

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**

**WESTERN ZONE BENCH PUNE, AT PUNE**

**APPEAL NO. 641 OF 2025**

[Appeal u/s 16 (h) read with Section 18 (1) of the National Green Tribunal Act, 2010]

IN THE MATTER OF

Shamshir Abdul Wahab Khan

...Appellant

VERSUS

The State Environment Impact Assessment Authority,

Maharashtra & Ors.

...Respondents

**REJOINDER TO THE REPLY DATED 12.02.2026 FILED BY THE  
RESPONDENT NO. 2 & 3 .**

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**ADVOCATES FOR THE APPELLANT:**

Sangramsingh R. Bhonsle, Nrupal A. Dingankar, Pushkara A. Bhonsle,

Sneha Bhonsle, Naman Sherstra & Sanmitra Y. Pol

Office at: H-5, Second Floor, Lajpat Nagar III, New Delhi.

Contact: 95458 09120

Email: [srb.chambers@gmail.com](mailto:srb.chambers@gmail.com)



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**ADVOCATES FOR THE APPELLANT:**

Sangram Singh R. Bhonsle,  
Nrupal A. Dingankar, Pushkara A. Bhonsle,  
Sneha Bhonsle, Naman Sherstra &

Sanmitra Y. Pol

Office at: H-5, Second Floor, Lajpat Nagar  
III, New Delhi.

Contact: 95458 09120

Email: srb.chambers@gmail.com

**Date: 17.02.2026**

**Place: New Delhi**



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The State Environment Impact Assessment Authority,

Maharashtra & Ors.

...Respondents

**REJOINDER TO THE REPLY DATED 12.02.2026**

**FILED BY THE RESPONDENT NO. 2 & 3.**

TO,

THE HON'BLE CHAIRPERSON

AND THE HON'BLE COMPANION MEMBERS,

OF THE HON'BLE NATIONAL GREEN TRIBUNAL.

It is most respectfully submitted on behalf of the Appellant as under:

1. The Appellant, vide the present Appeal u/s 16 (h) of the National Green Tribunal Act, 2010 has challenged the Environment Clearance dated 16.12.2025 granted by the Respondent No. 1 for undertaking sand mining at the Dhanori Sand Ghat over an extent of 4.5 Ha at Wainganga River Bed, adjoining Gat Nos. 181/1, 180/2, 181, 579, 182, 183 at Village Dhanori, Tehsil Pauni, District Bhandara, Maharashtra.

2. The Appellant has filed the present Appeal, *inter alia* on the grounds that:
  - a. The Replenishment Study, forming a part of the District Survey Report is fundamentally defective and therefore, no Environment Clearance could be accorded, on a fundamentally defective District Survey Report.
  - b. No Mining Plan was submitted by the Respondent No. 3, in the proposal for grant of Environment Clearance.
  - c. No Pre-Feasibility Report was submitted along with the proposal for the grant of Environment Clearance.
  - d. No recommendation of the Sub-Divisional Committee in terms of the Appendix X to the EIA Notification 15.01.2016 has been taken for proposing the said Sand Ghat for Environment Clearance, and
  - e. No application of mind by the Respondent No. 1 to the proposal of the Respondent No. 2.
3. The contentions raised by the Respondent No. 2 & 3 in the Reply unless specifically admitted by the Appellant herein shall not be deemed to have been admitted by the Appellant and no contentions raised by the Respondent No. 2 & 3 in the Reply, in any case, shall be deemed to be admitted for reasons of non-traverse.
4. The contentions raised in Para 1, 2 and 3 of the Reply by the Respondent No. 2 & 3 being a matter of record, as such need no reply and are in any case, denied.
5. The contentions in Para 4 of the Reply are denied to the extent that the Appeal as filed by the Appellant is not maintainable, because the DSR cannot be challenged by way of an Appeal is denied. The Respondent No. 2 & 3, vide their contentions in Para 4 have clearly failed to understand the contention of the Appellant in the Appeal, by which the Appellant has raised a challenge to the grant of EC dated 16.12.2025, granted by the Respondent No. 1 on the basis of a DSR, which was approved, without there being proper Replenishment Study, being undertaken, rendering the DSR for District Bhandara to be defective and untenable in law. A defective DSR cannot form the basis of an Application for the

