

BEFORE THE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI

O.A.No. 151 of 2020 (SZ)

IN THE MATTER OF:

Akhila Kerala Dheevara Sabha, Represented by its General  
Secretary, V. Dinakaran,  
Residing at Sudeepam,  
Pannapra P.O.688004, Alappuzha and Kerala.

...APPLICANT

v.

State of Kerala represented by Chief Secretary, Government  
Secretariat, Thiruvananthapuram – 695001 & others

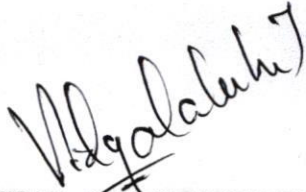
...RESPONDENTS

REPLY FILED ON BEHALF OF THE 12<sup>TH</sup> RESPONDENT

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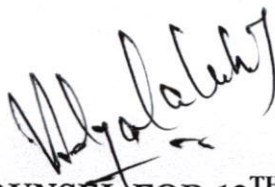
State of Kerala represented by Chief Secretary, Government  
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Sl. No.	Date	Description	Page No
1.	18.11.2021	REPLY FILED ON BEHALF OF THE 12 <sup>TH</sup> RESPONDENT	1-3
2	17.11.2021	COPY OF THE JUDGMENT PASSED BY THE HIGH COURT OF KERALA AT ERNAKULAM IN WP(C) Nos.11060/2020 & 15520/2021	4-53

Dated at Chennai on this 18<sup>th</sup> day of November, 2021

  
COUNSEL FOR 12<sup>TH</sup> RESPONDENT

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I, RANI R.S., wife of Mr. R.Prabodh Chandran, aged about 45 years, working as Legal  
Officer, SEIAA at Thiruvananthapuram, do hereby solemnly affirm and sincerely state as  
follows:-

1. I am well acquainted with the facts of the case from the available records and I am  
authorized to file this Reply on behalf of the 12<sup>th</sup> Respondent . I crave leave of the Hon'ble  
Tribunal to file report/statement as and when additional facts are available to the  
Respondent.
2. It is submitted that the above applications have been preferred by the Applicants  
herein for the following relief:-

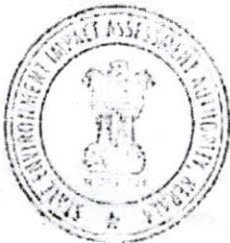
INTERIM RELIEF

Pending disposal of this application, this applicant prays that this Hon'ble Tribunal  
be pleased to stay all illegal sand mining operations in thotappally lake mouth,  
Harbour and transportation of mineral beach sand.

PRAYER

For the reasons stated above, it is humbly prayed that this Hon'ble Tribunal may be  
pleased to:

- A. Declare that the activities of 8<sup>th</sup> and 9<sup>th</sup> respondent are illegal sand mining without  
any mining permit and environmental clearance. Which is a violation of the  
provisions of Environment (Protection) Act, 1986?



*Ranma*

RANI. R.S  
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Legal Officer  
State Environment Impact Assessment Authority  
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