

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
AT PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 263 OF 2025**

IN THE MATTER OF:

Karan Singh

...Applicant

Versus

Union of India & Ors.

...Respondents

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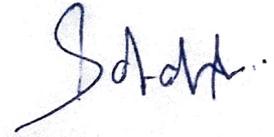
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Proof of Service

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THROUGH COUNSEL

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PLACE: New Delhi

DATE: 27.01.2026

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
AT PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 263 OF 2025

IN THE MATTER OF:

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REPLY/RESPONSE BY WAY OF AN AFFIDAVIT OF ATAL KUMAR, DIVISIONAL FOREST OFFICER, WILDLIFE DIVISION, PATHANKOT, ON BEHALF OF RESPONDENT NO. 5, I.E. DEPARTMENT OF FOREST AND WILDLIFE CONSERVATION, PATHANKOT, IN COMPLIANCE WITH THE ORDER DATED 29.07.2025, PASSED BY THE HON'BLE NATIONAL GREEN TRIBUNAL

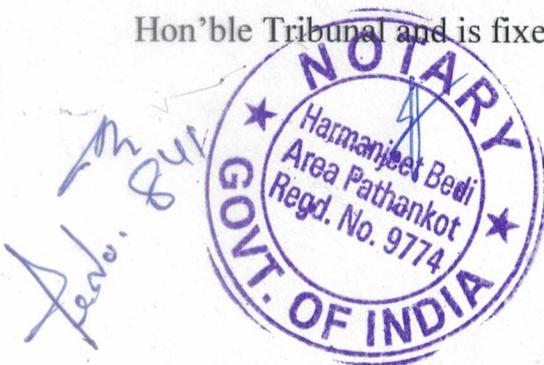
I, the above named deponent, do hereby solemnly affirm and declare as under:-

MOST RESPECTFULLY SHOWETH:

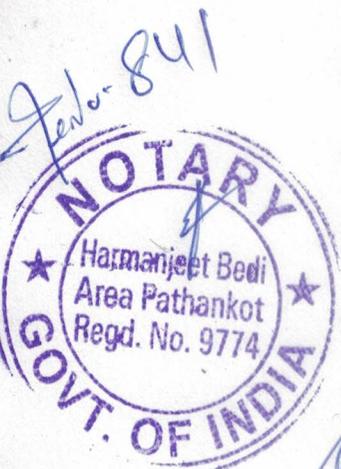
PRELIMINARY SUBMISSIONS:-

1. That the above captioned matter is pending before this

Hon'ble Tribunal and is fixed for hearing on 29.01.2026.

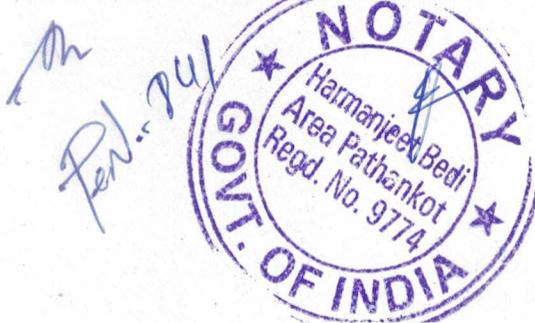


2. That the Answering respondent is well conversant with the facts of the case and competent to controvert the averments and submissions made by the APPLICANT in the present original application and place correct facts of the case before this Hon'ble Tribunal by way of the present reply by way of affidavit.
3. That at the outset, the Answering Respondent denied all the purported grounds, submissions and contentions raised by the APPLICANT save except matters of records. The Present petition is devoid of any merits and deserves to be dismissed at the threshold by this Hon'ble Court.
4. That the APPLICANT through the present Original Application, the APPLICANT has raised sweeping and omnibus grievances alleging that rampant illegal mining and stone-crushing activities are being carried out in and around Village Shekhpur Manziri and adjoining villages of District Pathankot without obtaining mandatory environmental clearances or statutory permissions, in alleged violation of the Mines and Minerals (Development and Regulation) Act, 1957, the Punjab Minor Mineral Rules, 2013, and other environmental protection norms,



including excavation beyond the permissible depth. However, bare perusal of the contents of the present Original Application shows that the applicant has failed to demonstrate the circumstances which enforced him to file the present application before this Hon'ble Tribunal.

5. That it is humbly and respectfully submitted that the villages mentioned by the applicant in Para No. 3 are located outside the one-kilometre radius of Dittal–Firoza Wildlife Sanctuary Kathlor– Kushallian. However, the villages which fall within a radius of 1000 meters of the Kathlor–Kushallian Wildlife Sanctuary, as per the judgment in *T.N. Godavarman Thirumulpad v. Union of India*, Writ Petition (Civil) No. 202 of 1995, decided on 26.04.2023, mining activities cannot be carried out. Despite this, if any mischievous elements undertake such activities, the Forest and Wildlife Protection Department immediately informs the Mining Department to take action in this regard, and the Mining Department registers FIRs against the offenders.
6. Khewat No. 7 is classified as *Gair Mumkin Jungle* (non-



cultivable forest land) and Khewat No. 8 is classified as *Gair Mumkin Rasta* (non-cultivable road). No illegal mining has taken place in these khasra numbers. However, certain mischievous elements attempted to carry out illegal mining within a 1000-meter radius of village Kushallian. In this regard, the Mining Department was informed by the Range Officer (Wildlife), Pathankot through letters-No.: 474-75 Date: 31/05/2022 No. 76-P dated 22.05.2024, No. 112-P dated 24.06.2024, and No. 24-P dated 05.05.2025, as well as by the Divisional Forest Officer (Wildlife), Pathankot through letters No. 1410 dated 15.10.2025, No. 1467 dated 27.10.2025, and No. 1971 dated 30.12.2025, for taking action against the offenders. (Copy of the letters are hereby annexed herewith from **Annexure R-1 to R-7**).

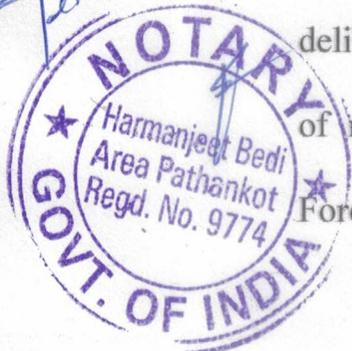
7. That based upon the reports of this office, FIR No. 68 dated 10.06.2025, FIR No. 143 dated 02.11.2025, FIR No. 148 dated 14.11.2025, FIR No. 156 dated 25.11.2025, FIR No. 157 dated 27.11.2025, FIR No. 160 dated 01.12.2025, and FIR No. 164 dated 11.12.2025 have been registered against the offenders at Police Station



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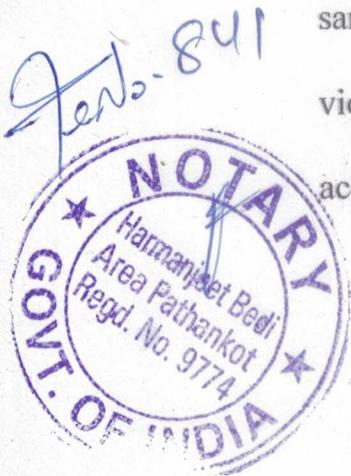
Taragarh, District Pathankot.

