



Ref: AL/FCA/Prop.No149884/2025-26/01

Dated: 12.02.2026

The Additional Principal Conservator of Forest,
And Nodal officer, Nagpur
Ministry of Forest,
Govt. of Maharashtra.

Sub : Proposal for regularization of 3.84 H.a. Forest Land – Ashok Leyland, Gadegaon, Bhandara
(Reference proposal No. FP/MH/IND/149884/2021)

Reference:

1. Our Online proposal FP/MH/IND/149884/2021
2. Your office letter No. Desk-17/Nodal/Nagpur/PID-12892/1149/2021-22 dated 05.10.2021
3. Your office letter No. Desk-17/Nodal/Nagpur/PID-13215/79/2022-23 dated 08.04.2022
4. Your office letter No. Desk-17/Nodal/Nagpur/PID-13215/592/2023-24 dated 25.05.2023
5. Your office letter No. Desk-17/Nodal/Nagpur/PID-149884/1585/2024-25 dated 10.10.2024
6. Hon'ble high court of judicature at Bombay, Nagpur bench Nagpur order dated 20th June 2006

This is with reference to directions given to user agency M/s. Ashok Leyland Bhandara vide letter dated 10.10.2024 (Ref.No.4) and in the context of Hon'ble High Court of judicature at Bombay, Nagpur Bench writ petition No. 1800 of 1994, para (iv) page no.16 as under

"It is needless to state that since the only impediment in regularization of the petitioners alleged encroachment is the permission of the Central government under section 2 of the forest (conservation Act 1990, if the permission is obtained by central Government, then the State Government shall regularize the encroachment"

Also, direction in the Judgment to Union of India, through the secretary, MoEF central Secretariat, New Delhi to "grant the necessary approval and, therefore company be allotted /granted the concern land on long term lease by the State of Maharashtra through the Secretary, Revenue Department, Mantralaya, Bombay or its Corporate Agency-MIDC "(Copy of ref. no.5 is attached)

We hereby reiterate that, in 1980, **Ashok Leyland (AL)** considered expansion of its operations and received letters of intent from both the State of Maharashtra and the State of Rajasthan. GoM had offering intensives to pioneer units established in talukas like Lakhani/Sakoli where no big industries are exists.

Based on the communications from the State Industrial and Investment Corporation of Maharashtra Limited (SICOM), AL prioritized to establish the project with the investment of approx.95 Cr then and requiring 350 Acre land. The project was expected to attract ancillary units and generate employment for nearly 5,000 workers

AL selected the land of 350 acre in pursuant to the discussions with GoM & signed the MOU with SICOM on 10 Dec 1980 in presence of the Hon'ble Chief Minister and Industries Minister. Under the MoU, AL also agreed to prioritize supply of commercial vehicles required by the State of Maharashtra, in addition to the quota allotted by the Central Government.

With reference the communication on 20.06.1981 from District Collector to The commissioner, Nagpur Division that ,the proposed land is vacant on site ,and recorded as grazing land in the Nisar Patrak, the gram panchayat were also issued no objection for allotment to AL. Based on these communications, two registered lease deeds dated 22.03.1982 and 03.08.1982 transferred 231 acres of land from MIDC to AL.

Plant : No.1, MIDC, Gadegaon, Bhandara, Maharashtra – 441804

Registered Office: Ashok Leyland Limited, No. 1, Sardar Patel Road, Guindy, Chennai - 600032, Tel.: 91 44 2220 6000

E-mail: reachus@ashokleyland.com | Website: www.ashokleyland.com

CIN : L34101TN1948PLC000105

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Delay in allotment of balance 120 acre land hampered the project progress, particularly Shop 3 (Heat treatment) which was critical to productization of industrial unit.

In March 1983, AL's Chairman and Managing Director highlighted the difficulties to Hon'ble Chief Minister and Deputy Chief Minister, communications show that, The GoM assured AL that, the construction could proceed; same will be regularized after completing required formalities, since the land is "Revenue Forest" in the revenue record. Accordingly Shop 3 made ready in May 1983 and building completion certificate is also issued by MIDC on 05.05.1983.

Since, the land was essential for Shop No.3, AL was permitted to proceed with construction and same is informed GoM on 17.01.1985.

