

**BEFORE THE NATIONAL GREEN TRIBUNAL, WESTERN
ZONE BENCH, PUNE**

ORIGINAL APPLICATION NO. 18 OF 2025

Adv. Vaibhav Baban Satam

...Applicant

Versus

Thane Municipal Corporation

Through its Commissioner & Ors

...Respondents

REJOINDER TO REPLY FILED BY THE RESPONDENTS

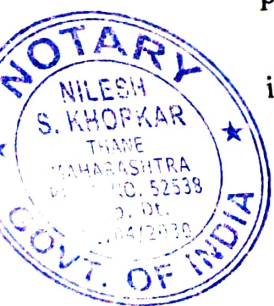
MAY IT PLEASE YOUR WORSHIP;

1. I am the Applicant in the above Original Application and am fully conversant with the facts and circumstances of the present case.
2. The present Rejoinder is being filed in response to the Affidavit in Reply dated 09.03.2026 filed by Respondent No.8 - MAHARASHTRA COASTAL ZONE MANAGEMENT AUTHORITY (hereinafter referred to as "MCZMA") through its Director, Env & CC Department and Member Secretary, MCZMA, Mr. Abhay Pimparkar in compliance with the Hon'ble Tribunal's order dated 06.01.2026.
3. The Applicant craves leave to file this Rejoinder by way of last opportunity as granted by this Hon'ble Tribunal vide order dated 16.06.2026. The contents of the Original Application and previous



Rejoinder to other Respondents are reiterated and not repeated herein for the sake of brevity.

4. I personally visited the site on 24.06.2026 and have inspected the site as per the reply filed by Respondent no. 8.
5. The areas with Miyawaki-style plantation (dried bamboo stakes) show incomplete coverage and waste intermixed with saplings. The same can be addressed from the photos. Exposed soil, rubble, and debris near the creek / foreshore indicate inadequate remediation. Hereto annexed and marked as Exhibit "A Colly" are the recent photographs of the site.
6. However, to my utter shock as the still has legacy waste piles such as plastic, debris, and mixed municipal solid waste still persist at Gaimukh Jakat Naka, Ghodbunder Road. Hereto annexed and marked as Exhibit "B Colly" are the recent photographs of the site.
7. The site continues to pose risks of leachate runoff into Vasai Creek and due SWM dumping and then burning has impact on the Eco Sensitive Zone of Sanjay Gandhi National Park. These visuals rebut the claims of "FULL RESTORATION" and LARGE-SCALE PLANTATION" made in MCZMA's Annexures.
8. Rejoinder to Affidavit in reply of Respondent No.8 (MCZMA) parawise:
 - i) With reference to Para 1, "I have examined the relevant records available in my Office in respect of the above matter" However District Collector, Thane was requested to take



action via Letter no: Complaint2025/CR57/TC4 dated 28 Feburay 2025, after verification and send the factual, detailed action taken report to the authority within 15 day” **Exhibit “C Colly”**. Respondent no 8 have not produced the ATR filed by District Collection (Respondent No 6)

- ii) With reference to Para 2 of MCZMA’s Affidavit in reply, the contents are noted and need no comment.
- iii) With reference to Para 3 of MCZMA’s Affidavit in reply admits that the site falls partly within CRZ-I (most critical) and partly outside. While it correctly quotes the prohibition on dumping of city/town wastes (including construction debris, industrial solid wastes and fly ash) for land filling under the CRZ Notification 2019, MCZMA failed to prevent TMC from dumping waste in both zones.
- iv) With reference to Para 4 of CRZ Notification 2019 prohibits waste dumping for land filling across CRZ, with stricter bar in CRZ-I. No general exception permits temporary MSW dumping in CRZ-I without specific clearance, which TMC never obtained. The Jan–May 2025 dumping was wholly unauthorised and caused spillover into CRZ-I, mangroves & creek. Post-dumping “restoration” does not erase the violation or ongoing contamination.
- v) With reference to Para 4 of MCZMA's Affidavit in reply, the contents are denied as they are incomplete and self-servicing. TMC’s report dated 04.03.2026, claiming removal



of the waste and restoration since May 2025 and the Miyawaki plantation of 34,852 saplings is incomplete and environmentally hazardous. The recent photographs show that the waste still exists undermining the "fully restored claim".