8. That the grievances raised by the APPLICANT are not tenable in the eyes of law as the allegations are general, vague, and wholly unsubstantiated, having been made without placing on record any specific inspection reports, scientific studies, seizure memos, or official findings to establish the existence of ongoing illegal mining, and it is well settled that mere apprehensions, suspicions, or reliance on newspaper reports cannot justify invocation of the extraordinary jurisdiction of this Hon'ble Tribunal; further, the APPLICANT has failed to demonstrate that any illegal mining activity was permitted, protected, or ignored by the respondents, whereas official records clearly show that whenever unauthorized activities were noticed, FIRs were promptly registered and enforcement action was initiated, thereby negating any allegation of administrative apathy; the APPLICANT has also deliberately suppressed material facts such as registration of multiple FIRs, issuance of communications by the Forest and Wildlife authorities, and continuous

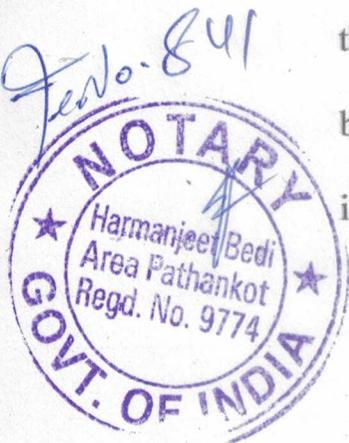


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monitoring and enforcement measures undertaken by the respondents, which suppression itself disentitles the APPLICANT from any equitable relief; moreover, the APPLICANT has failed to establish any direct causal nexus between the alleged environmental degradation and any authorized mining activity, as no credible scientific or expert evidence has been produced to support such claims; several grievances raised, including allegations relating to forged revenue entries, land encroachments, and national security concerns, fall outside the jurisdiction of this Hon'ble Tribunal and lie within the domain of revenue authorities, civil courts, or security agencies, and the APPLICANT is impermissibly attempting to convert the Tribunal into a general supervisory body; it is further submitted that the respondents have strictly complied with all binding judicial directions issued by the Hon'ble Supreme Court and the Hon'ble Punjab and Haryana High Court, including prohibitions on mining within wildlife sanctuary limits and sensitive border areas, and any violation, when detected, has been dealt with in accordance with law, rendering the allegation of judicial



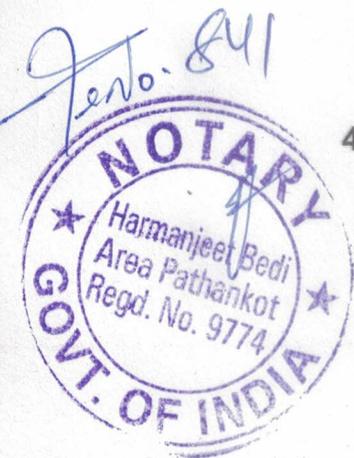
defiance factually incorrect; the APPLICANT's prayer for blanket and sweeping directions such as complete stoppage of mining is contrary to the doctrine of proportionality and the rule of law, as regulatory violations, if any, are required to be addressed through statutory mechanisms rather than disproportionate blanket bans; additionally, the issues raised do not constitute a "substantial question relating to the environment" under Section 14 of the National Green Tribunal Act, 2010, since the alleged violations are isolated, have already been addressed, and no ongoing or unremedied environmental damage of public importance has been demonstrated; lastly, the APPLICANT has bypassed available and efficacious statutory remedies by not approaching the District Administration, Pollution Control Board, or Mining Authorities for redressal of specific grievances and has instead invoked the jurisdiction of this Hon'ble Tribunal on speculative and presumptive grounds, and therefore, in view of the foregoing, the present application, being founded on assumptions, conjectures, and incomplete disclosure of material facts, amounts to a



misuse of environmental jurisdiction and deserves to be dismissed as misconceived, devoid of merit, and not warranting any interference by this Hon'ble Tribunal.

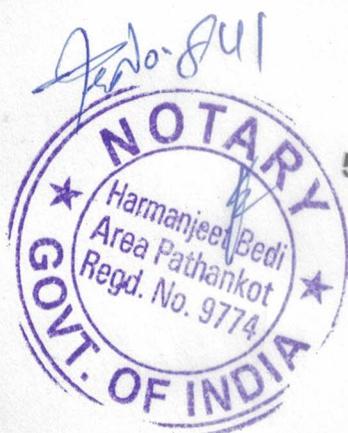
REPLY ON MERITS:-

1. That the contents of the para No. 1 of the application needs no reply by the answering respondent.
2. That the contents of the para No. 2 of the application needs no reply by the answering respondent.
3. That the contents of Para No. 3 of the application are denied to the extent they allege rampant and unchecked illegal mining in the area. It is respectfully submitted that mining activities in District Pathankot are strictly regulated under the Mines and Minerals (Development and Regulation) Act, 1957, the Punjab Minor Mineral Rules, 2013, and environmental laws in force. There is no sanctioned or permitted mining activity within prohibited areas, including wildlife sanctuary limits or eco-sensitive zones.
4. That in reply to the contents of the para No. 4 of the application it is submitted that the averment that mining



operations are being carried out without environmental clearance is incorrect and misleading. No mining lease or operation has been granted or permitted by the competent authority in areas falling within restricted zones. Wherever any unauthorised activity was noticed, immediate action was initiated in accordance with law. It is further submitted that the APPLICANT has deliberately failed to distinguish between villages located outside and those falling within the 1000-meter radius of Kathlor-Kushallian Wildlife Sanctuary. It is submitted that mining is completely prohibited within the said radius in compliance with the judgment of the Hon'ble Supreme Court in *T.N. Godavarman Thirumulpad v. Union of India*. The respondent departments have strictly enforced this prohibition, and no lawful mining exists within the said restricted zone.