grant of EC and the EC granted on the basis of a defective DSR is the subject matter of challenge in the present Appeal. In any case, the issue that an approved DSR cannot be challenged, even though the same has been approved without proper replenishment study is no longer *res integra* as this Hon'ble Tribunal has already taken a view that once it is established by the material on record that the DSR has been prepared and approved without proper replenishment study being undertaken, the same is liable to be quashed and set aside and thereafter, revise the DSR to bring the same in conformity with the Notifications dated 15.01.2016 and 25.07.2018 as well as the Sand Mining Guidelines of 2016 and 2020 issued by the Respondent No. 4. Therefore, a DSR approved without proper replenishment study is a defective DSR, which needs to be revised and EC granted on a defective DSR can be challenged u/s 16 (h) of the NGT Act, 2010, before this Hon'ble Tribunal.

6. A view that the existing legal regime mandates the preparation of a Replenishment Report in a scientific manner and the Report forming an integral part of DSR, a DSR without proper replenishment study is bad in law has already been taken by the Hon'ble Supreme Court and therefore, a challenge to the grant of Environment Clearance on a defective DSR, more particularly when the Replenishment Study is not conducted in accordance to the strict compliance of Clause 5 of the Sand Mining Guidelines, 2020, can be raised u/s 16 (h) of the NGT Act, 2010 before this Hon'ble Tribunal. Thus, the contentions raised by the Respondent No. 2 and 3 in Para 4 are completely denied.
7. The contentions in Para 5 raising a challenge to the *bona fides* of the present Appellant, the same lack merit as the Hon'ble Supreme Court has categorically held in a series of judgments that in cases concerning environmental governance, the Courts should decide the case on merits as the environmental cases involve present and future generations and issues of sustainable development for the future. Also, vague aspersions on the intention of public spirited individuals does not constitute an adequate response to those interested in the protection of the

environment. Also, this Hon'ble Tribunal has held that the environment is not a subject which is person oriented, but is society centric. The impact of the environment is normally felt by a larger section of the society as whenever the environment is diluted or eroded, the results are not person specific. Thus, if the Appellant vide the present Appeal has raised substantial questions relating to the environment, arising out of the implementation of the Schedule Acts, this Hon'ble Tribunal must proceed to hear the Appeal on merits. The Appellant vide the present Appeal has raised a substantial challenge to the grant of Impugned Environment Clearance, which is well within the implementation of the Schedule Acts and therefore, this Hon'ble Tribunal has the jurisdiction u/s 16 (h) of the NGT Act, 2010 to decide the Appeal of the Appellant, on merits. Also, the contention that if the Appeals are dismissed, then huge financial revenue loss shall be caused to the Government, is an argument not available to the Respondent No. 2 and 3, especially in matters of environmental concern. The degradation caused to the environment as a consequence of the sand mining proposed to be done on the Impugned Environment Clearance would cause irreparable damage to the environment, which can never be compensated in terms of money. Thus, the contentions in Para 5 of the Reply are denied.

