

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Original Application No. 1144/2024

IN THE MATTER OF:

MOHAN SINGH BAGDRI

... APPLICANT

VERSUS

STATE OF UTTARAKHAND AND OTHERS ... RESPONDENT(S)

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RESPONDENT NO.6

Through



Soumitra Kundu

Deputy General Manager (North)

Bridge and Roof Co(I) Ltd

New Delhi

Place: New Delhi

Dated: 18/03/2025

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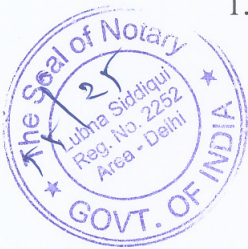
STATE OF UTTARAKHAND AND OTHERS ... RESPONDENT(S)

**AFFIDAVIT ON BEHALF OF RESPONDENT NO. 6, M/S
BRIDGE AND ROOF COMPANY INDIA LIMITED. IN
RESPONSE TO THE NOTICE ISSUED BY THIS HON'BLE
TRIBUNAL,**

MOST RESPECTFULLY SHOWETH: -

I, Soumitra Kundu, S/o Amarendra Nath Kundu aged about 56 Years currently posted as Deputy General Manager (North) of the Bridge and Roof Co. (I) Ltd having office at B-22,2nd Floor, Himalaya House, K G Marg, New Delhi-110001.

1. The deponent is well conversant with the facts and circumstances of the case, as per the records maintained by site office and as such competent to swear and depose the present affidavit. The present affidavit is being filed on behalf of the Bridge and Roof Co. (I) Ltd, to place on record the actual site status in respect of the matter.
2. That the undersigned, on behalf of Respondent NO. 6, **Bridge and Roof Co. (I) Ltd.**, working as the executing agency for the Uttarakhand Rural Road Development Authority (URRDA), wish to submit the following reply in response to the application



filed by M/s Mohan Singh Bagdri vide letter petition dated 27.01.2024. The applicant's complaint alleges violations of environmental norms during the execution of the construction work of road under Prime Minister Gramin Sadak Yojna and a bridge at Bhardari Gad:

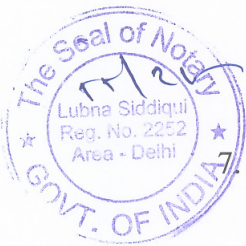
3. That the work for the construction of the Steel Girder Bridge was awarded to **M/s Khara Contractors** vide LOA number **B&R/HO/71123/PMGSY/UK/PKG-16/LOA/688**, dated **03.03.2022**. The project was initiated after receiving the benchmark and approach road from **PMGSY Irrigation Division/Jakholi in January 2023**, but , due to a technical issue, the location of the bridge was shifted approximately 50 meters downstream in **February 2024**, and construction at this new location commenced in **February 2024**. However, no **Gharat (water mill)** is present near the project site (refer to Video - Annxure-1).
4. That a joint inspection of the site was conducted on **11.12.2024** as per the **DM/Rudraprayag office order number 901/33-10 (2024-25)** dated **09.12.2024**. The inspection was attended by the **Executive Engineer /PMGSY Rudraprayag, SDM/Rudraprayag**, and other concerned officers. During the inspection, it was observed that during the foundation work, excavation had been carried out on the riverbanks. The excavation yielded about **643 cubic meters of soil and small boulders**, which were used to prepare temporary ramps to facilitate the movement of laborers, excavators, and other construction equipment (refer to Video -Annxure-2) and this



A handwritten signature in blue ink, consisting of a stylized, cursive script.

temporary ramp material will be used for backfilling purpose after completion of abutment.

