

Sl. No. 05 D. 30 MAR 2026

Before the Hon'ble National Green Bench Tribunal

Eastern Zone Bench, Kolkata

Memorandum of Application

(Under Section 18(1) read with Section 14 and 15 of the National Green Tribunal Act, 2010)

(An application under Section 18(1) read with Section 14 and 15 of the National Green Tribunal Act, 2010)

Original Application No. 87 of 2025/EZ

In the matter of :-

Roomana Parween.

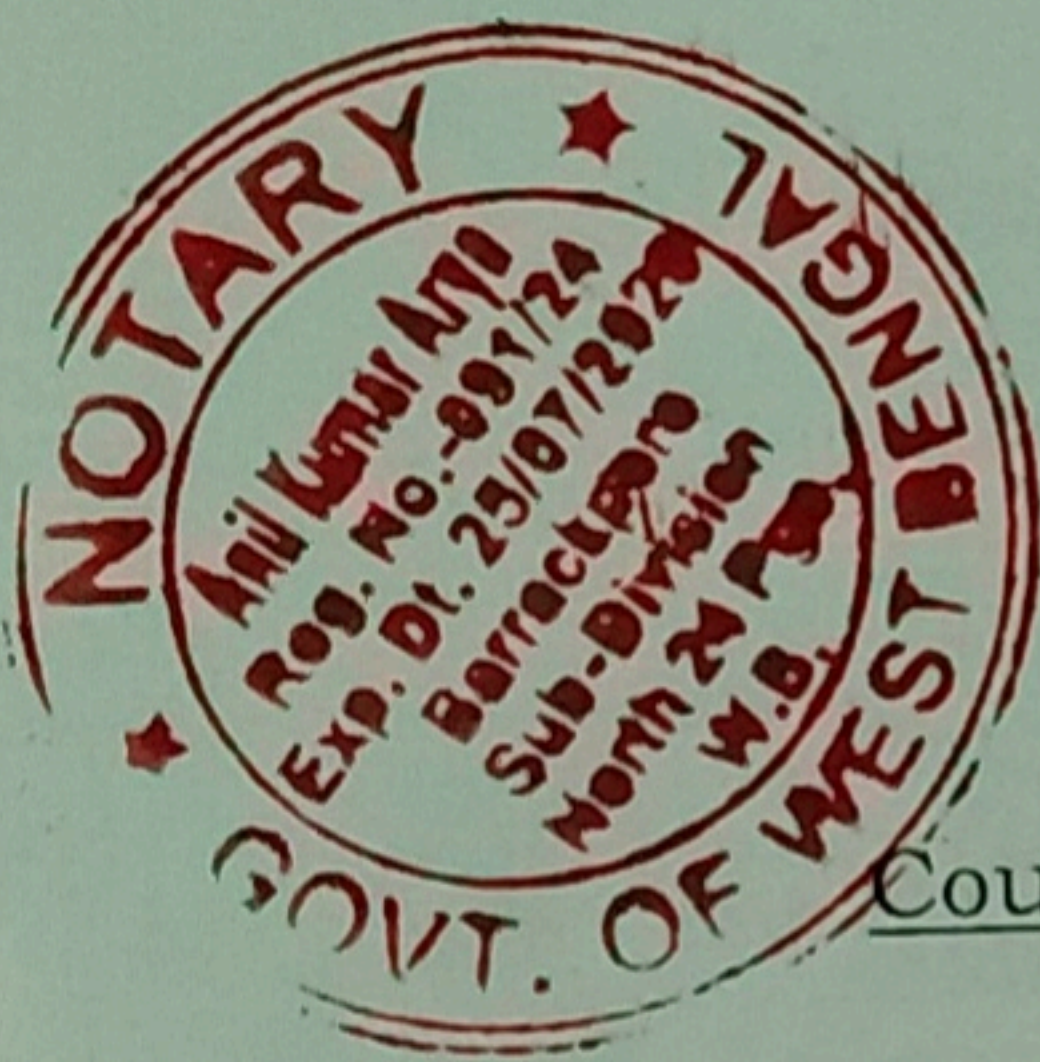
..... ...Applicant.

-: Versus :-

The Member Secretary, West Bengal

Pollution Control Board & Others.

.... Respondents.



Counter Affidavit on behalf of the respondent Nos. 6 & 7 herein.

I, Md. Aslam, Son of Manjur Alam, aged about 35 years, by religion - Islam, by Occupation - Business, residing at 14/A/1, Ali Haider Road, Mathpara, P.O. Titagarh, District : North 24-

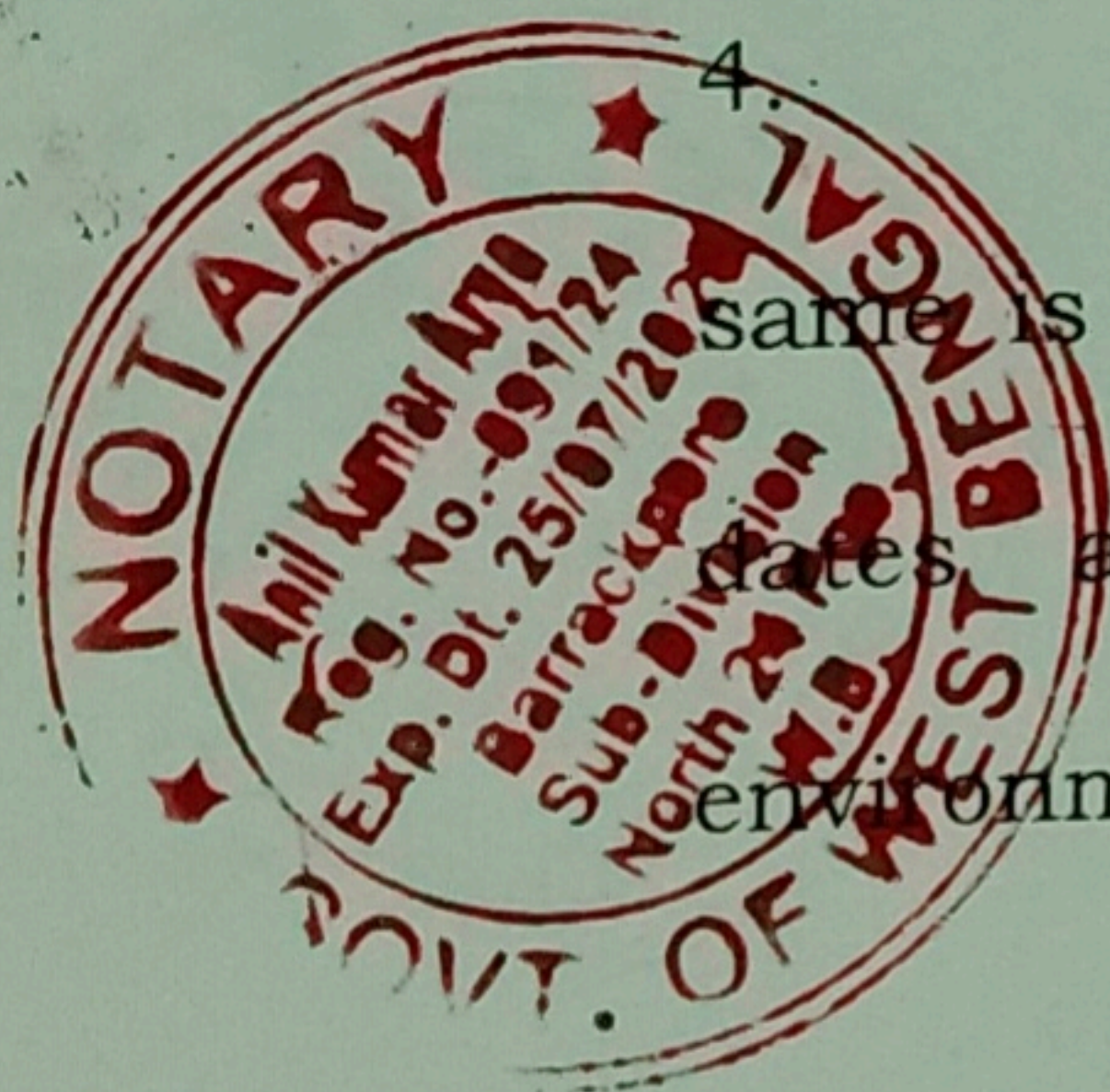
Parganas, Kolkata - 700119, do hereby solemnly affirm and say as follows :-