8. The contentions in Para 6 are also an eyewash and far-fetched from reality. The Respondent No. 2 and 3 has clearly failed to understand the purport of the challenge to the grant of the EC in the Appeal as raised by the Appellant. The Appellant has categorically raised a challenge that the Replenishment Study for the approved DSR for District Bhandara has not been prepared in strict compliance to Clause 5 of the Sand Mining Guidelines, 2020. In order to negate the challenge of the Appellant, the Respondent No. 2 and 3 ought to have demonstrated, by bringing on record, material to show that the Replenishment Study undertaken for the DSR 2025 was in strict compliance of Clause 5 of the Sand Mining Guidelines, 2020. However, on perusing the contentions raised in Para 6, all that the Respondent No. 2 and 3 have contended that the DSR has been

duly prepared after examining all the relevant aspects. However, for reasons best known to the Respondent No. 2 and 3, the Reply nowhere elaborates the strict compliance of Clause 5 of the Sand Mining Guidelines, 2020 in preparing the Replenishment Study. Thus, considering the contentions in Para 6 of the Reply, in the absence of specific contentions showing the compliance of Clause 5 of the Sand Mining Guidelines, 2020, this Hon'ble Tribunal ought to draw an inference that the Replenishment Study for the DSR is defective. A bare perusal of the Replenishment Study forming a part of the DSR would also clearly show that the Replenishment Study prepared by the Respondent No. 2 and 3 for the DSR of the District of Bhandara is far from the necessary compliances mandated in terms of Clause 5 of the Sand Mining Guidelines, 2020.

9. The second part of the Reply in Para 6, deals with the fact that the DSR was duly published and put in public domain as per law. Such stand of the Respondent No. 2 and 3 is not at all disputed by the Appellant. What the Appellant has challenged is that the DSR for District Bhandara has been approved without proper Replenishment Study and ought to be revised in terms of the judgment passed by this Hon'ble Tribunal.
10. The contentions in Para 7, to the extent that the present Appeal deserves to be dismissed for want of bona fides, merely because the Appellant has not raised objections to the DSR is contrary to law. This Hon'ble Tribunal has already taken a view that a DSR approved without a proper Replenishment Study ought to be revised and brought in conformity with the Notifications dated 15.01.2016 and 25.07.2018 as well as the Sand Mining Guidelines, 2016 and 2020 issued by the Respondent No. 4. Thus, merely because the Appellant has not challenged the DSR for District Bhandara while the same was put in public domain, by no means can be contended to hold that the bona fides of the Appellant are doubtful and therefore, the Appeal ought to be dismissed. At the cost of repetition, it is reiterated that once a person brings a substantial question of law pertaining to the environment, affecting the society at large, for adjudication before this Hon'ble

Tribunal, this Hon'ble Tribunal must make an endeavour to adjudicate the issue on merits. The Appellant in the present Appeal has more than prima facie, established that a substantial question of law pertaining to the grant of EC with regards to the enactments specified in the schedule to the NGT Act, 2010 has been raised in the present Appeal u/s 16 (h) of the NGT Act, 2010 and therefore, this Hon'ble Tribunal may be pleased to adjudicate the substantial question of law raised in the present Appeal on merits.

11. The contention in Para 8 is not supported by any document whatsoever. The Respondent No. 3, being a Project Proponent, ought to have produced documents on record to show that the DSR was prepared in terms of the methodology provided.
12. The contentions in Para 9 of the Reply are an attempt to reiterate the challenge raised by the Appellant in the Appeal. Be that as it may, the Appellant shall rely on the grounds of Appeal for the purpose of substantiating the contentions of the Appellant. In any case, the contentions in Para 9 contrary to the grounds of Appeal raised by the Appellant in the present Appeal are in any case, denied.
13. The contentions in Para 10 are an attempt by the Respondent No. 2 and 3 to explain the procedure enumerated in Clause 5.1 of the Sand Mining Guidelines, 2020. Clause 5.1 of the Sand Mining Guidelines, 2020 is exhaustive and self explanatory and the Appellant shall rely on Clause 5.1 of the Sand Mining Guidelines, 2020 to interpret as to what was the compliance that was required to be done by the Respondent No. 2 and 3 while preparing the Replenishment Study.
14. In Para 11, surprisingly, the Respondent No. 2 and 3 has made a statement that the DSR for District Bhandara is for 1 year only, unlike for 5 years in other States. At the outset, this statement itself fortifies the case of the Appellant that the DSR is a defective DSR as in terms of Appendix X to the Notification dated 15.01.2016 as well as the Notification dated 25.08.2017, the DSR shall form the basis of an Application for EC, preparation of Reports and appraisal of projects. The Report shall be updated once every 5 years. Thus, in terms of the Notification dated

