

Before the Notary
at Alipore Judge's Court

70 Before the National Green Tribunal

Eastern Zone Bench, Kolkata

OA No. 210/2024/EZ

Nandini Chakravarty

.....Applicant

Versus

State of West Bengal and Ors.

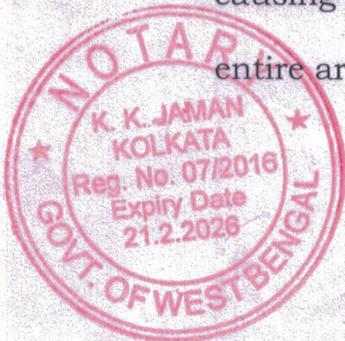
.....Respondents

Sl. No. 236 Dated 20 JUN 2025

AFFIDAVIT ON BEHALF OF THE APPLICANT

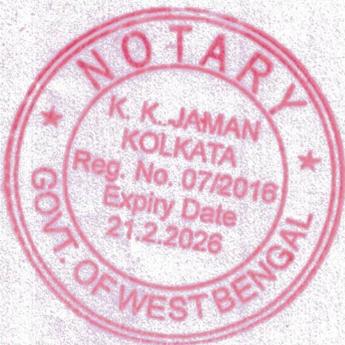
I, Nandini Chakravarty, wife of Kunal Chakravarty, aged about 70 years, by faith Hindu, by occupation - business, residing at 49/5, P.G.M. Shah Road, Kolkata, West Bengal - 700033 do hereby solemnly affirm say as follows:-

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.



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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 has once again resulted in the flooding of the adjacent villages of Nimerhati, Purbannapara and Makardah during the current 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 disbursal of harmful effluents onto the local waterbodies. Please find attached the photographs of the spillage of waste oil & acidic effluents onto the waterbody at the premises of the applicant due to flooding of the area – Appendix A



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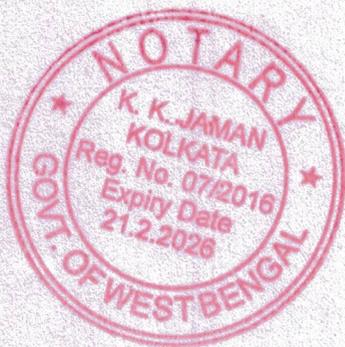
7. Moreover, the emission of the effluent gases from the Saraswati Industrial Complex still persists whereby open burning of rubber, plastics, industrial & chemical waste are burnt causing immense respiratory problems for the local residents.
8. Unless immediate effective measures are taken up to stop 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.

Mandi Chakraborty

DEPONENT

Identified by

Debasish Chowdhury
Debasish Chowdhury Advocate
Alipore Juages Court
Kol-70002,
WB/929/1983

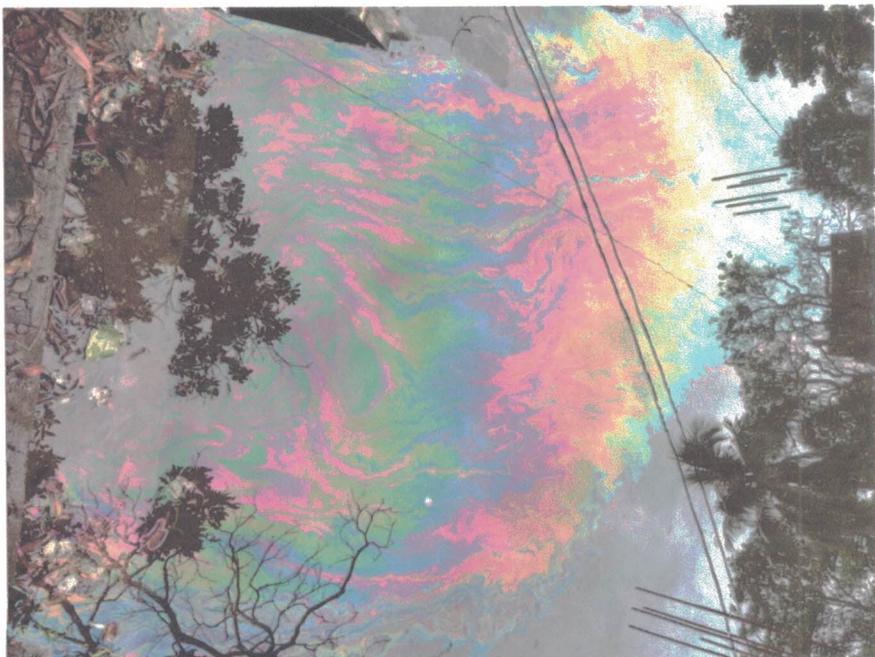


solemnly declare and affirm
before me on identification under
the notaries Act

Kazi Khalekujaman

Kazi Khalekujaman
Notary, Govt. of West Bengal
Regn. No.: 07/2016

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APPENDIX-A