

## BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

## WESTERN ZONE BENCH AT PUNE

## APPEAL NO. 19 OF 2025

**IN THE MATTER OF:**

VIJAYKUMAR KARSANBHAI GADHAVI AND ORS.

.... APPELLANTS

VERSUS

UNION OF INDIA AND ORS.

.... RESPONDENTS

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**THROUGH**


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**REJOINER ON BEHALF OF THE APPELLANTS TO THE COUNTER  
AFFIDAVIT DATED 24.03.2025 FILED BY RESPONDENT NO. 1,  
MoEFCC.**

**MOST RESPECTFULLY SHOWETH:**

1. That the above-mentioned Appeal was filed under Section 16(h) read with Section 20 of the National Green Tribunal Act, 2010 challenging the Environmental Clearance dated 12.12.2024 pertaining Proposal No. IA/GJ/IND3/408164/2022 granted by the Ministry of Environment Forest and Climate Change to Greenfield Chemical Complex Ltd. for the proposed production of 11,00,000 TPA capacity of Light Soda Ash (LSA), 5,00,000 TPA capacity of Dense Soda Ash (DSA) and 2,00,000 TPA capacity of Sodium Bicarbonate (SBC). That the impugned project site which is located near village Bada, Taluka – Mandvi, District Kutch in Gujarat falls under Category 'A' project and is listed at Schedule 4(e) i.e., a soda ash industry and 1(d) of EIA Notification 2006 and has been granted EC in blatant violation of the EIA Notification 2006, Technical EIA Guidance Manuals for Soda Ash Industry, 2010, Species Best Interest Principle and the Precautionary Principle.
2. That the instant Rejoinder is being filed in response to the Counter Affidavit dated 24.03.2025 filed by Respondent No. 1, Ministry of Environment Forest and Climate Change (MoEFCC). At the outset, the Appellants deny all the averments made by Respondent No. 1 and

nothing should be assumed to be admitted for want of specific traverse and all averments in the Reply Affidavit should be assumed to be denied unless specifically admitted or part of the record. The Appellants reiterate all the facts and submissions made in the Appeal to be true and correct and the same may be read as part of the instant rejoinder and are not all being repeated for the sake of brevity. At the outset it is submitted that the MoEFCC has failed to properly respond to tickle issues raised by the Appellants in the Appeal. It is further submitted that more particularly it has failed to respond to various crucial aspects as raised by the Appellants.

3. That the contents of Para No. 1 to 10 requires no response as these are factual averments.

**MoEFCC has overlooked that NEERI lacks NABET accreditation for conducting EIA for Soda Ash Plants:**

4. That the contents of Para No. 11 are denied except which are the matter of record. The Appellants herein submit that CSIR-NEERI does not possess any valid NABET accreditation required for conducting EIA for soda ash plants. The Appellants assert that CSIR-NEERI conducted the EIA for the proposed project despite not being a NABET-accredited EIA consultant organization for soda ash projects/activities, constituting a clear violation of the EIA Consultants Accreditation Scheme. In this regards, it is pertinent to note that this Hon'ble Tribunal in the matter titled **Sreeranganathan K.P vs. Union of India & Ors. 2014 SCC OnLine NGT 5631** has quashed the impugned EC vide judgment dated 28.05.2014. That grievances raised therein were that an airport was proposed to set up in on the banks of the holy river Pampa, Arunmula Village in an ecologically sensitive and environmentally diverse and rich area. The issues raised were that the EC was granted without considering the deleterious effects of the airport on the pristine environment of the area. Also, the EIA Report submitted was

inadequate, incorrect, misleading, fraud as prepared by a non-accredited agency. Further issues pertain that the public hearing conducted for the purpose of the setting up the airport was conducted in a clandestine and undemocratic manner in violation of EIA Notification, 2006 and the impugned EC dated 18.11.2013 was granted without any application of mind of the EAC and MoEFCC. The observations and directions of this Hon'ble Court was further upheld by the Hon'ble Supreme Court whereby vide order dated 21.11.2014 it refused to let the proposed Aranmula International Airport take off in Kerala, dismissing a petition filed by the project proponent challenging the cancellation of its environmental clearance by this Tribunal:

*"81. The EIA study which is a part of the proceedings can be undertaken only by an accredited agency of the MoEF. It is for the project proponent themselves to arrange for the EIA study through an accredited agency and to submit the report to the Ministry. The public hearing and eliciting the response of the general public are integral parts of the proceedings before the report is submitted for clearance. It was after strictly adhering to all the statutory requirements that the report was prepared and decided upon by the statutory agencies.*

*[...]*

*111. At the time of presentation, there was no QCI implemented accredited Scheme (NABET) and all the consultants enlisted and approved by the first respondent were eligible for conducting EIA. The Office Memorandum issued by Government of India, MoEF clearly provides accreditation of the EIA Consultants and after the review of the accreditation progress by the QCI/NABET, the competent authority has approved a list of 265 consultants, wherein said Enviro Care India Pvt. Ltd., is arrayed as Sl. No. 73 and they are permitted to appear before State Level Expert Appraisal Committee/State Environment Impact Assessment Authority (SEAC/SEIAA) for Category "B" Projects and the EAC for Category "A" Projects till 30<sup>th</sup> June 2011. These 265 Consultants will also be permitted to certify various documents, as consultants, such as EIA/EMP. The MoEF after evaluating the EIA Report submitted by Enviro Care India Pvt. Ltd. is completely aware that the said agency is competent to prepare an EIA report since the said agency already submitted EIA reports for Chennai, Raipur and Vadodara Airports. Hence the statement to the effect that EIA has not been prepared by an accredited agency and the EIA submitted by the present Respondent is inadequate, misleading and is a fraud perpetrated by this Respondent, is totally false, misleading and is denied in toto.*

151. (i) .... A person who has merely applied for certain sectors cannot be said to have blanket power to prepare EIA reports and appear in respect of all categories and sectors without reference to the category applied for and the consequent accreditation. Whether the consultant had prepared the EIA report for those sectors earlier had no relevance and it is open to the 5<sup>th</sup> respondent/consultant to challenge the issue as to whether the accreditation is legal or not in the present petition. It is not correct to state that at the time of presentation, there was no QCI implemented accreditation scheme. From 2009, the Ministry has imposed guidelines on preparation of EIA and presentation to EAC. The fact that the 5<sup>th</sup> respondent/consultant was found in the list of 255 applicants would not entitle him to certify the reports pertaining to the sectors unconnected to their application.

vi. As per the scheme of accreditation of EIA consultants, an EIA consultant can apply to a maximum of 5 sectors for accreditation. It is candidly admitted by the 5<sup>th</sup> respondent/consultant that though he applied for the 5 sectors, his application did not include airport projects. The only explanation tendered by the 5<sup>th</sup> respondent/consultant is that in view of commercial reasons he did not apply for accreditation for airport sector though he has sufficient experience in the field. This explanation cannot be accepted even for a moment. Admittedly, the 5<sup>th</sup> respondent/consultant has not applied for accreditation for airport projects falling under Category A. **Mere pendency of an application for accreditation for Category B projects would not cloth him with a right to make a study, field survey and preparation of EIA reports in respect of the airport projects which according to notification is categorized as Category A. If this contention has to be accepted, the very purpose of importance and significance of placing airport projects under Category A itself would be defeated. It is contended by the 5<sup>th</sup> respondent/consultant that the guidelines manual is only recommendatory and not mandatory. But that is not the case in so far as EIA Notification, 2006 is concerned.** Much was contended by the 5<sup>th</sup> respondent/consultant that he has completed studies on two green field airports at Raipur and Vadodara and he was the consultant for the construction in phase II of Chennai airport and his experience in the field would speak volumes of his competence. This contention has to be rejected for two reasons. **Firstly, the competence of the 5<sup>th</sup> respondent/consultant has to be tested from the view point of EIA Notification, 2006 which governs the field. While airport project is categorized as A to which neither the 5<sup>th</sup> respondent/consultant has applied for nor was granted any projects under Category A and in particular the airport projects. On the contrary, he applied twice and obtained accreditation only for the projects under Category B. Hence, he is incompetent.**

*Secondly, in so far as the alleged experience of the 5th respondent/consultant is concerned, there are no materials placed before the Tribunal to indicate the nature of works that was undertaken by the 5th respondent/consultant in respect of the three airport projects. Even assuming that the 5th respondent/consultant had experience, that would not qualify him as a competent consultancy agency in view of the mandatory provisions of the EIA Notification, 2006. Hence, it has got to be held that the 5th respondent/consultant was not competent to make a study and prepare an EIA report for the airport project. As rightly pointed out by the appellants, the EAC at the time of meeting never considered this vital aspect of the matter, but has recommended for the issuance of EC. This would certainly shake the very bottom of the recommendation made by the EAC since it was based on the EIA report given by the 5th respondent/consultant, an incompetent agency.*

*163. Thus, in the instant case, even without a final EIA report, the other materials were taken up for appraisal and hence, both the appraisal by EAC and consequent clearance by MoEF have to be termed as faulty.*

*164. The EIA report did not assess the impact of the proposed activity of the 3rd respondent/project proponent on land, water air, environment and ecology of the area and it did not provide the required details in these respect as mandated by law, thereby enabling the EAC to make a scrutiny and take an independent decision on the issues of environment. The inadequacy of the EIA report is demonstrated by the fact that it has not considered details about the flora and fauna. The EIA report did not provide any details about the flora in the region except stating that there are no endangered species in the area. A report of the Salim Ali Foundation clearly states that there are more than 212 species of plants. The report also states that there are more than 60 species of fishes and more than 80 species of birds. But, the EIA report did not reflect the same. The EIA has not made any attempt, whatsoever to characterize the ecology of the area including wildlife that inhabits forested lands which required to be cleared for providing a long runway at the proposed airport. The crucial aspects relating to filling up of paddy lands and its impact on the environment were not considered though objections were raised in that regard.*

5. That in the present Appeal, it is respectfully submitted that CSIR-NEERI did not possess the requisite NABET accreditation to conduct an Environmental Impact Assessment study specifically for the Soda Ash plant sector. As per the Quality Council of India (QCI) – NABET list dated

July 2020, CSIR-NEERI was clearly not accredited for undertaking EIA studies for projects falling under the Soda Ash sector. However, the same list confirms that T.R. Associates held valid accreditation for this specific sector. Despite in full awareness of NEERI's lack of sector-specific accreditation, the project proponent, for reasons best known to them, proceeded with the engagement of CSIR-NEERI for conducting the EIA. It is further submitted that the EIA Report prepared by CSIR-NEERI was presented before the public during the public hearing conducted on 17.10.2022. During this hearing, several objections were raised not only by the Appellants but also by other participant, highlighting concerns about the credentials of the EIA consultant and the adequacy of the report. Subsequently, during the 72nd meeting of the EAC held on 02.01.2024, a direction was issued mandating that a new NABET-accredited consultant—namely, T.R. Associates—would revalidate the EIA prepared by CSIR-NEERI by conducting one season's data collection. It is submitted that, if the entire process of preparation of collection of data and preparation of EIA report is illegal, same cannot be validated by another agency. Moreover, there exists no legal provision under any established law or regulation that permits a new NABET-accredited consultant to "revalidate" or certify the EIA study and baseline data originally prepared and collected by a non-accredited consultant. In the absence of such statutory backing, such revalidation is irregular and undermines the integrity of the EIA process. The Appellants contend that since NEERI lacked the requisite accreditation at the time of preparing the EIA report, it renders the entire EIA process invalid, non-compliant, and devoid of legal sanctity. This legal position has been recognized and upheld by this Hon'ble Tribunal in the precedent-setting **Aranmula Airport Case (Supra)** , wherein the Tribunal categorically observed and directed that an EIA prepared by a non-accredited consultant cannot form the basis for granting environmental clearance and is, therefore, liable to be set aside. That

the Respondent No. 1 has failed to take this aspect into consideration and has completely disregarded it while granting the impugned Environmental Clearance dated 12.12.2024, reflecting a clear case of non-application of mind.