1. That I am the respondent No. 6 herein. I am well acquainted with the facts and circumstances of the instant case and I am duly authorised to sign and affirm this affidavit on behalf of the respondent No. 7 herein. As such I am competent to affirm this affidavit.

2. That I have read a copy of original application purported to have been verified by Roomana Parween (hereinafter referred to as the said application) and have understood the meanings, contents and purports of the same. I have been advised to and/or deal with only those allegations and/or statements, which are material for different of the instant case, which I hereby do.

3. That the said allegations are wholly false, exaggerated and unfounded. The respondents unit operates strictly in accordance with lawful permission.

4. That the application deserves to be dismissed as the same is based as unverified assumptions, absence of scientific data, and personal animosity rather than any genuine environmental concerned.

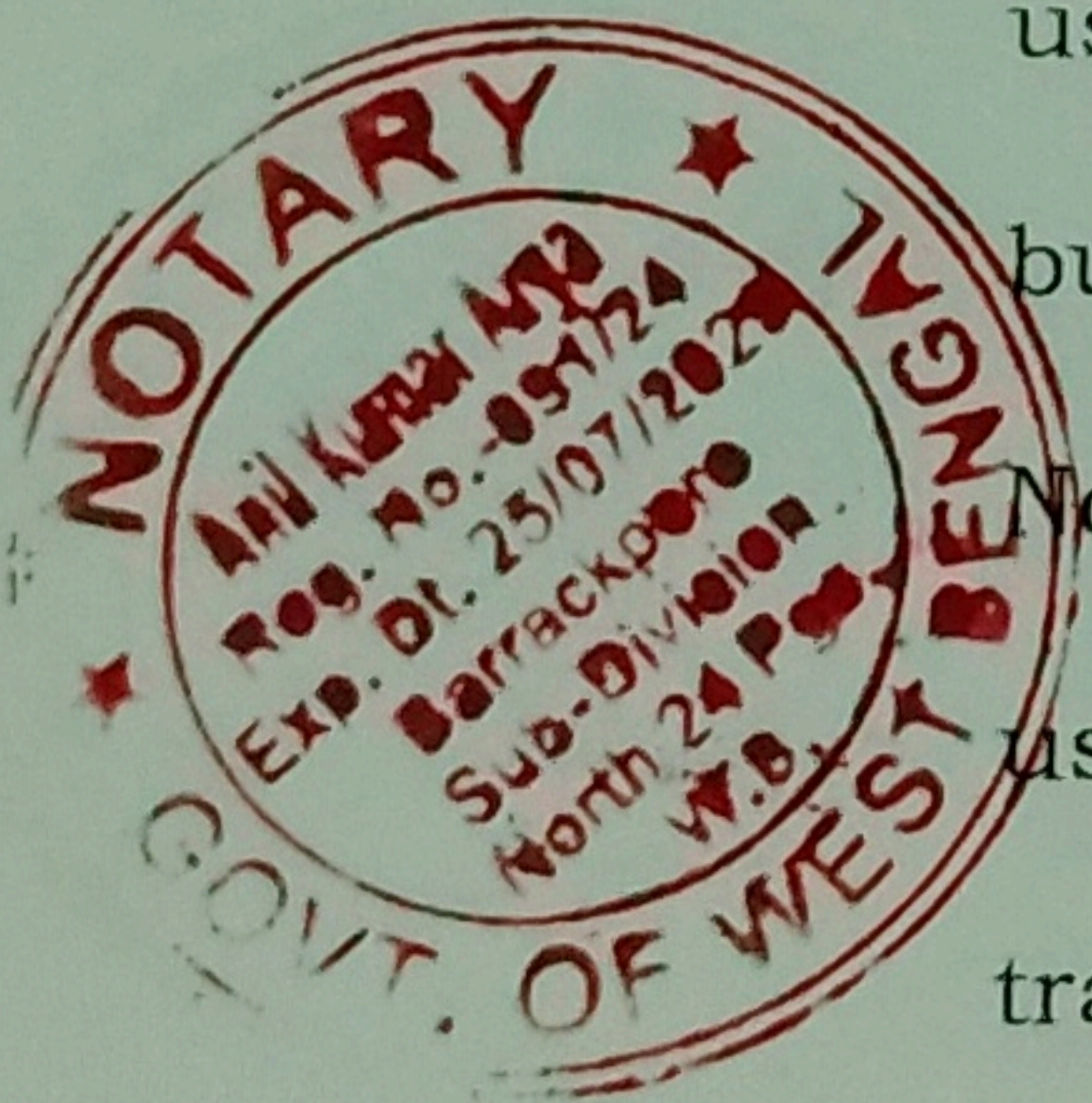


f) That the respondent is paying Municipal Tax at Barrackpore Municipality on the holding situated at W/17 (43145) Co-1, Number of Holding in the Assessment Register 14/A/1, Ali Haidar Road, Titagarh, P.O. and P.S. Titagarh, District : North 24-Parganas, Pin-700119.

A photo copy of the Municipal Tax Receipt issued by the concerned authority is annexed hereto and the same is marked with annexure "R-2" to this application.

6. I deny each and every allegations and/or statement contained in paragraph 1, 2, 3, 4 and 6 of the said application excepting those what are matters of records. I state that the machine used produces mechanical vibration within permissible decibel limits and small unit is surrounded within the 5' high boundary wall. The motor using in the unit is 2 HP and the Unit operates only during business hours and remains closed on Sunday and holiday. No night operation is conducted and no loud music muscle used in working hours and unit is running legally, having trade licenses.

7. I deny the allegation contained in paragraph 7 and 9, I have valid license to run unit and I refrain myself to comment on paragraph 8, 9, 10 and 11.

