

**BEFORE THE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 814/2024

COUNTER OF RESPONDENTS 1 AND 2

IN THE MATTER OF:

BRAND AMBASSADOR VIYANA BERWAL VIA NARESH KADYAN
AND OTHERS

.....APPLICANTS

VERSUS

1. MR. TANMAY KUMAR, SPECIAL SECRETARY CUM IN-CHARGE
BIODIVERSITY WING, MINISTRY OF ENVIRONMENT FOREST
AND CLIMATE CHANGE, INDIRA PARYAVARAN BHAWAN, JOR
BAGH ROAD, NEW DELHI- 110003.

EMAIL: tanmay.kumar-rj@gov.in

Respondents No. 1

2. DR. ALKA RAO,
PRINCIPAL SCIENTIST, GNR PROTEIN CENTRE, CSIR –
INSTITUTE OF MICROBIAL TECHNOLOGY (CSIR- IMTECH),
SECTOR- 39A, CHANDIGARH.

WHATSAPP NUMBER: 9915017172 –

EMAIL: raoalka@imtech.res.in

Respondents No. 2

3. DR. JOYKUMAR MEITEI LAISHRAM,
PROFESSOR AND DEAN, COLLEGE OF AGRICULTURE,
CENTRAL AGRICULTURE UNIVERSITY, IMPHAL,
MANIPUR- 795004.

EMAIL: jmlaishram@rediffmail.com

Respondents No. 3

4. MR. RANDEEP SINGH JAUHAR, CHAIRMAN, HARYANA
BIODIVERSITY BOARD, S.C.O NO. 206, SECTOR-14,
PANCHKULA- 134109.

EMAIL: sbbhry18@gmail.com

Respondents No. 4

Respectfully Sheweth,

Purpose of non-official defeated with bad intention, breaching public trust, violating article 19 of Indian Constitution, being fundamental rights.

Whereas:

- 1. Section 51 of Biological Diversity Act, 2002, defined that:**

All Members, officers, etc., of National Biodiversity Authority and State Biodiversity Board deemed to be public servants-

All members, officers and other employees of the National Biodiversity Authority or the State Biodiversity Board shall be deemed, when acting or purporting to act in pursuance of any of the provisions of this Act, to be public servants within the meaning of section 21 of IPC, now 28 of Bharatiya Nyaya Sanhita, 2023: BNS.

- 2. Central Government, regularly nominated public servants, as per definition of 21 IPC, now 28 of BNS, against 8(4)(d) as stated above, which is ethically wrong and illegal, because officials of Central Government, nominated against quota of non-official, they shall be terminated at once, holding accountable of section 11(d) so abused his position as to render his continuance in office detrimental to the public interest; or (e) acquired such financial or other interest as is likely to affect prejudicially his functions as a member, conflict of interest as well, exposing criminal proceedings and recovery with interest.**

Prayers:

- 1. Restoration of fundamental rights of non-officials, as purpose defeated with unconstitutional nominations with bad intentions.**
- 2. A high-powered committee / Commission may kindly be constituted, to inquire and Smt. Sukanya Berwal, completed her Research, on subject: "EFFECTIVENESS OF NATURAL ENVIRONMENT AND ANIMAL WELFARE AWARENESS PROGRAMME FOR SECONDARY SCHOOL STUDENTS OF STD IX", on behalf of Scouts and Guides for Animals and Birds, along with OIPA: Indian People for Animals, as a member, to review, the constitution of National Biodiversity Authority: NBA, as per**

rules and regulations, granting opportunity and transparency, to the non-official and representatives of State Biodiversity Board, instead selective nomination with bad intention.

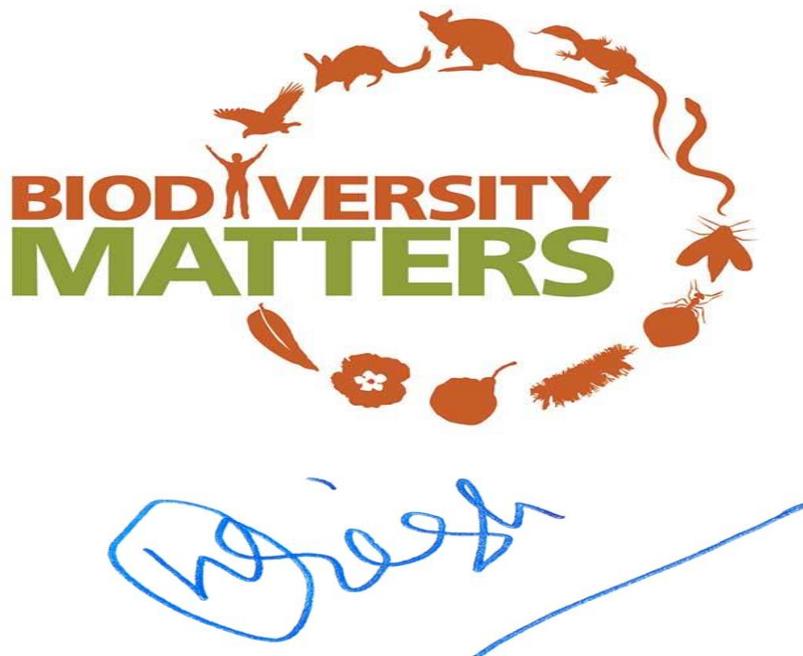
3. All public servants, on the pay role from public funds but managed to get berth against non-official quota, breaching public trust, being criminal conspiracy, may be removed from the National Biodiversity Authority: NBA, directing departmental actions against both public servants:

At present, following public servant, nominated against non-official quota-

Dr. Alka Rao, FSSAI Adviser, being an official's employee on the pay role of FSSAI, admitted by the Respondent No. 1, besides these facts were concealed by the Respondent No. 2.

3. As deems fit, taking a Suo moto, in the interest of flora and fauna, keeping in view, prayers of initial OA with all attachments, already submitted for consideration.

With scouting spirits in the interest of non-officials, to safeguard their fundamental rights, performing fundamental duties of *Viyana Berwal*.



Naresh Kadyan, on behalf Brand Ambassador *Viyana Berwal* and others.