[Copy of the judgment titled Sreeranganathan K.P vs. Union of India & Ors. 2014 SCC OnLine NGT 5631 is annexed as ANNEXURE A/2 to the Rejoinder filed by the Appellants to the Reply Affidavit of R4].

6. Further, the Appellants herein submit that as per the EIA Notification, 2006, the Stage II i.e., Scoping refers to the process to determine detailed and comprehensive ToR addressing all relevant environmental concerns for the preparation of the EIA Report. That once the standard ToR is granted to the project, the Project Proponent shall carry out the EIA Study based on the standard ToR granted:

*"II. Stage (2) – Scoping:*

***Scoping refers to the process to determine detailed and comprehensive Terms of Reference (ToR) addressing all relevant environmental concerns for the preparation of an Environmental Impact Assessment (EIA) Report in respect of project or activity for which environmental clearance is sought. Standard ToR developed by the Ministry in consultation with the sector specific Expert Appraisal Committees shall be the deemed approval ToR for the projects or activities. The standard Tor are displayed on the website of the MoEFCC:***

***Provided that the Expert Appraisal Committee or State Expert Appraisal Committee may finalize amendment, if found necessary for a project within thirty days of the acceptance of application Form I or Form IA. These standard TOR shall enable project proponent to commence preparation of and Environment Impact Assessment Report after successful online submission and registration of the application:***

***Provided further that, the Expert Appraisal Committee or State Expert Appraisal Committee may stipulate additional ToR, if found necessary, within thirty days of the acceptance of application in the specified Form I or Form IA and the project proponent shall***

*carry out the EIA study based on the standard ToR as well as additional ToR, if any, stipulated by EAC/SEAC”.*

7. The Appellants herein present a date-wise sequence of events that clearly demonstrates the Project Proponent issued the work order to CSIR-NEERI well before the ToR were granted. However, as per the EIA Notification, 2006, an EIA study can only be undertaken after the grant of ToR. Despite this, Respondent No. 4, instead of appointing a NABET-accredited consultant post-ToR as would be expected of a prudent entity, chose to proceed with CSIR-NEERI for reasons best known to them.
- i. **05.06.2018** – Respondent No. 4 accepted that it awarded work order to NEERI for preparation of EIA Study much before the proposal for EC was submitted and ToR was granted. (Para 19 of the Reply Affidavit by R4).
  - ii. **December, 2019** – NABET QCI for the first time provided accreditation for soda ash to T.R. Associates vide letter dated 27.01.2023. (Para 61 of the Reply Affidavit by R4).
  - iii. **11.07.2020** – official list of NABET-accredited Consultant Organizations reveals that CSIR-NEERI did not possess accreditation from the National Accreditation Board for Education and Training (NABET) for conducting EIA studies in the specific sector of Soda Ash Plants. That the same list pertains the details of T.R. Associates which is duly accredited by NABET for soda ash sector.
  - iv. **July, 2021** - Project Proponent submitted its application for the grant of ToR in July 2021. (Para 23 of the Reply Affidavit by R4).
  - v. **06.08.2021** - That despite being fully aware of this accreditation status, the Project Proponent wilfully proceeded to engage CSIR-NEERI for the preparation of the EIA Report,

without disclosing the ineligibility of CSIR-NEERI in their EDS (Essential Details Sought) Reply dated 06.08.2021.

- vi. **10.08.2021** - The MoEFCC granted the standard ToR on 10.08.2021 under Item 4(e) of the EIA Notification, 2006, which pertains specifically to Soda Ash Plants.
- vii. **17.10.2022** – this issue was categorically raised by the Appellants as well as other participants in the public hearing and in this regard a formal complaint was lodged with the Quality Council of India.
- viii. **23.12.2022** – Subsequent to the complaint, the NABET issued a disqualification order against CSIR-NEERI on 23.12.2022. The order barred CSIR-NEERI from conducting any EIA studies for Soda Ash Plants and also prohibited it from applying for accreditation in the said sector for a period of six months.
- ix. **02.01.2024** - During the 72nd meeting of the Expert Appraisal Committee (EAC) held on 02.01.2024, the committee took cognizance of the fact that the EIA/EMP report had been prepared by CSIR-NEERI, an entity which, at that point, was not accredited by QCI/NABET for the soda ash sector and thereby directed TR Associates to revalidate the EIA Report prepared by NEERI by collecting with one season fresh non-monsoon data.

That the Appellants herein submit that in the EIA Notification, 2006 clearly states that it is only after the grant of ToR that the preparation of the EIA Report commenced. That this Hon'ble Tribunal in the matter titled **Sreeranganathan K.P vs. Union of India & Ors. 2014 (Supra)** has held:

*"162. (5) As could be seen from the EIA Notification, 2006, there is a mandate for the preparation of a draft EIA report initially and*

*after finalization of ToR and summing up of such draft EIA report has to be necessarily placed during Public Consultation as required under paragraph 7".*

It is of critical importance to highlight that, as of 11.07.2020, the official list of NABET-accredited Consultant Organizations reveals that CSIR-NEERI did not possess accreditation from the National Accreditation Board for Education and Training (NABET) for conducting EIA studies in the specific sector of Soda Ash Plants. That the same list pertains the details of T.R. Associates which is duly accredited by NABET for soda ash sector. The EAC and MoEFCC has failed to consider this aspect that the project proponent has appointed NEERI on 05.06.2018 much prior to the grant of ToR for reasons best known to them. That at the time of grant of ToR on 10.08.2021, the NABET list clearly shows that T.R. Associates is accredited to conduct EIA for soda ash sector. Despite being fully aware, the project proponent did not appoint them. This deliberate attempt is a matter of grave concern and raises questions about the transparency and due diligence exercised by the Project Proponent. That the Respondent No. 1 has failed to take this aspect into consideration and has completely disregarded it while granting the impugned Environmental Clearance dated 12.12.2024, reflecting a clear case of non-application of mind.

Copy of the List of Accredited EIA Consultant Organizations (ACOs) as on July 2020 is annexed herewith as **ANNEXURE A/1.**

**Failure of MoEFCC to consider that NIO does not have NABET accreditation to conduct marine EIA:**

8. That the Appellants in reply to Para No. 12 of the counter affidavit submit that the oceanographic baseline data for the proposed project has been conducted by CSIR-National Institute of Oceanography (NIO). It is essential to note that the National Accreditation Board for Education and Training (NABET), vide letter dated 21.05.2012 has explicitly

rejected the accreditation of NIO. It is pertinent to note that the QCI-NABET's rejection letter dated 21.05.2012 mandated NIO to take up marine components of EIAs only with accredited EIA consultants. However, in the present case, NIO has partnered with CSIR-NEERI, who does not have NABET accreditation to conduct EIA for soda ash plant and additionally whose accreditation has been disqualified for six months by NABET due to violations in conducting EIA studies illegally. Thus, the oceanographic baseline data collected by CSIR-NIO lacks credibility, as NABET's letter dated 21.05.2012 mandated NIO to work only with accredited EIA consultants, yet NIO partnered with CSIR-NEERI, which lacks NABET accreditation for conducting EIA for a soda ash plant. This association between two entities, one unaccredited and the other disqualified, raises serious concerns about the credibility and legality of the oceanographic studies conducted for this project. By conducting the study in collaboration with a disqualified consultant, NIO has acted in direct contravention of the stipulations outlined in the NABET letter and the EIA Notification, 2006. Such a blatant violation undermines the validity and reliability of the oceanographic baseline data collected by NIO. Consequently, this data cannot and should not be relied upon for assessing the project, as it is tainted with procedural lapses and breaches of regulatory mandates. This deliberate attempt is a matter of grave concern and raises questions about the transparency and due diligence exercised by the Project Proponent. MoEFCC has failed to consider this aspect and has granted the impugned EC without applying any mind.

**Public Hearing conducted without following the due process of law as provided in Para 7 and Appendix IV of the EIA Notification, 2006:**

9. That the Appellants in reply to Para No. 13 of the Counter Affidavit submits that the public hearing witnessed strong opposition, however,

the public hearing was forcefully held and concluded in the presence of large number of police with tear gas shells, water cannons, lathis. The intent of the regulation is to ensure that the voices and concerns of these communities are meaningfully integrated into any developmental decision-making processes affecting the region. In the present case, the proposed project has faced substantial opposition from the local communities residing along the coastline, who have expressed serious concerns regarding its potential ecological and marine impacts. The MoEFCC is completely silent about the manner in which the public hearing was conducted. The public hearing forum, is meant to facilitate consultation and participatory decision-making, is expected to offer a platform for the communities to voice their objections. However, the manner in which the hearing was conducted has raised serious questions about its fairness. Despite the overwhelming opposition, the public hearing was forcefully carried out amidst heavy police presence. Security forces were reportedly equipped with tear gas shells, water cannons, and lathis, creating an atmosphere of intimidation and fear. Such measures not only suppressed peaceful dissent but also compromised the participatory spirit. As a result, the hearing concluded under coercive circumstances, raising doubt on the fairness of the public hearing process and the extent to which the concerns of the affected communities were genuinely considered. The public hearing was concluded without completing the due procedure laid down in Appendix IV of the EIA Notification, 2006 in Para No. 6.0 which requires reading of the minutes of the public hearing, allowing all the members present during the public hearing ask their queries and answer the questions of the affected communities. Further, the available video recordings of the public hearing stand as compelling evidence of this procedural lapse. These recordings substantiate the claim that the public hearing ended without due process and that the concerns of the affected stakeholders were not read out or validated in their presence. That the Respondent

No. 1 has failed to take this aspect into consideration and has completely disregarded it while granting the impugned Environmental Clearance dated 12.12.2024, reflecting a clear case of non-application of mind.