Despite of rigorous efforts from AL, District Administration issued notice to demolition of construction on "Revenue Forest" land. AL approached the Hon'ble Bombay High Court, Nagpur Bench by filing Writ Petition No. 1800 of 1994. The Court issued notice and granted status quo on 13.07.1994 and later issued Rule with interim relief on 21.10.1994. During the pendency of the Writ Petition, AL submitted a proposal to GoM on 26.12.2005 for regularization of forest land under possession of AL.

On 20.06.2006, the Hon'ble High Court passed an Order in the above Writ Petition and Directed that;

- a) *The proposal dated 26.12.2005 submitted under Rule 5 of the Forest (Conservation) Rules, 2003 for necessary permission under Section 2 of the said Act be forwarded along with comments and necessary details to the Secretary, Ministry of Environment, New Delhi within three months.*
- b) *The Central Government was directed to consider the proposal and take a decision within six months of receipt, and if necessary, inspect AL's establishment at Bhandara.*
- c) *The Court further directed that interim relief shall continue until the Central Government's decision and for one month thereafter, and clarified that if permission is granted by the Central Government, the State Government shall regularize the encroachment.*

However, the Central Government returned the proposal on 30.05.2007 advising that permission from the Hon'ble Supreme Court be obtained. AL continued to request the State to take up the matter with the Supreme Court, citing the High Court's operative order.

Further, in response to the various exchange of communications and discussions with Department of Revenue and Department of Forests, In 2021, the proposal for Diversion of 10.37 Ha forest land under possession of AL & In 2024 the revised proposal with Bare Minimum Demand of 3.84 Ha forest land is submitted by AL

In response the directions given by your kind office while scrutiny of our proposals vide reference no.1,2,3 &4; the following actions are already completed and endorsed by your office.

1. Ref No. 1 : The proposal for minimum demand of 3.84 ha submitted
2. Ref No. 2 : The alleged encroached land of 6.53 ha is released to Dept. of Revenue by providing new fencing of 750 Meter by keeping original boundary wall intact to provide protection to thick greenery within the released area.
3. Ref. No. 3 : Possession of 6.53 ha land is given by Dept. of Revenue to Department of forest (Taba Patra is attached)

Now, 3.84 Ha (Table 1) forest land which is bare minimum (Same is inspected and certified by Dy. Conservator Forest, Bhandara Division) is under the possession of M/s. Ashok Leyland, Bhandara which is minimum demand to run the plant considering the safety zone required for the critical process. The Heat Treatment activities being carried out on the said land which is very essential one to supports the core activity of production and safety zone for LPG bulk storage installation.

Table 1

| Sr. No. | Name of Structure | Area (in Ha.) | Sur/ Gut No. | Village/ Taluka | Legal status of land |
|---------|--|---------------|--------------|----------------------------|----------------------|
| 1 | Heat Treatment Shop No. 3 | 1.13 | 1 | Chikhli Hamesha / Bhandara | Bade jhar ka jungle |
| 2 | LPG Storage Area | 0.01 | 1 | | |
| 3 | Road and Yard | 0.75 | 1 & 57 | | |
| 4 | Shop No. 4 | 0.22 | 57 | | |
| 5 | Waste Water Treatment Plant | 0.02 | | | |
| 6 | Shop approach road | 0.20 | | | |
| 7 | LPG Storage Area | 0.26 | | | |
| 8 | Safety Distance Zone for LPG (All 4 sides) | 0.49 | 1 & 57 | | |
| 9 | Shop peripheral Roads | 0.57 | | | |
| 10 | Canteen Building and Approach Road | 0.19 | 113 | Gadegaon/ Lakhni | Zudpi Jungle |
| | TOTAL | 3.84 | | | |

Also, we would like to bring to your notice that, the suitable compensatory afforestation land equivalent to the proposed area for regularization is also procured by AL in 2021 to minimize the processing time for acquisition and ready to hand over to the Department of Forest.

Detailed chronology with annexures is attached to state the facts of alleged encroachment and necessity of regularization of alleged encroached land.

We hereby request to consider the proposal **FP/MH/IND/149884/2021** for regularization of bare minimum demand of 3.84 Ha forest land under Forest (Conservation) Act 1980 and accord approval. It will greatly help the organization to maintain and continue critical production process & core activity of Heat Treatment.



(Rajendra Thakare)
General Manager & Plant Head
Authorized Signatory
Ashok Leyland Limited, Bhandara Unit

Place : Bhandara

Copy to the District Collector Bhandara for information

Copy to Chief Conservator of Forests, Nagpur Circle Nagpur for information

Copy to the DCF Bhandara for information.

