

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

APPEAL NO. 53 OF 2026

IN THE MATTER OF

M/S JAYPEE ENTERPRISES

....APPELLANT

VERSUS

HARYANA STATE POLLUTION CONTROL BOARD
& ORS

....RESPONDENTS

**AFFIDAVIT ON BEHALF OF THE APPELLANT
REGARDING COMPLIANCE OF THE ORDER
DATED 30.04.2026**

(FOR INDEX:-Kindly See Inside)

**New Delhi
Dated: 04.07.2026**

Filed BY

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Mansi
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New Delhi
Dated: 04.07.2026

Filed BY

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**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

**APPEAL NO. 53 OF 2026
U/S 16 OF N.G.T ACT, 2010**

IN THE MATTER OF

M/S JAYPEE ENTERPRISES
Through its Proprietor
Jitender Pal Singh
Plot No. 11, Sector G, Sector 7B
Model Economic Township
Jhajjar, Haryana: 124501APPELLANT

VERSUS

1. HARYANA STATE POLLUTION CONTROL BOARD
Through Member Secretary
Sec 6, Panchkula
Haryana:-134109
Phone - 0175-2581005
Email - hspcbho@gmail.com
2. COMMISSION FOR AIR QUALITY MANAGEMENT
Through Member Secretary
17th floor, Jawahar Vyapar Bhawan
Tolstoy Marg, New Delhi: - 110001
Email:- arvind.nautiyal@gov.in
Phone:- 011-23701197RESPONDENTS

**AFFIDAVIT ON BEHALF OF THE APPELLANT
REGARDING COMPLIANCE OF THE ORDER
DATED 30.04.2026**

TO,

THE HON'BLE CHAIRPERSON
AND HIS OTHER COMPANION JUDGES
OF THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

MOST RESPECTFULLY SHOWETH:

1. That the present Appeal has been preferred under Section 16 of the National Green Tribunal Act, 2010 challenging the impugned order dated 03.03.2026 passed by the Haryana State Pollution Control Board (HSPCB), whereby an Environmental Compensation of ₹23,10,000/- has been imposed upon the Appellant.

2. That the present Appeal raises substantial questions regarding the legality and validity of the impugned order, inter alia, on the grounds that the Environmental Compensation has been imposed without issuance of any Show Cause Notice, without affording any opportunity of hearing, and without supplying the inspection report or any material relied upon by the Respondent Board. It has further been specifically pleaded that the impugned order itself mentions an incorrect address, namely Plot No. 14,

whereas the Appellant's industrial unit is situated at Plot No. 11, thereby demonstrating complete non-application of mind. The Appellant is also operating with valid Consent to Establish and Consent to Operate granted by the Respondent Board.

3. That this Hon'ble Tribunal, vide order dated 30.04.2026, while granting interim protection to the Appellant, was pleased to direct that the operation of the impugned order shall remain stayed subject to the Appellant depositing 25% of the Environmental Compensation, out of which 10% was directed to be deposited within one month, the remaining 15% within the next one month, and furnishing adequate security by way of a security bond with one surety for the balance amount.

4. That the Appellant respectfully submits that, with utmost respect for the orders passed by this

Hon'ble Tribunal and in order to demonstrate its bona fides, the Appellant has duly complied with the first condition of the order by depositing 10% (i.e. 2,31,000/-)of the Environmental Compensation with the Haryana State Pollution Control Board through 01.06.2026 within the time stipulated by this Hon'ble Tribunal. **The Copy of the NEFT Transaction/Receipt is annexed herewith and marked as ANNEXURE A/1.**

5. That the Appellant has always held the orders of this Hon'ble Tribunal in the highest regard and has never intended to disregard or violate any direction passed by this Hon'ble Tribunal. The deposit of the initial 10% amount itself demonstrates the Appellant's bona fide intention to comply with the judicial directions to the fullest extent possible.
6. That, however, despite making sincere efforts, the Appellant has been unable to deposit the

remaining 15% of the Environmental Compensation solely on account of severe financial hardships. The Appellant is facing acute financial constraints due to reduced business operations, mounting operational expenses, and outstanding liabilities. The Appellant does not possess sufficient funds to arrange the remaining amount within the prescribed period.

