



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE

Original Application No. 201/2023 (WZ)

Charan Bhatt

....Applicant

Versus

Wetland Division, MoEF&CC & Ors.

....Respondents

Rejoinder Affidavit in Response to the Reply Affidavit Filed by Respondent No. 8 State Wetland Authority Government of Maharashtra.

MAY IT PLEASE THE HON'BLE TRIBUNAL

1. The Applicant reiterates that the State Wetland Authority, being the statutory body under the Wetlands (Conservation and Management) Rules, 2017, read with the Environment (Protection) Act, 1986, bears the primary responsibility for the protection, preservation, and scientific monitoring of wetlands within the State of Maharashtra. The assertion in the reply affidavit that the Wetland Authority does not possess the specific land details of the concerned wetland is alarming, and indicates a serious systemic failure. Such an admission reflects that the wetlands of the State are not in safe



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hands and remain highly vulnerable to illegal encroachments and ecological destruction completely fail follow the duties and responsibilities.

2. The Applicant states that, in good faith and with the sole intention to protect and restore the wetland in question, detailed representations were submitted to the State Wetland Authority, the Environment Department, and the Central Pollution Control Board (CPCB), providing complete particulars of the Sasunavghar Wetland, including land survey numbers, wetland maps issued by VVCMC, and MRSAC Sasunavghar village land details data. These were duly communicated via email dated 08 July 2025. Despite this, the said representations were neither acted upon nor acknowledged, raising serious suspicion of inaction and possible willful neglect in the discharge of statutory duties.

A copy of representation has annexed and marked as Annexure 1

3. The Joint Committee Report has categorically recorded that the said wetland has been illegally filled with soil, construction debris, and metallic waste, leading to the burial of mangroves and irreversible damage to water bodies. The Committee has further observed that the illegal filling extends 2–3 kilometres in a systematic manner and has recommended complete restoration of



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the area. This finding directly contradicts the Wetland Authority posture of ignorance or lack of information.

4. The Applicant prays that this Hon'ble Tribunal take on record the serious lapses of Respondent No. 8, direct immediate restoration of the Sasunavghar Wetland as per the Joint Committee recommendations, and initiate appropriate action against those responsible for the inaction and dereliction of statutory duties.
5. The Applicant submits that the affidavit of the State Wetland Authority itself admits knowledge of the binding directions issued in *PIL Vanashakti vs. Union of India* by orders dated **14 October 2013** and **08 March 2022**, as well as the Office Memorandum issued under **Rule 4** of the Wetlands (Conservation and Management) Rules by the Ministry of Environment, Forest and Climate Change, which categorically mandate the identification, protection of wetlands. Despite having full and undeniable knowledge of these statutory and judicial mandates, the State Wetland Authority and the concerned State machinery have, in **flagrant breach of public trust**, willfully ignored their obligations, thereby committing **gross negligence, culpable inaction, and enabling the systematic destruction of ecologically sensitive wetlands** in contemptuous disregard of the orders of the Hon'ble Supreme Court and various High Courts.



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6. The Applicant states that the State Wetland Authority has **willfully and deliberately failed** to protect the wetland and has **intentionally suppressed and not disclose** the land details of the affected wetland area, despite being the statutory custodian of such records. This calculated omission amounts to **abetment of environmental offences** and a direct breach of the **public trust reposed in the Authority under the Environment (Protection) Act, 1986**, attracting liability under **Section 17** thereof. The Applicant further prays that this Hon'ble Tribunal be pleased to **take on record** the Applicant detailed representation dated 08 July 2025, along with the **MRSAC data**, the **official VVCMC Wetland Map of village Sasunavghar**, and the **Wetland Atlas** issued by ISRO, as these documents conclusively establish the precise location, extent, and notified status of the affected wetland. The deliberate omission of such verified records by the State Wetland Authority demonstrates **culpable inaction, conscious concealment, and contemptuous disregard** of binding judicial directions and the core principles of environmental jurisprudence, including the **Precautionary Principle**, the **Polluter Pays Principle**, and the **Public Trust Doctrine**.



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Date: 11/08/2025

Place: Nallasopara

BEFORE ME

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BHARAT D. PATIL
ADVOCATE & NOTARY
Aaradhana Co-op.Hsg.Soc.Ltd.
Flat No. B-10, Dindayal Nagar,
Vasai (W), Dist. Palghar-401201.