5. That in reply to the contents of the para No. 5 of the application it is submitted that on every instance where attempts of illegal mining were detected, the Forest & Wildlife Department promptly intimated the Mining Department, resulting in registration of FIRs and initiation

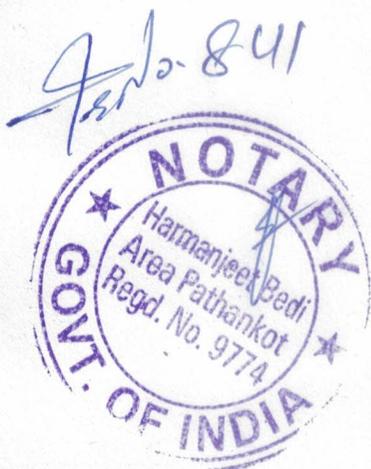


on

of criminal proceedings. The record clearly reflects continuous monitoring and enforcement actions. The contention that agricultural lands have been degraded due to sanctioned mining is baseless. No mining activity has been approved on agricultural land. Any damage alleged by the APPLICANT is not attributable to permitted mining operations but to unauthorised acts by miscreant elements, against whom strict penal action has already been taken.

6. The detailed reply to the contents of the sub paras from A to T has been given below:-

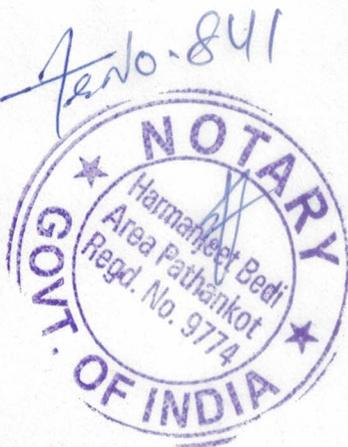
a. That the contents of Para 6(a) are denied. It is denied that extensive or illegal mining activities are being carried out in or around the villages named by the APPLICANT. No mining activity has been permitted without statutory approval or environmental clearance. The APPLICANT has made bald and generalized allegations without placing on record any documentary proof to establish the existence of authorised or unauthorised mining sanctioned by the respondents. Wherever any unauthorised activity was



noticed, the same was promptly acted upon in accordance with law.

b. That the averments made in Para 6(b) regarding alleged stone crushers operating illegally within 5 kilometres of the Line of Control (LoC) are false, exaggerated, and misleading. No stone crusher is permitted to operate without requisite No Objection Certificates and statutory consents from competent authorities. Any unauthorized unit found operating is proceeded against under the Punjab Pollution Control Board norms and mining laws. Mere proximity to the LoC does not ipso facto establish illegality, and the APPLICANT has failed to disclose any verified inspection report supporting his claim.

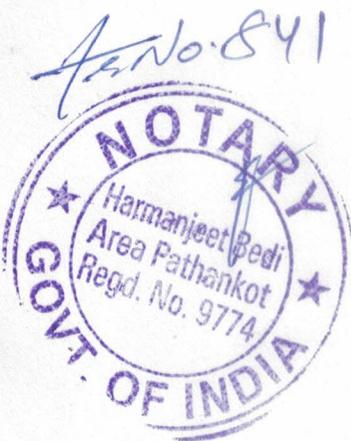
c. That the allegations regarding excavation up to 5-6 feet and indiscriminate removal of fertile topsoil are categorically denied. No mining or excavation has been authorized beyond permissible limits under the Punjab Minor Mineral Rules, 2013. The respondents maintain regular inspections, and no sanctioned mining activity exists in the area alleged by the



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APPLICANT. Any unauthorised excavation, if attempted by private miscreants, has already been addressed through penal action.

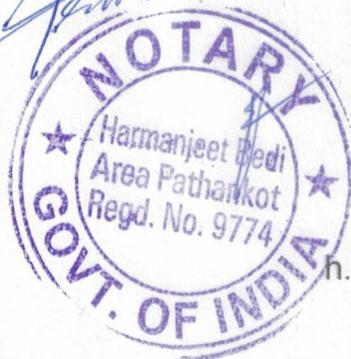
- d. That the contention alleging large-scale ecological and agricultural damage is conjectural and unsubstantiated. The APPLICANT has failed to correlate any specific damage to a legally permitted mining activity. On the contrary, the record reflects that agricultural land and forest areas are protected under statutory provisions, and no mining lease has been granted over such land. Alleged degradation, if any, cannot be attributed to the respondents.
- e. That the allegation regarding illegal mining within 200 meters of land comprised in Khewat Nos. 7 and 8 is factually incorrect. Khewat No. 7 is classified as *Gair Mumkin Jungle* and Khewat No. 8 as *Gair Mumkin Rasta*, where mining is legally impermissible and has not been allowed. The respondents have ensured protection of the said land, and any attempt by unauthorised persons has been immediately stopped and reported.



f. That the submissions relating to alleged illegal occupation of Central Government land manned by the Border Security Force (BSF) are wholly denied. The land in question remains under the ownership and control of the Central Government, and no mining rights have been conferred therein. Any allegation of unauthorized occupation or activity is a matter of law enforcement and has no nexus with the respondents permitting mining activity.

g. That the APPLICANT's reliance on alleged BSF security concerns is misplaced and speculative. The BSF and district administration maintain constant vigilance in border areas. No material has been placed on record to establish that mining activities have compromised national security or facilitated cross-border activities. The APPLICANT has merely reproduced apprehensions without substantiating them through official findings.

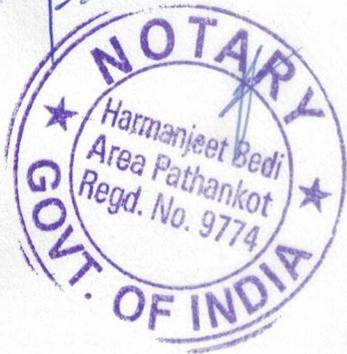
h. That the allegation of violation of the Hon'ble Punjab and Haryana High Court's order dated 29.08.2022 is incorrect. The respondents have strictly complied with



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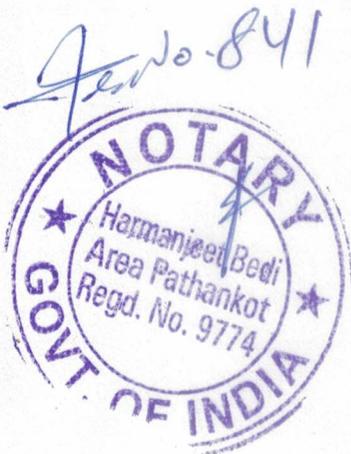
all judicial directions restraining mining activities in sensitive border and riverine areas. Any illegal activity noticed subsequent to the order has been dealt with by lodging FIRs and initiating criminal proceedings, which fact the APPLICANT has deliberately suppressed.

- i. That the allegation of violation of the Hon'ble Punjab and Haryana High Court's order dated 29.08.2022 is incorrect. The respondents have strictly complied with all judicial directions restraining mining activities in sensitive border and riverine areas. Any illegal activity noticed subsequent to the order has been dealt with by lodging FIRs and initiating criminal proceedings, which fact the APPLICANT has deliberately suppressed.
- j. That the allegations concerning damage to public infrastructure such as power lines, transformers, trees, and roads are baseless and unsupported by record. No damage attributable to authorized mining activity has been reported. On the contrary, the departments concerned have ensured protection of public utilities,



and any damage caused by unauthorized acts has been taken cognizance of by the competent authorities.