**MoEFCC overlooked the procedure followed in granting CRZ**

**Clearance as per OM dated 29.11.2022:**

10. That in reply to the Para No. 14 of the Appellants herein submit that the proposed project has been duly recommended by the Gujarat Coastal Zone Management Authority (GCZMA). It is crucial to note that the GCZMA recommendation was issued vide its letter dated 26.12.2023, and was the same was relied upon by the EAC during its 87<sup>th</sup> meeting held on 21.10.2024, this alone does not constitute compliance with the applicable statutory procedure. It is pertinent to note that the Office Memorandum issued by the MoEFCC dated 29.11.2022 lays down a specific procedure for obtaining CRZ Clearance for activities permissible under the CRZ Notification. Paragraph 6 of the said OM categorically mandates that all Category 'A' projects falling within CRZ areas shall be appraised by the respective Sectoral EACs:

*"6. The Category 'A' projects requiring comments of the CRZ Sector shall be forwarded along with all the statutory documents as mentioned in Para 2(i) before consideration of the project by Sectoral EACs. The Sectoral EAC shall appraise the project for composite EC and CRZ Clearance based on the comments of the CRZ Sector and CZMA Recommendations. In cases, the Sectoral EAC is same for appraisal of projects for both EC and CRZ clearance, the comments of the CRZ sector need not be required"*

The OM further stipulates that upon receipt of the recommendation from the concerned SCZMA, the proposal must be forwarded to the sector-specific EAC, which is required to conduct a detailed scrutiny and

deliberation before issuing its recommendation for CRZ clearance. Only thereafter may the MoEFCC issue the final CRZ clearance. Importantly, it is evident, that as per information available on the Parivesh portal, a distinct Sectoral EAC for CRZ projects exists. This CRZ-specific EAC is entrusted with appraising projects such as laying of pipelines, facilities for intake and outfall of cooling water, among others. However, in the present case, the proposal in question was never presented before the CRZ EAC. As such, there was no appraisal by the competent sector-specific committee mandated to consider such projects. The omission of this crucial step, the lack of scrutiny and recommendation by the CRZ EAC, amounts to a substantive violation of the OM dated 29.11.2022. Instead of following the prescribed procedure, the CRZ clearance was granted solely based on the recommendation of the GCZMA, and the project was then presented before an EAC dealing with Industry-3 sector projects — a committee which does not have the jurisdiction to appraise CRZ-specific components. This procedural bypassing renders the grant of CRZ clearance legally untenable and in direct contravention of the applicable regulatory framework. That such a procedural lapse unequivocally reflects a non-application of mind on the part of the EAC handling Industry-3 sector projects in its appraisal of the present proposal. The EAC, which is specifically designated to assess projects falling under the Industry-3 category, was not the competent authority to appraise the CRZ components of the proposal. Upon receipt of the recommendation from the GCZMA, the Industry-3 EAC ought to have recognized that the proposal involved activities that squarely fell within the jurisdiction of the CRZ-specific EAC, particularly given that the project includes components such as pipeline laying and marine discharge structures, which are expressly listed under the domain of the CRZ EAC. That, instead of transferring the proposal to the CRZ Sectoral EAC for appropriate technical scrutiny, the Industry-3 EAC proceeded to appraise the project on the basis of the GCZMA's recommendation

alone. This action is procedurally flawed and substantively irregular, as it bypassed the mandatory evaluation process laid down in the Office Memorandum dated 29.11.2022. The failure to ensure that the proposal was examined by the appropriate Sectoral EAC for CRZ matters not only undermines the sanctity of the appraisal mechanism but also raises serious concerns about the due diligence exercised by the EAC in this case.

Copy of the OM dated 29.11.2022 is annexed herewith as **ANNEXURE A/2.**

**MoEFCC overlooked that the project is proposed to come up in a CVCA area which is a turtle nesting ground:**

11. The Respondent No.1 is completely silent about the fact that the project is proposed to come up in a CVCA area which is one of the turtle nesting site for green sea turtles in India. Furthermore, the Appellants herein submit that the impugned project is proposed to come up in the Gulf of Kachchh in CRZ IA area which is also a Critically Vulnerable Coastal Area (CVCA). That the area is not only highly ecologically sensitive but also an extremely rich in biodiversity and hence a very fragile landscape. That the proposed area is known to be one of the few nesting sites for Green Sea Turtles and Olive Ridley Turtles. Additionally Furthermore, it a habitat of several Schedule I species of the Wildlife (Protection) Act, 1972 which includes Indian Monitor Lizard, Black Shoulder Kite, Eurasian Spoonbill, Indian Peafowl, Marsh Harrier, Oriental Honey Buzzard, Gugal. The Appellants herein submit in this regard that the Schedule I species under the Wildlife (Protection) Act, 1972 are accorded the highest level of protection. Despite this, a project of such nature has been permitted within such highly ecologically sensitive area. It is crucial to note that the entire Gulf of Kachchh is declared as CVCA area and that no construction is permitted in a CVCA area. In this regard, the Appellants respectfully submit that the Hon'ble Supreme Court, in the

matter titled **Kapico Kerala Resorts (P) Ltd. v. State of Kerala**, reported in **(2020) 3 SCC 18**, vide its judgment dated 10.01.2020, has made an observation that under Para 8(V)(4) of the CRZ Notification, 2011, certain ecologically sensitive coastal areas including the Gulf of Kachchh were to be declared as CVCAs. That the 2011 Notification states that Gulf of Kachchh shall be declared as CVCA upon the formulation and notification of appropriate guidelines by the MoEF&CC in consultation with relevant stakeholders. It further required that Integrated Management Plans be prepared for such areas. In contrast, Para 3.1 of the CRZ Notification, 2019, categorically states that the Gulf of Kachchh shall be treated as a CVCA, thereby conferring such status on the region *ipso facto*, that is, irrespective of whether any guidelines, CZMP Maps, or Integrated Management Plans have been prepared or notified. Thus, the effect of the 2019 Notification is that the Gulf of Kachchh enjoys *de jure* status as a CVCA by statutory declaration alone. Consequently, any developmental or construction activity proposed within this ecologically sensitive zone is prohibited. The relevant extracts of the judgment are reproduced hereby:

*39. Therefore, it is not as though the reduction of the distance parameter to 20 m from HTL is intended to confer a benefit upon persons like the appellants. Moreover, even the CRZ 2019 Notification places Vembanad Lake in the category of CVCA in Para 3.1 but with a different reach. **There is a world of difference between the 2011 and 2019 Notifications, insofar as CVCAs are concerned. This can be summarised as follows:***

***39.1. In Para 8(V)(4) of the CRZ 2011 Notification, areas to be declared as CVCAs were identified but Para 8(V)(4)(b) mandated that those identified areas can be declared as CVCAs through a process of consultation. Para 8(V)(4)(c) required guidelines to be developed and notified by MoEF in consultation with the stakeholders, for identifying, planning, notifying and implementing CVCAs. Integrated management plans***

*were also required to be prepared for CVCAs under Para 8(V)(4)(d) of the 2011 Notification.*

*39.2. But under Para 3.0 of the CRZ 2019 Notification, certain coastal areas are accorded special consideration for the purpose of protecting the critical coastal environment and the difficulties faced by local communities. Para 3.1 identifies the critically vulnerable coastal areas. They include Vembanad Lake. While the words contained in Para 8(V)(4)(b) of the 2011 Notification are: "... shall be declared as CVCA through a process of consultation with the fisher and other communities inhabiting the area ...", the words contained in Para 3.1 of the 2019 Notification are "... shall be treated as CVCA and managed with the involvement of coastal communities including fisher folk".*

*40. Therefore, for the appellants, the situation has gone from bad to worse. Under the 2011 Notification the areas identified in the Notification had to be declared as CVCAs only through a process of consultation with local fisher, etc. Guidelines are to be put in place for identifying, notifying and implementing CVCA but the 2019 Notification straightaway treats the named areas as CVCAs and vests their management with the authority with the involvement of coastal communities. Therefore, the alternatives claimed by the appellants also do not appear to be viable for them.*

*41. Hence, in the light of our finding: (i) that the substantial issues that arose in common for both the islands have already been answered in Vaamika Island [Vaamika Island (Green Lagoon Resort) v. Union of India, (2013) 8 SCC 760], and (ii) that the distinguishing features sought to be projected, are not so material as to take a different view than the one taken therein, the appeals are liable to be dismissed. Accordingly, all the appeals are dismissed. There shall be no order as to costs."*

Thus, it is submitted that the impugned project, which is proposed to be established within the Gulf of Kachchh region, therefore falls squarely within a designated CVCA area. As such, it is legally impermissible under the CRZ Notification, 2019, for any construction or industrial activity to

be undertaken in this area, especially when the objective of CVCA designation is to ensure heightened protection of fragile ecosystems and to prevent any form of ecological degradation. Therefore, the mere absence of finalized CZMP Maps or Management Plans cannot be cited as a justification to dilute the statutory protection afforded to this region. The legal position, as clarified by the Hon'ble Supreme Court and mandates that the entire Gulf of Kachchh be treated as a CVCA, and no project or construction can be permitted within this area, rendering the present project unsustainable in law.

[Copy of the judgment titled Kapico Kerala Resorts (P) Ltd. v. State of Kerala, reported in (2020) 3 SCC 18 is annexed as ANNEXURE A/1 of the Rejoinder filed by the Appellant in reply to the Counter Affidavit of R4].

12. Furthermore, the Appellants also submit that it is crucial to consider that the entire project area squarely falls within CRZ IA, as the intake and outfall pipelines are an integral and inseparable component of the proposed industrial activity. These pipelines are not merely ancillary infrastructure but are central to the functioning of the project. Specifically, the intake pipeline is designed to draw seawater, which serves as a critical raw material for the industrial process, while the outfall pipeline is intended for the discharge of effluents generated by the industry. That without the functioning of these pipelines, the industry would be rendered entirely inoperative, even for a moment, underscoring their essential nature. Therefore, it would be incorrect and misleading to assess the project in isolation from the pipelines or to treat them as separate from the main industrial facility. Furthermore, the mere possibility of extending the pipeline and constructing the factory slightly away from the immediate CRZ IA zone does not mitigate or alter the actual environmental impact caused by the project. The ecological footprint, particularly with respect to marine ecosystems, Schedule-I

species, such as sea turtles which are endangered in nature as well as coral reefs, remains substantial and direct due to the operation of these pipelines within the ecologically sensitive CRZ IA zone. Thus, any attempt to disassociate the pipelines from the overall environmental assessment of the project would result in a gross misrepresentation of its true ecological consequences. It is crucial to note here that the intake of large volumes of seawater carries the risk of sucking or entrapping in marine organisms, such as green sea turtles, coral polyps, and other aquatic life forms, through the pipelines. This process could lead to significant mortality rates among these species, causing irreversible damage to the biota and ecological health of the area.