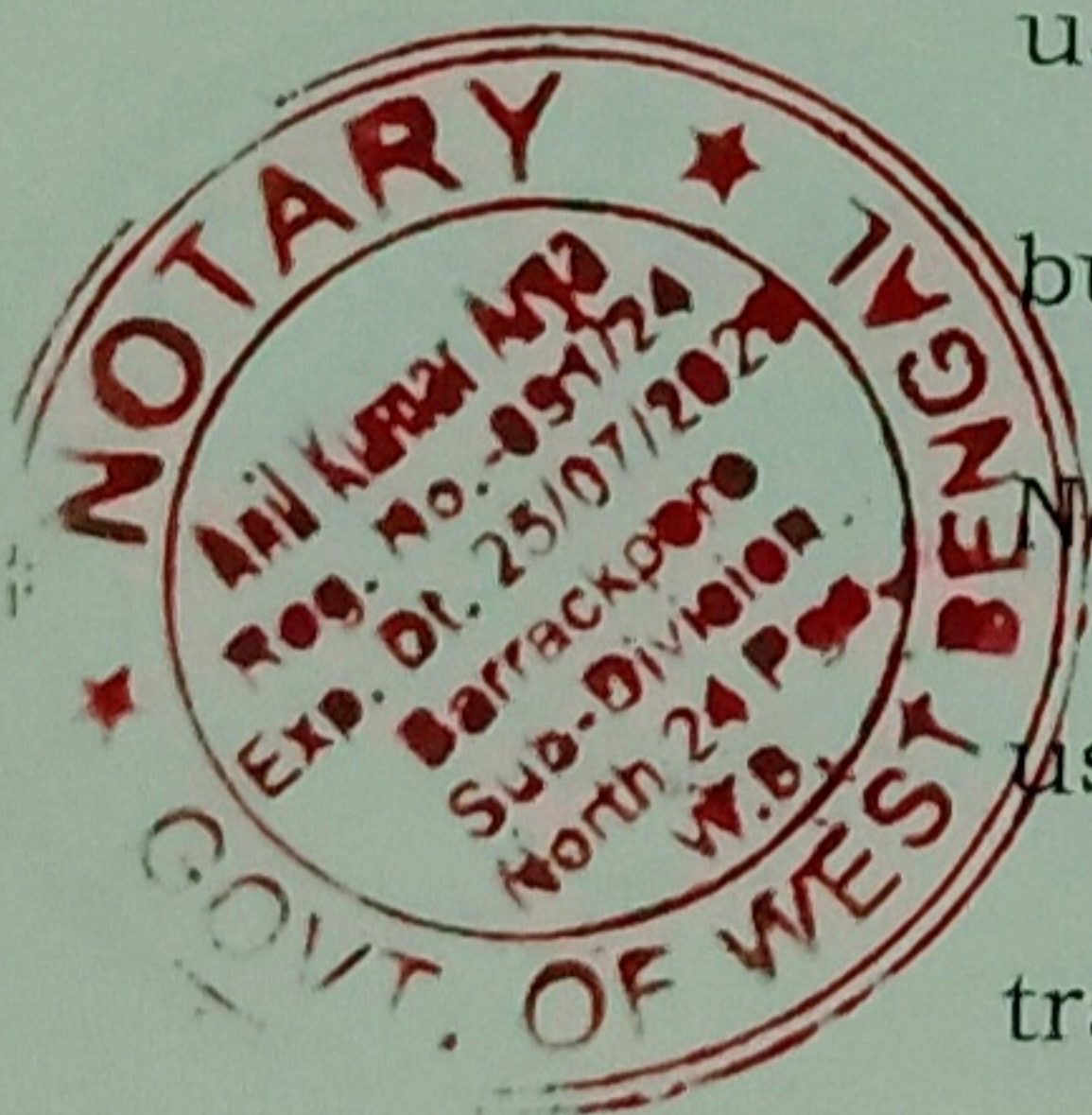


f) That the respondent is paying Municipal Tax at Barrackpore Municipality on the holding situated at W/17 (43145) Co-1, Number of Holding in the Assessment Register 14/A/1, Ali Haidar Road, Titagarh, P.O. and P.S. Titagarh, District : North 24-Parganas, Pin-700119.

A photo copy of the Municipal Tax Receipt issued by the concerned authority is annexed hereto and the same is marked with annexure "R-2" to this application.

6. I deny each and every allegations and/or statement contained in paragraph 1, 2, 3, 4 and 6 of the said application excepting those what are matters of records. I state that the machine used produces mechanical vibration within permissible decibel limits and small unit is surrounded within the 5' high boundary wall. The motor using in the unit is 2 HP and the Unit operates only during business hours and remains closed on Sunday and holiday. No night operation is conducted and no loud music muscle used in working hours and unit is running legally, having trade licenses.

7. I deny the allegation contained in paragraph 7 and 9, I have valid license to run unit and I refrain myself to comment on paragraph 8, 9, 10 and 11.



8. With regard to the statement contained in paragraph 12 of the said application I assured the police authority Titagarh Police Station to maintain and compliance all provisions -

(a) Environment (Protection) Act, 1986

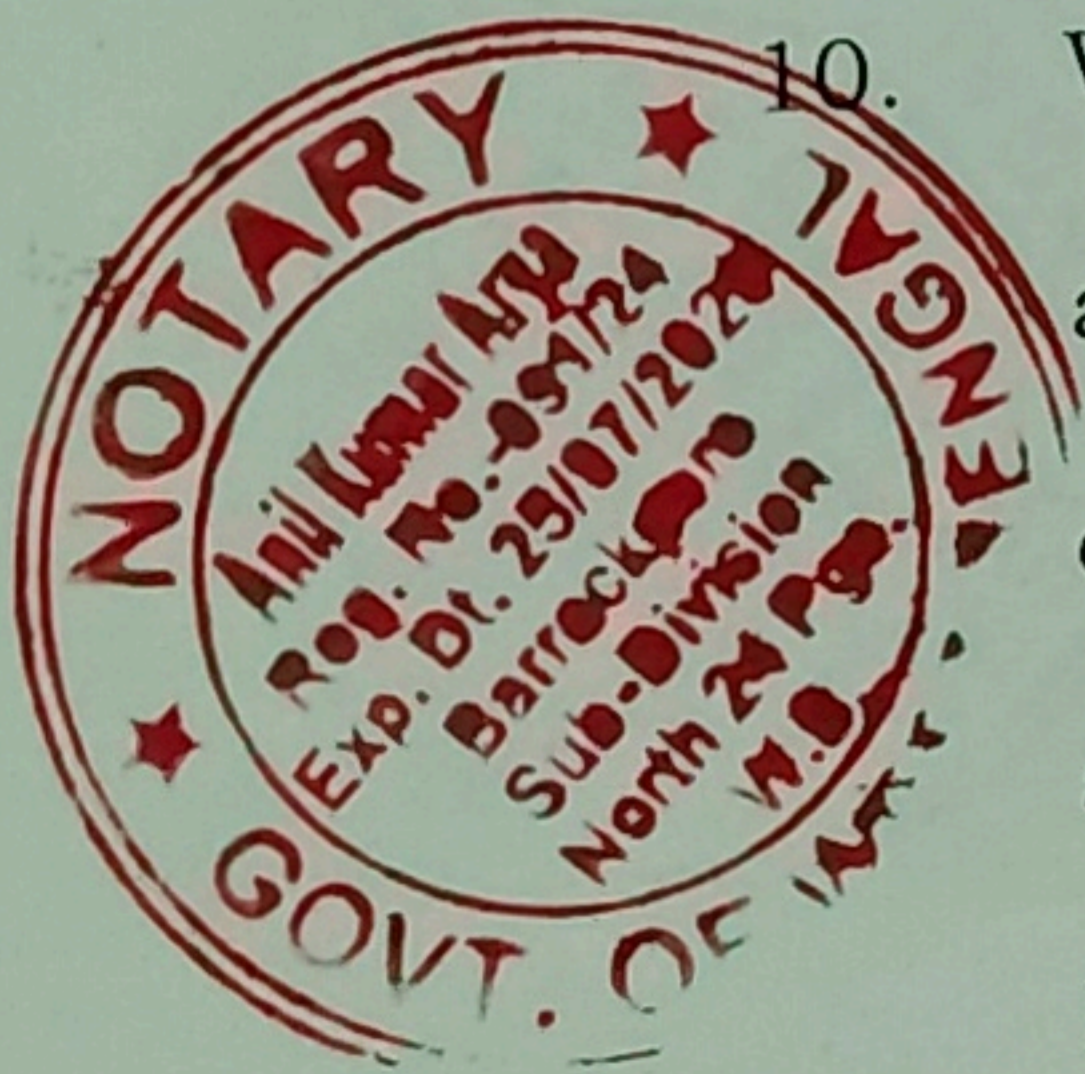
(b) Noise Pollution (Regulation and Control) Rules, 2000 and

(c) Factories Act, 1948 ;

and I state that the applicant resides reasonable distance from unit. No complaint has been received from any other neighboring resident or local body.

