

**BEFORE HON'BLE NATIONAL GREEN TRIBUNAL  
(NGT), NEW DELHI**

**O.A NO. 537/2022**

**WITH**

**O.A. NO. 426/2023**

**WITH**

**O.A. NO. 457/2023**

**IN THE MATTER OF:**

**MUKESH KUMAR CHAUHAN**

**...APPLICANT**

**VERSUS**

**STATE OF U.P & ORS.**

**...RESPONDENTS**

**INDEX**

<b>S.NO</b>	<b>PARTICULARS</b>	<b>PAGE NO.</b>
1.	ADDITIONAL RESPONSE ON BEHALF OF THE RESPONDENT NO 8 I.E. M/S P&P EXIM PVT. LTD. IN COMPLIANCE OF ORDER DATED 13.11.2025 ALONG WITH AFFIDAVIT.	1-7
2.	ANNEXURE-1 PHOTOGRAPHS OF THE TRUCKS BEING COVERED WITH TARP	8-10
3.	ANNEXURE-2 PHOTOGRAPHS OF THE ROADS SPRINKLED WITH WATER.	11
4.	ANNEXURE-3	

PHOTOGRAPHS OF THE PLANTATION DONE.	12
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**THROUGH COUNSEL**

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**DATE**

1836

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**ADDITIONAL RESPONSE ON BEHALF OF THE  
RESPONDENT NO. 8 I.E. M/S P&P EXIM PVT. LTD. IN  
COMPLIANCE OF ORDER DATED 13.11.2025**

**MOST RESPECTFULLY SHOWETH:**

1. That the above-captioned matter is pending adjudication before this Hon'ble Tribunal and is listed on 16.12.2025.
2. That the reply to the Original Application filed by the Applicant was duly filed by the Respondent no.8 as is evident vide order dated 28.08.2023.
3. That vide order dated 20.03.2024, this Hon'ble forum directed the Respondent no. 5 to 8 to file additional responses with respect to CSR activities in the areas of the railway good-shed and other

additional remedial measures which was duly filed by the Respondent no. 8 as is evident vide order dated 19.09.2025.

4. That vide order dated 13.11.2025, this Hon'ble forum further directed the Respondent no. 8 to file additional response regarding the remedial measures taken to curb air pollution generated in the transportation of the material by respondent no. 7 & 8.

5. That the Respondent no. 8 has been taking the following measures-

a. The Respondent no.8 completely covered the trucks with tarpaulin covers to control the spread of dust that gets generated during the process of transportation of the clinker at the railway siding.

**(Photographs of the trucks being covered are annexed herewith as Annexure-1).**

b. That the Respondent no. 8 makes sure that the trucks are not overloaded with clinkers. It is made sure that the clinkers are filled up to an adequate height which further prevents the dust from escaping during the movement of the trucks and further prevents the clinkers from falling during the movement. An adequately loaded truck also minimizes fuel consumption which

consumption which in turn curbs emission of black smoke due to incomplete fuel combustion.

- c. That the Respondent no. 8 also ensures that the clinkers are sprayed with water before loading it on the trucks which ensures that fugitive dust is minimized and in turn curbs air pollution. It is further submitted that the Respondent no. 8 has also deployed fog cannons at loading points to reduce dust emission.
- d. That the Respondent no. 8 also ensures that the trucks are not driven beyond a speed of 25-30 km/hr which further ensures minimal air turbulence around the truck and thus prevents resuspension of dust in the air.
- e. That a water tanker has also been deployed to sprinkle water on the roads which further ensures that the dust does not spread in the air during the movement of the truck.

**(Photographs of the roads sprinkled with water is annexed herewith as Annexure-2).**

f. That additionally, a green belt is being maintained near the railway siding which further acts as a dust barrier.

**(Photographs of the plantation done are annexed herewith as Annexure-3)**

6. That it is respectfully submitted that the actions of Respondents have struck a perfect balance between economic development and environmental pollution and adequate measures are being taken by the answering respondent to mitigate air pollution in a proactive manner

### **PRAYER**

In the view of above facts and circumstances, it is most humbly prayed that this Hon'ble Court may be pleased to:

1. To discharge the liability of the answering Respondent in the present matter; and
2. Pass any other order/ direction that this Hon'ble Court may deem fit and appropriate in the nature and circumstances of the case.

P & P EXIM PVT. LTD.

*Banwag*  
Director

RESPONDENT NO. 8

THROUGH COUNSEL

*J. K. K.*

AK ASSOCIATES  
ADVOCATES AND LEGAL CONSULTANTS  
HAVING OFFICE AT:  
3/31, 1<sup>ST</sup> FLOOR, WEST PATEL NAGAR,  
NEW DELHI-110 008

DATE

SL NO. 077 ...DT. 12-12-2024

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**AFFIDAVIT**

I, Praveen Sarawagi, aged 40 years, S/o Shri Narayan Prasad Sarawagi, R/o flat No. 9PH 92/1B Moulana Abdul Kalam Azad Sarani, Kankurgachi Kolkata West Bengal. Designated as Director of M/s. P & P Exim Pvt. Ltd. (respondent no. 8). Do hereby solemnly affirm and declare as under: -

1. That I am the director of respondent no. 8 and I am well conversant with the facts & circumstances of the present case and as such, I competent to depose the presSent Affidavit.
2. That the accompanying reply has been drafted by the counsel for the respondent no. 8 under my instructions and the contents thereof are true and correct to my knowledge. The contents of the accompanying reply are explained to me in a vernacular language and the contents of the

P &amp; P EXIM PVT. LTD.

  
Director

12 DEC 2025

accompanying reply may be read as part and parcel of this affidavit, which are not being repeated herein for the sake of brevity.

P & P EXIM PVT. LTD.

*Barawag*  
Director

DEPONENT

VERIFICATION: -

Verified at Kolkata on this 12<sup>th</sup> day of December, 2025 that the contents of my above affidavit are true and correct to my knowledge on the basis of the record maintained by the applicant bank during ordinary course of its business. No part of this Affidavit is false and belief and nothing material has been concealed there from.

P & P EXIM PVT. LTD.

*Barawag*  
Director

DEPONENT

Director



Solemnly Affirm & Declared Before me on Identification of Ld. Advocate

*[Signature]*

SANJAY KUMAR DAS  
NOTARY GOVT. OF INDIA  
REGN. NO. 54436/25  
Chief Judicial Magistrate  
Kolkata-700001

12 DEC 2025

Identified by

*[Signature]*

Himadri Chakraborty  
Advocate

CJM Court, Calcutta

Enrolment No. WB/154-A/11240







ANNEXURE 2





1848