

**BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE  
MISCELLANEOUS APPLICATION NO. 3 of 2025  
IN  
APPEAL NO. 74 of 2016 (WZ)**

**IN THE MATTER OF:**

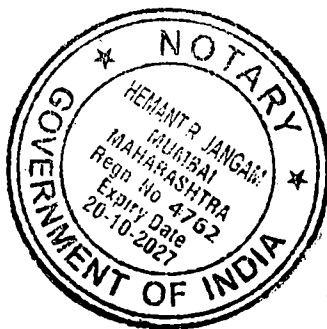
CONSERVATION ACTION TRUST & ANR. ... APPLICANTS  
/ORIGINAL  
APPELLANTS

VERSUS

UNION OF INDIA AND ORS. ...RESPONDENTS

SN.	PARTICULARS	PAGE NOS.
1.	<b>REJOINDER IN MISCELLANEOUS APPLICATION NO. 3 of 2025 IN APPEAL NO. 74 of 2016 (WZ) ON BEHALF OF THE APPLICANTS TO THE AFFIDAVIT IN REPLY FILED BY RESPONDENT NO. 3, GUJARAT COASTAL ZONE MANAGEMENT AUTHORITY (GCZMA)</b>	1 - 3

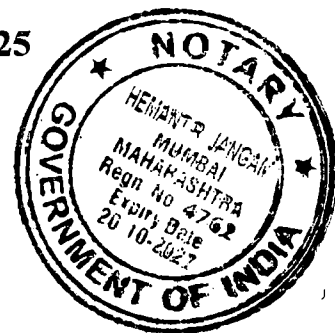
THROUGH



**RISHIKA AGARWAL  
COUNSEL FOR THE APPLICANTS**

**BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH AT PUNE  
MISCELLANEOUS APPLICATION NO. 3 of 2025**

**IN  
APPEAL NO. 74 of 2016 (WZ)**



**IN THE MATTER OF:**

CONSERVATION ACTION TRUST & ANR.

... APPLICANTS

/ORIGINAL

APPELLANTS

VERSUS

UNION OF INDIA AND ORS.

...RESPONDENTS

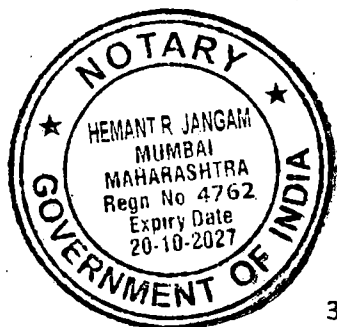
**Rejoinder In Miscellaneous Application No. 3 Of 2025 In Appeal No. 74  
Of 2016 (WZ) On Behalf of The Applicants to the Affidavit in Reply  
Filed by Respondent No. 3, Gujarat Coastal Zone Management  
Authority (GCZMA)**

**MOST RESPECTFULLY SHOWETH:**

1. I, Debi Goenka, aged 69 years, the Executive Trustee of Applicant No. 1, Conservation Action Trust, Mumbai, do hereby solemnly affirm on that, I am well acquainted with the facts and circumstances of the case on the basis of the records available and am thus duly authorized to file this Affidavit on behalf of the Applicant No. 1 herein, i.e. Conservation Action Trust.
2. The above-mentioned Miscellaneous Application No. 3 of 2025 was filed to bring out certain facts from the NIO report titled "*Impact Assessment Study on Mudflats & Mangroves in the area due to the expansion project of phase III*" (the "NIO report") at Adani

*Petronet (Dahej) Port Limited*". That on the basis of the NIO Report itself it is evident that Respondent No. 6 has submitted false and misleading information while applying for all the necessary statutory clearances, as well as in the studies/reports submitted by the Respondent No. 6 with various authorities for the purpose of obtaining the necessary permissions.

3. That the instant Rejoinder is being filed in response to the Affidavit in Reply (hereinafter '**Affidavit in Reply**') filed by Respondent No. 3, Gujarat Coastal Zone Management Authority (GCZMA). At the outset, the Applicants deny various statements that have been made and nothing should be assumed to be admitted unless specifically admitted or is part of the record. The applicants reiterate all the facts and submissions made in Miscellaneous Application No. 3 of 2025 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.
4. Applicants herein submits that the Respondent in its affidavit in reply has not denied any contentions or statements made by the applicant in its Miscellaneous Application.
5. The Applicants further submits that the Respondent agrees to all the contentions and statements made by the applicant.
6. Thus, in light of the above facts and circumstances, the prayers in the Miscellaneous Application No. 3 of 2025 shall be allowed.



*Dev. Antke*

**APPLICANT NO. 1**

*Dev. Antke*

**APPLICANT NO. 2**



VERIFICATION

I, Debi Goenka, the Applicant No. 2 herein do hereby state and solemnly declare that what is stated in the Application in paragraphs No. 1 to 6 is based on my own knowledge and whatever is stated in the remaining paragraphs is stated on information and belief and I believe the same to be true.

Solemnly declared at Mumbai )

*Debi Goenka*

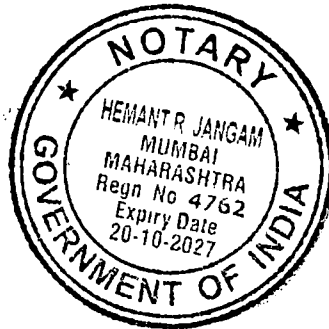
On this day of April 2026 )

4 APR 2026

Applicant

(Debi Goenka)

Identified by me



**BEFORE ME**  
*Hemant R. Jangam*  
HEMANT R. JANGAM  
NOTARY, GOVT. OF INDIA  
MUMBAI, MAHARASHTRA.

4 APR 2026

Advocate for the Applicant