13. The Appellants respectfully submit that the contents of Para No. 15 is a matter of record and requires no response. However, it is submitted that the Forest Clearance granted is without any merit and application of mind.

**MoEFCC has failed to consider that the proposed project area is one of the turtle nesting ground in India:**

14. The Appellants in reply to Para No. 16 submits that RTI Reply dated 23.03.2022 received from the Forest Range Officer Mandvi, Kutch West Forest Division which clearly shows year wise data from 2011 to 2021 with regard to the number of eggs found, as well as the details of number the of dead turtles found between 2019 to 2022 which clearly makes it evident about the presence of turtles along the coast of Mandvi and Bada i.e., the proposed project site. The data thus serves as evidence confirming the presence of Green Sea Turtles and Olive Rидleys, along with their nesting sites along the coasts of Mandvi and Bada. Additionally, the RTI response includes a list of wild animals rescued from in and around Bada, such as Nilgai, Sarus Crane, Crocodiles, Striped Hyena, Peacocks, and others. The Appellants herein reproduces the tables as provided in the RTI Response:

**Details of turtle eggs hatched on the beach of Mandvi****Taluka**

SN	Year	No. of Eggs found	Details of the birth and release of the hatchlings into the sea.
1	2020-2021	574	487
2	2019-2020	285	247
3	2018-2019	787	504
4	2017-2018	108	81
5	2016-2017	329	290
6	2015-2016	558	472
7	2014-2015	1266	1112
8	2013-2014	1452	1163
9	2012-2013	1789	1392
10	2011-2012	1400	1157

**Details of Turtles found dead on the beach**

<b><u>SN</u></b>	<b><u>Date</u></b>	<b><u>Place</u></b>	<b><u>Number</u></b>	<b><u>Name</u></b>
1	09.04.2019	On the beach of Modhwa	1	Green sea turtle
2	01.05.2019	Mandvi Windfarm Beach	1	Green sea turtle
3	16.06.2019	Mandvi Windfarm Beach	1	Green sea turtle
4	25.07.2021	On the shore of Dharbadi	1	Green sea turtle
5	25.08.2021	Mandvi Windfarm Beach	1	Green sea turtle
6	03.10.2021	On the beach of Kathada	1	Green sea turtle
7	08.03.2022	Mandvi Windfarm Beach	1	Green sea turtle

15. Further, the Appellants herein submit that in November 2022, the Forest Department, Kachchh identified a nesting site of the Green Sea Turtle along the Bada coastline and took appropriate steps to safeguard it. Subsequently, on 17.12.2022, the Department successfully facilitated the release of at least 85 hatchlings into the sea, thereby officially confirming the occurrence of nesting activity in the area. This significant conservation event underscores the ecological importance of the coastal stretch as an active breeding ground for a Schedule I protected species under the Wildlife Protection Act, 1972. Furthermore, following the discovery of the turtle nest in Bada, several additional nests were subsequently identified along the same coastal stretch, all within a 10-kilometre radius of the proposed project site. These findings further reaffirm the area's critical role as a nesting and breeding habitat for the endangered Green Sea Turtle and highlight the urgent need for its protection from industrial disruption. However, in stark contradiction, the ZSI Report of 2019 fails to acknowledge the presence of any endangered species, i.e., Green Sea Turtle and Olive Ridley Turtle, in the proposed project area.

Copy of the images showing the Forest Department identifying, safeguarding and releasing of hatchlings in the proposed project area are annexed as **ANNEXURE/A3.**

Furthermore, an RTI Application dated 10.01.2025 was filed before the Range Forest Officer, Mandvi-Kachchh, seeking information regarding the presence of turtle eggs along the seashore of the Mandvi Range. In response, the Public Information Officer (PIO) issued a reply dated 06.02.2025 (erroneously typed as 06.02.2024), which clearly affirms the presence of turtles on the Mandvi seashore. This official response substantiates the ecological significance of the proposed project area and directly contradicts the Respondent's claim regarding the absence of turtle nesting activity.

S.N.	Information Sought	Response Received
1.	Provide details of turtle eggs hatched on the seashore in Mandvi Range area from the year 2011/2012 to 2023/2024:	8682
2.	Provide details of turtles found dead on the seashore in Mandvi Range area from the year 2011/2012 to 2023/2024:	33
3.	Provide the species of turtles:	Green Sea Turtle

Thus, the RTI reply demonstrates that a total of 8,682 turtle eggs were recorded between 2011 and 2024, and 33 dead turtles were found along the seashore of Mandvi. These figures, officially provided by the Forest Department, establish the presence of turtles in the proposed project area. Accordingly, the findings of the ZSI Report, the EIA Report prepared by CSIR-NEERI, the GUIDE Report, and the NIO Report, each of which deny the presence of turtles, stand contradicted and are rendered inaccurate in light of the data provided by Forest Department. True translated copy of the RTI Application filed on 10.01.2025 and RTI Response Received on 06.02.2025 from the Range Forest Officer, Mandvi-Kachchh are annexed herewith as **ANNEXURE A/4.**

**The sub-Committee has failed to consider that the proposed project site is a turtle nesting ground:**

16. The Appellants in reply to Para No. 17 respectfully submit that the EAC, during its 80<sup>th</sup> meeting held on 07.06.2024, after detailed deliberations, recommended the project in question for the grant of Environmental Clearance. Upon reviewing the official records available on the Parivesh Portal, the Appellants observed that the timeline for the project explicitly reflects the 80<sup>th</sup> EAC meeting on 07.06.2024 as the last meeting wherein the project was considered. Notably, there is no reference or

documentation available on the timeline of the project regarding any subsequent deliberations in the 84<sup>th</sup> and 87<sup>th</sup> EAC meetings in connection with the said project. In this context, the Appellants further submit that they have made numerous representations to the EAC, repeatedly requesting that a site inspection be conducted in the presence of members from the affected communities. That this site inspection was carried out without any notice to, or consultation with the affected community members of the village, who had consistently and actively sought to be involved in such an important process. It is of critical importance to highlight that the findings of the site inspection, as well as the recommendations made by the sub-committee, are entirely silent on the presence of the nesting sites of Green Sea Turtles and other Schedule-I wildlife species within the proposed project area which has been categorically recorded by the Forest Department. Moreover, the sub-committee also fails to address or assess the potential direct and indirect impacts of the project's intake and outfall pipelines on coral ecosystems and marine fauna, including sea turtles. This omission demonstrates a clear lack of due diligence and reflects the non-application of mind by the sub-committee in evaluating the ecological implications of the project before recommending it for approval.

Copy of the screenshot of the timeline of the project from Parivesh Portal is annexed herewith as **ANNEXURE A/5.**

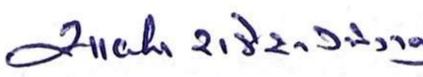
17. Thus, in the light of the above facts, circumstances and submissions, the Hon'ble Tribunal shall be pleased enough to allow the prayers of the Appeal.

Pass any other order as this Hon'ble Tribunal may deem fit in the facts and circumstances of the present case.

  
APPELLANT NO. 1

ભરત ગ્રામ્પી  
APPELLANT NO. 2

Bharat Grampi  
APPELLANT NO. 3

  
APPELLANT NO. 4

  
APPELLANT NO. 5

THROUGH



RAHUL CHOUDHARY



KAUSTAV DHAR

ADVOCATES

COUNSEL FOR THE APPELLANTS

N-73, LOWER GROUND FLOOR,

GREATER KAILASH-I,

NEW DELHI-110048

MOBILE NO: 9312407881

Email: [litigation@dclawchambers.com](mailto:litigation@dclawchambers.com)

Place: Pune/Delhi

Date: 06 .06 .2025

**VERIFICATION**

Verified by Vijaykumar Karsanbhai Gadhavi, S/o Karsanbhai Gadhavi, aged about 63 years, R/o Village - Panchotiya Vadi Vistar, P.O. Mota Layja, Mandvi, Pin code - 370465, do hereby verify that the contents of Paragraphs 1 to 17 are true to my personal knowledge and nothing material has been concealed therefrom.

  
APPELLANT No.1

**VERIFICATION**

Verified by Laxman Kanjibhai Gadhavi, S/o Kanjibhai Gadhavi, aged about 55 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby verify that the contents of Paragraphs 1 to 17 are true to my personal knowledge and nothing material has been concealed therefrom.

લેક્ષ્મણ કાંજિબેખાઈ ગઢવાઈ

**APPELLANT No.2**

**VERIFICATION**

Verified by Bharat Gangji Gala, S/o Gangji Gala, aged about 59 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby verify that the contents of Paragraphs 1 to 17 are true to my personal knowledge and nothing material has been concealed therefrom.

Bharat Gangji

**APPELLANT No.3**

**VERIFICATION**

Verified by Rajesh Gangji Salva, S/o Gangji Salva, aged about 59 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby verify that the contents of Paragraphs 1 to 17 are true to my personal knowledge and nothing material has been concealed therefrom.

Rajesh Gangji Salva

**APPELLANT No.4**

**VERIFICATION**

Verified by Vijaysinh Nanubha Padhiyar, S/o Nanubha Padhiyar, aged about 41 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby verify that the contents of Paragraphs 1 to 17 are true to my personal knowledge and nothing material has been concealed therefrom.

Vijaysinh Nanubha Padhiyar

**APPELLANT No.5**

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE  
APPEAL NO. 19 OF 2025**

**IN THE MATTER OF:**

VIJAYKUMAR KARSANBHAI GADHAVI AND ORS.

....APPELLANTS

VERSUS

UNION OF INDIA AND ORS.

...RESPONDENTS

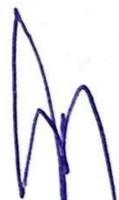
**AFFIDAVIT**

NOTARIAL REGISTER  
SR. No. ....1376  
DATE : 05 JUN 2025

I, Vijaykumar Karsanbhai Gadhavi, S/o Karsanbhai Gadhavi, aged about 63 years, R/o Village - Panchotiya Vadi Vistar, P.O. Mota Layja, Mandvi, Pincode - 370465, do hereby solemnly affirm and state as follows:

1. I am the Appellant No. 1 in the above titled Appeal and conversant with the facts and circumstances of the case and competent to swear this Affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.



  
**DEPONENT**

**VERIFICATION**

Verified at <sup>Manuvi</sup> ~~Delhi~~ on this 05 day of 06, 2025 that the contents of the above mentioned Affidavit are true and correct and nothing material has been concealed therefrom.



