



**BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
ORIGINAL APPLICATION NO. 145 OF 2025**

IN THE MATTER OF:

M/s Calstar Sponge Limited.

...Applicant

-Versus-

Ministry of Environment, Forest & Climate Change and Ors. ...Respondents

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NDoH- 30.10.2025

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Date: 27.10.2025

Place: Kolkata

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SETTLED BY:

Mr. Sanjay Upadhyay
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**BEFORE THE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
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**REJOINDER ON BEHALF OF THE APPLICANT TO THE REPLY
AFFIDAVIT DATED 18.09.2025 FILED ON BEHALF OF MINISTRY
OF ENVIRONMENT, FOREST AND CLIMATE CHANGE.**

1. That the Applicant has filed the present Original Application under Section 14 read with Section 18 of the National Green Tribunal Act, 2010 challenging the arbitrary classification and consequent in-action of the Ministry of Environment, Forest and Climate Change (Respondent No.1) and the West Bengal Pollution Control Board (Respondent No. 2), to keep the proposal dated 05.04.2024 of the Applicant herein for grant of Environment Clearance for the expansion of existing plant as pending, till action under Section 15 read with Section 19 of Environment Protection Act, 1986, is not taken by the Respondent No. 2 and consequently stalling the Applicant's expansion project in question.
2. That the project is kept pending for appraisal falsely putting it under the Notification dated 14.03.2017 and despite the fact that the existing unit has been expanded three times in the last eighteen years and is now being punished on the wrong pretext that the Unit needed a clearance way back in 2007. The fact has already been explained as to how it does not come within the purview of the EIA Notification 2006, once the Industrial Area itself has a prior Environmental Clearance of which the unit was a part and recognised as such. The same was accepted by SEIAA & MOEF when they appraised the proposal three times, including an evaluation of its past

existence and compliance with the conditions stipulated in the previous Environmental Clearances, however no deficiency was ever noted by either MoEF&CC or SEIAA. The said Environment Clearance's validity has also been extended twice meaning thereby, that the Project was assessed by the MOEF&CC and only then the validity was extended. Despite this, the Respondent No. 1, after eleven years it decided to change its stand retrospectively and decided to initiate action under Section 15 read with Section 19 of the Environment Protection Act, 1986. That it is the case of the Applicant that neither the prosecution nor the issue of consideration of the present expansion proposal as a violation case, on account of its establishment in 2007, which has been raked up now as a violation, is tenable in law.

3. That this Hon'ble Tribunal vide Order dated 19.08.2025 was pleased to issue notices in the Original Application No. 145 of 2025 to the Respondents, to file their responses to the averments in the Original Application within four weeks.
4. That in furtherance of the Order dated 19.08.2025, the Ministry of Environment, Forests and Climate Change has filed its reply on 18.09.2025.
5. That on 22.09.2025 this Hon'ble Tribunal has given the liberty to the Applicant herein to file its Rejoinder to the Reply dated 18.09.2025 of the Respondent No. 1. The present Rejoinder is being filed in furtherance of the liberty so given by this Hon'ble Tribunal.
6. That at the outset the Applicant denies and disputes all the submissions and contents of the above Reply dated 18.09.2025 as factually and legally incorrect, as if traversed seriatim, and no submissions/ contents would be deemed to be admitted for want of a specific denial.

7. That in response to the reply of the Respondent No. 1, the Applicant herein seeks to submit certain preliminary submissions along with para wise replies, which, in the humble opinion of the Applicant herein, are crucial for a holistic adjudication of the present Application.

