific denial.

PARAWISE REPLY:

2. That the contents of Para 1 and 2 as stated do not call for any comments being matter of record and formal in nature.
3. The contents of para 3 are a partial and incomplete narration of facts. It is not merely the applicant's plea but a matter of judicial record that the lease of Respondent No.7 was cancelled by the District Magistrate, Jhansi on 12.08.2024, and this fact formed the foundation of the final order dated 23.09.2024 passed by this Hon'ble Tribunal in OA No. 742/2024. The subsequent revival of the lease by

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the Special Secretary, Mining, through order dated 27.01.2025, was done without reference to or leave of the Hon'ble Tribunal, and is therefore contrary to judicial discipline and illegal.

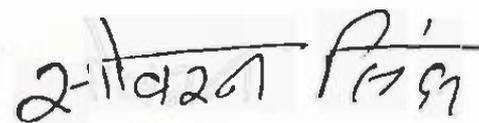
Furthermore, the SEIAA in its 884th meeting dated 02.04.2025 has categorically held that the Environmental Clearance stood cancelled w.e.f. 12.08.2024 due to the lease cancellation. These facts cumulatively establish that any revival of mining operations by Respondent No.7 is without valid lease or EC, and hence patently illegal. The DFO's reply fails to acknowledge this legal position and overlooks binding directions of this Hon'ble Tribunal.

4. That the contents of Para 4 as stated do not call for any comments being matter of record.
5. That the contents of Para 5 as stated do not call for any comments so far as they are matter of record. It is submitted that the letter dated 20.06.2025 written by the DFO to the District Mining Officer is a mere formality and does not reflect any independent action or assessment by the Forest Department. Despite repeated violations and cancellation of lease and EC, no effective steps have been taken by the Forest Department to ensure compliance with the Tribunal's directions. Such passive communication falls short of the proactive duty cast upon a statutory authority entrusted with environmental and forest protection.
6. That the contents of Para 6 & 7 are general and do not address the core issues of inaction and non-enforcement

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against continued violations by Respondent No.7. While the deponent claims adherence to legal duties and Tribunal's directions, the record demonstrates a lack of effective steps to prevent illegal mining and enforce the cancellation of lease and EC. Mere assurance of compliance cannot substitute actual action on ground.



Sovran Singh
Applicant

Through



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Date: 18.08.2025
New Delhi

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ORIGINAL APPLICATION NO. 99 OF 2025

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AFFIDAVIT

I, Sovran Singh, Aged about 35 years, S/o Gyan Singh R/o Targuwan, Lalitpur, Uttar Pradesh - 284126, do hereby solemnly affirm and states as under:

- 1. That the deponent is applicant in the above-mentioned matter and as such he is well conversant with the facts and circumstances of the present case.
2. That the deponent has gone through the contents of the accompanying response filed on behalf of Divisional Forest Officer (DFO), Jhansi. The same has been drafted as per my instructions and has explained to me in vernacular. The contents of the same are true and correct to the best of my knowledge and nothing material has been concealed there from.

Handwritten signature of Sovran Singh

DEPONENT

VERIFICATION

I, the deponent above named do hereby verify that the contents of this affidavit are true and correct to the best of my knowledge derived from the records and nothing relevant has been concealed therefrom. Verified at on this day of August, 2025.



This affidavit has been sworn before me by Shri Sovran Singh, S/o Gyan Singh, R/o Targuwan, Lalitpur, Dist. Lalitpur, UP on this day of August, 2025. The contents of the affidavit have been read over and explained to the deponent and he admitted them to be true and correct.

Handwritten signature of the Oath Commissioner

DEPONENT

Handwritten date: 28.8.25