SOLEMNLY AFFIRMED  
BEFORE ME  
  
BHARAT H. MEHTA  
ADVOCATE & NOTARY  
LAYJA ROAD,  
MANDVI - KACHCHH

  
**DEPONENT**

05 JUN 2025

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE  
APPEAL NO. 19 OF 2025**

**IN THE MATTER OF:**

VIJAYKUMAR KARSANBHAI GADHAVI AND ORS.

VERSUS

UNION OF INDIA AND ORS.

...APPELLANTS

...RESPONDENTS

**AFFIDAVIT**

NOTARIAL REGISTER

SR. No. : 1377

DATE : 05 JUN 2025

I, Laxman Kanjibhai Gadhavi, S/o Kanjibhai Gadhavi, aged about 55 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby solemnly affirm and state as follows:

1. I am the Appellant No. 2 in the above titled Appeal and conversant with the facts and circumstances of the case and competent to swear this Affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.

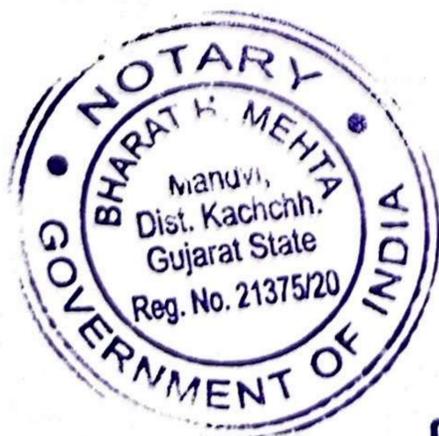


લક્ષ્મણ કાંજીભાઈ ગઢવી

DEPONENT

**VERIFICATION**

Verified at <sup>Mandvi</sup> Delhi on this 05 day of 06, 2025 that the contents of the above mentioned Affidavit are true and correct and nothing material has been concealed therefrom.



SOLEMNLY AFFIRMED  
BEFORE ME

૧૩૬  
BHARAT H. MEHTA  
ADVOCATE & NOTARY  
LAYJA ROAD,  
MANDVI - KACHCHH

લક્ષ્મણ કાંજીભાઈ ગઢવી

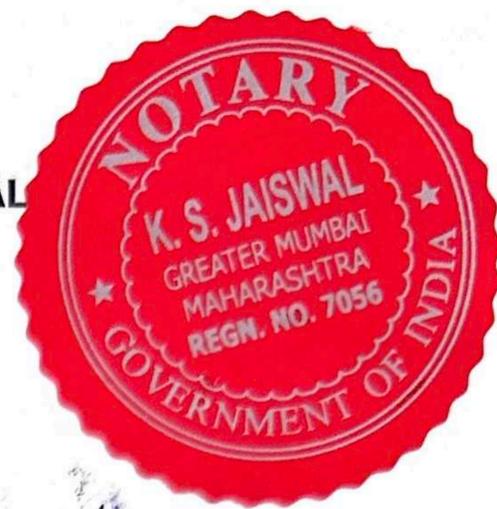
DEPONENT

લક્ષ્મણ કાંજીભાઈ ગઢવી

05 JUN 2025



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE  
APPEAL NO. 19 OF 2025



**IN THE MATTER OF:**

VIJAYKUMAR KARSANBHAI GADHAVI AND ORS.

...APPELLANTS

VERSUS

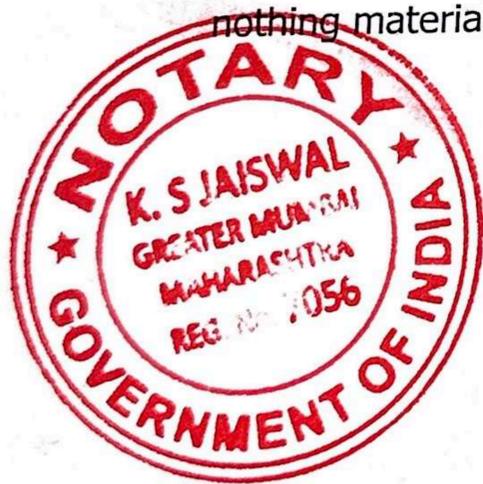
UNION OF INDIA AND ORS.

...RESPONDENTS

**AFFIDAVIT**

I, Bharat Gangji Gala, S/o Gangji Gala, aged about 59 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby solemnly affirm and state as follows:

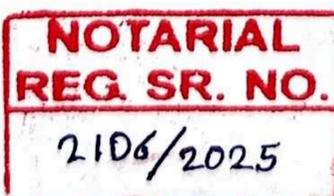
1. I am the Appellant No. 3 in the above titled Appeal and conversant with the facts and circumstances of the case and competent to swear this Affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.



Bharat Gangji.  
DEPONENT

**VERIFICATION**

Verified at <sup>mumbai</sup> Delhi on this 4th day of June, 2025 that the contents of the above mentioned Affidavit are true and correct and nothing material has been concealed therefrom.



4 JUN 2025

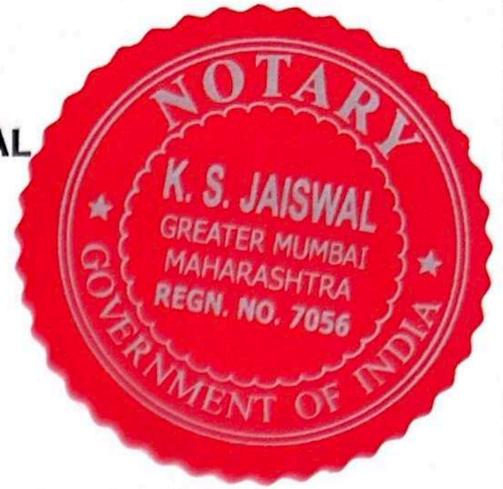
Bharat Gangji.  
DEPONENT



As Per Aadhar Card no -  
3126 3381 8768  
**BEFORE ME**  
**KAMLESH PRAKASH S. JAISWAL**  
Advocate & Notary Govt. Of India  
Off.: Shop No. 7, Nutan Kalpana Society,  
Near Nkulund Court, J.S.D. Road,  
Mandvi (W), Mumbai - 400 088,  
Maharashtra



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE  
APPEAL NO. 19 OF 2025



**IN THE MATTER OF:**

VIJAYKUMAR KARSANBHAI GADHAVI AND ORS.

....APPELLANTS

VERSUS

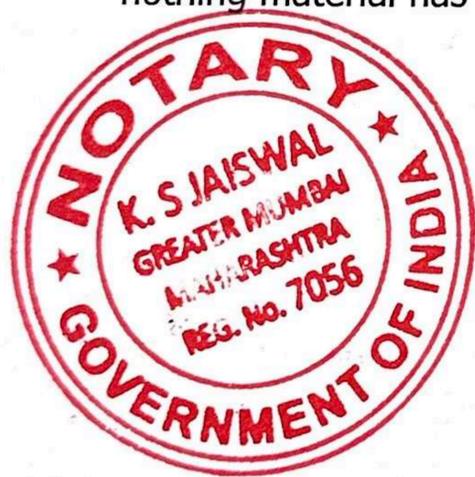
UNION OF INDIA AND ORS.

...RESPONDENTS

**AFFIDAVIT**

I, Rajesh Gangji Salva, S/o Gangji Salva, aged about 59 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby solemnly affirm and state as follows:

1. I am the Appellant No. 4 in the above titled Appeal and conversant with the facts and circumstances of the case and competent to swear this Affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.

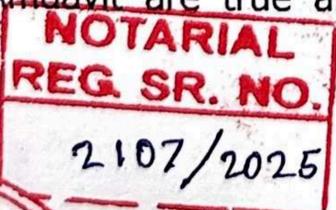


*Rajesh Gangji Salva*

DEPONENT

**VERIFICATION**

Verified at <sup>Mumbai</sup> Delhi on this 4/5 day of June, 2025 that the contents of the above mentioned Affidavit are true and correct and nothing material has been concealed therefrom.



4 JUN 2025

As Per Aadhar Card no-  
5550 3874 5412

BEFORE ME

*Rajesh Gangji Salva*

DEPONENT

**KAMLESH PRAKASH S. JAISWAL**  
Advocate & Notary Govt. Of India  
Off.: Shop No. 7, Nuzem Kalyan Society,  
Near Mulund Court, J.S.D. Road,  
Mulund (W), Mumbai - 400 020.  
Maharashtra



**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE  
APPEAL NO. 19 OF 2025**

**IN THE MATTER OF:**

VIJAYKUMAR KARSANBHAI GADHAVI AND ORS.

....APPELLANTS

VERSUS

UNION OF INDIA AND ORS.

...RESPONDENTS

**AFFIDAVIT**

NOTARIAL REGISTER

SR. No. : 1378

DATE : 05 JUN 2025

I, Vijaysinh Nanubha Padhiyar, S/o Nanubha Padhiyar, aged about 41 years, R/o Village – Bada, Taluka – Mandvi, P.O. Bada, District Kutch, Pincode - 370465, do hereby solemnly affirm and state as follows:

1. I am the Appellant No. 5 in the above titled Appeal and conversant with the facts and circumstances of the case and competent to swear this Affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.





**DEPONENT**

**VERIFICATION**

Verified at <sup>personally</sup> ~~Delhi~~ on this 05 day of 06, 2025 that the contents of the above mentioned Affidavit are true and correct and nothing material has been concealed therefrom.