PRELIMINARY SUBMISSIONS

8. That the Environment Clearance (EC) for installation and operation of 2x100 TPD Sponge Iron Units – for the said project had already been obtained by the Asansol Durgapur Development Authority (ADDA), Respondent No 3, vide Environment Clearance dated 06.11.2006 from MoE&F. Further the Applicant vide letter dated 22.10.2009 (*Annexure A/13, Pg 105 of Application*) had clarified to the SEIAA that EC for setting up of 2x100 TPD Sponge Iron Plant at Jamuria Industrial Estate was obtained by ADDA vide EC dated 06.11.2006 and the said clarification was accepted and the SEIAA granted the EC dated 03.02.2010 (*Annexure A/17, Pg 127-130 of Application*) for the second expansion of the project of the Applicant.
9. That after the setting up of the initial 2x100 TPD Sponge Iron Unit by the Applicant in the year 2006, the unit was granted expansion three times by both the MOEF & CC (earlier MOEF) and SEIAA i.e., by first expansion EC dated 07.08.2009 granted by SEIAA (*Annexure A/8, Pg 84-87 of the Application*), second expansion EC dated 03.02.2010 granted by SEIAA (*Annexure A/17, Pg 127-130 of Application*), and third expansion EC dated 20.05.2011 granted by MOEF (*Annexure A/21, Pg 139-145 of Application*). During grant of these EC's the existing units and their ECs were duly examined and on being satisfied with them further ECs were issued. It is pertinent to reiterate that, the EC issued by MOEF to the applicant in 2011 duly mentions the details of all earlier existing unit including 2 x 100 TPD sponge iron unit in question. This EC dated 2010

was issued by MOEF duly accepting the EC granted to Asansol Durgapur Development Authority to Jamuria Industrial Area as the valid EC for the 2 x 100 TPD sponge iron unit set up by the applicant. Hence this act of MOEF to reclassify the unit as a violator in 2019 for the period 2007 to 2009 is not only bad in law but is also a violation of principles of natural justice.

10. Further, as stated earlier, the SEIAA and MOEF & CC have also extended the validity of the above-mentioned ECs on 18.08.2017 (*Annexure A/24, Pg 159 of Application*) and 23.07.2018 (*Annexure A/25, Pg 160-161 of Application*) without raising any question or alleging the Applicant's proposal to be a case of violation.
11. That while considering the earlier expansion proposals of the Applicant, SEIAA and MoEF&CC undertook detailed scrutiny of the Applicant's proposals, including compliance with the conditions stipulated in the previous ECs, and no shortcoming was ever observed by SEIAA and MoEF&CC. In this regard, the Applicant provided all explanations and clarifications as sought by SEIAA and MoEF&CC and the same were duly considered and accepted. Since the Applicant has already been granted ECs for expansion on three occasions and validity of said ECs have also been extended on two occasions, this gives rise to the doctrine of legitimate expectation that the Applicant's unit is operating after obtaining all the requisite permissions and that there is no violation on the Applicant's part. There are catena of decisions in this regard and the Applicant reserves its right to raise the same during the course of the arguments. The OM dated 07.11.2014 (*Annexure A/22, Pg 146-147 of the Application*) issued by the MoEF&CC also provides that in case certain violations were committed by project proponent but the State did not file a case, then project proponent would not be considered at fault. Further a

positive duty is cast on the Respondent No.1 to reasonably explain the delay in processing the fourth expansion application and its conduct of raising allegations of violation of EIA Notification, 2006 after about 13-14 years since the establishment of the plant as it is clearly evident that on earlier occasions it has accepted the unit to be in compliance.

12. That arguendo, if it is accepted for the time being that the 2x100 TPD Sponge Iron Unit has not obtained the EC before the cut-off date of 30.06.2007 then it is humbly submitted that the later grant of ECs on three occasions for expansion would amount to grant of the ex-post facto EC for the 2x100 TPD Sponge Iron Unit that with the grant of EC on 07.08.2009 it ceases to be a violator.
13. Thus, the illegality if any, has already been regularised on 07/08/2009. So, now the allegation of violations is untenable in law. The act of MOEF in alleging the unit as a violator and not completing the credible action from the period 2019 to 2024 is highly questionable. The WBPCB asked MOEF & CC to clarify about the Applicability of the law vide letter dated 05.11.2024, MOEF & CC did not furnish the requested clarification till the filing of this Application by the applicant. It is only now that the State PCB in its Affidavit dated 17.10.2025 (served on 26.10.2025) has confirmed that they will taking action under Environment Protection (Manner of Holding Inquiry and Imposition of Penalty) Rules, 2024. A true copy of Letter dated 05.11.2024 is marked and annexed as **ANNEXURE A/50**.
14. That MOEF& CC has referred in its reply dated 18.09.2025 to the judgement dated 16.05.2025 passed by Hon'ble Supreme Court in the case titled "*Vanashakti vs. Union of India 2025 INSC 718*" and stated it as the reason for not proceeding with the application for grant of 4th expansion of the Applicant. It is humbly submitted that MOEF & CC has erred in its

interpretation of the Hon'ble Supreme Court's judgement in "*Vanashakti vs. Union of India 2025 INSC 718*". The Hon'ble Supreme Court has categorically said that all EC's granted till date are valid and will remain to do so and it has nowhere stated in its order that further EC applications of an Applicant are to be kept on hold. As such this interpretation of MOEF & CC to not proceed with the Application for grant of EC for the 4th expansion of the Applicant is bad in law and goes against the Hon'ble Supreme Court's judgment dated 16.05.2025.