**Office of the Principal Chief Conservator of Forests (Head of Forests Force),
Maharashtra State, Nagpur**

Additional Principal Chief Conservator of Forests & Nodal Officer, M.S. Nagpur
1st Floor, B Wing, VanBhavan, Ramgiri Road, Civil Lines, Nagpur- 440 001
Tel.No.: 0712- 2556916 , E-mail: apccfnodal@mahafor.st.gov.in

No. Desk-17/Nodal/Nagpur/TD-12892/1149 /2021-22
Nagpur – 440 001 Date - 05/10/2021

To,
Chief Conservator of Forest (T),
Nagpur

Sub – Forest Land – Bhandara

Proposal for Diversion of 10.37 ha. Forest land for non forestry use i.e. for
Industrial Unit Ashok Leyland in District Bhandara of Maharashtra.

Ref – Hon'ble High Court of judicature at Bombay, Nagpur Bench, Nagpur
order dt. 20th June 2006

The copy of the Hon'ble High Court of judicature at Bombay, Nagpur Bench, Nagpur
writ petition no. 1800 of 1994 in enclosed for further needful action.

2.00 In this context, Hon'ble High Court as per para (iv) is as under –

“ It is needless to state that since the only impediment in regularization of the petitioners
alleged encroachment is the permission of the Central Government under Section 2 of the Forest
(Conservation) Act, 1980, if the permission is granted by the Central Government, then the State
Government shall regularise the encroachment.”

3.00 Subsequently, as per GOI published latest Hand Book on 28/3/2019 (Amended up to
August 2017) Ministry of Environment and Forests Notification dt. 10th January 2003 in sub
Clause 7 Processing of proposals received by the Central Government. point no. 4 (iii) is as
under –

“whether the State Government or the Union territory Administration, as the case may be,
has certified that it has considered all other alternatives and that no other alternatives in the
circumstances are feasible and that the required area is the minimum needed for the purpose.”

4.00 It is therefore requested that to give directions to the User Agency for submit revised
proposal of minimum forest area at the earliest.

Enclosed – As above

(Naresh Zurmure)

Additional Principal Chief Conservator of Forests
& Nodal Officer, Nagpur

Copy submitted to - The Principal Secretary (Forests) Revenue & Forests Department,
Mantralaya, Mumbai – 32 for information.

Copy to - Deputy Conservator of Forests (T) Bhandara for information & necessary action.

Copy to – M/s Ashok Lyland Ltd. Gadegaon Bhandara 441 904 for information & necessary
action.

Bhandara



**OFFICE OF THE PRINCIPAL CHIEF CONSERVATOR OF FORESTS (HoFF)
MAHARASHTRA STATE, NAGPUR**

Additional Principal Chief Conservator of Forests and Nodal Officer, M.S. Nagpur
First Floor, "B" Wing, Van Bhavan, Civil Lines, Nagpur-440 001
Tel.No. 0712-2530166, 2554916, Fax No. 0712-2550675 E-mail:apccfnodal@mahaforest.gov.in

Desk-No. 17/NODAL/ID-13215/20-21/77
Nagpur-440 001, dated 8 / 04 /2022.

To,
Chief Conservator of Forests
(Territorial) Nagpur Circle, Nagpur

Subject:- Forest Land- Bhandara
Proposal for Diversion of 3.84 ha forest land for non-forestry use i.e. for Industrial
Unit Ashok Leyland Ltd. in District Bhandara of Maharashtra.

Reference:-1) This office letter No. Desk-17/Nodal/Nagpur/ID-13215/2388/21-22, dated 11/02/2022 / 15.37
2) Your office letter No. D-10/Land/C.R.956(20_21)/2872/21-22 dated 11/02/2022 / 19.39

This office is in receipt of letter referred at No. 2 in response to this office letter cited at No. 1 regarding the subjected matter.

After going through the contents of reference no. 2, it is observed that-

1. The user agency i.e. M/S Ashok Leyland Ltd. Bhandara has submitted revised proposal for diversion of 3.84 ha. forest land for non-forestry use based on the actual and barest minimum requirement.
2. The user agency has given an undertaking for removal of existing boundary wall around the encroached upon forest land admeasuring 10.37 ha.
3. The CCF(T) Nagpur circle, Nagpur has submitted that M/S Ashok Leyland Ltd. Bhandara has encroached upon forest land to the extent of 10.37 ha. since about 40 years and recommended to condon the violation by charging NPV over the encroached area.