7. That it is respectfully submitted that the inability to deposit the remaining amount is neither deliberate nor intentional. The default is purely involuntary and occasioned by genuine financial incapacity beyond the control of the Appellant.
8. That it is further submitted that if the interim protection granted by this Hon'ble Tribunal is vacated merely on account of the Appellant's present financial inability, the Appellant shall suffer irreparable injury. The manufacturing unit of the Appellant is entirely dependent upon a High

Tension (HT) electricity connection, and any coercive action, including electricity disconnection or recovery proceedings by the Respondent Board, would result in complete closure of the manufacturing operations, cancellation of vendor commitments, loss of livelihood of employees, and severe financial and reputational damage. Such losses cannot be compensated subsequently.

9. That the Appellant reiterates that it remains fully committed to complying with every direction passed by this Hon'ble Tribunal.
10. That the present application is being filed bona fide and in the interest of justice.

PRAYER:

In view of the facts and circumstances stated hereinabove, it is most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to:

- a) Take on record the compliance made by the Appellant by depositing 10% of the Environmental Compensation in terms of the order dated 30.04.2026.
- b) Continue the interim protection granted vide order dated 30.04.2026 and restrain the Respondents from taking any coercive steps against the Appellant during the pendency of the present Appeal; and
- c) Pass such other or further order(s) as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the present case.

AND FOR THIS ACT OF KINDNESS, THE APPELLANT SHALL, AS IN DUTY BOUND, EVER PRAY.

New Delhi
Dated: 04.07.2026

Through

Sharif Zaidi

Appellant

Mansil

**S.A. ZAIDI & MANSIL CHAHAL
ADVOCATES**

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
O.A. NO. 53 OF 2026**

IN THE MATTER OF

M/S JAYPEE ENTERPRISES

...APPELLANT

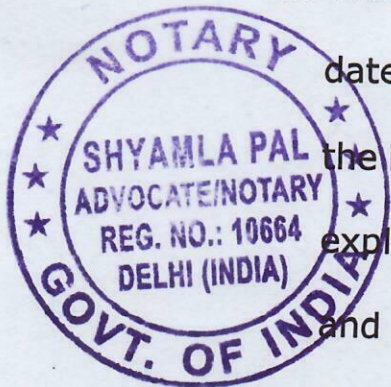
VERSUS

HARYANA STATE POLLUTION CONTROL BOARD & ORS.
RESPONDENTS

AFFIDAVIT

I, Jitender Pal Singh, Proprietor in M/s Jaypee Enterprises situated at Plot no 11, Sector-G, Sector-7B, Model Economic Township, Jhajjar, Haryana:-124501, presently at New Delhi do here by solemnly affirm and declare as under:

1. That I am the Appellant the above noted case therefore I am fully conversant with the fact of the case I am competent to sign and swear this Affidavit.
2. That the accompanying affidavit in compliance of order dated 30.04.2026 has been drafted by my counsel under the instruction of me and the same has been read over and explain to me in vernacular language and the same are true and correct to best of my knowledge and belief.
3. That the Contents of accompanying affidavit in compliance of order dated 30.04.2026 be read as part and parcel of this affidavit as the same are not repeated herewith for the sake of brevity.



4 JUL 2026

[Handwritten Signature]

DEPONENT

VERIFICATION

Verified at Delhi on this **4 JUL 2026** day of 2026 that the contents of my above Affidavit are true and correct to my knowledge and nothing material has been concealed there from.

[Handwritten Signature]

DEPONENT



ATTESTED

[Handwritten Signature]

NOTARY PUBLIC, DELHI
GOVT. OF INDIA

4 JUL 2026



Payment successful

₹2,31,000

From

JAY PEE ENTERPRISES
IDFC FIRST Bank ****6990

To

HARYANA STATE POLLUTION
CONTROL BOARD ECNGT
INDUSIND BANK ****3757

Payment mode

NEFT

Payment date

2:55 pm • 01 Jun, 2026

Transaction ID

IDFB6152M7743945



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