Charan Bhatt

Charan Bhatt
(Applicant-In-Person)



Notary Register Sr. No.	191/2025
Date:	11 AUG 2025

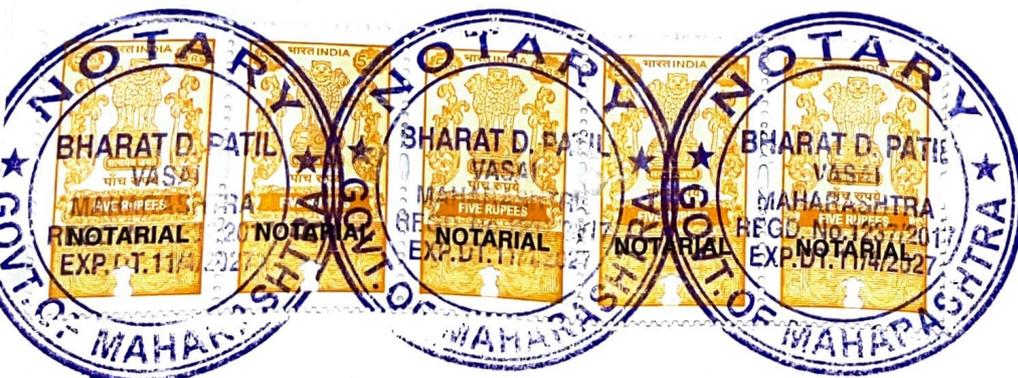
Solemnly Affirmed and Executed before me at Vasai on **11 AUG 2025**

Verification

I, Charan Bhatt, do hereby state on solemn affirmation that the contents of the aforesaid paragraphs are true and correct to the best of knowledge, belief and information, thus I verify the same and sign over the present petition application on this 11th day of August, 2025

Charan Bhatt

Verified at Vasai this 11th day of August, 2025





charan b <cb181991@gmail.com>

Submission of Wetland-Affected Land Details of Village Sasunavghar, Dist Palghar - Request to Take on Record

1 message

charan b <cb181991@gmail.com>

8 July 2025 at 12:32

To: Aniruddha Kulkarni <aniruddha1488@gmail.com>, mefcc@gov.in, Collector Office Palghar <collectorpalghar@gmail.com>, mos.akc@gov.in, secy-moef@nic.in, rajat.agarwal@ias.nic.in, DIVYA SINHA <divyasinha.cpcb@nic.in>, dir1.mev-mh@nic.in, psec.env@maharashtra.gov.in, Pushkal Mishra <pushkalm6@gmail.com>

Respected Sir/Madam,

Greetings

I am submitting the land details along with the survey numbers of **Village Sasunavghar, District Palghar**, which fall under the **wetland-affected area** as recorded in the **Wetland Atlas**, classified as **Intertidal Mudflat - Natural - Coastal Mangrove**. Kindly find the affected land details enclosed in the attachment for your reference.

Thank you

Regards

Charan Bhatt

 **sasunavghar wetland details.pdf**
7534K

To,

1. The Wetland Division

Ministry of Environment, Forest and Climate Change (MoEF&CC)
Indira Paryavaran Bhawan, Jor Bagh Road
New Delhi – 110003

2. The Member Secretary

Maharashtra State Wetland Authority
Room No. 217, 2nd Floor, New Administrative Building
Mantralaya, Mumbai – 400032
Maharashtra

3. The Chairman / Member Secretary/Concern Officials

Maharashtra Wetland Grievance Redressal Committee
Office of the Maharashtra State Wetland Authority
Mantralaya, Mumbai – 400032

4. Palghar District Collector.

Subject: *Submission of Verified Wetland (ATLAS) Affected Survey Numbers in Village Sasunavghar, Taluka Vasai, District Palghar for Official Record of land details of wetland and Protection under Wetlands (Conservation and Management) Rules, 2017 and Hon'ble Supreme Court Order.*

Respected Sir/Madam,

I, Charan Bhatt, a resident of Palghar District, respectfully submit this representation for your kind consideration and urgent action. The purpose of this submission is to officially place on record a comprehensive list of land parcels located in Village Sasunavghar, Taluka Vasai, which fall within ecologically sensitive wetland zones, as identified ISRO SAC ATLAS.