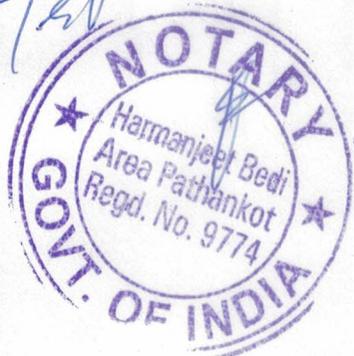
- k. That the averment that stone crushers are operating in areas without naturally occurring rocky terrain is misleading. Crushers, if permitted, operate strictly in accordance with statutory approvals and environmental norms. No crusher is allowed to process illegally sourced material. The APPLICANT's claim is founded on assumptions rather than verified inspections or official reports.
- l. That the contents of Para 6(L) alleging forged or manipulated revenue entries and unlawful leasing of government land are vehemently denied. It is submitted that revenue records are maintained strictly in accordance with statutory procedure by the competent revenue authorities. No mining lease or permission has been granted on the basis of forged entries. The APPLICANT has neither specified any particular revenue entry nor impleaded any revenue official, thereby rendering the allegation vague, reckless, and devoid of proof. Any dispute relating to



revenue entries falls within the exclusive jurisdiction of revenue courts and cannot be presumed in the present proceedings.

m. That the allegation that illegal mining has caused extensive damage to public infrastructure such as high-voltage electricity lines, transformers, and roads is incorrect and misleading. No damage attributable to any permitted mining activity has been reported by the concerned departments. On the contrary, infrastructure in the area is regularly monitored by the respective line departments, and no official report substantiating the APPLICANT's claim has been placed on record. Any incidental damage caused by unauthorised acts of private individuals has been duly acted upon by the authorities.

n. That the contention that the region lacks naturally occurring rocky terrain and, therefore, stone crushers are illegally sourcing material is denied. No stone crusher is allowed to operate without verifying the lawful source of raw material and without requisite statutory approvals. The APPLICANT has made

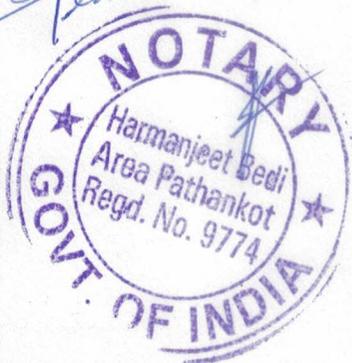


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sweeping assertions without producing any inspection report, seizure memo, or enforcement record to demonstrate illegal sourcing of material by licensed units.

o. That the allegation regarding excavation beyond permissible limits under Rule 28 of the Punjab Minor Mineral Rules, 2013 is factually incorrect. No permission has been granted for excavation beyond the prescribed depth. The Mining Department conducts periodic inspections to ensure compliance with statutory limits. Any violation, if detected, has been promptly dealt with through stoppage of work, penalties, and criminal action. The APPLICANT has failed to cite any specific instance where the respondents authorized excavation beyond permissible depth.

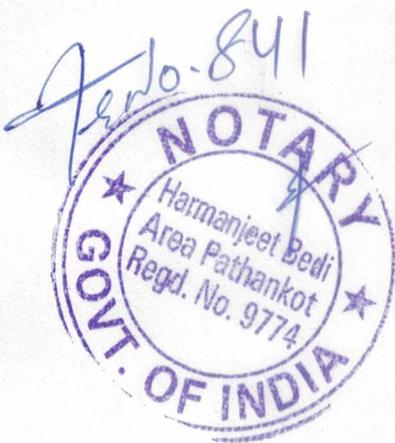
p. That the contention regarding creation of deep artificial ponds, lowering of groundwater table, and resultant water scarcity is conjectural and unsupported by scientific data. No hydrological study, groundwater report, or expert assessment has been produced by the



APPLICANT to substantiate the claim. The respondents have not permitted any mining activity that could cause such environmental consequences. Alleged impacts, if any, cannot be attributed to lawful or permitted activity of the respondents.

q. That the allegation that the cumulative impact of alleged illegal activities presents a substantial environmental question is denied. It is submitted that the respondents have been continuously monitoring the area and taking enforcement action wherever unauthorised activities were noticed. The APPLICANT has attempted to project isolated allegations as a systemic failure, which is contrary to the record demonstrating inspections, issuance of notices, and registration of FIRs against offenders.

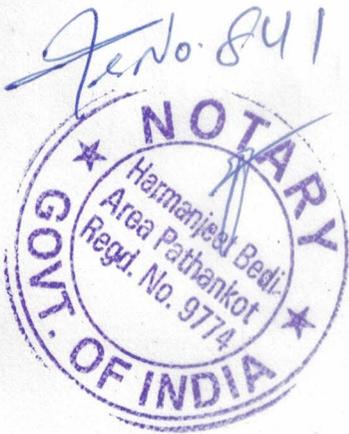
r. That the averment that the State authorities have failed to exercise their statutory duties is wholly false and misconceived. On the contrary, the respondents have acted diligently and in strict compliance with environmental, forest, mining, and revenue laws. The APPLICANT has deliberately suppressed material



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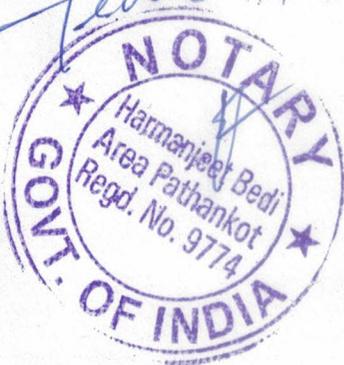
facts relating to enforcement actions already taken by the authorities and has approached this Hon'ble Tribunal on presumptions rather than substantiated violations.

- s. That the contents of the sub para (s) are merely reproduction of the different provisions of the Statute hence, needs no comments.
- t. That the contents of the sub para (n) are vehemently denied being wrong and incorrect. no illegalities or improprieties have been committed by the answering respondent. While attempts were made by certain unauthorised persons to conduct illegal mining within 1000 meters of village Kushallian, the same were immediately reported by the Range Officer (Wildlife), Pathankot, and the Divisional Forest Officer (Wildlife), Pathankot, through multiple official communications. Acting upon these reports, the Mining Department registered FIRs and initiated criminal proceedings, thereby negating the allegation of administrative apathy. That FIRs bearing Nos. 68 dated 10.06.2025, 143 dated 02.11.2025, 148



dated 14.11.2025, 156 dated 25.11.2025, 157 dated 27.11.2025, 160 dated 01.12.2025, and 164 dated 11.12.2025 were duly registered at Police Station Taragarh, District Pathankot, against offenders involved in illegal mining activities. This conclusively establishes that the authorities have acted decisively and within the framework of law.