5. That as per the order dated **14.02.2025**, **drone video** (before and after excavation) and **Google Earth images** have been submitted in a pen drive for reference (Annxure-1, Annxure-2, Annxure-3). These videos and images demonstrate that no environmental norms were violated during the excavation process. The excavation was carried out in compliance with the necessary guidelines, and the material excavated was utilized for the temporary ramps and for backfilling purpose, which is a common and permissible practice in construction projects.
6. It is therefore, in the foregoing circumstances, most respectfully prayed that **Bridge and Roof Co. (I) Ltd.** has adhered to all environmental norms and regulations during the execution of the construction work awarded to it. There has been no violation of environmental laws or regulations during the excavation and other activities at the project site. Therefore, we humbly request that **Bridge and Roof Co. (I) Ltd.** should not be made a party to this case, as there is no merit to the allegations against the company and/ or pass any other order that it may deem fit and proper and in the interest of justice.



7. We, being CPSE, further assure the Hon'ble Tribunal that we remain committed to upholding environmental standards throughout the execution of this project pertaining to our scope of work.

8. The above information document and present Affidavit are submitted accordingly.


RESPONDENT NO.6

Verification


सौमित्र कुंडू / SOUMITRA KUNDU
Deputy General Manager (North)
उप महाप्रबंधक उत्तर
BRIDGE & ROOF CO. (INDIA) LTD.
ब्रिज एण्ड रूफ कम्पनी (इण्डिया) लिमिटेड

Verified at New Delhi on this 18 day of March 2025 that the contents of the above affidavit are true and correct to my knowledge based on the records of Bridge and Roof Co. (I) Ltd. No part of it is false and nothing material has been concealed therefrom.

RESPONDENT NO.6


सौमित्र कुंडू / SOUMITRA KUNDU
Deputy General Manager (North)
उप महाप्रबंधक उत्तर
BRIDGE & ROOF CO. (INDIA) LTD.
ब्रिज एण्ड रूफ कम्पनी (इण्डिया) लिमिटेड



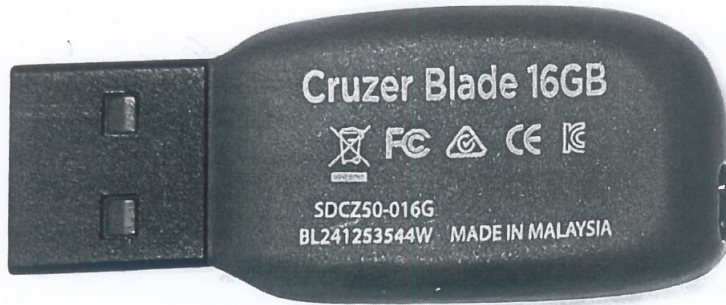
ATTESTED
NOTARY PUBLIC
GOVT. OF INDIA

Signed Before Me

18 MAR 2025



ANNEXURE - 1, 2, 3



Ref No.: BANDR/AUTHORISATION/O.A. No. 1144/2024

Date: 17.03.2025

TO
THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Sub.: Authorisation in favour of SHRI SOUMITRA KUNDU in the matter of Mohan Singh Bagdri – vs- Bridge And Roof Co. (India) Ltd. (Original Application No. 1144/2024)

Respected Sir,

I, **UPPARA VENUGOPAL, GENERAL MANAGER (HUMAN RESOURCE)** of Bridge And Roof Co. (India) Ltd of “Kankaria Centre”, 2/1, Russel Street, Kolkata – 700 071 (hereinafter referred to as the Company) hereby authorize **SHRI SOUMITRA KUNDU, DEPUTY GENERAL MANAGER (NORTH)** of the Company, whose signature is attested below, to appoint an Advocate, sign all necessary Affidavit(s) / Petition(s) / Replies and Submission(s) required to be filed in the matter of Court Proceedings between Mohan Singh Bagdri – vs- Bridge And Roof Co. (India) Ltd (Original Application No. 1144/2024) on behalf of the Company from time to time.

This is for your kind perusal and record please.



(UPPARA VENUGOPAL)

GENERAL MANAGER (HUMAN RESOURCE)

ACCEPTED


(SOUMITRA KUNDU)
DEPUTY GENERAL MANAGER (NORTH)

SIGNATURE of SHRI SOUMITRA KUNDU,
DEPUTY GENERAL MANAGER (NORTH) is ATTESTED


(UPPARA VENUGOPAL)
GENERAL MANAGER (HUMAN RESOURCE)