15.01.2016 as well as the Notification dated 25.08.2017, the life of a DSR is 5 Years and the DSR has to be updated, once every 5 years. The Notification dated 15.01.2016 as well as the Notification dated 25.08.2017 does not recognize a DSR for a period of one year. Thus, the fact that the Respondent No. 2 and 3 at Para 11 in their Reply have stated that the DSR for District Bhandara is for a period of one year, itself shows that the DSR is not in consonance with the Notification dated 15.01.2016 as well as the Notification dated 25.08.2017. On the basis of the admission by the Respondent No. 2 and 3 in Para 11 that the DSR is for one year only, the Impugned EC ought to be set aside.

15. As far as the remaining contentions in Para 11 are concerned, the Respondent No. 2 and 3 has made an attempt to show a timeline to meet the compliance of surveys enumerated in Clause 5.1 of the Sand Mining Guidelines, 2020. At the outset, it is submitted that on perusing the minutes of the SEAC Meeting dated 04.12.2025, it is evident that the DSR for the District Bhandara was approved on 21.11.2025. On perusing Clause 5.1 of the Sand Mining Guidelines, 2020, the Replenishment Study requires 4 surveys. Thus, considering the fact that the DSR for District Bhandara was approved on 21.11.2025, the First Survey in terms of Clause 5.1 of the Sand Mining Guidelines, 2020 ought to have been conducted in April, 2024 for recording the level of Mining Lease before the monsoon season. The Second Survey was to be conducted at the time of closing of mine for the monsoon season, which would mean that the Survey ought to have been conducted in June, 2024. This survey would provide the quantity of material that was excavated before the onset of monsoon. The Third Survey was to be conducted after the monsoon, i.e. in October, 2024, which would show the quantum of material deposited/ replenished in the Mining Lease. The Fourth Survey would have to be conducted at the end of March, 2025 to know the quantity of material excavated during the Financial Year. Thus, if at all the Surveys would have been conducted by the Respondent No. 2 and 3 in April, 2024, June, 2024, October, 2024 and

March, 2025, the said data could have been used for the purposes of showing compliance of Clause 5.1 for the approval of the DSR.

16. Interestingly, the Respondent No. 2 and 3, in Para 11 (i) has contended that the First Survey was carried out from 03.10.2024 to 16.10.2024. The Respondent No. 2 and 3 have categorically admitted to the fact that the said Survey was to be carried out in the month of April, 2024 for recording the level of sand before the monsoon. This by itself is a clear admission that the First Survey, which ought to have been carried out in the month of April, 2024 has not been carried out by the Respondent No. 2 and 3 in terms of Clause 5.1 of the Sand Mining Guidelines, 2020. Considering for the sake of argument that the Survey was conducted on 03.10.2024, between March, 2024 and October, 2024, a Second Survey in June, 2024 was necessary to provide the quantity of material excavated before the offset of monsoon in April, 2024 to June, 2024. Admittedly, considering the contentions in Para 11 (i), even the Second Survey of June, 2024 has not been conducted by the Respondent No. 2 and 3 in terms of Clause 5.1. The First Survey as contended by the Respondent No. 2 and 3 that was carried out from 03.10.2024 to 16.10.2024, even for the sake of argument is to be accepted, though not admitted, the same ought to have been the Third Survey in terms of Clause 5.1 of the Sand Mining Guidelines, 2020. Thus, the contentions raised by the Respondent No. 2 and 3 in Clause 5.1 clearly demonstrates that the first two surveys of April, 2024 and June, 2024 have not been conducted by the Respondent No. 2 and 3 and therefore, there is a clear violation of Clause 5.1 of the Sand Mining Guidelines, 2020.