SOLEMNLY AFFIRMED  
BEFORE ME

  
BHARAT H. MEHTA  
ADVOCATE & NOTARY  
LAYJA ROAD,  
MANDVI - KACHCHH



**DEPONENT**

**05 JUN 2025**

### List '1' – Accredited EIA Consultant Organizations (ACOs) - as on July 2020<sup>#</sup>

S. No.	Consultant Organization	Scope of Accreditation			
		As per NABET Scheme			Project or Activity as per Schedule of MoEFCC Notification dated September 14, 2006 and subsequent Amendments
		Sector Number	Name of Sector	Category	
1	<b>Aadhi Boomi Mining and Enviro Tech Private Limited</b> (formerly known as Suriya Mining Services) <b>Address:</b> 3/216, K.S.V.Nagar, Narasothipatti, Salem-636004 <b>Email:</b> <a href="mailto:suriyakumarsemban@gmail.com">suriyakumarsemban@gmail.com</a> <b>Tel.:</b> 09842729655, 09443290855 <i>Conditions apply</i>	1	Mining of minerals – opencast only	A	1 (a) (i)
		3	River Valley Projects	A	1 (c )
		7	Mineral beneficiation	A	2 (b)
		9	Cement Plants	A	3 (b)
		34	Highways	B	7 (f)
		38	Building and construction projects	B	8(a)
2	<b>Aakhivi Consultants</b> <b>Address:</b> 57 C, Block E5, Shatabdi Vihar, Sector 52, Noida, UP - 201 308 <b>Email:</b> <a href="mailto:aakhivi.2016@gmail.com">aakhivi.2016@gmail.com</a> <b>Tel.:</b> 08409580043; 07210434847	1	Mining of minerals - opencast only	A**	1 (a) (i)
		4	Thermal power plants	A**	1 (d)
		34	Highway	A**	7 (f)

S. No.	Consultant Organization	Scope of Accreditation			
		As per NABET Scheme			Project or Activity as per Schedule of MoEFCC Notification dated September 14, 2006 and subsequent Amendments
		Sector Number	Name of Sector	Category	
		39	Townships and Area development projects	B	8 (b)
114	<b>National Environmental Engineering Research Institute</b> <b>Address:</b> Nehru Marg, Nagpur – 440020 <b>Email:</b> <a href="mailto:director@neeri.res.in">director@neeri.res.in</a> ; <a href="mailto:ms_kumar@neeri.res.in">ms_kumar@neeri.res.in</a> <b>Tel.:</b> 0712-2249885, 07758079540 <i>Conditions apply</i>	2	Offshore & Onshore Oil and gas exploration, development & production	A	1 (b)
		3	River valley, hydel, Drainage and Irrigation projects	A	1 (c)
		4	Thermal power plants	A	1 (d)
		10	Petroleum refining industry	A	4 (a)
		13	Chlor-alkali industry	B	4 (d)
		16	Chemical fertilizers	B	5 (a)
		18	Petro-chemical complexes (industries based on processing of petroleum fractions & natural gas and/or reforming to aromatics)	A	5 (c)
		19	Textile – cotton and manmade fibers	B	5 (d)
		27	Oil & gas transportation pipeline (crude and refinery/ petrochemical products), passing through national parks/ sanctuaries/coral reefs	A	6 (a)

S. No.	Consultant Organization	Scope of Accreditation			
		As per NABET Scheme			Project or Activity as per Schedule of MoEFCC Notification dated September 14, 2006 and subsequent Amendments
		Sector Number	Name of Sector	Category	
			/ecologically sensitive Areas including LNG terminal		
		31	Industrial estates/ parks/ complexes/areas, export processing Zones (EPZs), Special Economic Zones(SEZs), Biotech Parks, Leather Complexes.	A	7 (c)
		32	Common hazardous waste treatment, storage and disposal facilities (TSDFs)	A	7 (d)
		33	Ports, harbours, break waters and dredging	A	7 (e)
		36	Common Effluent Treatment Plants (CETPs)	B	7(h)
		37	Common Municipal Solid Waste Management Facility (CMSWMF)	B	7 (i)
115	<b>N S envirotech Laboratories &amp; Consultants</b> <b>Address:</b> Plot No.-69 / 318, V.T. Road Chouraha, Madhyam	1	Mining of minerals including open cast/ underground mining	B	1 (a) (i)
		9	Cement plants	B	3 (b)

S. No.	Consultant Organization	Scope of Accreditation			
		As per NABET Scheme			Project or Activity as per Schedule of MoEFCC Notification dated September 14, 2006 and subsequent Amendments
		Sector Number	Name of Sector	Category	
		33	Ports, harbours, break waters and dredging	A	7 (e)
		37	Common municipal solid waste management facility (CMSWMF)	B	7(i)
		38	Building and Construction projects	B	8(a)
		39	Townships and Area development projects	B	8 (b)
160	<b>T. R. Associates</b>  Address: A-401, S.G Business Hub, Between Sola Bhagwat and Gota overbridge, near Urniya Campus, S.G. Highway, Ahmedabad 380060  <b>Email:</b> adm.trassociates@gmail.com; trassociates@hotmail.com, malav.trassociates@gmail.com, trpatel.trassociates@gmail.com  <b>Tel.:</b> 9825371099, 09723137312	1	Mining of minerals – Opencast only	B	1 (a) (i)
		4	Thermal power plants	B	1 (d)
		9	Cement plants	B	3 (b)
		13	Chlor-alkali industry	A	4 (d)
		14	Soda ash Industry	A	4 €
		17	Pesticides industry and pesticide specific intermediates (excluding formulations)	A	5 (b)
		21	Synthetic organic chemicals industry (dyes & dye intermediates; bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals,	A	5 (f)

S. No.	Consultant Organization	Scope of Accreditation			
		As per NABET Scheme			Project or Activity as per Schedule of MoEFCC Notification dated September 14, 2006 and subsequent Amendments
		Sector Number	Name of Sector	Category	
	<i>Conditions apply</i>		other synthetic organic chemicals and chemical intermediates)		
		38	Building and construction projects	B	8 (a)
161	<b>Udaipur Min-Tech Pvt. Ltd.</b> <b>Address:</b> 206, "Apeksha Complex", Sector 11, Hiran Magri, Udaipur- 313002 <b>Email:</b> <a href="mailto:ssbist@udrmintech.com">ssbist@udrmintech.com</a> <b>Tel.:</b> 0294- 2489672, 09414167672, 09950998672 <i>Conditions apply</i>	1	Mining of minerals - Open cast mining only	A	1 (a) (i)
162	<b>ULTRA-TECH</b> <b>Address:</b> 206, 224-225, Jai Commercial Complex, Eastern Express Highway, Opp. Cadbury, Khopat, Thane West - 400 601	1	Mining of minerals including open cast/ underground mining	A	1 (a) (i)
		2	Offshore & Onshore Oil and gas exploration, development & production	A	1 (b)
		3	River Valley projects	A	1 (c)

Government of India  
Ministry of Environment, Forest and Climate Change  
IA-III Section (CRZ)

Indira Paryavaran Bhawan  
Jor Bagh Road, New Delhi - 110003  
Dated: 29<sup>th</sup> November, 2022

**OFFICE MEMORANDUM**

**Subject: Procedure for Clearance of Permissible Activities as per the CRZ Notification, 2019 / ICRZ Notification, 2019 -regarding.**

The Ministry issued the Coastal Regulation Zone (CRZ) Notification, 2019 on 18<sup>th</sup> January, 2019 and the Island Coastal Regulation Zone (ICRZ) Notification, 2019 on 8<sup>th</sup> March, 2019 in supersession of the CRZ Notification, 2011 and the IPZ Notification, 2011 respectively. The Ministry specified the procedure for CRZ clearance as per the CRZ/ IPZ Notification, 2011 *vide* Office Memorandum dated 26<sup>th</sup> April, 2022. The Ministry has also rolled out a fully computerised PARIVESH portal for application, appraisal and approval of projects requiring various clearances at the State and Central level. Therefore, in order to remove redundancy and bring in greater clarity in delegation of powers as per the provisions of the CRZ / ICRZ Notification, 2019, the following procedure shall be followed henceforth for appraisal and approval of projects requiring CRZ or combined Environmental Clearance (EC) and CRZ clearances under the said notifications.

2. The procedure for clearance of permissible activities as per the CRZ Notification, 2019 and ICRZ Notification, 2019 shall be as under:-

(i). The project proponents shall apply on PARIVESH portal (<https://parivesh.nic.in/>) along with the following set of documents for seeking prior clearance under the CRZ / ICRZ Notification, 2019 to the concerned State or the Union Territory Coastal Zone Management Authority (CZMA):-

- a. Project summary details as per Annexure-V to the notification.
- b. Rapid Environment Impact Assessment (EIA) Report including marine and terrestrial component, as applicable, except for building construction projects or housing schemes.
- c. Comprehensive EIA with cumulative studies for projects, (except for building construction projects or housing schemes with built-up area less than the threshold limit stipulated for attracting the provisions of the EIA Notification, 2006) if located in low and medium eroding stretches, as per the CZMP to this notification.
- d. Risk Assessment Report and Disaster Management Plan, except for building construction projects or housing schemes with built-up area less than the threshold limit stipulated for attracting the provisions of the EIA Notification, 2006.
- e. CRZ map in 1:4000 scale, drawn up by any of the agencies identified by the Ministry using the demarcation of the HTL or LTL, as carried out by NCSCM.
- f. Project layout superimposed on the CRZ map duly indicating the project boundaries and the CRZ category of the project location as per the approved CZMP under this notification.
- g. The CRZ map normally covering 7 km radius around the project site also indicating the CRZ-I, II, III and IV areas including other notified ecologically sensitive areas.

*Amu*

h. "Consent to Establish" or No Objection Certificate from the concerned State Pollution Control Board or Union territory Pollution Control Committee for the projects involving treated discharge of industrial effluents and sewage, and in case prior consent of Pollution Control Board or Pollution Control Committee is not obtained, the same shall be ensured by the proponent before the start of the construction activity of the project, following the clearance under this notification.

(ii). The concerned State / Union Territory Coastal Zone Management Authority (CZMA) shall examine the above documents in accordance with the approved Coastal Zone Management Plan (CZMP) / Island Coastal Regulation Zone (ICRZ) Plans or Integrated Islands Management Plan (IIMP) in accordance with the procedure laid down and make recommendations as per the provisions of CRZ Notification, 2019 / ICRZ Notification, 2019, clearly specifying the permissibility, section / clause of the notification permitting the project / activity, to the concerned authority as under :-

S. No	Scenario as per the CRZ Notification, 2019	Clearance	Approving Authority	Procedure
<b>Projects requiring only CRZ clearance</b>				
1	<p>(a). All development activities or projects in CRZ-I and CRZ-IV areas except those mentioned at S. No. 2(a) below.</p> <p>(b). All construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance, except those mentioned at S. No. 2(a) and 2 (b) below.</p> <p>(c). Projects in CRZ –II and III, which also traverse through CRZ–I or CRZ-IV or both.</p> <p>(d). Construction of sewage treatment plants in CRZ-I for the purpose of treating the sewage from the municipal area of Greater Mumbai.</p>	Standalone CRZ	Ministry	<p>Application at CZMA by the PP;</p> <p>↓</p> <p>Recommendation of CZMA;</p> <p>↓</p> <p>Application in the Ministry;</p> <p>↓</p> <p>Recommendation of EAC (CRZ);</p> <p>↓</p> <p>Clearance by the Ministry</p>
2	<p>(a). Stand-alone jetties, Salt works, Slipways, Temporary structures and Erosion Control Measures (like Bunds, Seawall, Groynes, Breakwaters, Submerged reef, Sand nourishment, etc.) located in CRZ-I and CRZ – IV.</p> <p>(b) Permissible and regulated activities which fall purely in CRZ–II and CRZ-III areas.</p>	Standalone CRZ	CZMA	<p>Application at CZMA by the PP;</p> <p>↓</p> <p>Clearance by the CZMA</p>