15. That the Hon'ble Supreme Court in "*Vanashakti vs. Union of India 2025 INSC 718*" also adopted a practical and a proportionate approach wherein ordered that the ECs already granted till the date of judgment under the 2017 Notification and the 2021 OM shall remain unaffected by the judgement. Thus, in arguendo same principle may also be applied to the case of the Applicant. Further, it is also pertinent to note that the proposal dated 05.04.2024 was for the expansion of the unit and the original recommendation of the EAC was to initiate action under Section 15 read with Section 19 of the Environment Protection Act, 1986, although it is clearly not tenable in law. However, the Applicant is ready to comply with any additional condition for better environmental outcome in the proposed expansion, which may be directed to be considered by this Hon'ble Tribunal.

PARA WISE REPLY

16. That the contents of para 1-3 of the Reply merit no response.
17. That the contents of para 4 has reiterated the cause of action of the Applicant for filing the present Application i.e., causing undue delays in consideration of the proposal dated 05.04.2024 without any justifiable reason. Thus, merits no response for the same and the contents of the Original Application may be read as a response to the same.

18. That the contents of para 5-6 reproduces the facts about the issuance of EIA, Notification 2006 and its contents and thus, merit no response.
19. That the contents of para 7 mention about the various stages that the proposal undergoes at the time of appraisal under the EIA Notification, 2006, for the grant of EC, which are not disputed, thus merit no response.
20. That the contents of para 8 reiterate the facts and laws as per EIA Notification, 2006 which are not disputed, thus merit no response.
21. That the contents of para 9 merit no response as it only reiterates the Entry 3 (a) of the Schedule-I of the EIA Notification, 2006.
22. That contents of para 10 are true and it is submitted that the Applicant unit was granted ECs on 07.08.2009, 03.02.2010 and 20.05.2011 for expansion and the validity of the said ECs were subsequently extended by both the SEIAA and the MOEF & CC on 18.08.2017 and 23.07.2018 respectively.
23. That the contents of para 11, which are either a matter of record or which pertains to the meetings of EAC, merit no response and rest of the contents are denied. The Applicant's unit was covered in the EC dated 06.11.2006 (*Annexure A/4, Pg 66-71 of Application*) granted to ADDA for the establishment of Jamuria Industrial Estate and this EC is before the cut off date of 30.06.2007 as per circular dated 21.11.2006 of MOEF. Further, it is humbly submitted that the unit has later obtained three ECs for expansion from both SEIAA and MOEF & CC and both the authorities had granted the said ECs only after getting a sufficient explanation from the Applicant regarding the prior compliances of the 2x100 TPD Sponge Iron Unit of the Applicant.
24. That the contents of para 12 are a matter of record and it is an admitted fact that only an action under Section 19 of the EPA Act, 1986 was recommended even in the TOR dated 27.06.2019 (*Annexure A/30, Pg 193-208 of Application*). Even though the stand of the Applicant is that there

is no violation on its part and the violation, if any, has already been regularised by both SEIAA and MOEF & CC, but it is ready to comply with any additional condition for better environmental outcome in the proposed expansion, which may be directed to be considered by this Hon'ble Tribunal.