17. Thereafter, on perusing the contentions in Para 11 (ii), the Respondent No. 2 and 3 have contended that since, no mining activity was conducted between October, 2024 to June, 2025, the Second Survey was not conducted. Such contention of the Respondent No. 2 is completely contrary to law and more particularly to Clause 5.1 of the Sand Mining Guidelines, 2020 where the Surveys were to be conducted in April, 2024, June, 2024, October, 2024 and March, 2025. In any

case, none of the Surveys, alleged to have been conducted are in strict compliance with Clause 5.1 of the Sand Mining Guidelines, 2020.

18. In para 11 (iii), the Respondent No. 2 and 3 has made out a case that the Third Survey in terms of compliance of Clause 5.1 of the Sand Mining Guidelines, 2020 was conducted in October, 2025. On perusing Clause 5.1 of the Sand Mining Guidelines, 2020, if at all, the DSR was approved on 21.11.2025, the Fourth Survey ought to have been completed before March, 2025. Thus, the so-called alleged Third Survey conducted by the Respondent No. 2 and 3 in October, 2025 does not by any stretch of imagination, fulfil the compliance of Clause 5.1 of the Sand Mining Guidelines, 2020.

19. Interestingly, if at all, the contentions of the Respondent No. 2 and 3 in Para 11 (i) to (iii) are to be accepted, the Fourth Survey in terms of Clause 5.1 of the Sand Mining Guidelines, 2020 would be conducted in March, 2026. Thus, the question that arises is that if the Fourth Survey in compliance of Clause 5.1 of the Sand Mining Guidelines, 2020 is yet to be conducted, then how could a DSR be approved on 21.11.2025. This by itself, justifies the case of the Appellant that the DSR has been approved without a proper Replenishment Study being undertaken and therefore, the DSR ought to be revised and the Impugned Environment Clearance granted on the basis of a defective DSR ought to be quashed and set aside.

For the better understanding of this Hon'ble Tribunal of the timelines that have been violated by the Respondent No. 2 and 3 as far as the Surveys being conducted for the preparation of Replenishment Study in terms of Clause 5.1 of the Sand Mining Guidelines, 2020, is concerned, the Appellant has tabulated the violations as under:

Sr. No.	Timeline as provided by Respondent No. 2 and 3 in Para 11 of Reply.	Timeline in terms of Clause 5.1 of Guidelines, 2020.	Delay in conducting Survey
1.	First Survey: (Before Monsoon) 03.10.2024 to 16.10.2024	First Survey: (Before Monsoon) In April, 2024	About 6 Months
2.	Second Survey: (at Closing for Monsoon) Not Conducted	Second Survey: (at Closing for Monsoon) In June, 2024	Not Conducted
3.	Third Survey: (After Monsoon) 06.10.2025 to 16.10.2025	Third Survey: (After Monsoon) In October, 2024	About 12 months
4.	Fourth Survey: (End of March)	Fourth Survey: (End of March) In March, 2025	Not Conducted

20. Also, in any case, the contentions raised by the Respondent No. 2 and 3 in Para 11 (i) to (iii) for reasons best known to the Respondent No. 2 and 3 are not reflected in the Replenishment Study that forms a part of the DSR. Therefore, the Respondent No. 2 and 3 may be directed to show from the Replenishment Study that the timeline as contended in Para 11 (i) to (iii) forms a part of the Replenishment Study. In any case, the timeline as contended by the Respondent No. 2 and 3 is also bad in law.

21. As far as contentions in Para 12 are concerned, on perusing Clause 5.2.2 of the Sand Mining Guidelines, 2020, the details of the instruments, their limitation and software use ought to be demonstrated in the form of an accuracy assessment report through a chapter in the Replenishment Study Report. Thus, merely by stating that the Respondent No. 2 has got the aerial survey done by MRSAC in the month of October, 2025 and without the details of the same being

demonstrated in the form of an accuracy assessment report, the reliance on such aerial survey is of no consequence.