In the background of the factual status of the instant case, it is reiterated that the encroached land excluding the 3.84 ha land having construction should be immediately vacated and taken possession of.

The boundary wall around the encroached land admeasuring 10.37 ha should not be removed as it seems to provide adequate protection to the thick green belt inside. Instead, an independent access gate should be provided for the field forest personnel for entry and exit for the purpose of watch and protection of the green belt.

As the user agency has already submitted proposal for diversion of forest land admeasuring 3.84 ha in order to regularise its already executed non forestry activity over the area, it would be in the fitness of things to charge Penal NPV for the violation of provisions under FCA, 1980 by excluding this area. Therefore, Penal NPV should be levied for the violation regarding encroached upon land admeasuring 6.53 ha only.

Similarly, violation for the encroached upon forest land of 10.37 ha should be submitted in full details.

It is requested to take immediate action in this regard and report compliance, accordingly.

(Naresh Zurmure)

Addl. Principal Chief Conservator of Forests &
Nodal Officer, Maharashtra State, Nagpur.



सत्यमेव जयते
महाराष्ट्र शासन

प्रधान मुख्य वनसंरक्षक (वनबल प्रमुख), महाराष्ट्र राज्य, नागपूर यांचे कार्यालय

(अपर प्रधान मुख्य वनसंरक्षक तथा केंद्रस्थ अधिकारी महाराष्ट्र राज्य, नागपूर यांचे कार्यालय)

वनभवन, रामगिरी रोड, सिव्हिल लाईन्स, नागपूर - ४४० ००१

पहिला माळा, डीविंग, दूरध्वनी क्रमांक-०७९२-२५५६७८५.

Phone No : ०७९२-२५५६९१६

Email ID apccfnodal@mahaforest.gov.in

ISO 9001: 2015

स्पिडपोस्ट/ईमेलद्वारे-

क्रमांक कक्ष-१७/नोडल/नागपूर/आयडी-१३२१५/५२२ /२३-२४
नागपूर ४४० ००१ दिनांक २५/०५/२०२३.

विषय: Proposal is for diversion of 3.84ha. Bade Jhad Ka Jungle and Zudpi Jungle Forest land in favour of M/s. Ashok Leyland Ltd; for non-forestry use i.e. Industrial Unit of Ashok Leyland in District Bhandara in the State of Maharashtra.

- संदर्भ:** १. या कार्यालयाचे पत्र क्र. कक्ष-१७/नोडल/नागपूर/आयडी-१३२१५/२३८८, दि.११.०२.२२.
२. आपले कार्यालयाचे पत्र क्र. कक्ष-१०/जमीन/प्र.क्र.९५६(२०-२१)/१२८७, दि.२२.०२.२२.
३. या कार्यालयाचे पत्र क्र. कक्ष-१७/नोडल/नागपूर/आयडी-१३२१५/७९, दि.०८.०४.२२.
४. आपले कार्यालयाचे पत्र क्र. कक्ष-१०/जमीन/प्र.क्र.९५६/२३-२४/८७, दि.१४.०४.२३.

संदर्भिय पत्रांचे अवलोकन होणेस विनंती आहे. संदर्भ क्र.१ वरील पत्रान्वये मा. उच्च न्यायालय, मुंबई खंडपीठ नागपूर यांचे आदेशानुसार कार्यवाही करणे बाबत निर्देश निर्गमित केले होते.

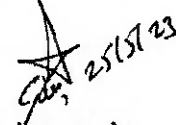
त्या अनुषंगाने आपले कार्यालयाचे संदर्भ क्र.२ वरील पत्रान्वये विषयांकित प्रकरणी सादर करण्यात आलेल्या प्रस्तावाचे पत्रातील मुद्दा क्र.३ मध्ये स्पष्ट करण्यात आलेले आहे की सादर प्रकरणी प्रकल्प यंत्रणेने १०.३७ हे. वन जमीनीवर ४० वर्षांपासून अतिक्रमण केल्याने सादर १०.३७ हे. क्षेत्रावर दंडनीय नक्त मूल्य आकारणे बाबत शिफारस केलेली आहे.