1. Basis of Identification

The classification and identification of the wetland-affected lands are based on:

- Verified data from the Indian Space Research Organisation – Space Applications Centre (ISRO–SAC-Ahmedabad).
- Land use and survey number demarcations under the Smart Village Mapping Project conducted by the Maharashtra Remote Sensing Applications Centre (MRSAC).
- The Vasai Virar City Municipal Corporation (VCCMC) wetland maps, where designated wetland areas are distinctly marked.
- The National Wetland Atlas, which has recorded the ecological attributes and boundaries of wetlands, with potential updates incorporated thereafter.

These documents collectively confirm the presence of Natural Intertidal Mudflat Wetlands and Natural Coastal Mangrove Wetland ecosystems in Sasunavghar village. The said land parcels must be preserved as per the mandate of the Wetlands (Conservation and Management) Rules, 2017, notified under the Environment (Protection) Act, 1986.

2. Wetland-Affected Survey Numbers

The following Survey Numbers situated in Village Sasunavghar, Taluka Vasai, District Palghar, are identified as falling within the wetland zone, either partially or entirely:

Survey Nos.:

89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186A, 186B, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241.

3. Legal and Environmental Importance

These lands form a part of the natural wetland ecosystem critical for ecological balance, biodiversity conservation, groundwater recharge, and flood mitigation. As per Rule 4 of the Wetlands (Conservation and Management) Rules, 2017, these areas must be protected and managed with strict regulatory oversight. Activities such as encroachment, unauthorized construction, landfilling, and development are strictly prohibited unless duly assessed and approved in accordance with the Wetland Rules.

Furthermore, the historical satellite imagery and wetland atlas maps from 2006–2007 onward show significant degradation and unlawful alteration of wetland boundaries. Hence, the earlier datasets should be considered the baseline for restoration and protection measures.

4. Documents Submitted for Reference

To substantiate this representation, I am enclosing the following verified supporting documents:

- **Annexure 1** – ISRO-SAC Wetland Classification Map of Sasunavghar Village.
- **Annexure 2** – MRSAC Smart Village Mapping Survey Map with Survey Numbers clearly marked.
- **Annexure 3** – VVCMC Zoning Map identifying wetland zones using pink and blue shades.

These maps provide a composite and cross-verified view of the wetland presence in the land above survey number village sasunavghar vasai taluka, district Palghar.

5. Prayer for Action

In light of the above facts and legal mandate, I humbly request your esteemed authority to:

1. Take official record the above Survey Numbers as falling within the wetland zone in the wetland authority Wetland Database/Records for Sasunavghar village.
2. Issue appropriate directions to prevent any zoning changes, encroachments, or development approvals in the mentioned parcels

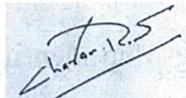
unless they undergo wetland clearance in accordance with the 2017 Wetland Rules.

3. Initiate protective and restoration measures for any degraded wetland parcels in the above list as per the latest Wetland Atlas and past satellite records.
4. The land survey details datasets of MRSAC (Smart Village Mapping) superimpose with the ISRO-SAC/National Wetland Atlas be take on official record, VVCMC Wetland Maps and and treated as authoritative reference sources for any present or future regulatory, planning, or environmental assessment process concerning the village of Sasunavghar.

I shall remain grateful for your time and immediate intervention in safeguarding these ecologically fragile and legally protected wetlands.