7. That the contents of the para No. 7 of the application are vehemently denied being wrong and incorrect. No ground is made out to justify the filing of the present Original Application before this Hon'ble Court. Detailed reply has been given in the preliminary submissions and foregoing paras hence, same may kindly be read as part and parcel of the present para. In view of the foregoing preliminary submissions and the detailed para-wise reply on merits, it is respectfully submitted that the present Original Application is wholly misconceived, based on sweeping, vague, and unsubstantiated allegations, and is founded on assumptions, conjectures, and suppression of material facts. The applicant has failed to place on record any



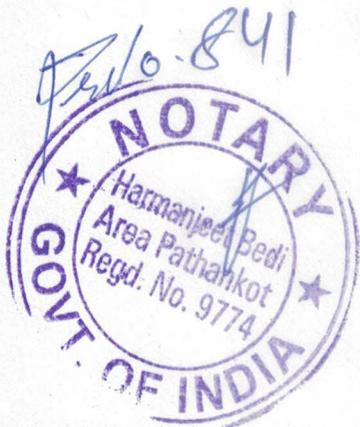
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credible or cogent evidence to establish the existence of sanctioned, permitted, or protected illegal mining activities, whereas the record clearly demonstrates that the answering respondents have acted diligently, promptly, and strictly in accordance with law by enforcing statutory prohibitions, maintaining constant monitoring, issuing official communications, and registering multiple FIRs against offenders whenever unauthorised activities were detected. The applicant has neither established any causal nexus between the alleged environmental degradation and any lawful activity of the respondents nor demonstrated any systemic failure or violation of judicial directions so as to warrant interference by this Hon'ble Tribunal. On the contrary, the application seeks to convert the Tribunal into a general supervisory forum by raising issues falling outside its jurisdiction and by praying for blanket and disproportionate directions, despite the availability of efficacious statutory remedies. The APPLICANT's attempt to project a law- and-order and national security failure is speculative and exaggerated. All activities near the international border are under constant surveillance of



the Border Security Force and civil administration. Any illegal movement or activity is promptly dealt with, and no nexus between illegal mining and cross-border security threats has been substantiated by the APPLICANT. The allegation of violation of orders passed by the Hon'ble Punjab and Haryana High Court is denied. The respondents have scrupulously complied with all judicial directions, including restrictions imposed on mining in sensitive riverine and border areas. Any violation, when noticed, has been dealt with through statutory enforcement mechanisms. Consequently, the present Original Application, being devoid of merit and constituting a misuse of the environmental jurisdiction of this Hon'ble Tribunal, deserves to be dismissed at the threshold with costs, in the interest of justice.

8. That the contents of the para No. 8 of the Application are vehemently denied being wrong and incorrect. Detailed reply has been given in the preliminary submissions and foregoing paras hence, same may kindly be read as part and parcel of this para



It is therefore, respectfully prayed that the present Original Application filed by the applicant may kindly be dismissed qua the answering respondent in the interest of justice.

Place: Pathankot
Date: 24.01.2026

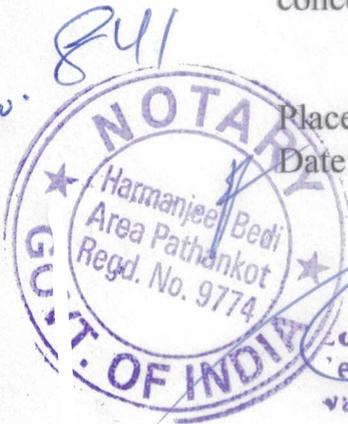

Deponent
(Atal Kumar), PFS
Divisional Forest Officer
Wildlife Division,
Pathankot

VERIFICATION:-

Verified that the contents of paras 1 to 8 of preliminary submissions and contents of the Para 1 to 08 of the reply on merits are true and correct to the best of my knowledge, belief and as per the information derived from official record. No part of it is false and nothing has been kept concealed therein.

Place: Pathankot
Date: 24.01.2026


Deponent
(Atal Kumar), PFS
Divisional Forest Officer
Wildlife Division,
Pathankot



841
certified that above said affidavit was declared on solemn affirmation before me on this day at 27/1/2026 by Sr. Atal Kumar, Sr. Divisional Forest Officer, Wildlife Division, Pathankot identified by *841*
Harmanjeet Bedi
Harmanjeet Bedi, Notary
Pathankot (Ph. 3)
27 JAN 2026

Annexure R-1.

Phone Number: 0186-2250092

Email: dfowildlifepathankot@gmail.com

**Wildlife Preservation Department, Punjab
Office of Divisional Forest Officer (Wildlife),
Forest Complex, Dalhousie Road, Pathankot.**

To,

1. Senior Superintendent of Police, Pathankot.
2. District Mining Officer, Pathankot.

Number: 474-75

Date:31/05/2022

Subject: Regarding illegal mining occurring in the Eco Sensitive Zone of Kathlor Kushlian Sanctuary.

Regarding the above subject, you are informed that the Forest Range Officer (Wildlife), Pathankot, reported to this office that on **20-05-2022**, illegal mining was occurring in the area of **Villages Gajju and Datyal** within approximately 200-300 meters of the Kathlor Kushlian Sanctuary. To stop the illegal mining, the concerned SHO Narot Jaimal Singh and the Mining Officer were immediately informed. The Mining Officer assured arrival at the spot, but no staff member from the Mining Department arrived.


Superintendent
Divisional Forest Office
Pathankot

Subsequently, the 112 police helpline was informed, but after the police party that reached the spot left, they started mining again.

It is pertinent to mention that per the orders of the Hon'ble Supreme Court, mining is banned within a 1 km radius of the boundary of Wildlife Sanctuaries and National Parks (copy attached). It is also informed that the aforementioned JCB machines belong to **Shri Balram Singh S/o Shri Sansar Singh**, Village Datyal, Pathankot, owner of **Balram Stone Crusher Datyal, Sai Stone Crusher Datyal, and Guru Nanak Stone Crusher Datyal**. Despite repeated warnings, they continue illegal mining secretly, damaging government property. Therefore, you are requested to take legal action against this illegal mining according to your laws to ensure compliance with the Hon'ble Supreme Court's orders and prevent violations of the **Wildlife Protection Act, 1972**.

—Sd/- Rajesh Kumar, I.F.S.

Divisional Forest Officer (Wildlife), Pathankot.


Superintendent
Divisional Forest Officer
Pathankot

Annexure R-2

No. 76-P

Dated: 22/05/2024

From,

Forest Range Officer (Wildlife),
Pathankot.

To,

Sub-Divisional Officer Mining,
Drainage-cum-Mining Division, Pathankot.

