

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

**I.A No. 224 OF 2024
IN
O.A. No 142 OF 2024**

IN THE MATTER OF:

SURENDERAPPLICANT
Versus

STATE OF UTTAR PRADESH & ORSRESPONDENTS

**ADDITIONAL DOCUMENTS IN I.A 224/2024 IN
O.A NO. 142/2024 FILED ON BEHALF OF M/S
AL- NASIR EXPORTS PVT LTD.**

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New Delhi
Dated: 17.05.2024

Filed By:

Shaiq
Mansi
S.A.ZAIDI & MANSI CHAHAL
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2015/4P/2023
13/9/23

सेवा में

श्रीमान जिला मजिस्ट्रेट साहब
राजनगर, जनपद गाजियाबाद उत्तर प्रदेश।

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विषय: शिकायत विरुद्ध अल-नासिर एक्सपोर्ट प्राइवेट लिमिटेड,
पता: 2761, भूङ्गढ़ी, डासना, जिला गाजियाबाद उत्तर प्रदेश
को PCB के द्वारा सील करने के बावजूद भी उसके मालिक
के द्वारा लगातार मीट काटने व प्रदूषण फैलाने के सम्बंध में
शिकायत पत्र

महोदय

निवेदन यह है कि उपरोक्त मांस फैक्ट्री को दिनांक
18/08/2023 को जल प्रदूषण फैलाने तथा अन्य नियम व शर्तों
के उल्लंघन के कारण PCB के द्वारा सील कर दिया गया है।

1. यह कि उपरोक्त मीट की फैक्ट्री के द्वारा बराबर से होकर बहते
नाले के माध्यम से गंग नहर में दूषित जल डाला जा रहा है
तथा फैक्ट्री के अन्दर कई स्थान पर वाटर पम्प लगाकर भूमि के
अन्दर काटे गये पशुओं के रक्त व वैस्तेज को पम्प किया जा
रहा है जिससे इलाके में स्थित गांव का पानी भी दूषित हो गया
है तथा उसमें से काफी दुर्गंध आती है।
2. यह कि श्रीमान जी को अवगत कराना जरूरी है कि उपरोक्त
फैक्ट्री में केवल 180 पशुओं को काटने की ही परमिशन है परन्तु
इसके विपरीत लगभग 2000 पशु रोजाना काटे जाते हैं जिसमें
बीमार व बच्चे-पशु भी काटे जाते हैं
3. जो उपरोक्त फैक्ट्री के मालिक श्री नासिर कुरेशी है वो मौजूदा
विधानसभा-27 देहात मुरादाबाद से विधायक हैं तथा राजनीति में
इनका अहम स्थान है जिस कारण कोई इनके खिलाफ शिकायत
देने की चेष्टा नहीं कर पाता।

[Handwritten signature]

4. यह कि दिनांक 18/08/2023 को फैक्ट्री को PCB के द्वारा सील करने के बावजूद भी फैक्ट्री के अन्दर चोरी छुपे दूसरे गेट से पशुओं का काटा जाना जारी है तथा पहले की ही तरह रक्त व अन्य वैस्तेज के माध्यम से प्रदूषण फैलाया जा रहा है।
5. यह कि उपरोक्त फैक्ट्री पर गाजियाबाद विकास प्राधिकरण के 18 करोड़ रुपये काफी पहले से बकाया है परन्तु इस सम्बंध में भी उपरोक्त फैक्ट्री पर कोई कार्यवाही अभी तक नहीं की जा सकी है।
6. यह कि उपरोक्त नासिर कुरेशी व उसके परिवारजनों की अन्य फैक्ट्रियाँ जो हापुड़, गाजियाबाद व अन्य जिलों में धड़ल्ले से चल रही हैं जिससे उपरोक्त लोग भूमि के अन्दर तथा नहर नालों के माध्यम से पशुओं का रक्त व वैस्तेज प्रकृति में डालकर दूषित कर रहे हैं।
7. यह कि उपरोक्त फैक्ट्री को स्थाई रूप से सील कर लाईसेंस को रद्द किया जाना व दोषियों के खिलाफ कानूनी कार्यवाही किया जाना पर्यावरण की शुद्धता को बचाये रखने के लिए अत्यन्त आवश्यक है।