25. That the contents of para 13 are admitted fact thus merit no response. However, it is pertinent to clarify here that the proposal dated 05.04.2024 is in continuation of the initial proposal dated 30.08.2018 (*Annexure A/26, Pg 162-178 of Application*) and which is before the OM dated 07.07.2021 and it is only an expansion proposal for a unit which already had the EC for its existing units, so the violation Notification dated 14.03.2017 is also not applicable to the project.
26. That the contents of para 14 are denied and the onus is upon the Respondent to explain the delay in considering the expansion proposal. Further, it is humbly submitted that the matter was wrongfully referred to the IA Division or Legal Monitoring Cell with respect to appraisal of said proposal as per MOEF & CC Notification 14.03.2017 pertaining to violation, because it was not a case of violation, rather it was only for expansion of the existing unit which is running with all the legal permissions especially ECs at the time of making the proposal.
27. That the contents of para 15 are denied. It is submitted that the EAC or MOEF & CC or their regional offices also have the power to make a complain under Section 19 of the EPA, 1986 and there is no mandatory requirement that such an action can only be initiated by the SPCB. Thus, deferring the proposal with a direction to SPCB to initiate the action is only a dilatory act which will delay the appraisal of the proposal which in the humble submission of the Applicant has caused him huge financial and as well mental hardship, which the Respondents are liable to compensate.

28. That the contents of para 16 are denied for want of knowledge. Further it is pertinent to mention here that the Respondent No. 1 has issued a clarification letter dated only on 10.09.2025 to WBPCB to initiate against the Applicant's Unit only as per the provisions of Environment Protection (Manner of holding Inquiry and Imposition of Penalty) Rules, 2024. It is humbly submitted that communication dated 04.09.2024 (*Annexure A/45, Pg 292-293 of Application*), 06.09.2024 (*Annexure A/46, Pg 294-295 of Application*), 05.11.2024 and 02.01.2025 (*Annexure A/47, Pg 296-297 of Application*), were unanswered by the Respondent No.1 and it was only when this Hon'ble Tribunal has issued notices in the present Original Application, the Respondent No.1 has now sent the clarification to the WBPCB. Thus, this conduct also corroborates the submission of the Applicant that the only motive of the Respondent No.1 was to cause undue delay in the appraisal of the proposal of the Applicant.
29. That the contents of para 17 are denied as false and without any merit. It is humbly submitted that the proposal is for proposed expansion of the project and the 2x100 TPD Sponge Iron Unit of the Applicant has already been appraised while granting the EC dated 06.11.2006 (*Annexure A/4, Pg 66-71 of Application*) to ADDA. Further the project was later on given ECs for expansion on 07.08.2009 by SEIAA (*Annexure A/8, Pg 84-87 of Application*), 03.02.2010 by SEIAA (*Annexure A/17, Pg 127-130 of Application*) and 20.05.2011 by MoEF (*Annexure A/21, Pg 139-145 of Application*). Thus, on all these three occasions the unit in existence for further regularisation and violation if any (which in humble submissions are not) have already been granted EC. Arguendo, the Hon'ble Supreme Court in the Vanashakti judgement (Supra) has itself ordered not to disturb the ECs already granted for violation under Notification dated 14.03.2017 and OM dated 07.07.2021 and the same may be applicable to the project

of the Applicant. However, it is clear that the said Judgment has no application on the present case as is brought out from the previous paragraphs.

30. That in response to the para 18 it is humbly submitted that the balance of convenience as well as the facts and circumstances and the precedents of the courts are in favour of the Applicant herein and the Respondent No.1 may be directed to process the proposal of the Applicant till the disposal of this Application.

In view of the above-mentioned facts and circumstances in the present rejoinder read with the contents of Original Application it is humbly prayed that contents of the Reply of the Respondent No.1 may be discarded as devoid of any merit or logical submissions.

Date: 27.10.2025

Place: Kolkata

DRAWN & FILED BY:



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SETTLED BY:

Mr. Sanjay Upadhyay
[Senior Advocate]



**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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M/s Calstar Sponge Ltd.

...Applicant

-Versus-

Ministry of Environment, Forest & Climate Change & Ors. ...Respondents

AFFIDAVIT

I, Soumya Acharya, S/o Shib Sankar Acharya, aged about 28 years am the Authorized Signatory for M/s Calstar Sponge Ltd. having its registered office at 18, R.N. Mukherjee Road Kolkata, West Bengal, 700001, do hereby solemnly affirms and declares as under:

1. That I am fully conversant of the facts and circumstances of the matter and am competent to swear this affidavit.
2. The contents of the accompanying Rejoinder are true and current to the best of my knowledge and have been drafted by the counsel on my instructions and nothing material has been concealed therefrom.
3. That the Annexures in the accompanying Rejoinder are true and correct to the best of my knowledge.