Thanking You,

Sincerely,

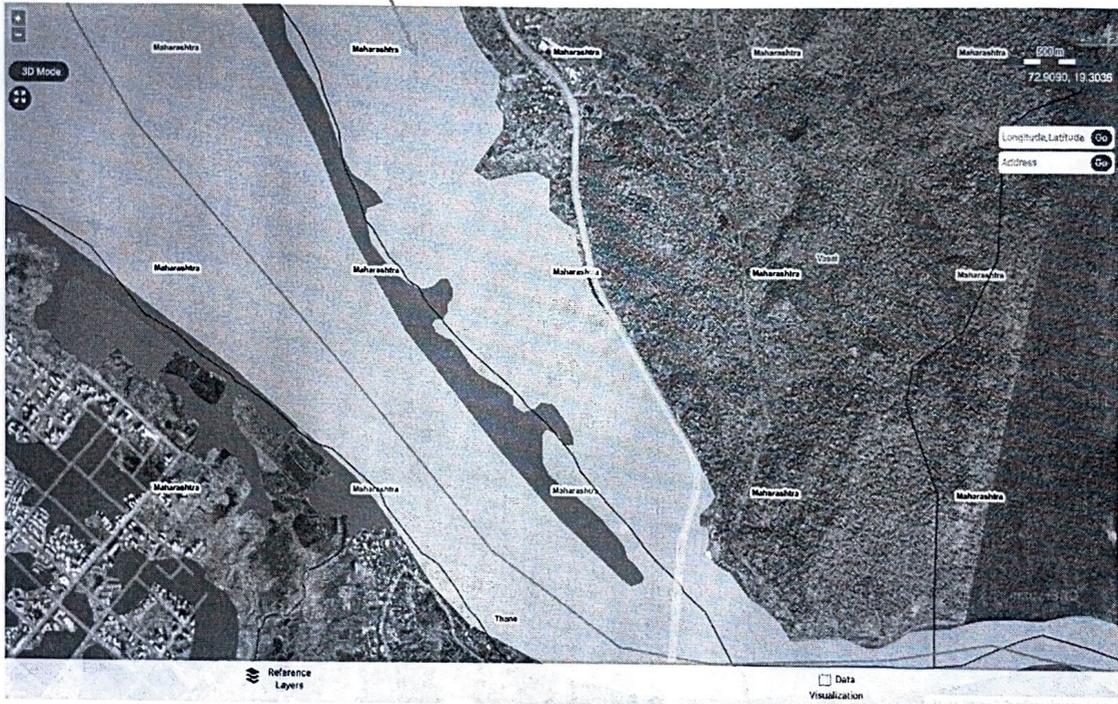


Charan Bhatt
Room No. 2, Vartak Compound,
Near D-Mart, Achole Road,
Nalasopara (East), Palghar District – 401209

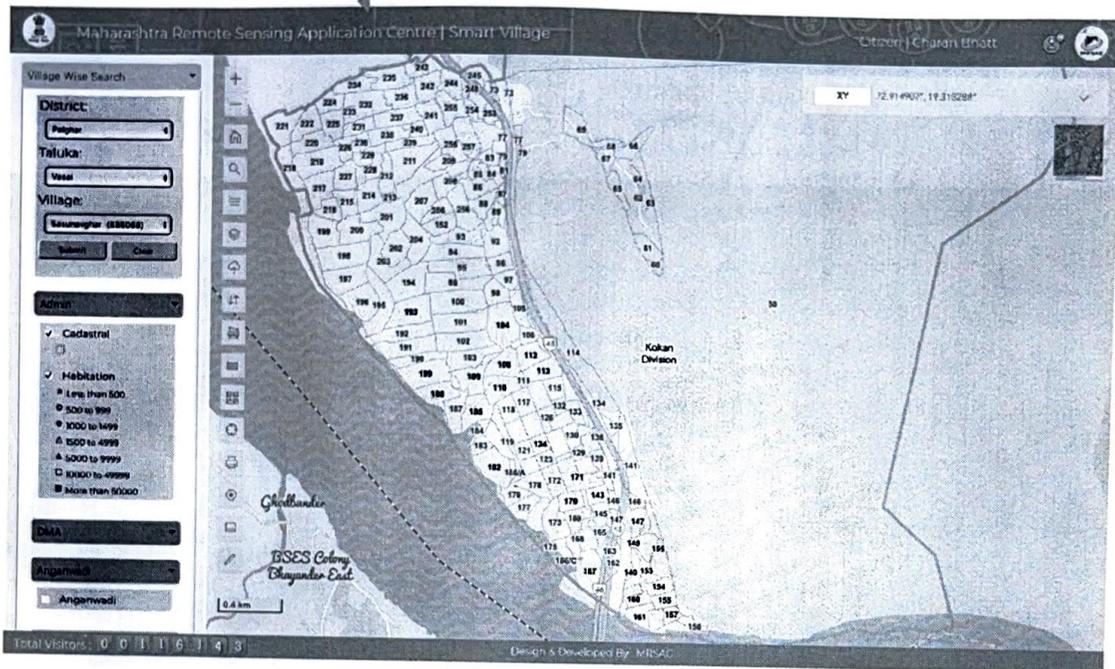
Date: 08.07.2025

Place: Vasai

**Annexure 1 – ISRO-SAC Wetland Classification Map of Sasunavghar Village.
WETLAND ATLAS MAP *NATURAL INTERTIDAL MUDFLAT & NATURAL COASTAL MANGROVEE.***



Annexure 2 - Land Survey Number Details of Sasunavghar Village MRSAC Smart Village data.



Annexure 3 – The Vasai Virar Municipal Corporation Wetland Map of Village Sasunavghar clearly shows the wetland-affected land along with the survey numbers.