अतः श्रीमान जी से प्रार्थना है कि उपरोक्त तथ्यों को संज्ञान में लेते हुए उपरोक्त फैक्ट्री के मालिक व उसमें काम करने वाले लोगों के खिलाफ सख्त से सख्त कानूनी कार्यवाही करने की कृपा करें और फैक्ट्री को बंद कराकर उसका लाईसेंस रद्द करने की कृपा करें। आपकी अति कृपा होगी।

59/MCP
13/09/23

दिनांक 28-8-23


प्रार्थी

सुरेन्द्र पुत्र प्रकाश

पता: 82 शिबनपुरा, गाजियाबाद

उत्तर प्रदेश 201001

प्रतिलिपि-

1. श्रीमान चैयरमैन महोदय, गाजियाबाद विकास प्राधिकरण
जनपद गाजियाबाद उत्तर प्रदेश।
2. श्रीमान चैयरमैन महोदय, एन. जी. टी. फरीदकोट हाउस
कॉपरनिकस मार्ग नई दिल्ली-110001
3. माननीय मंत्री महोदय, श्री धर्मपाल सिंह, ऐमिनल हसबैन्डी, रुम
नम्बर 65/66, मैन विल्डिंग, यू0पी0 सैक्रेट्रीएट लखनऊ उत्तर
प्रदेश।
4. श्रीमान निदेशक महोदय, ऐडमिनिसट्रेशन एण्ड डेवोलपमेंट संजय
गांधी, ऐनिमल केयर सेंटर, बादशाह बाग लखनऊ, उत्तर प्रदेश।
5. श्रीमान अध्यक्ष महोदय, केन्द्रीय प्रदूषण नियंत्रण बोर्ड, परिवेश
भवन पूर्वी अर्जुन नगर, दिल्ली-110032
6. माननीय मुख्य मंत्री महोदय, उत्तर प्रदेश सरकार लखनऊ
7. माननीय प्रधानमंत्री महोदय, भारत सरकार दिल्ली।
8. माननीय गवर्नर महोदय, उत्तर प्रदेश सरकार लखनऊ
9. माननीय ग्रह मंत्री महोदय, ग्रह मंत्रालय, भारत सरकार दिल्ली
10. माननीय राष्ट्रपति महोदय, भारत सरकार राष्ट्रपति भवन नई
दिल्ली।



5

From
 Susendra s/o Prakash
 Ho No. 82, Shilbompuke
 Ghangalbad U.P.
 201001

To

The Chairman, N.S.T.
 Fardkot House, Lopesnicus
 Masg. New Delhi 110001



NATIONAL GREEN TRUST
 National Bench, No. 8
 Principal & Issuer of
 Receipts
 12 SEP 20
 Dairy No.....
 Signature.....

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

Original Application No. of 2023

IN THE MATTER OF:

Surendra
S/o Shri Prakash
R/o 82, Shibban Pura.
Ghaziabad-201 001

... Applicant

Versus

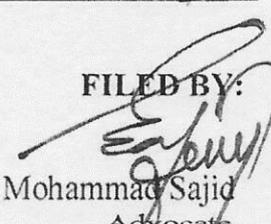
Uttar Pradesh Pollution
Control Board and Ors.

... Respondents

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FILED BY:


Mohammad Sajid
Advocate

Place: New Delhi
Dated: 03.11.2023

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New Delhi-110003
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SYNOPSIS

That the Applicant is law abiding citizen and peace loving person of India. He is permanent resident of Ghaziabad. U.P. He is earning his livelihood lawfully to feed his family. Being a law abiding citizen of India, he feels to be duty bound to point out and convey the illegalities, irregularities and violations of Rule of Law and is illegal slaughtering of animals by which the Al-Nasir Slaughtering House is creating pollution and polluted air, water and other sources for human consumption thereby the pollution is causing health hazards and damage to the health and lives of the residents of village Bhoorgarhi, Dasna district Ghaziabad, U.P. and nearby area of the meat factory. This slaughter house was sealed by the authorities on 18.08.2023. The Management and owner of Al-Nasir Slaughter House is slaughtering illegally in another adjoining Karan Frozen Foods (Processing Unit) which is absolute in violation of environmental and pollution laws and guidelines. The waste blood, waste water and fuzla is being carried into the Ganga Nehar through Nala and the same waste material is being carried into the underground water through borewell which is hazardous and dangerous to the human lives.