Calstar Sponge Ltd

Soumya Acharya

Authorised Signatory

DEPONENT

VERIFICATION:

Verified at on this day of, 2025 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed therefrom.

**Solemnly Affirmed & Declared Before
me on Identification of Ld. Advocate**

[Signature]

**AMITAVA GHOSH
NOTARY, GOVT. OF INDIA
REGN NO. 56596
HIGH COURT, CALCUTTA**

Calstar Sponge Ltd

Soumya Acharya

Authorised Signatory

DEPONENT

Identified by
[Signature]
**Himadri Chakraborty
Advocate
CJM Court, Calcutta
Enrolment No. WB/154-A/199**

24 OCT 2025



LIFE
Lifestyle for
Environment

WEST BENGAL POLLUTION CONTROL BOARD

(Department of Environment, Government of West Bengal)

Paribesh Bhawan, 10A, Block – LA, Sector III, Bidhannagar

Kolkata – 700 106, Ph.: 2335-9088/8861/7428, Fax : 2335-2813

Website: www.wbpcb.gov.in, Email: net.wbpcb-wb@bangla.gov.in

Memo No.

-6L/WPB/2002

Dated: 05/11/2024

To

Shri Dinesh Runiwal,
Scientist 'F'/Director,
Ministry of Environment Forest and Climate Change,
Indira Paryavaran Bhawan,
Vayu Wing, 3rd Floor, Jor Bagh Road, Aliganj,
New Delhi – 110003.

Sub : Request to initiate credible action on the violation by invoking powers under section 15 read with section 19 of the Environment (Protection) Act, 1986 in respect of proposed expansion project of M/s Calstar Sponge Limited (located at Jamuria, Mouza – Ikra, Jamuria Industrial Estate, Dist – Burdwan, West Bengal) submitted to the Ministry vide proposal No. IA/WB/IND1/453340/2023 – reg.).

Ref : F. No. IA-J-11011/655/2009-IA-II(I) dated 06/09/2024.

Sir,

With reference to the above, this is for your information that your request to initiate legal action against the company (i.e. owner of the unit having full control over the affairs of the company) during the violation period by invoking powers under section 15 read with section 19 of the Environment (Protection) Act, 1986 for the period for which the unit has been established and operating without prior environmental clearance, can not be complied with as you will appreciate that the Notification issued by MoEF vide dated 11/08/2023 on Environment Protection Act, 1986 under Jan Vishwas (Amendment of Provisions) Act, 2023 clearly mandated that :

'15. Penalty for contravention of provisions of Act, rules, orders and directions.—(1) Where any person contravenes or does not comply with any of the provisions of this Act or the rules

made or orders or directions issued thereunder for which no penalty is provided, he shall be liable to penalty in respect of each such contravention which shall not be less than ten thousand rupees but which may extend to fifteen lakh rupees.

(2) Where any person continues contravention under sub-section (1), he shall be liable to additional penalty of ten thousand rupees for every day during which such contravention continues.

15A. Penalty for contravention by companies.—(1) Where any company contravenes any of the provisions of this Act, the company shall be liable to penalty for each such contravention which shall not be less than one lakh rupees but which may extend to fifteen lakh rupees.

(2) Where any company continues contravention under sub-section (1), the company shall be liable to additional penalty of one lakh rupees for every day during which such contravention continues.

15B. Penalty for contravention by Government Department.—(1) Where contravention of any of the provision of this Act has been committed by any Department of the Central Government or the State Government, the Head of the Department shall be liable to penalty equal to one month of his basic salary: Provided that he shall not be liable for such contravention, if he proves that the contravention was committed without his knowledge or instructions or that he exercised all due diligence to prevent such contravention.

(2) Where any contravention under sub-section (1) is attributable to any neglect on the part of, any officer, other than the Head of the Department, the officer shall be liable to penalty equal to one month of his basic salary: Provided that he shall not be liable for the contravention, if he proves that he exercised all due diligence to avoid such contravention.