22. As far as the contentions in Para 13 are concerned, it is more than evident that as far as the PARIVESH Portal is concerned, the Appellant has contended that the approved Mining Plan and the Pre-Feasibility Report of the project has not been submitted to the Respondent No. 1. The grievance as far as the DSR is concerned was pertaining to the DSR being approved without proper Replenishment Study being undertaken, which is now evident writ large. Thus, the contentions in Para 13 as such have no bearing on the contentions raised by the Appellant in the present Appeal.

23. In Para 14 of the said Reply, the Respondent No. 2 and 3 have reiterated the fact that the DSR is not for a period of 5 years and is prepared for 1 year only. It is one thing to say that the DSR is updated every year, on the basis of the surveys that are undertaken in terms of Clause 5 of the Sand Mining Guidelines, 2020 and another thing to say that the DSR is prepared for a year only. As already stated hereinabove, in terms of the Notification dated 15.01.2016 and 25.07.2018, the DSR is updated once every 5 years, thus, a DSR cannot be approved for merely a period of one year. The contention in Para 14 is contrary to law and therefore, not admitted by the Appellant.

24. The contentions in Para 15 are further an admission of the fact that the Respondent No. 2 and 3 have not undertaken the surveys in terms of the strict compliance enumerated in Clause 5.1 of the Sand Mining Guidelines, 2020. A substantial compliance and a strict compliance are two different issued and the Respondent No. 2 and 3, in terms of Clause 5.1 of the Sand Mining Guidelines, 2020 are expected to strictly comply with the surveys enumerated therein. Thus the contention in Para 15 are denied.

25. In terms of Para 16, the Respondent No. 2 and 3 have admitted to the fact that the Mining Plan was not updated on the PARIVESH Portal. The Respondent No. 4, vide an Office Memorandum dated 19.04.2021 has clearly directed that all the

SEIAAs/ SEACs are to ensure that all filed for approval of ToR as well as EC be processed strictly through PARIVESH only. The non-adherence to the directions in the Office Memorandum dated 19.04.2021 could invite adverse actions against the concerned SEIAA. Considering the fact that the Respondent No. 2 and 3 in Para 16 has admitted to the fact that the Mining Plan was never processed through PARIVESH, there was no question of the Respondent No. 1 to have considered the Mining Plan. The Respondent No. 1 is under a statutory obligation to direct the Respondent No. 2 and 3 to comply with the Office Memorandum dated 19.04.2021. In any case, on perusing the Minutes of the Meeting dated 09.12.2025 of the Respondent No. 1, there is not even a mention about the Mining Plan. Therefore, the Respondent No. 2 and 3 ought to be put to strict proof that the Mining Plan was ever submitted to the Respondent No. 1 as in the Minutes of the Meeting dated 09.12.2025, of the Respondent No. 1, no deliberation regards to the Mining Plan was noted.

26. As far as the contentions in Para 17 and 18 are concerned, the Respondent No. 2 and 3 in the Reply has contended that since, Form-2 along with the Application at Sr. No. 38 on PARIVESH does not contain any column for the submission of Pre-Feasibility Report. Such contention of the Respondent No. 2 and 3 is absolutely erroneous as on clicking Form 2 on the PARIVESH Portal, at Sr. No. 38.10, the same allows the Project Proponent to upload Additional Documents, if any. It is stated that in terms of Clause 6 as well as Appendix XI (7) of the Notification dated 15.01.2016, it is mandatory for the Project Proponent to submit a Pre-Feasibility Report. Thus, it is evident that a Pre-Feasibility Report is mandatory compliance for the purpose of grant of EC. On perusing the contentions raised by the Respondent No. 2 and 3 in its Reply at Para 17 and 18, the Respondent No. 2 and 3 has admitted to the fact that the Pre-Feasibility Report was not uploaded on PARIVESH.