या बाबत संदर्भ क्र.३ वरील पत्रान्वये स्पष्ट निर्देश देण्यात आले होते की विषयांकित प्रकरणी मा. उच्च न्यायालय, मुंबई खंडपीठ नागपूर यांचे आदेशानुसार प्रकल्प यंत्रणेस प्रकल्प चालविणेकरिता आवश्यक वनजमीन चा प्रस्ताव सादर करावा आणि गेले ४० वर्षांपासून अतिक्रमित केलेले १०.३७ हे. क्षेत्राचा वनभंगाचा प्रस्ताव सादर करावा आणि ३.८४ हे. वनक्षेत्र प्रकल्पाकरिता वळती करणे बाबतचा प्रस्ताव सादर केला असले कारणाने उर्वरित ६.५३ हे. क्षेत्राकरिता दंडनीय नक्त मूल्य आकारणे बाबत शिफारस करावी, परंतु आपले पत्रासोबत केवळ ३.८४ हे क्षेत्राकरिताचा वनभंगाचा प्रस्ताव हा सादर केलेला आहे.

तसेच संदर्भ क्र.४ चे पत्रासोबत प्राप्त उपवनसंरक्षक (प्रा) भंडारा यांचे पत्रान्वये असे कळविले आहे की ६.५३ हे. क्षेत्र महसूली वनक्षेत्र असल्याने त्याचा ताबा महसूल विभास देण्यात आला असून तसा पंचनामा व ताबा

देण्यात आलेला आहे. सबब आपणांस असे कळविण्यात येत आहे की जर सदरचे जमीनीचा मूळ उल्लेख वनजमीन असा आहे तर सदरची ६.५३ हे जमीन आपले ताब्यात घेण्यात यावी व तसा अहवाल या कार्यालयास सादर करावा.

करिता विषयांकित प्रकरणी आपणांस पुनःश्च कळविण्यात येत आहे की वर दिलेल्या निर्देशानुसार कार्यवाही होवून सूधारित अहवाल या कार्यालयास सादर करावा जेणेकरून प्रस्ताव शासनास सादर करणे शक्य होईल.


(नरेश झुरमुरे)

अपर प्रधान मुख्य वनसंरक्षक तथा केंद्रस्थ अधिकारी
महाराष्ट्र राज्य, नागपूर

प्रति,
मुख्य वनसंरक्षक (प्रा) नागपूर



**Office of the Principal Chief Conservator of Forests (Head of Forests Force),
Maharashtra State.**

Additional Principal Chief Conservator of Forests & Nodal Officer,

1st Floor, B Wing, Van Bhavan, Ramgiri Road, Civil Lines, Nagpur- 440 001
Tel.No.: 0712- 2556916 . E-mail: apccfnodal@mahaforest.gov.in

No.Desk-17/Nodal/Nagpur/PID-149884/1585/2024-25
Nagpur - 440 001, Date: 10/10/2024

Sub: Proposal for diversion of 3.84 ha. Bade Jhad Ka Jungle and Zudpi Jungle Forest land in favour of M/s. Ashok Leyland Ltd; for non-forestry use i.e. Industrial Unit of Ashok Leyland in District Bhandara in the State of Maharashtra (FP/MH/IND/149884/2021).

Ref: 1.The Chief Conservator of Forests, Nagpur, letter no. Desk-10/Land/C.R.956/2020-21/1193, dtd. 03.02.2022.
2. The Government of India, Ministry of Environment Forests and Climate Change, guidelines dtd.24.01.2022.


The Chief Conservator of Forests (T), Nagpur on 03/02/2022 has submitted proposal for seeking prior approval for diversion of 3.84 ha. Bade Jhad Ka Jungle and Zudpi Jungle Forest land in favour of M/s. Ashok Leyland Ltd, for non-forestry use i.e. Industrial Unit of Ashok Leyland in District Bhandara in the State of Maharashtra to this office.

The Deputy Conservator of Forests (T), Bhandara has certified that the construction of buildings and other utility work of Industrial Unit of Ashok Leyland in District Bhandara has already been carried out in 3.84 ha of forest land. Hence violation of Van (Sanrakshan Evam Samvardhan) Adhinyam, 1980 has been committed.

Since the construction work has already been carried out, hence it can't be treated as diversion. Also, as per the Government of India, Ministry of Environment, Forests and Climate Change, guidelines dtd.24.01.2022, utilization of forest land for establishing industries is a non-site specific activity and can't be considered on forest land.

Hence the proposal can't be considered in its present form and is rejected. The User Agency may submit the proposal for regularization if required.

Encl:- As above


(Naresh Zurmure)

**Addl. Principal Chief Conservator of Forests
& Nodal Officer**

To,

M/s Ashok Leyland Ltd.
Gadegaon, Bhandara, 441904

Copy to: The Conservator of Forests, Nagpur for information and necessary action.