9. Further I submit that part restoration cannot validate prior illegal acts. There are broader violations of Environment Protection Act 1986, Solid Waste Management Rules 2016, Eco Sensitive Zone Notification 2022, and Coastal Regulative Zone norms continue till date. The RTI replies also confirm absence of prior approvals for the illegal dumping.

10. In view of the above, the Original Application deserves to be allowed.

Place: Thane
Date: 26th June 2026

Vaibhav B. Satam
Adv Vaibhav Satam



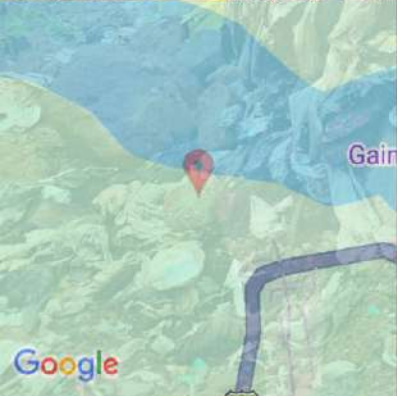
BEFORE ME

Nilesh S. Khopkar
NILESH S. KHOPKAR
P.A., LL.B.
ADVOCATE & NOTARY GOVT. OF INDIA
502 SEEMA HEIGHTS, GOVIND BACHHAJI ROAD,
CHARAI, THANE 400601, MAHARASHTRA

NOTED & REGISTERED
Sr. No. 333 Page No. 23
Book No. 1 Date 28/6/2026

12 8 JUN 2026





7WPJ+6JF Gaimukh Jakat Naka, Thane West, Thane, Maharashtra 401107, India

Thane
Maharashtra
India

2026-06-24(Wed) 03:22(pm)



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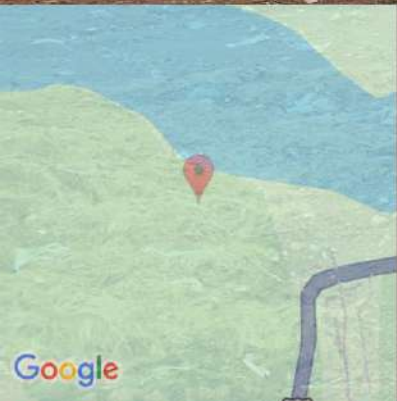
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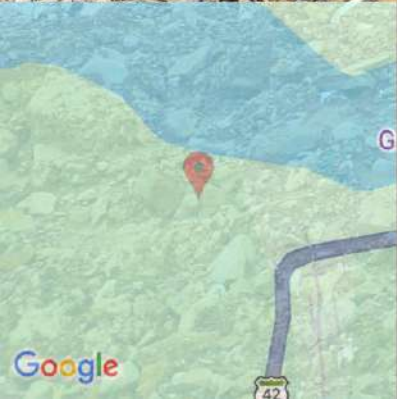
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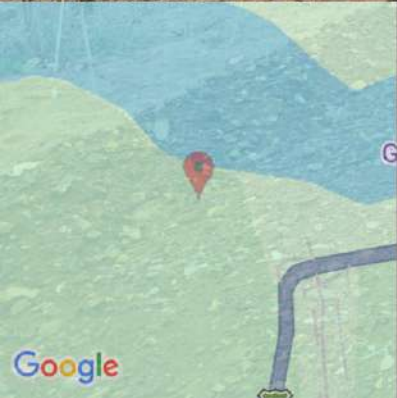
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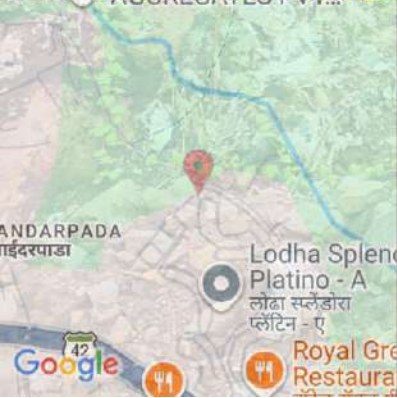
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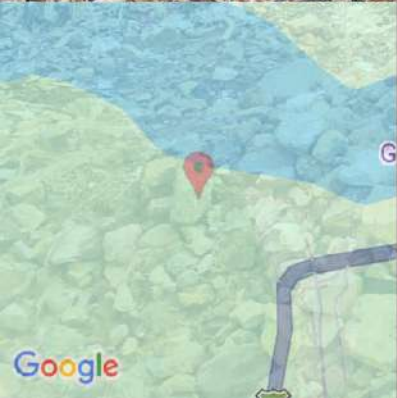
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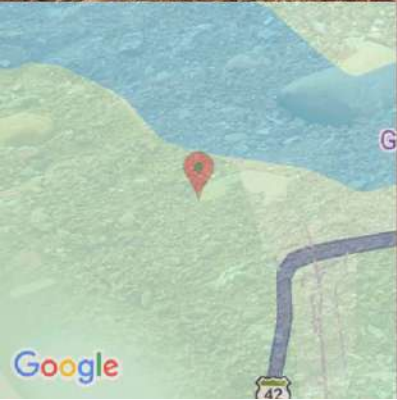
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2026-06-24(Wed) 03:35(pm)