27. It is also submitted that the Appellant has a screenshot of the PARIVESH Portal, which clearly demonstrates that the Pre-Feasibility Report was never uploaded

on the PARIVESH Portal in terms of the Office Memorandum dated 19.04.2021 of the Respondent No. 4. Considering that, in terms of Form 2, Clause 38.10, of the PARIVESH Portal, where a Project Proponent can upload any additional file, it was the statutory obligation of the Respondent No. 3 to upload the Pre-Feasibility Report on the PARIVESH Portal, which is mandatory in terms of the Notification dated 15.01.2016. Thus, in the absence of the Pre-Feasibility Report being submitted to the Respondent No. 1 for the grant of the Impugned EC, only on this ground itself, the Impugned EC ought to be quashed and set aside.

28. As far as the contentions in Para 19 are concerned, the same need no reply.

29. As far as the contention in Para 20 and 21 is concerned, the Respondent No. 2 and 3 have relied upon the Government of Maharashtra, Sand Policy for 2025-2026. At the outset, the Sand Policy for the State of Maharashtra cannot override the EIA Notification dated 15.01.2016, which has come into being, in exercise of the powers conferred u/s 3 (2) (v) (1) of the Environment (Protection) Act, 1986 read with Rule 5 (3) (d) of the Environment (Protection) Rules, 1986 and therefore, the Sand Policy of the State of Maharashtra cannot supersede the Notification dated 15.01.2016. Under the Notification dated 15.01.2016, the Sub-Divisional Committee is under an obligation to physically visit each site and recommend on the suitability of the site for mining. The contention in Para 20 and 21, even if for the sake of argument are accepted for a minute, the same does not show as to when the so-called Taluka Level Committee conducted the physical inspection and does not show the recommendation as contemplated under the Notification dated 15.01.2016. In any case, the Taluka Level Committee cannot be equated with the Sub-Divisional Committee under the Notification dated 15.01.2016 and 25.07.2018.

30. As far as the contentions in Para 22 regarding allegations of illegal mining are concerned, it is submitted that previously, where illegal mining was being undertaken, the Director, Mines and Geology Department of the State, constituted a District Level Task Force in every District to ensure that illegal mining does not

take place. The Respondent No. 2 and 3, instead of making any such endeavour to constitute a District Level Task Force, which shall regulate illegal sand mining, on the contrary is defending an Environment Clearance granted contrary to law, allowing the Environment to be depleted and also making no endeavour whatsoever to regulate the illegal sand mining. Furthermore, the Respondent No. 2 and 3 are not only not making any effort to curb illegal mining, the Respondent No. 2 and 3 are further making oblique allegations against the Appellant and making an attempt to malign the genuine concerns of the Appellant, to protect the environment in the District of Bhandara.

31. The contentions in Para 23 and 24 are in no way concerned with the present Appeal and require no reply from the Appellant.
32. As far as the contentions in Para 25 are concerned, the present Reply as filed by the Respondent No. 2 and 3, by no means addresses the challenge raised by the Appellant in the present Appeal and the present Appeal ought to be allowed in terms of the prayers raised in the present Appeal.



**ADVOCATES FOR THE APPELLANT:**

Sangram Singh R. Bhonsle,  
Nrupal A. Dingankar, Pushkara A. Bhonsle,  
Sneha Bhonsle, Naman Sherstra &  
Sanmitra Y. Pol

Office at: H-5, Second Floor, Lajpat Nagar  
III, New Delhi.

Contact: 95458 09120

Email: srb.chambers@gmail.com

**Date: 17.02.2026**

**Place: New Delhi**

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
WESTERN ZONE BENCH, PUNE  
APPEAL NO. 641 OF 2025 (WZ)

**NOTARIAL REG.**  
ENTRY NO. 0661/661  
DATE 17 FEB 2026

IN THE MATTER OF:

Shamshir Abdul Wahab Khan

... Appellant

Versus

The State Level Environment Impact Assessment Authority,  
Maharashtra & Ors.