Copy to: The Deputy Conservator of Forests, Bhandara Forest Division, Bhandara for

Proposal for Regularization of 3.84 ha. forest land for non forestry use i.e. for Industrial Unit of Ashok Leyland Limited Bhandara in the state of Maharashtra.

(Online Proposal No. FP/MH/IND/149884/2021)

CRONOLOGY

In 1980, Ashok Leyland (AL) considered expansion of its operations and received letters of intent from both the State of Maharashtra and the State of Rajasthan. The Government of Maharashtra (GoM) had formulated a policy offering substantial incentives to pioneer units in talukas where no large-scale industries existed, with the objective of promoting industrial growth and infrastructure development in virgin areas.

Based on communications from the State Industrial and Investment Corporation of Maharashtra Limited (SICOM), an undertaking of GoM, AL was actively persuaded to establish its new project in Bhandara District. AL prioritized this project (**Annexure-I-letter from SICOM to AL MD**), proposing an investment of approximately ₹95 crores and requiring about 300 acres of land. The project was expected to attract ancillary units and generate employment for nearly 5,000 workers.

AL selected land in villages Gadegaon and Kesalwada of Sakoli Panchayat Block and housing land in Chikhali, which qualified as a virgin area eligible for pioneer unit incentives. Pursuant to discussions, GoM agreed to allot 350 acres of land, and a Memorandum of Understanding was executed on 10.12.1980 (**Annexure -II: MOU**) between AL and SICOM in the presence of the Hon'ble Chief Minister and Industries Minister. Under the MoU, AL also agreed to prioritize supply of commercial vehicles required by the State of Maharashtra, in addition to the quota allotted by the Central Government.

By Notification dated 12.01.1981 (**Annexure-V: Notification for transfer of Govt. land to MIDC**), the area was declared as an Industrial Area under the Maharashtra Industrial Development Act. Subsequently, the Collector, Bhandara, vide communication dated 20.06.1981, informed the Commissioner, Nagpur Division, that the lands were under the management of the Revenue Department, vacant on site, and recorded as grazing land in the Nistar Patrak. The Gram Panchayat passed a resolution granting no objection for allotment of land to AL. Based on these communications, two registered lease deeds dated 22.03.1982 and 03.08.1982 transferred 231 acres of land from MIDC to AL (**Annexure-III: Possession receipts plot No.1 &1(part)**).

For the remaining 120 acres, the State Government initiated steps, including withdrawal of Nistar Rights under Section 161(3) of the Maharashtra Land Revenue Code. MIDC requested authorities to hand over the additional land to AL. However, delays in allotment hampered project progress, particularly construction of Shop No.3 (Heat Treatment), a critical installation.

On 11.03.1983, AL's Chairman and Managing Director met the Hon'ble Chief Minister and Deputy Chief Minister, highlighting difficulties due to non-availability of the balance land (**Annexure-IV: Letter dated 12.03.1983 from AL MD to Chief Minister**). Various communications show that the State assured AL that construction on the balance land could proceed and would be regularized after completing formalities, including Central Government approval. The delay arose because the balance land was recorded as "Revenue Forest" in revenue records.

GoM opined (**Annexure -VI: letter dated 02.05.1985 from Dy. Secretary GoM, revenue & forest to Secretary to GoI, Ministry of Environment and forest**) that under Section 2 of the Forest (Conservation) Act, 1980, prior approval of the Central Government was required for non-forest use. It is undisputed that of the land shown as forest (15.30 acres), there was negligible vegetation except for shrubs, and the area was never part of any afforestation program.

Since the land was essential for Shop No.3, AL was permitted to proceed with construction, accordingly construction completed in May 1983(**Annexure-VIA: MIDC building completion certificate**) and plant productionized in July 1983 and informed GoM on 17.01.1985. From 1983 onwards, the State pursued Central Government approval under Section 2 of the Forest (Conservation) Act, 1980. Vide communication dated 20.01.1985, GoM confirmed that the proposal had been submitted to the Central Government. On 02.05.1985, detailed project information was furnished to the Ministry of Environment and Forests.