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Gaimukh Jakat Naka, Thane West, Thane, Maharashtra 400615, India

Thane
Maharashtra
India



2026-06-24(Wed) 03:44(pm)

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MAHARASHTRA COASTAL ZONE MANAGEMENT AUTHORITY

Tel. No. : 2202 9388
Email: dir1.mev-mh@nic.in

No. Complaint 2025/ CR 57/ TC 4
Office of the -
Maharashtra Coastal Zone Management
Authority, Environment & Climate Change,
Department, 15th Floor, New Administrative
Building, Mantralaya, Mumbai- 400 032
Date: 28.02.2025

To,
District Collector, Thane,
Court Naka, Ad Prabhakar Hegde Rd,
Kharkar Alley, Thane West, Thane - 400601

Subject: Complaint regarding illegal dumping in CRZ area at Gaimukh Jakat Naka, Ghodbunder Road, Thane (W) complaint by Adv Vaibhav Satam

Sir,

Please find enclosed herewith email dated 19.01.2025 from Adv. Vaibhav Satam regarding above mentioned subject for examination and inquiry with due priority. In this complaint, it is alleged that illegal dumping in CRZ area at Gaimukh Jakat Naka, Ghodbunder Road, Thane (W).

2. In light of above, you are again requested to verify and take necessary action in matter, if any violation of provisions of CRZ Notification 2019 as well as and Hon. High Court Order dated 06.10.2005, 27.01.2010 & 17.09.2018 is observed, you are requested to take appropriate action after verification and send the factual, detailed action taken report to the Authority within 15 days.

Yours Sincerely,



(Vishal Madane)

Under Secretary, Environment Dept.

Copy for information to:

- 1) PS (Environment) & Chairperson, (MCZMA), Environment Department, Room No. 217 (Annex), Mantralaya, Mumbai - 32
- 2) Adv. Vaibhav Satam (adv.vaisa@gmail.com)
- 3) Select File (TC-4)

GOVERNMENT OF MAHARASHTRA



No. RTI 2025/ CR 29/ TC 4
Environment & CC Department, 15th floor,
New Administrative Building,
Mantralaya, Mumbai - 400 032.
Date: 16.04.2025

Tel. No. : 22029388
Website : <http://mczma.gov.in>

✓ To,
Adv. Vaibhav B. Satam,
42/88A, Gokuldham CHS,
Vrundavan Society,
Thane (West) 400 601

Subject: Information under Right to Information Act, 2005

Sir,

This has reference to your RTI application dated 17.03.2025 received on 19.03.2025 under Right to Information Act, 2005 seeking information pertains to action taken report on concerning the complaints dated 19.01.2025 regarding illegal dumping of waste in The Eco Sensitive Zone (Zone) of Sanjay Gandhi National Park, Thane and the Coastal Zone Management Zone (CZMZ) near Gaimukh Jakat Naka, Ghodunder Road, Thane West.

2. This is to inform you that, this office vide letter dated 28.02.2025 forwarded your complaint received by email dated 19.01.2025 to District Collector Thane for appropriate action. Copy of the letter dated 28.02.2025 is attached herewith.

3. If you are not satisfied with the above information, you can file an appeal to the Appellate Authority within 30 days. Details of the first Appellate Authority are as follows-

Director (Environment)
15th floor, Environment Department,
New Administrative Building,
Mantralaya, Mumbai - 400 032

Yours faithfully,

(Vishal Madane)
Under Secretary

& Public Information Officer