... Respondents

**AFFIDAVIT**

I, Mr. Shamshir Abdul Wahab Khan, Age: Adult, Occ: Journalist, C/o Bilkis Qureshi,  
Behind Takiya Darga, Bhandara, Maharashtra- 441 804 do hereby solemnly affirm and state  
as under:

1. That I am the Appellant in the above-named Appeal. I am conversant with the facts and circumstances of the case and as such competent to swear the present Affidavit.
2. That the contents of the Paras 1 to 32 of the present Rejoinder are facts true to my knowledge and contains submissions and prayers to this Hon'ble Tribunal based on legal advice and the same is believed to be true and correct.
3. That the Annexures that may enclosed along with the present Rejoinder are true copies of their respective originals.

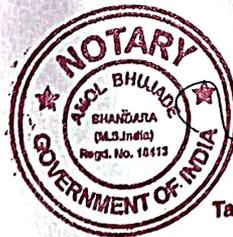
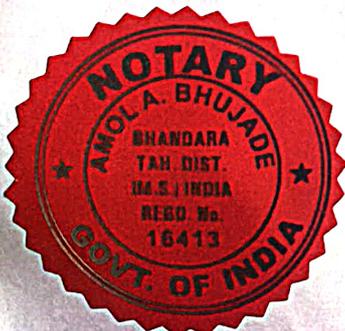
*Shamshir*  
DEPONENT

**VERIFICATION**

Verified at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_, 2026 that the contents of  
the present Affidavit are true and correct and nothing material has been concealed therefrom.



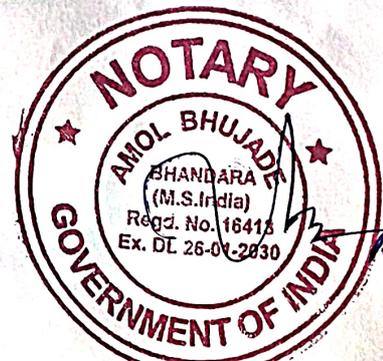
*Shamshir*  
DEPONENT



**ATTESTED**

*Amol A. Bhujade*  
AMOL A. BHUJADE  
ADV & NOTARY  
Tah. Dist. Bhandara (M.S. INDIA)

17 FEB 2026



1261



Adv Sangramsingh R Bhonsle &lt;srb.chambers@gmail.com&gt;

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**Service on the Respondents: Rejoinder of the Appellant to the Reply dated 12.02.2026 filed by the Respondent No. 2 & 3 in Appeal No. 641 of 2025 (WZ)**

1 message

**Adv Sangramsingh R Bhonsle** <srb.chambers@gmail.com>

Tue, Feb 17, 2026 at 5:33 PM

To: aniruddha1488@gmail.com, psec.env@maharashtra.gov.in, ms@mpcb.gov.in, ps2mefcc@gov.in, lmc.moefcc@gov.in, nitindeshpande0311@gmail.com, collector.bhandara@maharashtra.gov.in, dmobhandara123@gmail.com, cs@maharashtra.gov.in

Cc: Adv Sangramsingh Bhonsle <sangramsinghbhonsle@gmail.com>

Ma'am/ Sir,

We are the Advocates appearing on behalf of the Appellant in Appeal No. 641 of 2025 (WZ) and other connected Appeals. Please find attached a copy of the Rejoinder of the Appellant to the Reply dated 12.02.2026 filed by the Respondent No. 2 & 3 in Appeal No. 641 of 2025 (WZ).

Kindly consider this email as service of the Rejoinder on your Office

Regards,

**Sangramsingh R. Bhonsle**

Advocate On Record

Supreme Court of India

H-5, Second Floor, Lajpat Nagar III,

New Delhi - 110024.

Mob- 9545809120

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 **Final Rejoinder\_R2&3.pdf**  
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