Despite these efforts, the Naib Tahsildar, Bhandara issued a notice on 06.11.1985(**Annexure-VII**) directing AL to remove encroachment. AL sought regularization, but vide order dated 15.02.1987, the Tahsildar ordered was rejected. AL appealed to the Collector, Bhandara, but the appeal was rejected on 10.05.1994. Aggrieved, AL approached the Hon'ble Bombay High Court, Nagpur Bench by filing Writ Petition No. 1800 of 1994. The Court issued notice and granted status quo on 13.07.1994 and later issued Rule with interim relief on 21.10.1994.

During the pendency of the Writ Petition, AL submitted a proposal to GoM on 26.12.2005 for change of user of the alleged forest land under Rule 5 of the Forest (Conservation) Rules, 2003.

On 20.06.2006 (**Annexure-VII-A**), the Hon'ble High Court passed an Order in the above Writ Petition and the findings of the Court as follows;

- i) The record clearly shows that AL was persuaded by GoM to set up its unit in Maharashtra despite having an alternative offer from Rajasthan with full facilities at Alwar. AL relied on GoM's assurances of land and infrastructure support.

- ii) It is undisputed that Shop No.3 was permitted to be constructed after meetings with the Hon'ble Chief Minister and Deputy Chief Minister, subject to Central Government approval. It is also undisputed that the land recorded as "Revenue Forest" had no trees. In fact, AL has undertaken extensive plantation, creating a thick green cover, which is acknowledged by Government Authorities.
- iii) The Bhandara unit currently provides employment to 1,285 persons, mostly from adjoining villages. Closure of the factory would severely impact these families and ancillary units.
- iv) Shop No.3 manufactures gearboxes critical for AL's operations nationwide, and closure would disrupt supply chains and affect thousands of families across the country.
- v) AL has already submitted a proposal on 26.12.2005 for use of the forest land for non-forest purpose to the State Government along with requisite information and documents complete in all respects.

Hence, the Hon'ble High Court, vide its order dated 20.06.2006 (**Annexure-VIIA**), directed that,

- a) the proposal dated 26.12.2005 submitted under Rule 5 of the Forest (Conservation) Rules, 2003 for necessary permission under Section 2 of the said Act be forwarded along with comments and necessary details to the Secretary, Ministry of Environment, New Delhi within three months.
- b) The Central Government was directed to consider the proposal and take a decision within six months of receipt, and if necessary, inspect AL's establishment at Bhandara.
- c) The Court further directed that interim relief shall continue until the Central Government's decision and for one month thereafter, and clarified that if permission is granted by the Central Government, the State Government shall regularize the encroachment.

In compliance, AL submitted the proposal to the Deputy Conservator of Forests, Bhandara on 26.12.2005, which was forwarded through the hierarchy—DFO to CCF (29.08.2006), then to Nodal Officer (06.09.2006), then to GoM (22.12.2006), and finally to the Central Government on 04.04.2007.

However, the Central Government returned the proposal on 30.05.2007 (**Annexure-VIII**) advising that permission from the Hon'ble Supreme Court be obtained. The proposal was sent back through PCCF, CCF, and DFO, and AL was advised repeatedly between 2007 and 2009 to obtain Supreme Court permission.

AL continued to request the State to take up the matter with the Supreme Court, citing the High Court's operative order. Despite this, letters dated 30.12.2008 and 14.05.2009 warned that encroachment would be vacated if Supreme Court permission was not produced.

In addition, in 2018, Rajegaon Gram Panchayat raised objections, demanded removal of encroachment and employment for villagers. AL approached the Panchayat for a No Objection Certificate, which was refused, leading to protests and meetings with officials, though no agreement was signed.

AL received a Letter dated 06.05.2019 from the Deputy Collector (Revenue) Bhandara, wherein, it has been mentioned that vide notice dated 28.03.2019 (Letter No. Section/Forest Conservation/SN 446/4341/2018-19), the Deputy Conservator of Forests, Bhandara submitted a report through the District Collector regarding a proposal for obtaining 107.16 hectares of forest land under MIDC area for industrial development, which included 10.18 hectares for regularization of AL's intended encroachment.

| Old land measurement No. | New Gat No. | Total area (in hectares) | Area / land included in proposal of AL (in hectares) | Categorization of area / land as per old record |
|--------------------------|--------------|--------------------------|--|---|
| 1 | 1 | 25.22 | 7.68 | Govt. (Big tree forest) |
| 26 | 57 | 26.76 | 2.00 | Govt. (Big tree forest) |
| 25 | 47 | 18.00 | 0.50 | Govt. (Big tree forest) |
| | Total | | 10.18 | |

Further the report reiterated that the proposal submitted on 29.08.2006 was forwarded to the State and then to the Central Government on 04.04.2007, but the Central Government refused approval on 30.05.2007(**Annexure-VIII**) and advised approaching the Supreme Court. The notice states that AL has no documentary evidence of having obtained such permission and was informed repeatedly but no action is seen. Hence, AL was directed to submit within seven days the report and necessary documents regarding Supreme Court permission, failing which removal of encroachment would be initiated.