15C. Adjudicating officer.—(1) The Central Government, for the purposes of determining the penalties under this Act, may appoint an officer not below the rank of Joint Secretary to the Government of India or a Secretary to the State Government to be the adjudicating officer, to hold an inquiry and to impose penalty in the manner, as may be prescribed: Provided that the Central Government may appoint as many adjudicating officers as may be required.

(2) The adjudicating officer may— (a) call upon any person alleged to have contravened or not complied with the provisions of this Act and the rules made thereunder or having the knowledge of the facts and circumstances of the case; (b) require such person to produce any record, register or other document in his possession or any other document, which in the opinion of the adjudicating officer may be relevant to the subject-matter.

(3) The adjudicating officer shall, after giving the person a reasonable opportunity of being heard in the matter, and if, on such inquiry, he is satisfied that the person concerned has contravened or has not complied with the provisions of this Act or the rules made thereunder, he may impose such penalty as he thinks fit in accordance with the provisions of sections 14A, 14B, 15, 15A or section 15B, as the case may be.

- (4) The adjudicating officer, while adjudicating the quantum of penalty under sub-section (3), shall have due regard to the following, namely:— (a) the population and the area impacted or affected due to such contravention or non-compliance;
- (b) the frequency and duration of such contravention or non-compliance;
- (c) the vulnerability of the class of persons likely to be adversely affected by such contravention or non-compliance;
- (d) the damage caused or likely to be caused to any person, as a result of such contravention or non-compliance, if any;
- (e) the undue gain derived out of such contravention or non-compliance; and
- (f) such other factor, as may be prescribed.
- (5) The amount of penalty imposed under the provisions of sections 14A, 14B, 15, 15A or 15B, as the case may be, shall be in addition to the liability to pay relief or compensation under section 15 read with section 17 of the National Green Tribunal Act, 2010 (19 of 2010).

As per your request the case is to be initiated now post implementation of new Environment Protection Act, 1986 under Jan Vishwas (Amendment of Provisions) Act, 2023. As communicated by you that EAC will be able to take up the appraisal of the proposal for granting of EC to M/s Calstar Sponge Limited (located at Jamuria, Mouza – Ikra, Jamuria Industrial Estate, Dist – Burdwan, West Bengal), only after action u/s 19 of the Environment Protection Act, 1986 as prevailing that time is taken. However, it is not clear at our end whether any action can be initiated in the present date under the Environment Protection Act, 1986, when new Environment Protection Act, 1986 under Jan Vishwas (Amendment of Provisions) Act, 2023 come into force based upon the offence committed during the operation of the previous Act. For example can a case be started under the IPC post the introduction of Bharatiya Nagarik Suraksha Sanhita, 2023 from the 1st July, 2024.

A clarification in this regard may kindly be provided for taking necessary action from this end.

This is issued with the approval of the competent authority in the State Board.

Sd/-
(Chief Engineer, EIM Cell)
West Bengal Pollution Control Board

Memo No. 378/2(2)-6L/WPB/2002

Dated: 05/11/2024
TT

Copy for information to :

1. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Shahdara – 110032.
- ✓ 2. M/s. Calstar Sponge Limited, 18, R.N. Mukherjee Road, Kolkata – 700001.

[Signature]
11/11/2024

(Chief Engineer, EIM Cell)
West Bengal Pollution Control Board



Service in M/s Calstar Sponge Ltd. Vs. MOEF & CC & Ors. [OA 145/2025/EZ]

1 message

ELDF <eldflegal@gmail.com>

Mon, Oct 27, 2025 at 5:20 PM

To: Dipanjan Ghosh <dpnjnghsh0@gmail.com>, Avirup Roy Sanyal <AvirupRS@gmail.com>, Rashmi Bothra <rashmibothra24@gmail.com>

Cc: Shubham Upadhyay <Shubham@eldfindia.com>, Surya Gupta <surya@eldfindia.com>, Anukriti Bajpai <anukriti@eldfindia.com>

Dear Sir/Ma'am,

Please find attached copy of the **Rejoinder** on behalf of the Applicant to the Reply Affidavit dated 18.09.2025 of MOEF in the above-mentioned case.

Thanks & Regards

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Sameer Manher*Clerk**Enviro Legal Defence Firm**29, Presidential Estate LGF,**Nizamuddin East New Delhi – 110013**Ph. No. 011-40573181*

 **Rejoinder.pdf**
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