Subject: Illegal mining in the area of Village Chak Kushlian under the guise of Village Shahpur Gopi and Gol.

Regarding the above subject, it is written to you that the Divisional Forest Officer (Wildlife), Pathankot, via letter no. 2732 dated 07/03/2024, had reported to the District Mining Officer, Drainage-cum-Mining Division Pathankot, regarding **Sr. No. 11 Shahpur Gopi block** (1800m from sanctuary, 1350m from Kushlian forest), **Sr. No. 19 Village Gol block** (2400m from sanctuary, 1300m from Kushlian forest), and Sr. No. 20 Village Gol block (2550m from sanctuary, 1250m from Kushlian forest) including GPS coordinates for mining. It was also clarified that under I.A. 1000 in W.P. 202/95, the Hon'ble Supreme Court of


Superintendent
Divisional Forest Officer
Pathankot

India has issued orders that no mining/de-silting activities can be conducted within one kilometer of the Wildlife Sanctuary boundary.

The undersigned has been reported by the Forest Guard and Forester that mining is being conducted by the Mining Department in these blocks in Shahpur Gopi and Gol villages. Under the guise of these blocks, illegal mining is being carried out in the adjoining village **Chak Kushlian**, which falls within one kilometer of the boundary of the Kushlian Wildlife Sanctuary. Doing so violates the orders of the Hon'ble Supreme Court of India. Additionally, complaints are being received from local people that mining continues in this area even at night. This is affecting local residents and wildlife.

Please ensure mining work is done according to policy and take appropriate action against those doing illegal mining to ensure compliance with the Hon'ble Supreme Court's orders.


Superintendent
Divisional Forest Officer
Pathankot

-Sd/-
Range Officer (Wildlife),
Pathankot.

Endorsement No.77P

Date: 22/05/2024

A copy is sent to the Divisional Forest Officer (Wildlife), Pathankot, for information and necessary action.

-Sd/-

Range Officer (Wildlife),

Pathankot

True Translation



**Superintendent
Divisional Forest Office,
Pathankot**

Annexure R-3

From,

Forest Range Officer (Wildlife)
Pathankot.

To,

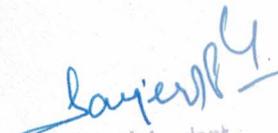
Sub-Divisional Officer,
Drainage-cum-Mining Division, Pathankot.

Number: 112-P

Date: 24/06/2024

Subject: Regarding the violation of the orders of the Hon'ble
Supreme Court of India.

Regarding the above subject, you are being intimated that as per the Judgement Dated 03/06/2022 IA No. 1000 of 2003 in W.P (C) No. 202 of 1995 T.N. Godavarman V/s Union of India and others of the Hon'ble Supreme Court of India, any kind of mining is prohibited within distance of **01 kilometer** from the boundary of a Wildlife Sanctuary. Shri Abhinandan Sharma, Forest Guard In-charge, Kathlor Kushalya Wildlife Sanctuary, has reported that on date **23/06/2024**, illegal mining was carried out by **M/s Guru Mehar Crusher**, Village Akhwara, in the villages of **Gajju Khalsa and Raji Beli**, which fall within one kilometer of the boundary of the Kushalya Wildlife Sanctuary. This constitutes a


Superintendent
Divisional Forest Officer
Pathankot

violation of the orders of the Hon'ble Supreme Court of India. Appropriate action as per mining rules should be taken against the concerned crusher so that the orders of the Hon'ble Supreme Court of India can be complied with.

-Sd/-

Forest Range Officer (Wildlife), Pathankot.

**Endorsement No. 113-P
24/06/2024**

Dated:

A copy of this is sent to the Divisional Forest Officer (Wildlife), Pathankot, for information and further necessary action.

-Sd/-

Forest Range Officer (Wildlife), Pathankot.

True Translation



**Superintendent
Divisional Forest Officer
Pathankot**

Annexure R-4

Number: 24-P

Date: 05/05/2025

From,

**Forest Range Officer (Wildlife),
Pathankot.**

To,

**Sub-Divisional Officer Mining,
Drainage-cum-Mining Division, Pathankot**

**Subject: Regarding illegal mining within one kilometer of
the boundary of Kathlor- Kushlian Wildlife Sanctuary.**

Regarding the above subject, it is written to you that the Forest Guard and Forester reported that on **04/05/2025**, illegal mining was occurring near the one-kilometer radius of the Kathlor-Kushlian Wildlife Sanctuary. Following this, your department registered **FIR No. 23 dated 04/05/2025** against the miners. It is brought to your attention that if mining occurs within the one-kilometer boundary of the Kathlor-Kushlian Wildlife Sanctuary, then a violation of the Hon'ble Supreme Court's judgment **IA No. 1000 of 2003 in W.P (C) No. 202 of 1995 dated 03/06/2022** should also be registered against them. Furthermore, complaints


Superintendent
Divisional Forest Officer
Pathankot

from local people state that illegal mining is done secretly at night in this area, affecting local residents and wild animals. Please take appropriate action against those conducting illegal mining, ensure compliance with the Hon'ble Supreme Court's orders, and place a complete ban on illegal mining within one kilometer.

-Sd/-

**Range Officer (Wildlife),
Pathankot**

**Endorsement No. 25-P
06/05/2025**

Date:

A copy is sent to the Divisional Forest Officer (Wildlife), Pathankot, for information and necessary action.

-Sd/-

**Range Officer (Wildlife),
Pathankot.**

True Translation


**Superintendent
Divisional Forest Officer,
Pathankot**

Number: 337 FIR
20/05/2025

Date:

To,

Range Officer (Wildlife),
Pathankot.

Subject: Regarding sending the report of FIRs related to mining in the areas falling under Taragarh and Narot Jaimal Singh police stations.

Reference: Your letter no: 33-P dated 13/05/2025.

In connection with the subject and reference cited above, you had requested information on how many cases (FIRs) related to mining have been registered from the year 2022 until now in the areas under **Police Station Taragarh and Narot Jaimal Singh**. The information requested regarding the said police stations is sent to you as per the attached list for further action.