While so, in 2021 (**Annexure-IX**), scrutiny revealed an additional 0.19 hectares under AL's possession, and a revised proposal for 10.37 hectares was submitted. AL purchased 12.2 hectares in Ratnagiri for compensatory afforestation, vide sale deed dated 17.02.2021, and committed to hand over the land within one year from the date of Sale deed.

In 2024, AL requested reduction of demand to 3.84 hectares, as 6.53 hectares had already been handed over to the Forest Department on 20.06.2024. The revised proposal was

submitted and recommended by the Deputy Conservator of Forests and Chief Conservator of Forests (Annexure-X).

However, as per the Additional Principal Chief Conservator of Forests letter dated 20.10.2024 (Annexure-XI), advising resubmission of proposal for regularization of 3.84 Ha. forest land instead diversion.

In view of all the above-stated pros-&-cons, Ashok Leyland requests support from all stakeholders for Regularization of 3.84 hectares' portion of additional land (Table 1) by getting the clearance of its proposal submitted under Forest (Conservation) Act, 1980 and continue to use the said land along with the buildings and structures constructed over it, for its operation purpose is submitted for approvals by keeping the minimum area required to produce our product as Ashok Leyland Bhandara.

Table 1:

| Sr. No. | Name of Structure | Area (in Ha.) | Sur/ Gut No. | Village/ Taluka | Legal status of land |
|---------|------------------------------------|---------------|--------------|----------------------------|----------------------|
| 1 | Heat Treatment Shop No. 3 | 1.13 | 1 | Chikhli Hamesha / Bhandara | Bade jhar ka jungle |
| 2 | LPG Storage Area | 0.01 | 1 | | |
| 3 | Road and Yard | 0.75 | 1 & 57 | | |
| 4 | Shop NO. 4 | 0.22 | 57 | | |
| 5 | Waste Water Treatment Plant | 0.02 | | | |
| 6 | Shop approach Roads | 0.20 | | | |
| 7 | LPG Storage Area (All 4 sides) | 0.26 | | | |
| 8 | Safety Distance Zone for LPG | 0.49 | 1 & 57 | | |
| 9 | Shop peripheral Roads | 0.57 | | | |
| 10 | Canteen Building and Approach Road | 0.19 | 113 | | |
| | TOTAL | 3.84 | | | |

Kindly consider our revised proposal of minimum demand of 3.84 ha. forest land for regularization for non-forestry use i.e. for Industrial Unit of Ashok Leyland Limited Bhandara and accord approval at the earliest.

Other Ashok Leyland's highlights:

It is a matter of pride to mention here that this Bhandara plant has received numerous coveted National Awards in last 25 years' time with the employee and their families involvement, thus overall culture and learnings at Ashok Leyland is percolated in the society.

To name few are:

1. Golden Peacock National Environment Award 2008 – 1st Prize.
2. Indian Manufacturing Excellence Award – Platinum Award.
3. Golden Peacock National Quality Award – Special Commendation.
4. CII EXIM Bank Award – Strong commitment to excel.

5. Rajeev Gandhi National Quality Award by Bureau of Indian Standards.
6. State Level Energy Conservation Award by Maharashtra Energy Development Agency – 2nd Prize.
7. Golden Peacock National Quality Award 2011 – 1st Prize.
8. IMC Ramakrishna Bajaj National Quality Award 2010 – Performance Excellence.
09. CII 5S Excellence Award by ABK AOTS CUMI – 1st Prize.
10. National Award for Excellence in Energy Management 2016 – ‘Excellent Energy Efficient Unit Award’ and ‘Innovative Project Award’.
11. Sustainability 4.0 Awards 2017 – Front Runner.
12. National productivity and CII Cluster Summit 2018 – Top 5 in Large organization category.
- 13 Silver award winner for CII EHS Excellence award consecutive 3 year .



(Rajendra Thakare)

General Manager & Plant Head

Authorized Signatory
Ashok Leyland Limited, Bhandara Unit

Date: 12.02.2026.

Place : Bhandara