

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

IN THE MATTER OF: O.A. NO. 208 OF 2020  
(Earlier O.A. 47/2016 (THC) (CZ))

**BHARAT KUMAR JAIN & Anr.** --- **APPLICANT**

//VERSUS//

**UNION OF INDIA & ORS.** --- **RESPONDENTS**

**WRITTEN ARGUMENTS ON BEHALF OF THE APPLICANT - SHRI**  
**BHARAT KUMAR JAIN**

1. That, the present original application is being filed with respect to the protection and preservation of the ecological area of Mount Abu which is situated in the Aravalli Range in the state of Rajasthan. Before commenting anything further, it becomes pertinent to point out here that the state of Rajasthan is critically water scarcity state wherein majority of the state is covered by dry and arid region unlike the city of Mount Abu which is ecologically preserved and is water bound area.
2. That, it is one of the rarest areas in the state of Rajasthan adjoining Gujarat which has ample flora and fauna and hence qua the notification, the Mount Abu region was declared under the eco-sensitive zone. In terms of the notification of Eco-sensitive zone of Mount Abu, various construction activities were absolutely prohibited and accordingly when it was observed that under the garb of renovation various construction activities were going on by the political influential and other financial influential people, this present original application was filed, raising a substantial question relating to environment.
3. That, after the passage of almost 04 years and after thorough adjudication of the matter, it has been observed that various

commercial activities over the agricultural lands, felling of trees and the construction activities are still persisting at the area in question and accordingly in order to keep the environmental norms intact and in the interest of keeping the spirits of National Green Tribunal Act alive, this original application may be adjudicated by passing a specific direction to the respondent authorities to ensure that no construction activities whatsoever may be permitted in or around the Eco-Sensitive Zone of Mount Abu and to keep the area protected and preserved which shall be in the interest of justice and the interest of environment at large.

**PLACE: BHOPAL**

**DATE: 08.03.2021**

A handwritten signature in blue ink that reads "NAVEEN" with a stylized flourish underneath.

**NAVEEN AHUJA  
COUNSEL FOR THE APPLICANT  
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