9. With regard to the grounds as stated in the said application, I state and submit that none of the grounds are legal, sound and convincing one and as such the instant original application is liable to be dismissed.

10. With regard to the relief sought for as stated in the said application, I state and submit that the applicant is not entitled to get any relief as sought for in the original application. I state that the instant original application is liable to be dismissed on the ground of the misused of environmental law allegations made do not disclose any substantial environment damage or public nuisance as defined under Environmental (Public) Act, 1986. Paper



writing units as non polluting (green). Therefore invocation of NGT jurisdiction on made personal inconvenience.

11. The respondent has a right to carry on lawful trade and the unit causes no measurable pollution emission or noise exceeding statutory limits.
12. That the statements contained in paragraphs 1 to 10 are true to my knowledge and rest are my respectful submissions before this Hon'ble Tribunal.

Prepared in my Office.

✓
Md. Aslam

Signature of the Deponent.

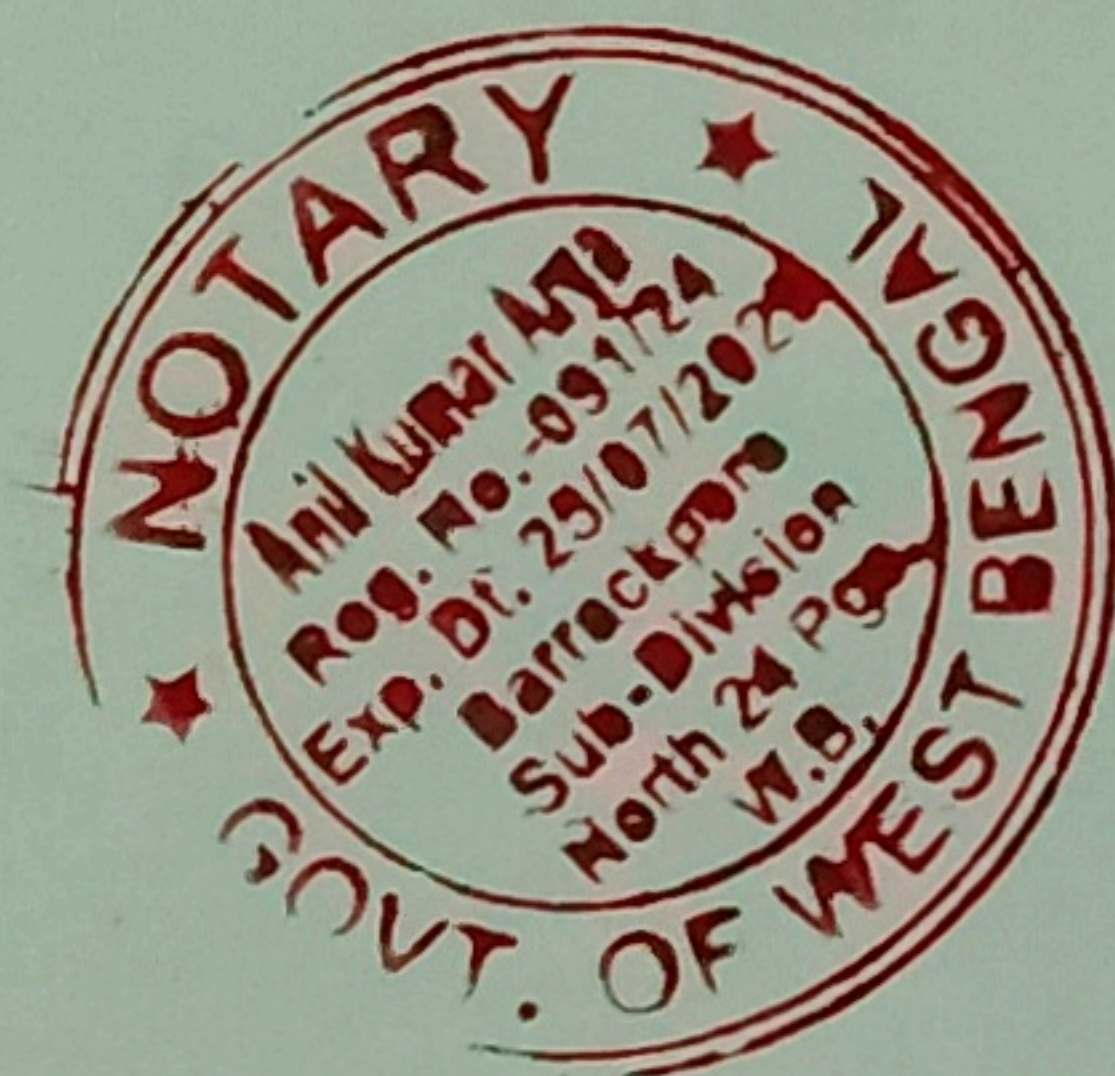
Advocate.

Identified by me.

Place : Kolkata.

Date : 30/03/2026

Md. Aehraf 30/03/2026
Advocate.



Solemnly Affirmed &
Declared Before Me
On.....

ANIL KUMAR ARYA
NOTARY-R/NO-091/2024
GOVT. OF WEST BENGAL

30 MAR 2026

VERIFICATION :

I, Md. Aslam, Son of Manjur Alam, aged about years,
 by religion - Islam, by Occupation - Business, residing at
 14/A/1, Ali Haider Road, Mathpara, P.O. Titagarh, District :
 North 24-Parganas, Kolkata - 700119, I am the respondent No. 6
 herein. I am well acquainted with the facts and circumstances of
 the instant case and I am duly authorised to sign and affirm this
 affidavit on behalf of the respondent No. 7 herein and I do hereby
 solemnly verify that the statements contained in paragraphs 1 to
 10 are true to my knowledge and rest are my respectful
 submissions before this Hon'ble Tribunal.

Prepared in my Office.

Md. Aslam

Signature of the Deponent.

