

Before the National Green Tribunal
Eastern Zone Bench, Kolkata

OA No. 210/2024/EZ

Nandini Chakravarty

.....Applicant

Versus

State of West Bengal and Ors.

.....Respondents

AFFIDAVIT ON BEHALF OF THE APPLICANT

I, Nandini Chakravarty , wife of Kunal Chakravarty, aged about 69 years, by faith Hindu, by occupation - business, residing at 49/5, P.G.M.Shah Road, Kolkata, West Bengal - 700033 do hereby solemnly affirm say as follows:-

1. I state that subsequent to filing of the rejoinder affidavit to the affidavit response on behalf of Respondent 1 and Respondent 4, it is pertinent to bring on record certain relevant facts for proper adjudication of this matter.
2. The applicant states that the wetlands of Nimerhati and the adjacent land to the Saraswati Canal of the Saraswati Industrial Complex has been filled up illegally, leading to the blockage of the drainage network within the Saraswati Industrial Complex and the adjacent area thus causing severe environmental pollution and resultant flooding of the entire area.



3. As per the affidavit filed by Respondent No. 4 and Respondent No. 1 a committee was constituted comprising of the members of the District Magistrate, CPCB Regional Directorate and WBPCB.
4. The aforesaid Joint Committee had visited the site on a number of occasions and had submitted their respective recommendations.
5. Unfortunately, till date no action has been taken by the Joint Committee or the respective authorities regarding the clearance of the drainage network within the Saraswati Industrial Complex or the adjacent areas. This will once again result in the flooding of the adjacent villages of Nimerhati, Purbannapara and Makardah during the upcoming monsoon season as has been prevalent during the last decade.
6. Currently the waste discharge from the Saraswati Industrial Complex continues to be drained onto the local drainage system and the same stagnates in the drain in the vicinity causing more pollution and disbursement of harmful effluents
7. Moreover, the emission of the effluent gases from the Saraswati Industrial Complex still persists whereby open burning of rubber, plastics, industrial & chemical waste are burnt causing immense respiratory problems for the local residents. A periodical tabulation of such emissions are enclosed herewith (Appendix A)



8. Unless immediate effective measures are taken up to stop the pollution in the area and to drastically rectify the pathetic state of the Saraswati Canal, its drainage network and the atmospheric condition around the Saraswati Industrial Complex, the entire locality is headed for a much larger disaster than it has already reached and the resultant harm to the environment and to the local residents shall be unprecedented and irreversible.

Mandir Chakravorty

DEPONENT

Identified by me
Sanjeeb Seni
Advocate

SANJEEB SENI
ADVOCATE
HIGH COURT, CALCUTTA
ENROLMENT No.: WB/18/2007

SOLEMNLY AFFIRMED AND DECLARED
BEFORE ME ON IDENTIFICATION

[Signature]
PADMA DAS
NOTARY

14 APR 2025



APPENDIX A

**TABULATION OF EMISSION & SOUND FROM THE SARASWATI INDUSTRIAL COMPLEX
RECORDED FROM THE APPLICANT'S PREMISES**

DATE	PERIOD OF EMISSION	TYPE OF EMISSION	SCALE OF PUNGENCY(on 10)
30.01.2025	4:30PM - 7:30PM	PUNGENT ODOUR	3-4
01.02.2025	5:15PM - 6:10PM	PUNGENT ODOUR	3-4
03.02.2025	4:15PM - 6:45PM	PUNGENT ODOUR	2-3
04.02.2025	4:45PM - 6:55PM	PUNGENT ODOUR	3-4
05.02.2025	4:10PM - 7:10PM	PUNGENT ODOUR	3-4
06.02.2025	3:28PM - 6:30PM	PUNGENT ODOUR	4-5
07.02.2025	4:30PM - 7:30PM	PUNGENT ODOUR	3-4
08.02.2025	3:00PM - 3:30PM	PUNGENT ODOUR	2-3
11.02.2025	11:00AM - 11:30AM	PUNGENT ODOUR	2-3
12.02.2025	11:00AM - 12:00PM	PUNGENT ODOUR	4-5
13.02.2025	11:30AM - 12:30PM	ODOUR OF PVC BURNING & BLAST SMOKE	6-7
14.02.2025	9:00AM - 11:00AM	ODOUR OF PVC BURNING	7-8
14.02.2025	3:00PM - 4:00PM	ODOUR OF PVC BURNING	7-8
15.02.2025	9:30AM - 10:30AM	PUNGENT ODOUR	4-5
17.02.2025	3:25PM - 6:00PM	PUNGENT ODOUR	3-4
19.02.2025	10:00AM - 11:00AM	PUNGENT ODOUR	3-4
19.02.2025	10:00AM - 11:00AM	PUNGENT ODOUR	3-4
21.02.2025	10:45AM - 11:30AM	PUNGENT ODOUR	3-4
23.02.2025	5:40PM - 7:10PM	PUNGENT ODOUR	7-8
25.02.2025	3:30PM - 5:40PM	PUNGENT ODOUR	3-4
26.02.2025	11:00AM - 12:30PM	PUNGENT ODOUR	3-4
26.02.2025	2:10PM - 3:10PM	PUNGENT ODOUR	3-4
27.02.2025	4:00PM - 5:00PM	PUNGENT ODOUR	3-4
28.02.2025	12:30PM - 1:30PM	PUNGENT ODOUR	3-4
07.03.2025	2:00PM - 2:45PM	PUNGENT ODOUR	4-5
12.03.2025	11:30AM - 12:00AM	PUNGENT ODOUR	4-5
22.03.2025	9:50AM - 11:00AM	PUNGENT ODOUR	4-5
28.03.2025	10:00AM - 10:45AM	PUNGENT ODOUR	7-8
04.04.2025	12:00PM - 12:45PM	PUNGENT ODOUR	4-5