List Attached

-Sd/-

**Sub-Divisional Officer-cum-
Assistant District Mining Officer,
Kathua Sub-Division, Malikpur (Pathankot).**


**Superintendent
Divisional Forest Officer
Pathankot**

Sr. No	FIR NO / Date	Police Station
---	---	---
1	42 / 13.05.22	SHO Taragarh
2	14 / 02.06.22	Narot Jaimal Singh
3	24 / 07.08.22	Narot Jaimal Singh
4	60 / 08.08.22	SHO Taragarh
5	64 / 24.08.22	SHO Taragarh
6	27 / 27.08.22	Narot Jaimal Singh
7	88 / 02.12.22	SHO Taragarh
8	2 / 05.01.23	Narot Jaimal Singh
9	5 / 09.01.23	Narot Jaimal Singh
10	19 / 11.03.22	Narot Jaimal Singh
11	18 / 19.03.23	SHO Taragarh
12	28 / 10.05.23	SHO Taragarh
13	27 / 07.06.23	Narot Jaimal Singh
14	28 / 12.06.23	Narot Jaimal Singh
15	0041 / 12.07.23	SHO Taragarh
16	0034 / 29.07.2023	Narot Jaimal Singh
17	0047 / 3.8.2023	SHO Taragarh


 Superintendent
 Divisional Forest Officer
 Pathankot

18	0035 / 07.08.2023	Narot Jaimal Singh
19	0045 / 01.09.2023	Narot Jaimal Singh
20	0055 / 07.09.2023	SHO Taragarh
21	0059 / 10.09.2023	SHO Taragarh
22	0058 / 02.10.2023	Narot Jaimal Singh
23	0070 / 16.11.2023	SHO Taragarh
24	0067 / 28.11.2023	Narot Jaimal Singh
25	0079 / 08.12.2023	SHO Taragarh
26	0070 / 09.12.2023	Narot Jaimal Singh
27	0084 / 17.12.2023	SHO Taragarh
28	0088 / 29/12/2023	SHO Taragarh
29	0008 / 29/01/2024	SHO Taragarh
30	0010 / 14/02/2024	Narot Jaimal Singh
31	0016 / 21/02/2024	SHO Taragarh
32	0014 / 15/03/2024	Narot Jaimal Singh
33	0024 / 29/03/24	SHO Taragarh
34	0029 / 09/04/24	SHO Taragarh
35	0030 / 11/04/24	SHO Taragarh
36	0022 / 23/04/24	Narot Jaimal Singh
37	0029 / 29/05/24	Narot Jaimal Singh
38	0030 / 30/05/24	Narot Jaimal Singh
39	0034 / 23/06/24	Narot Jaimal Singh


 Superintendent
 Divisional Forest Officer
 Pathankot

40	0039 / 08/07/24	Narot Jaimal Singh
41	0064 / 17/07/24	SHO Taragarh
42	0044 / 03/09/2024	Narot Jaimal Singh
43	0045 / 04/09/24	Narot Jaimal Singh
44	0046 / 06/09/24	Narot Jaimal Singh
45	0047 / 09/09/24	Narot Jaimal Singh
46	0077 / 18/09/24	SHO Taragarh
47	0082 / 28/09/2024	SHO Taragarh
48	0071 / 14/12/2024	Narot Jaimal Singh
49	0001 / 04/01/25	Narot Jaimal Singh
50	0003 / 21/01/25	Narot Jaimal Singh
51	0006 / 24/02/25	Narot Jaimal Singh

-Sd/-

**Sub-Divisional Officer-cum-
Assistant District Mining Officer,
Kathua Sub-Division, Malikpur (Pathankot).**


Superintendent
Divisional Forest Officer
Pathankot

Annexure R-5.

Phone Number: 0186-2250092

Email: dfowildlifepathankot@gmail.com

Department of Forests and Wildlife Preservation,
Office of Divisional Forest Officer (Wildlife), Forest
Complex,
Dalhousie Road, Pathankot.

To,

District Mining Officer,
Pathankot.

Number: 1410

Date: 15/10/2025

Subject: Regarding mining occurring within a 01 kilometer
radius of the Kathlor-Kushlian Wildlife Sanctuary (Villages-
Gajju Khalsa, Gajju Jagir, and Saharanpur).

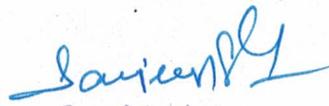
Regarding the above subject, it is written to you that the Range
Officer (Wildlife), Pathankot, via letter no. **156-P** dated
13/10/2025, reported illegal mining in the Kathlor Kushlian
Wildlife Sanctuary under this division. Under the guise of the "Jis
Da Khet, Us Di Ret" policy, some people are mining in village
lands along the Ravi River within a 01 km radius of the Kushlian


Superintendent
Divisional Forest Officer
Pathankot

Sanctuary, including at night using JCB machines, which appears illegal.

It is worth mentioning that the Punjab Government, Department of Mining and Geology, issued instructions via **Notification No. 977900/056/320 dated 12/09/2025**. According to these, owners/farmers of agricultural lands where silt/sand/river material accumulated due to floods are granted permission to clean/remove it as a "One Time Measure" until **31/12/2025** to make the fields cultivable again. According to paragraphs 05 and 06 of the said notification, no commercial mining can take place from any **Regular River Bed**, nor can any illegal mining of minor minerals be done under the guise of this notification.

Furthermore, it is brought to your attention that per **Notification IA No. 1000 of 2003**, the Hon'ble Supreme Court of India has also issued instructions that the 01 km radius of any National Park or Wildlife Sanctuary is declared an **Eco Sensitive Zone**. No mining activity of any kind can be conducted within it. Please take appropriate action as per rules and send a copy to this office for further proceedings.


Superintendent
Divisional Forest Officer
Pathankot

-Sd/-

Paramjit Singh, P.F.S.
Divisional Forest Officer (Wildlife), Pathankot.

Endst. no.

Date: /10/2025

A copy is sent to the Hon'ble Deputy Commissioner, Pathankot,
for information and necessary action.

-Sd/-

Paramjit Singh, P.F.S.
Divisional Forest Officer (Wildlife), Pathankot.

True Translation



Superintendent
Divisional Forest Officer
Pathankot

Annexure R-6

Phone Number: 0186-2250092

Email: dfowildlifepathankot@gmail.com

Department of Forests and Wildlife Preservation,
Office of Divisional Forest Officer (Wildlife), Forest
Complex,

Dalhousie Road, Pathankot.

To,

Executive Engineer,
Mining Department,
Pathankot.

Number: 1467 Date: 27/10/2025

Subject: Regarding mining occurring within a 01 kilometer radius of the Kathlor- Kushlian Wildlife Sanctuary (Villages- Raji Beli, Taharpur, Rakwal, and Bahadurpur).

Regarding the above subject and referenced letter, it is written to you that the Forest Range Officer (Wildlife), Pathankot, via letter no. **164-P dated 24/10/2025**, reported that under the guise of the "Jis Da Khet Us Di Ret" policy, some people are mining in the lands of villages **Raji Beli, Taharpur, Rakwal, and Bahadurpur** along the Ravi River within a 01 km radius of the


Superintendent
Divisional Forest Officer
Pathankot

Kathlor-Kushlian Wildlife Sanctuary. Mining is also being done at night using J.C.B. machines. As per the Ministry of Environment, Forest and Climate Change proposal and the Hon'ble Supreme Court's orders dated **26/04/2023** and **28/04/2023** in W.P (C) No. 202 of 1995 of I.A No. 1000 of 2003, mining is strictly prohibited within a 01 km radius of National Parks and Sanctuaries. This report is sent for your information and necessary action.