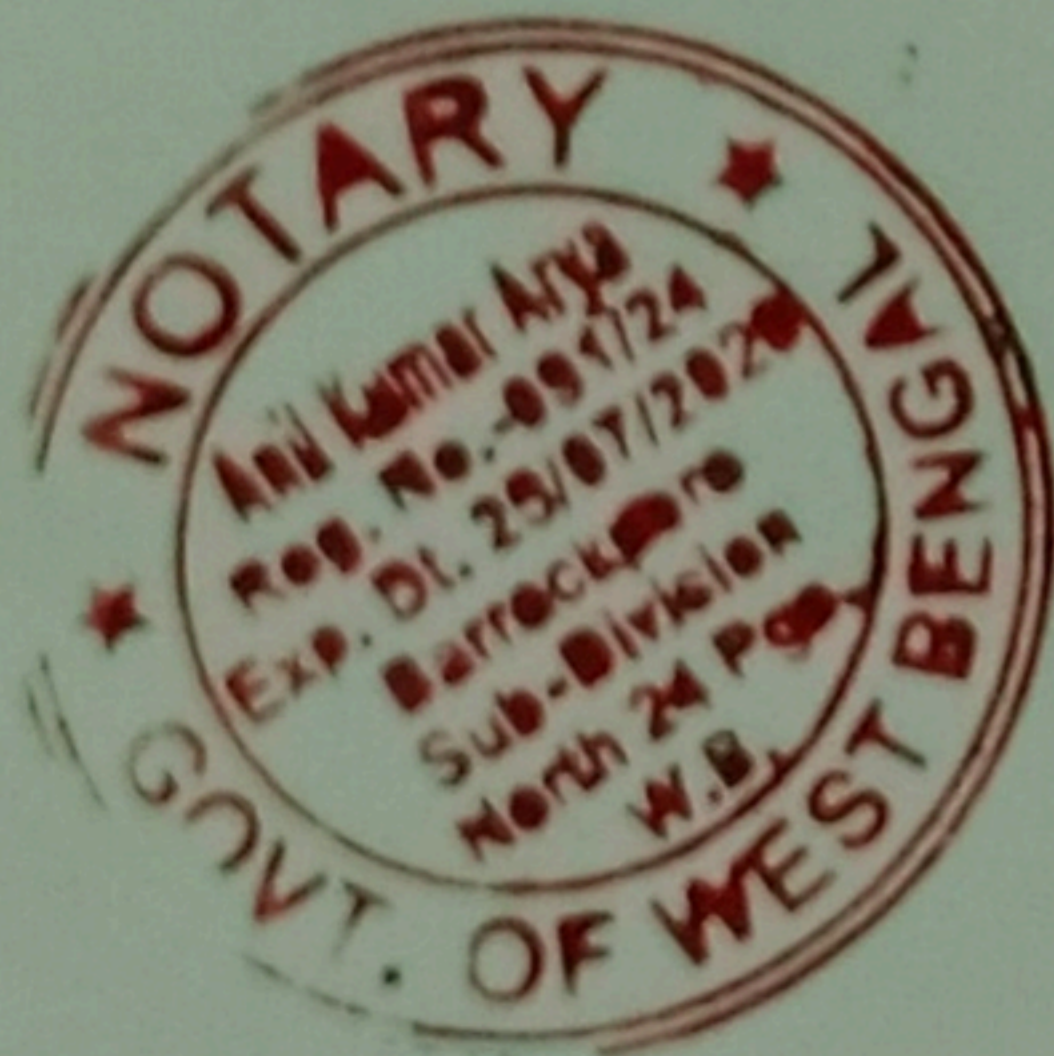
Advocate.

Identified by me.

Place : Kolkata.

Md. Ashraf
 Advocate.

Date : 30/08/2026



FORM - 24
(Under Rule 82)

Certificate No : 200062017029424
Enlistment No / ID No : 20006117233

CERTIFICATE OF ENLISTMENT

The West Bengal Municipal Act, 1993
(See section 118)

BARRACKPORE MUNICIPALITY
B.T ROAD, P.O, TALPUKUR, NORTH 24 PARGANAS
PHONE : 2592-0221, 2592-5565 * FAX : 2592-2679

Year for which the certificate

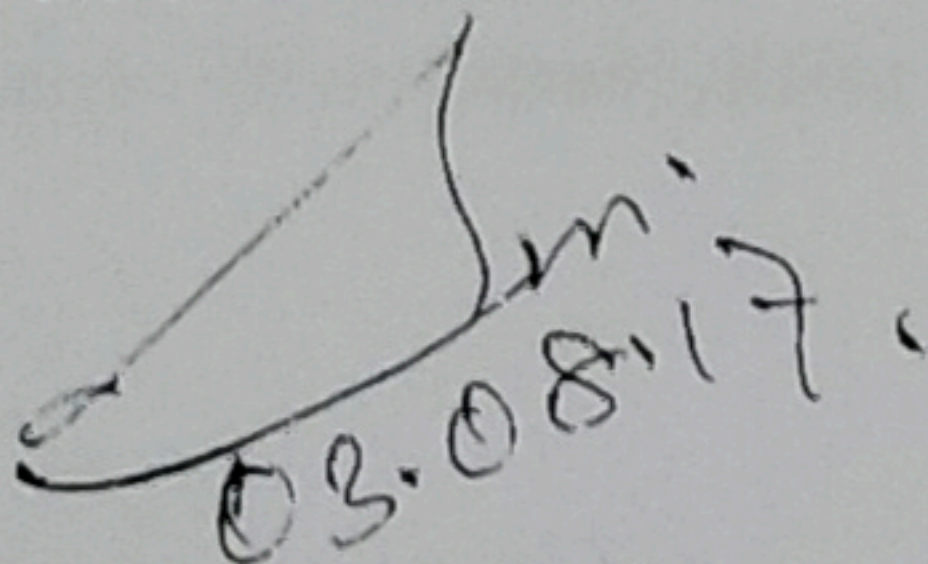
of enlistment or its renewal

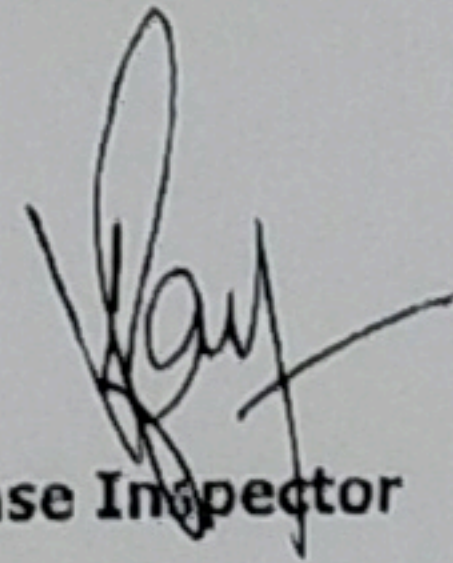
relates **2017-2018**

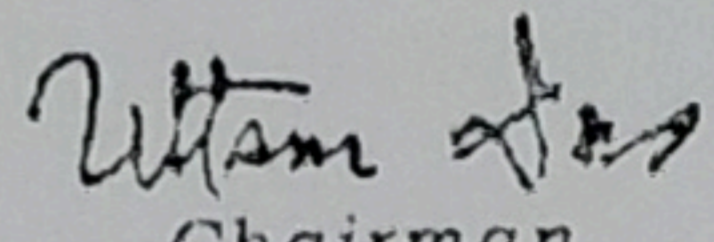
NEW

The Municipal Councillors of **Barrackpore Municipality** hereby grant unto **MD.ASLAM S/D/W of MANZOOR ALI** Prop / Partner of **EENVELOPE PAPER** residing and or carrying on or intending to carry on business at holdings / premises no. **14/A/1**, **ALI HYDER ROAD, TITAGARH, KOL-119** in Ward no. **17**, and exercising or intending to exercise the Profession, Trade or Calling of **ENVELOPE MAKING** this Certificate of Enlistment under section 118 of The West Bengal Municipal Act, 1993 and acknowledge to have received in consideration therefor an application and enlistment fee of Rs. **540.00** (Five Hundred Forty Rupees Only).

