Date: 27/08/2014

Hiranya Pandey,

Advocate High Court, Mumbai,

123-B, 1st Floor,

Esplanade Mansion,

144, MG Road,

Kalaghoda, Fort, Mumbai- 400023

Sir,

My client, Greenpeace India has placed in my hands your letter dated 3.9.2014 issued on behalf of your clients Crop Care Federation of India and have instructed me to write to you as under:

1. My clients have already replied to you by my earlier letters dated 27.8.2014 and 11.9.2014 and for the sake of brevity we are not repeating the contentions of the said letters. However, nothing contained in your letter should be treated as admitted by absence of specific denial and all that is in your letter dated 3.9.2014 which is contrary to or inconsistent with whatever is stated in the aforesaid letters ought to be treated as denied. For ready reference I am attaching the copies of my earlier replies.
2. My clients submit that my client is not dutybound under any provision of Article 51A or otherwise to submit the raw data, etc. If your clients had performed the tests honestly and diligently they would have come to the same conclusion as my clients. My clients deny that there is any threat to the economic security of India due to their actions. As regards the various documents concerning my clients which are sought by you, my clients are not obliged to provide any such documents to you. Our clients believe that excessive use of fertilizers is harmful to health and will continue to protest against the same despite your clients obviously mala fide remonstrations. My clients are sufficiently aware about the meanings of the various terms and interpretation of provisions of Constitution and Right to Information Act which you seek to explain in your letter and your clients are the last persons my clients hope to get any enlightenment from. My clients further deny all the wild factual allegations you have made in the letter about their funding, responsibility, etc.
3. As far as the actual testing the same was done at a globally known independent laboratory (The laboratory involved is a (DAkks) Deutsche AkkreditierungsstelleGmBH Certified laboratory, with a a DIN EN ISO/IEC 17025: 2005 Certification).
4. It is obvious that the notice is issued only for the purpose of harassing and intimidating my clients and thereby gagging them. Of course my clients will not succumb to any such tactics.
5. My clients finally instruct me to convey that if your clients are ill advised to take any legal action against my clients the same will be defended at your clients entire risk as to costs and consequences, which please note.

Yours sincerely,

Mihir Desai

Advocate