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	(c) All construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance mentioned at S.No. 2(a) and 2 (b).			
3	Building and construction projects located in CRZ area, which is not attracting the provisions of the EIA Notification, 2006.	Standalone CRZ	State/UT Planning Authority	Application at CZMA by the PP; ↓ Recommendation of CZMA; ↓ Approval by Concerned State's or UT's Planning Authorities
4	Self-dwelling units up to a total built up area of 300 sq.mts.	Standalone CRZ	Local Authority	Application at concerned Local Authority by the PP; ↓ Approval by the Local Authority
<b>Projects requiring CRZ clearance and also Environmental Clearance (EC) as per the EIA Notification, 2006</b>				
5	(a) Any project located in CRZ area that requires EC under Category 'A'.  (b) All construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance that requires EC under Category 'B'.	Combined EC & CRZ	Ministry	Application at CZMA by the PP; ↓ Recommendation of CZMA; ↓ Application for EC+CRZ at concerned Sector of the IA Division of Ministry; ↓ Comments of CRZ Sector in the Ministry; ↓ Recommendation of Sectoral EAC for EC + CRZ; ↓ Clearance (Combined) by Ministry (EC+CRZ)
6	Any project located in CRZ area that requires EC under Category 'B', except construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance.	Combined EC & CRZ	SEIAA	Application at CZMA by the PP; ↓ Recommendation of CZMA; ↓ Application in the concerned SEIAA; ↓

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			Recommendation of SEAC for EC&CRZ; ↓ Clearance by SEIAA (EC&CRZ)
<i>Special dispensation given to the Island areas, Municipal limits of Greater Mumbai and Critical Vulnerable Coastal Areas, not falling in the above categories shall be as specified in the Notification.</i>			
(Refer clause 4, 5, 7, 8 and 10 of the CRZ Notification, 2019)			

S. No	Scenario as per the ICRZ Notification, 2019	Clearance	Approving Authority	Procedure
<b>Projects requiring only ICRZ clearance</b>				
1	<p>(a). All development activities or projects in ICRZ-I and ICRZ-IV areas except those mentioned at Para 2(a) below.</p> <p>(b). All construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance, except those mentioned at S.No. 2(a) and 2(b) below.</p> <p>(c). Projects in ICRZ –II and III, which are also traversing through ICRZ–I or ICRZ-IV or both.</p>	Standalone ICRZ	Ministry	<p>Application at CZMA by the PP;</p> <p>↓</p> <p>Recommendation of CZMA;</p> <p>↓</p> <p>Application in the Ministry;</p> <p>↓</p> <p>Recommendation of EAC (CRZ);</p> <p>↓</p> <p>Clearance by the Ministry</p>
2	<p>(a). Stand-alone jetties, Salt works, Slipways, Temporary structures and Erosion Control Measures (like Bunds, Seawall, Groynes, Breakwaters, Submerged reef, Sand nourishment, etc.) located in ICRZ-I and ICRZ –IV.</p> <p>(b). Permissible and regulated activities which fall purely in ICRZ–II and ICRZ-III areas.</p> <p>(c). All construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance mentioned at S.No. 2(a) and 2(b).</p>	Standalone ICRZ	CZMA	<p>Application at CZMA by the PP;</p> <p>↓</p> <p>Clearance by the CZMA</p>

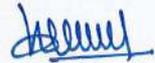
*helly*

*11/21/19*

3	Building and construction projects located in ICRZ area, which is not attracting the provisions of the EIA Notification, 2006.	Standalone ICRZ	State/UT Planning Authority	Application at CZMA by the PP; ↓ Recommendation of CZMA; ↓ Approval by Concerned UT's Planning Authorities
4	Self-dwelling units up to a total built up area of 300 sq.mts.	Standalone ICRZ	Local Authority	Application at concerned Local Authority by the PP; ↓ Approval by the Local Authority
<b>Projects requiring ICRZ clearance and also Environmental Clearance (EC) as per the EIA Notification, 2006</b>				
5	(a) Any project located in ICRZ area that requires EC under Category 'A'  (b) All construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance that requires EC under Category 'B'	Combined EC & ICRZ	Ministry	Application at CZMA by the PP; ↓ Recommendation of CZMA; ↓ Application for EC+CRZ at concerned Sector of the IA Division of Ministry; ↓ Comments of CRZ Sector in the Ministry; ↓ Recommendation of Sectoral EAC for EC + CRZ; ↓ Clearance (Combined) by Ministry (EC+CRZ)
6	Any project located in ICRZ area that requires EC under Category 'B', except all construction activities related to projects of Department of Atomic Energy or National Defence or Strategic or Security importance	Combined EC & ICRZ	SEIAA	Application at CZMA by the PP; ↓ Recommendation of CZMA; ↓ Application in the concerned SEIAA; ↓ Recommendation of SEAC for EC&CRZ; ↓ Clearance by SEIAA (EC&CRZ)
(Refer clause 4, 6, 7 and 8 of the ICRZ Notification, 2019)				

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3. The State / UT CZMA shall forward its recommendation on the permissible activities as per the CRZ Notification, 2019 / ICRZ Notification, 2019 to the concerned authorities, clearly mentioning the CRZ area in which the project is located / passing through, section / clause under which the activity is permissible, conditions if any, and along with all the statutory documents as mentioned in para 2(i) above.
4. In case, the CZMA desires to consider an activity which is not explicitly mentioned in the notification or not permissible, such recommendations shall be forwarded with detailed justification to the Ministry for consideration.
5. In case the Coastal Zone Management Authorities (CZMA) are not in existence due to delay in their reconstitution or any other reasons, then it shall be responsibility of the Department of Environment in the State Government or Union Territory Administration, for providing comments and recommendation to the proposals in terms of the provisions of the said notification, to the concerned authority, as the case may be.
6. The Category A projects requiring comments of the CRZ Sector shall be forwarded along with all the statutory documents as mentioned in para 2(i) before consideration of the project by the Sectoral EACs. The Sectoral EAC shall appraise the project for composite EC and CRZ clearance based on the comments of the CRZ Sector and CZMA recommendations. In case, the Sectoral EAC is same for appraisal of the projects for both EC and CRZ clearance, the comments of the CRZ sector need not be required.
7. This issues with the approval of the Competent Authority.



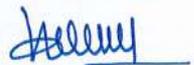
(Dr. H. Kharkwal)  
Scientist 'E' (CRZ)

**To**

1. The Principal Secretary, Environment Department of Coastal State's / UT's.
2. The Chairman, SEIAA of Coastal State's / UT's.
3. The Chairman, SEAC of Coastal State's / UT's.
4. The Chairman, SCZMA / UTCZMA.
5. The Member Secretary, SCZMA / UTCZMA.
6. The Chairman, EAC's (MoEFCC).
7. The Director (IA-Policy) /The Director (PARIVESH / CPC), MoEFC.
8. The Member Secretary, All EAC (IA-Division), MoEFCC

**Copy to:**

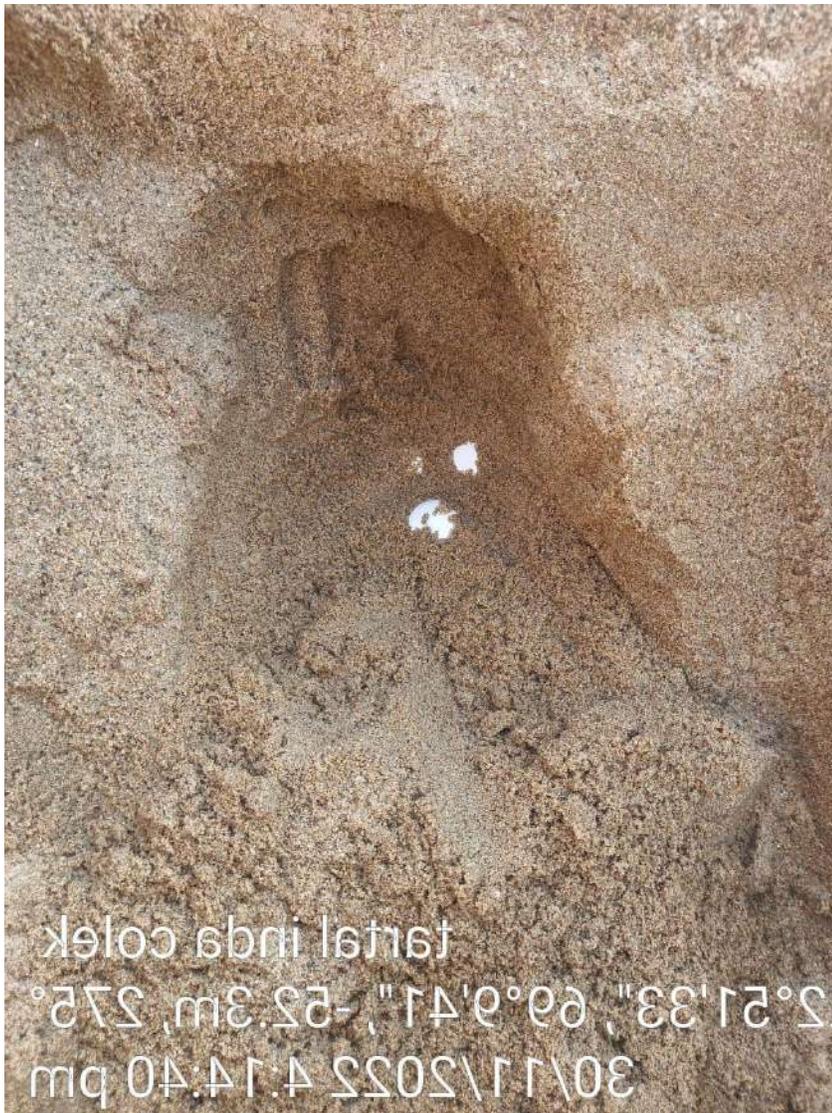
1. PS to MEF / PS to MoS (EF&CC)
2. PPS to Secretary, EFCC
3. PPS to DGF&SS
4. PPS to AS(TK) / PPS to AS(RS) / PPS to AS (NPG)
5. Sr. PPS to JS(SKB), PPS to JS(NKS) /JS(SM) / JS(NP) /
6. All Officers of IA Division
7. Technical Director (NIC)
8. NIC / IT for uploading on Website



(Dr. H. Kharkwal)  
Scientist 'E' (CRZ)

**COPY OF THE IMAGES SHOWING THE FOREST DEPARTMENT IDENTIFYING, SAFEGUARDING AND RELEASING OF HATCHLINGS IN THE PROPOSED PROJECT AREA.**







મિત્રજીત વિજયકુમાર ગઢવી

Advocate

19-શ્રી હરિ નગર-1, માંડવી નલિયા રોડ,

માંડવી-કચ્છ, 370465

મો. 8141817001

તા:- 10/01/2025

પ્રતિ,

રેન્જ ફોરેસ્ટ ઓફિસર શ્રી

માંડવી રેન્જ, માંડવી-કચ્છ.