This Certificate of Enlistment will be in force until **31st March, 2018** and to be produced at the time of renewal.

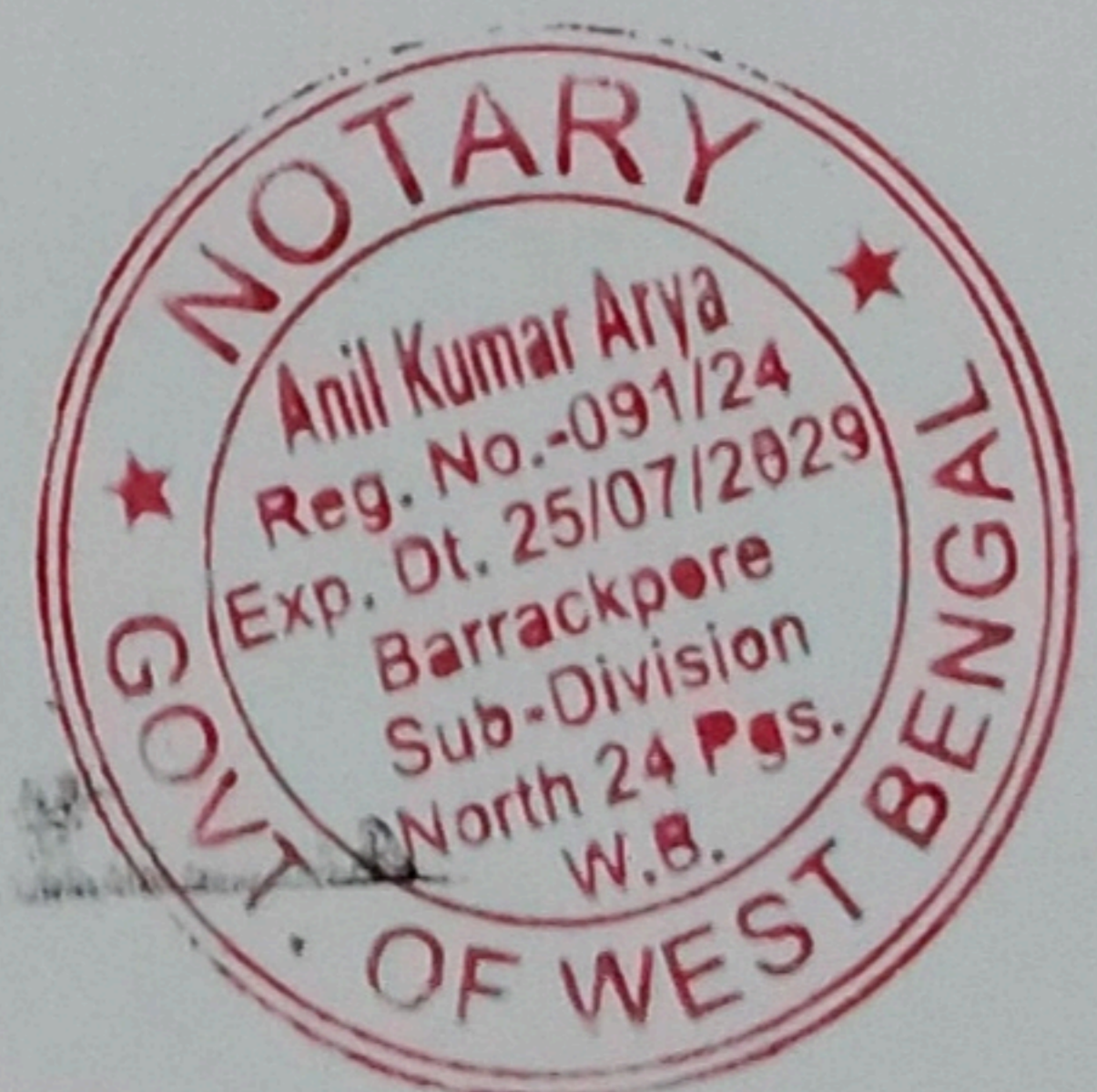

Clerk Incharge/Collecting
Sarkar
Dated : 03/08/2017


License Inspector


Chairman
Barrackpore Municipality

Chairperson/Vice-
Chairperson/Executive Officer

N.B. : Provided that such enlistment or renewal thereof shall not absolve such person from any liability to take out any licence under this Act or any other Law for the time being in force.



Form -24
(Under Rule 82)



Certificate No. 0917P8255240435

Old Certificate No.- 20006117233

PERMANENT CERTIFICATE OF ENLISTMENT

West Bengal Municipal Act, 1993
[See Section 118]

(Duplicate to be filled up)

Barrackpore (Municipality)

Barrackpur, North 24 Parganas

The Board of Councillors of **Barrackpore (Municipality)** hereby grant unto **Md. Aslam**, the Proprietor of **EENVELOPE PAPER** residing and or carrying on or intending to carry on business at Holding No :- 14/A/1, Al Hyder Road District :- North 24 Parganas Pincode :-700119 in ward no. 17 and exercising or intending to exercise the Profession, Trade or Callings of **Other Enterprises(Category), Mfg of Envelope- Hand Prosses(Nature of Business)** this Permanent Certificate of Enlistment under Section 118 of the West Bengal Municipal Act, 1993 and acknowledge to have received in consideration thereof, a total fee of Rs.2738/- (**Rupees: Two Thousand Seven Hundred Thirty Eight**) only.

This Certificate of Enlistment will be in force until the 12-Mar-2028 and to be produced at the time of further renewal.