-Sd/-

Paramjit Singh,

P.F.S. Divisional Forest Officer (Wildlife), Pathankot.

True Translation.



**Superintendent
Divisional Forest Officer
Pathankot**

Annexure R-7

Phone Number: 0186-2250092

Email: dfowildlifepathankot@gmail.com

Department of Forests and Wildlife Preservation,
Office of Divisional Forest Officer (Wildlife), Forest
Complex,
Dalhousie Road, Pathankot.

To,

District Mining Officer,
Pathankot.

Number: 1971

Date: 30/12/2025

**Subject: Regarding the news published in the newspaper
on 28/12/2025 about mining.**

Regarding the above subject, the Forest Range Officer (Wildlife), Pathankot, reported via letter no. **230-P** dated **29/12/2025** that keeping in view the news published on 28/12/2025, the site (near Kathlor bridge) was inspected on 29/12/2025. Three to four JCB machines were found operating at the spot. When stopped by the field staff of this division, they claimed the machines were deployed as per the Punjab Government's "Jis Da Khet Us Di Ret" policy.


Superintendent
Divisional Forest Officer
Pathankot

In this regard, you were previously informed via this office's letter no. **1410 dated 15/10/2025** and letter no. **1467 dated 27/10/2025** regarding mining in the lands of villages **Gajju Khalsa, Gajju Jagir, Saharanpur, Raji Beli, Taharpur, Rakwal, and Bahadurpur** along the Ravi River within the 01 km boundary of the Kathlor-Kushlian Wildlife Sanctuary. According to the Ministry of Environment, Forest and Climate Change proposal and the Hon'ble Supreme Court of India's orders dated **26/04/2023 and 28/04/2023 in W.P (C) No. 202 of 1995 of I.A No. 1000 of 2003**, mining is strictly prohibited within a 01 km radius of National Parks and Sanctuaries. Please take appropriate action as per rules and send a report to this office for further necessary action.

-Sd/-

Divisional Forest Officer (Wildlife),

Pathankot.

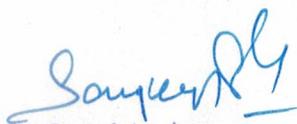
**Endorsement No. 1972
30/12/2025**

Date:

-Sd/-

Divisional Forest Officer (Wildlife),

Pathankot.

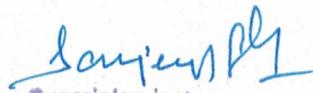

**Superintendent
Divisional Forest Office
Pathankot**

A copy is sent to the Hon'ble Deputy Commissioner, Pathankot,
for information and necessary action.

-Sd/-

**Divisional Forest Officer (Wildlife),
Pathankot.**

True Translation


Superintendent
Divisional Forest Officer
Pathankot

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH AT NEW DELHI
OA NO. 263 OF 2025

IN THE MATTER OF:

KARAN SINGH

...Applicant

Versus

Union of India & Ors.

...Respondent

KNOW ALL to whom these presents shall come that I, Atal Kumar, PFS, Divisional Forest Officer, Wildlife Division Pathankot, Department of Forest and Wildlife Preservation being the Authorized Representative of the abovenamed Respondent No. 5 do hereby appoint:

SATAKSHI SOOD, Advocate
AMALTAS LAW CHAMBER
S262, GREATER KAILASH – I, NEW DELHI 110048
PH: +91 8278812103 EMAIL: satakshi@amaltaslaw.in



(hereinafter called the Advocate to be my/our Advocate in the above noted case and authorize her:-

To act, appear and plead in the above-noted case in this court in any other court in which the same may be tried or heard and also in the appellat courts.

To sign, file and present pleadings, appeals, cross-objection or petitions or executions, review, revision, restoration, Withdrawal, compromises or other petitions replies, objections or affidavits or other documents as may be deemed necessary or proper for the position of the said case in and all its stages. To file and take back documents.

To withdraw, or compromise the said case, or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take out execution proceedings.

To deposit, withdraw and receive money and grant receipts therefore, and to do all other acts and things which may be necessary to be done for the progress and in the course of prosecution of the said case.

To appoint and instruct other Legal Practitioners authorizing them to exercise the power and authorities hereby conferred upon the advocates whenever they may think fit to do so.

AND I/we, the undersigned do hereby agree to ratify and confirm all acts, done by the advocates or his substitute in the matter as my / our own acts, as if done by me/us for all intents and purposes.

AND I/we undertake that I/we or my/our duly authorized agent would appear in the court on all hearings.

AND I/we, the undersigned do hereby agree that in the event of the above case being taken up on tour, I/we shall pay extra fees.

And I/we, the undersigned, do hereby agree not to hold the advocates or his substitute responsible for the result of the said case in consequence of their absence from the courts when the said is called up for the hearing or for any negligence of the said advocates or his substitute.

AND I/we, the undersigned do hereby agree that in the event of the whole or any part of the fee agreed by me / us to be paid to the advocate remaining unpaid, he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. If any costs are allowed or an adjournment, the advocates would be entitled to the same.

IN WITNESS WHEREOF I/We, do hereunto set my/out hand to these presents the contents which have been understood by me/us this 17th day of January, 2026

Accepted

Satakshi
D-225/13 Advocate

Atal Kumar
Divisional Forest Officer
Wild Life Division
PATHANKOT
Client

Re: NGT_Karan Singh v. UOI & Ors._OA 263 of 2025

1 message

27 January 2026 at 20:43

Satakshi Sood <satakshi@amaltaslaw.in>
To: Vivek Thakur <vkthakur1979@gmail.com>
Bcc: ydheerendra317@gmail.com

Dear Sir,

Please find attached the reply which is being filed on behalf of the Respondent No. 2 and 3 in the captioned matter.

Also attached is the reply which is being filed on behalf of the Respondent No. 5 in the captioned matter.

Regards,

Satakshi Sood**Partner****AMALTAS LAW CHAMBER****S-262, GF, Greater Kailash-I, New Delhi - 110048****T: +91 8278812103 | +91 9971023497 | www.amaltaslaw.in**

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS E-MAIL

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On Wed, Oct 29, 2025 at 2:22 PM Naimishi Verma <naimishi.verma@amaltaslaw.in> wrote:

Dear Sir,

Please find attached the reply which is being filed on behalf of the Respondent No. 6 in the captioned matter.

Thanks & Regards,
Naimishi Verma
Advocate

--

2 attachments **Reply_R2 and 3_Karan singh v. UOI.pdf**
5505K **Reply_R5_Karan Singh v. UOI.pdf**
18595K