વિષય:- માહિતી અધિકાર અધિનિયમ ૨૦૦૫ મુજબ માહિતી આપવા બાબત.

જય ભારત સાથે જણાવવાનું કે હું ઉપરના નામ અને સરનામે રહું છું, મને નીચે મુજબની માહિતી, માહિતી અધિકાર અધિનિયમ ૨૦૦૫ મુજબ આપવા વિનંતી છે.

1. વર્ષ 2011/12 થી 2023/24 સુધી માંડવી રેન્જ (તાલુકા) વિસ્તાર માં દરિયા કાંઠે નીકળેલ કાચબાના ઇંડાની વિગતો આપવા વિનંતી.
2. વર્ષ 2011/12 થી 2023/24 સુધી માંડવી તાલુકાના દરિયા કાંઠે મૃત હાલતમાં મળેલ કાચબાની વિગતો આપવા વિનંતી.
3. મુદ્દા નંબર 1 અને 2 અંગે ની માહિતીમાં કાચબાની પ્રજાતિ જણાવવા વિનંતી.

હું મિત્રજીત ગઢવી આથી જણાવવું છું કે માંગવામાં આવેલ માહિતી, માહિતી અધિકાર અધિનિયમ ૨૦૦૫ ની કલમ ૮ અથવા ૯ હેઠળ માહિતી જાહેર કરવાથી મુક્તિ આપેલ હોય તેવા વર્ગ હેઠળ આવરી લીધેલ નથી અને મારી ઉત્તમ જણ મુજબ તે આપના વિભાગ ને લગતી છે.

આ અરજી ઉપર રૂ.૨૦ ની નોન જ્યુડીસીયલ સ્ટેમ્પ ચોટાડેલ છે.

માંડવી-કચ્છ

આપનો વિશ્વાસુ

( મિત્રજીત વી. ગઢવી )

Received  
10/1/2025  
રેન્જ ફોરેસ્ટ ઓફિસર  
માંડવી રેન્જ

3221



રેન્જ ફોરેસ્ટ ઓફીસરશ્રીની કચેરી  
માંડવી નોર્મલ રેન્જ,  
ફોરેસ્ટ કોલોની, શીતલા રોડ,  
માંડવી-કચ્છ. પીન:૩૭૦૪૬૫

Email: [mandvirfo@gmail.com](mailto:mandvirfo@gmail.com)

☎ : 02834 223607

ક્રમાંક: ૩/૧૯૭-૯૯/૨૦૨૪-૨૫

તા: ૦૬/૦૨/૨૦૨૪

નમુનો ગ  
(જુઓ નિયમ ૪ (૧))  
અરજદારને માહિતી આપવા બાબત

પ્રતિ,

શ્રી મિત્રજીત વિજયકુમાર ગઢવી,  
૧૯, શ્રી હરી નગર-૧  
માંડવી-નલીયા રોડ,  
માંડવી-કચ્છ.

વિષય:- જાહેર માહિતી અધિકાર અધિનિયમ ૨૦૦૫ તળે માહિતી પુરી પાડવા  
બાબત

સંદર્ભ:- આપની તા.૧૦/૦૧/૨૦૨૫ વાળી અરજી અનુસંધાને

શ્રીમાન,

જાહેર માહિતી અધિકાર તળે માહિતી આપવા માટેની વિનંતી કરતી આપની તા.૧૦/૦૧/૨૦૨૫ વાળી અરજી અત્રેની કચેરીને તા.૧૦/૦૧/૨૦૨૫ ના રોજ મળેલ હતી જે અન્વયે જણાવવાનું કે આપના દ્વારા માંગવામાં આવેલ માહિતી અંગેના મુદ્દા ની માહિતી સબબ નીચે વિગતે પ્રત્યુત્તર પાઠવવામાં આવેલ છે.

મુદ્દા નં.૧: સને ૨૦૧૧/૧૨ થી સને ૨૦૨૩/૨૪ સુધીમાં દરિયા કાંઠેથી મળેલ કાચબાના ઈંડાની સંખ્યા ૮૬૮૨ છે.

મુદ્દા નં.૨: સને ૨૦૧૧/૧૨ થી સને ૨૦૨૩/૨૪ સુધીમાં દરિયા કાંઠેથી મૃત હાલતમાં મળેલ કાચબાની સંખ્યા ૩૩ છે.

મુદ્દા નં.૩: કાચબાની પ્રજાતિ: ગ્રીન સી ટર્ટલ છે.

આપ ઉપરના નિર્ણયથી નારાજ હોય તો નિર્ણય મળ્યાના તારીખથી દિન-૩૦ માં આપ પ્રથમ અપીલ અધિકારીશ્રી નાયબ વન સંરક્ષકશ્રી, કચ્છ પશ્ચિમ વન વિભાગ, અરિહંત નગર, ભુજને અપીલ કરી શકો છો.

આપનો વિશ્વાસુ,

જાહેર માહિતી અધિકારી,  
અને રેન્જ ફોરેસ્ટ ઓફીસર, માંડવી

નકલ સાદર રવાના :- નાયબ વન સંરક્ષકશ્રી, કચ્છ પશ્ચિમ વન વિભાગ, ભુજ તરફ જાણ સારું.

O/C

(Sample-A)



Mitrajeet Vijaykumar Gadhvi

Advocate

19-Shri Hari Nagar-1, Mandvi Naliya Road,

Mandvi-Kutch, 370465

Md. 8141817001

Date – 10/01/2025

To,

Range Forest Officer Shri

Mandvi Range, Mandvi-Kutch.

Subject:-Provision of information as per the Right to Information Act, 2005.

Jai Bharat, I hereby inform you that I reside at the above name and address and am requested to provide the following information under the Right to Information Act, 2005.

1. Please provide details of turtle eggs hatched on the seashore in the Mandvi Range (Taluka) area from the year 2011/12 to 2023/24.
2. Request you to provide details of turtles found dead on the beach of Mandvi taluka from the year 2011/12 to 2023/24.
3. Please provide the species of turtle in the information regarding points 1 and 2.

I, Mitrajeet Gadhvi, hereby state that the information sought does not fall under the category exempted from disclosure under Section 8 or 9 of the Right to Information Act, 2005 and to the best of my knowledge, it pertains to your department.

A non-judicial stamp of Rs. 20 has been affixed on this application.

મંડવી-કચ્છ

આપનો વિશ્વાસુ

( મિત્રજીત વી. ગઢવી )

Received  
10/1/2025  
રેન્જ ફોરેસ્ટ ઓફિસર  
મંડવી રેન્જ

3223



Range Forest Officer's Office

Mandvi Normal Range,

Forest Colony, Sheetla

Road, Mandvi-Kutch. Pin:370465

Email: [mandvirfo@gmail.com](mailto:mandvirfo@gmail.com)

☎ : 02834 223607

Serial No.: K/197-98/2024-25

Date: 06/02/2024

Specimen c

(See Rule 4 (1))

Matter of providing information to the applicant

To,

Shri Mitrajeet Vijaykumar Gadhvi,

19, Shri Hari Nagar – 1,

Mandvi-Naliya Road,

Mandvi, Kutch

**Subject** – Provision of information under the Right to Public Information Act, 2005**Reference** – Pursuant to your application dated 10/01/2025

Sir,

Your application dated 10/01/2025 requesting information under the Right to Information was received by this office on 10/01/2025, pursuant to which it is hereby informed that the following detailed reply has been sent to you regarding the information sought by you.

Issue No. 1: The number of turtle eggs found on the beach from 2011/12 to 2023/24 is 8682.

Issue No.2: The number of turtles found dead on the beach from 2011/12 to 2023/24 is 33.

Issue No. 3: Species of turtle: Green sea turtle.

If you are dissatisfied with the above decision, you can appeal to the First Appellate Officer, Deputy Conservator of Forests, Kutch West Forest Department, Arihant Nagar, Bhuj, within 30 days from the date of receipt of the decision.

Yours faithful,

Public Information Officer,  
and Range Forest Officer, Mandvi

Copy of the letter of respect to the Deputy Conservator of Forests, Kutch West Forest Division, Bhuj. Good information.

Copy of the screenshot of the timeline of the project from Parivesh Portal reflecting that the 80th EAC meeting on 07.06.2024 as the last meeting wherein the project was considered and there is no reference or documentation available on the timeline of the project regarding any subsequent deliberations in the 84th and 87th EAC meetings in connection with the said project.

**TimeLine Details**

Proposal received date at each stage of flow.

Submitted by Proponent	Query for Shortcoming (if any) by MS	Resubmission of Proposal by Proponent	Accepted by MS	Proposal considered by EAC	Minutes uploaded on	Additional Detail sought (if any) by MS	Replied by proponent	Delist/Relist	TOR Granted	EC Granted
30 Nov 2022	07 Dec 2022 19 Jan 2023 06 Oct 2023 03 Nov 2023	06 Jan 2023 08 Sep 2023 07 Oct 2023 27 Dec 2023	28 Dec 2023	Jun 07, 2024 To Jun 07, 2024 Apr 30, 2024 To Apr 30, 2024 Jan 02, 2024 To Jan 02, 2024 Feb 06, 2024 To Feb 06, 2024	Jun 20, 2024 Jun 20, 2024 May 13, 2024 Jan 09, 2024 Feb 15, 2024	09 Jan 2024 15 Feb 2024 13 May 2024	30 Jan 2024 28 Mar 2024 28 May 2024	Delisted : 20 Jan 2023 Relisted : 27 Dec 2023 Delisted : 20 Jan 2023 Delisted : 05 Nov 2023 Delisted : 05 Nov 2023	N/A	12 Dec 2024

Print page

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Litigation . &lt;litigation@dclawchambers.com&gt;

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**Copy of Rejoinder on behalf of the Appellant in Appeal No. 19 of 2025  
VijaykumarKarsanbhai Gadhavi Versus. Union of India & Ors.**

1 message

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**Litigation .** <litigation@dclawchambers.com>

Fri, Jun 6, 2025 at 3:54 PM

To: ENVIRO LEGAL DEFENCE FIRM &lt;eldflegal@gmail.com&gt;, secy-moef@nic.in, chiefsecretary@gujarat.gov.in, ms-gpcb@gujarat.gov.in

Cc: Kol Office &lt;kol\_office@dclawchambers.com&gt;

Dear Sir/madam,

Please find attached-Copy of Rejoinder on behalf of the Appellant in Appeal No. 19 of 2025 VijaykumarKarsanbhai Gadhavi Versus. Union of India &amp; Ors.

Thanks & Regards  
Counsel for the Appellant

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 **Rejoinder on behalf of Appellant R-1.pdf**  
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