Date of Renewal: 12-Mar-2025

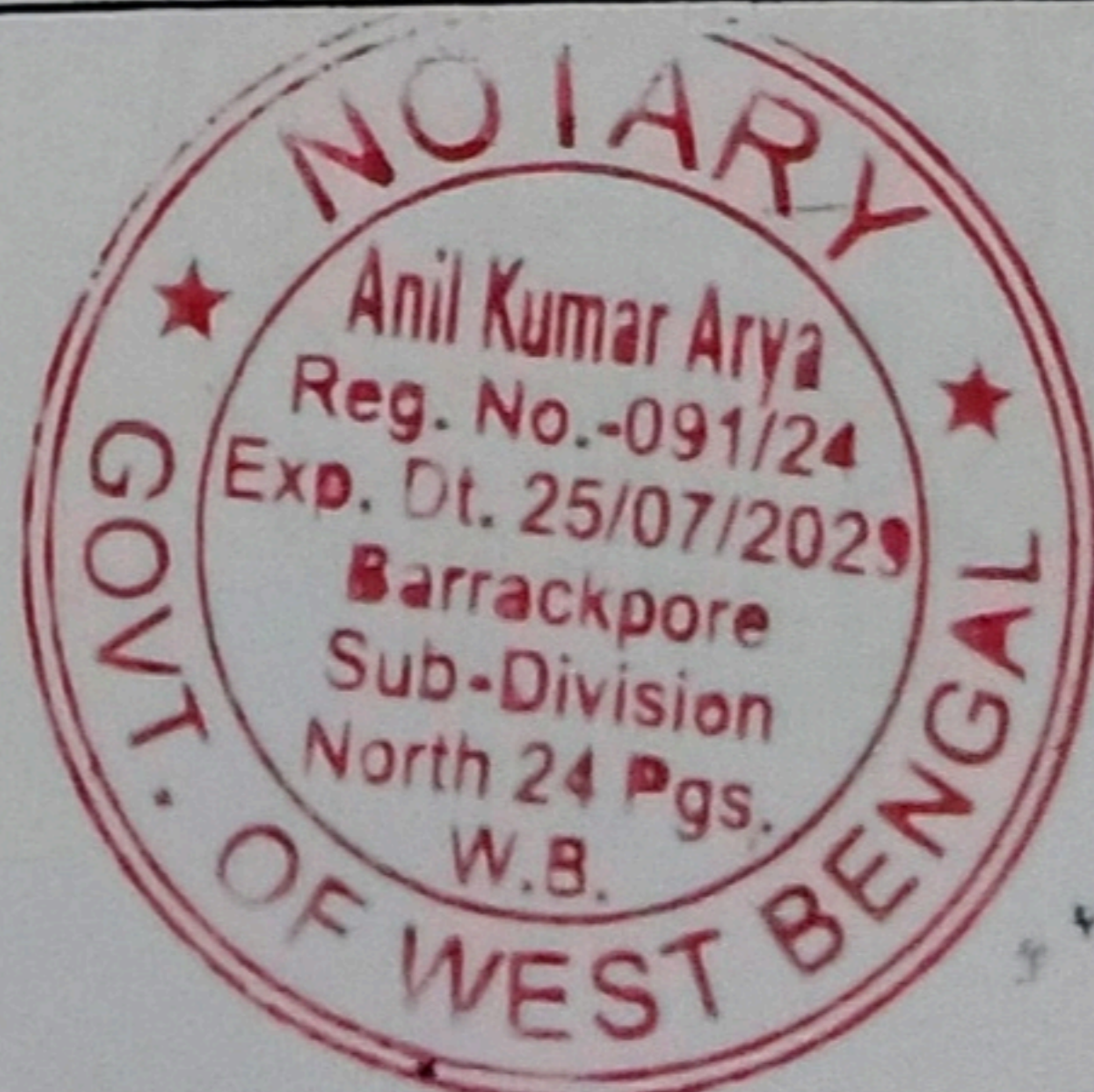


Barrackpore (Municipality)|Mfg of Envelope- Hand Prosses|0917P8255240435|12-Mar-2025|11-Mar-2028

(Scan QR Code with QR Reader)

Disclaimer : This document is auto-generated through Computer system as per data submitted by the applicant himself in online procedure. Respective Department / Authority/ Institution/ Office may verify the documents /credentials from the CE holder , if so deem fit.

The authenticity of this document can be verified by accessing the URL: edistrict.wb.gov.in and then clicking on the Third Party Certificate Verification link and keying in the Unique Number: 210902507200243873



RECEIPT FORM (Duplicate to be Filled up by carbon process)

Receipt Book No

Form No. 10

Receipt No. **152628**

BARRACKPORE MUNICIPALITY

Name of street or road on which the holding is situated W. 17/c-1/10: 43145

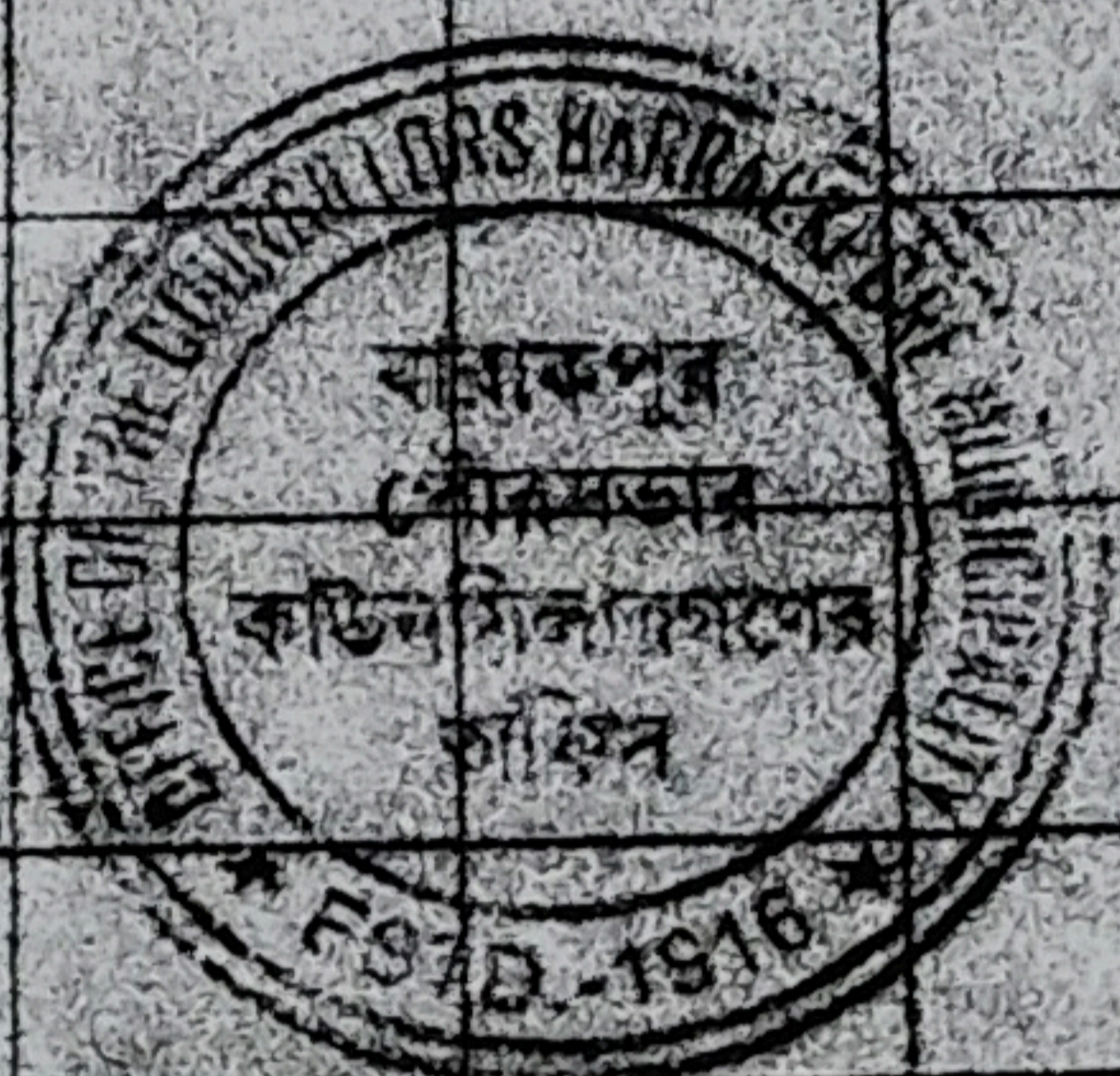
Number of Holding in the Assessment Register 14/A1, A & Road

Name of Assessee Mangoor Sh. Zakir

Received the sum of Rs. Four thousand

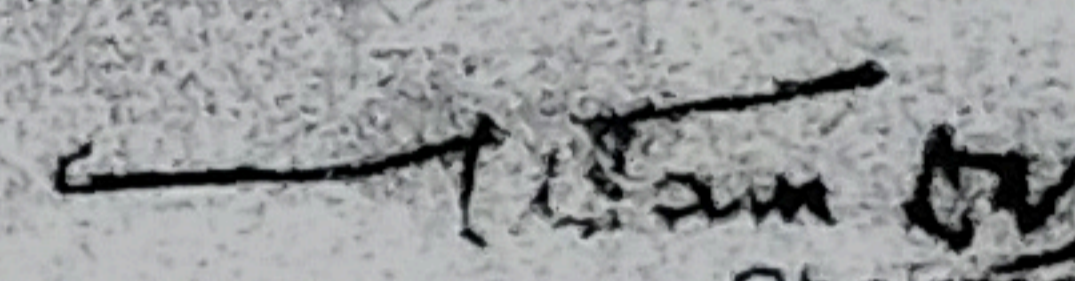
(In words) on account of municipal taxes as per details below.

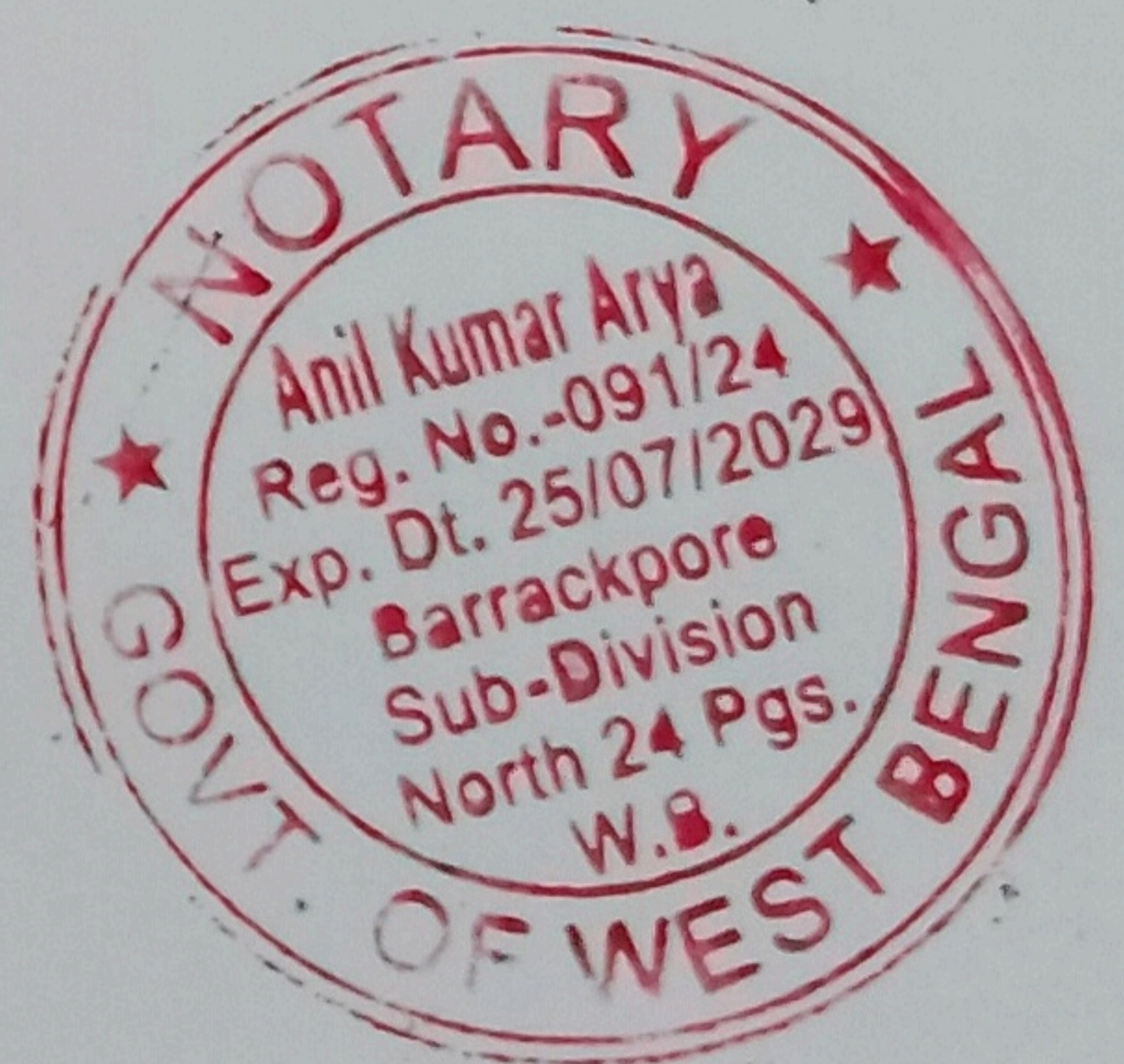
	Arrear		Current year 2016-17				
	Period	Amount	1st quarter	2nd quarter	3rd quarter	4th quarter	Total
			Amount	Amount	Amount	Amount	Net amount of each rate warrant fee and interest
Amount of quarterly Tax					22.40	22.40	43.00
Rebate					0.90	0.90	
Water Charge							
Warrant fee							
Interest if any							
Grand Total							43.00



Total (Rupees)..... 43/-

Dated 18/6/2016


 Chairman
 Barrackpore Municipality
 Collecting Sarkar
 Barrackpore Municipality



VAKALATNAMA

In The High Court At Calcutta / N.G.T.
Eastern Zone Bench, Kolkata.

MD. ASLAM
25/11/25

District: J

Constitutional writ Civil Criminal Revisional.
Appellate Jurisdiction

No. of.

ROOMANA PARWEEN

{ Appellant
{ Petitioners

- Versus -

Member Secretary, West Bengal
Pollution Control Board & others.

{ Respondent
{ Opposite Party

Vakalatnama on behalf of MD ASLAM, and Manjur Alam, of Titagarh

Know all men by these presents that by Vakalatnama, I/We appoint the Advocates noted below or any one of them my/our lawful Advocate or Advocates For filling the memorandum or appeal or petition of entering appearance in the above matter for appearing conducting and arguing the same for depositing or withdrawing any money in connection therewith for moving the Court in any matter connected therewith, for preparing the paper book in the case and for putting in papers, petitions etc. On my/our behalf for filling, taking back any documents for withdrawing suits or appeals or petitions with permission to institute fresh suit etc. For signing and filling petitions of compromise in connections with the said matter and for taking copies of paper from the Record and I/We further say that any act. Done by my/our said Advocate or Advocates or by any one of them after accepting this Vakalatnama, shall be considered as my/our own true and lawful Act.

And I/We further hereby agree and undertake to pay the said Advocates his or their fees as settled and all others sums that may be necessary to carry out the repulsion of the Court and otherwise to enable the said Advocates to conduct the case properly. Failing which the said Advocates after notice to me/us will be at liberty to withdraw from further conducting the case.

IN WITNESS WHERE OF I/WE sign and execute this Vakalatnama on
the 4th day of November - 2025

Name of Advocates

MD ASHRAF
Enrolment - F/960/605/2011.

Mob: 7003882440, Email: mohammadashraf91@gmail.com

(2) ANILAN BISWAS
Enrolment No. WB/85/2006.

Mob: 9903502156