LIST OF DATES AND EVENTS

18.08.2023	That the aforesaid meat factory was sealed on 18.08.2023 by the Respondent No. 2 due to various violations of pollution norms by the PCB because said Al-Nasir Slaughter House at Dasna was releasing waste polluted water (with blood and other fuzla) to the Gang Nahar through Nala. That the aforesaid meat factory is being run from the backdoor, main gate is sealed but the operation of slaughtering of restricted calves and unhealthy, ill animals are being slaughtered by the owners of the factory.
25.08.2023:	That the Applicant has filed complaint dated 25.08.2023 regarding illegal and unauthorized slaughtering in the sealed Slaughter House mentioned above to the Respondents and other concerned higher authorities but no action has been initiated against the aforesaid illegal operation of the Slaughter House.
11.09.2023:	That the Applicant again filed reminder dated 11.09.2023 to all concerned authorities/ Respondents for urgent and appropriate legal action, wherein the Applicant has narrated complete facts and circumstances and hazards causing damage to the health and environment of

	the area at Dasna, Ghaziabad, U.P. but no action seems to be taken against the illegal operation of the aforesaid meat factory.
17.10.2023:	That the Applicant had filed a Writ Petition (C) No. 1056/2023 titled. Surendra Vs. State of U.P. & Ors. before the Hon'ble Supreme Court of India, the same was listed and the Hon'ble Supreme Court was pleased to permit to withdraw the petition and granted to file the Applicant before the Hon'ble High Court of Allahabad or before any other appropriate court or forum.
18.10.2023:	The Applicant has again sent the complaint to the Respondents and concerned authorities for illegal action but no action has been taken till date.
19.10.2023:	Hence, this petition.



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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL
BENCH, NEW DELHI**

Original Application No. of 2023

IN THE MATTER OF:

Surendra
S/o Shri Prakash
R/o 82, Shibban Pura,
Ghaziabad-201 001

... Applicant

Versus

Uttar Pradesh Pollution
Control Board and Ors.

... Respondents

MEMO OF PARTIES

Surendra
S/o Shri Prakash
R/o 82, Shibban Pura,
Ghaziabad-201 001

... Applicant

Versus

1. Uttar Pradesh Pollution Control Board
Regional Office: 33/18, Kapil Vihar,
Saharanpur, Uttar Pradesh-247001
Email-grievance@uppcb.com
Phone- 0522-2720831

2. State Environment Impact Assessment Authority
Vineet Khand-1, Gomti Nagar, Lucknow,
Uttar Pradesh-226010

Email-Chairman.seac1@gmail.com

Phone -011-20819182

3. State of Uttar Pradesh Through Chief Secretary
101, 'B' Block, Lok Bhawan, U.P. Secretariat,
Lucknow-226001.

Email-cmup@nic.in

Phone-0522-2238212

4. Regional Office
Ministry of Environment,
Forests & Climate Change,
Kendriya Bhawan, 5th Floor,
Sector-H, Aliganj, Lucknow
Uttar Pradesh-260224

Email-rocz.lko-mef@nic.in

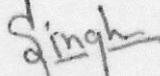
Phone-0522-2326696

... Respondents

Through

Applicant

Place: New Delhi
Dated: 3.11.2023


Mohammad Sajid,
Mahavir Singh,
Advocate,
167, Lawyers Chambers' Block-II,
Delhi High Court,
New Delhi-110003
E-mail: msajidadv@gmail.com

2. That the Respondent No. 1 is the U.P. Pollution Control Board is the concerned statutory authority in the present matter under dispute and is entrusted with the responsibility of safeguarding the environment. The Respondent Nos. 2 to 4 are the SEIAA also through its Chairman U.P., the State of U.P. its Secretary, Forest and the Regional Office of the Ministry of Environment Forest and Climate Change which are also proper and necessary parties in the matter before the Hon'ble Tribunal.

That the Applicant is filing this application for the common cause and issue of his co-villagers and for the protection of environment. The villagers are mostly poor persons who are bound to suffer unregulated illegal slaughtering activities in their area. Relief from the Hon'ble NGT is their last ray of hope for justice since all authorities have failed to take action in the matter and no one pays heed to the repeated complaints and no action ever has been taken against the illegal slaughtering thereby violating various provisions, regulations and environmental laws.

The detailed facts of the matter are submitted in the following paragraphs:

The Applicant wish to seek the following reliefs from this Hon'ble Court.

- (i) Issue a direction to the Respondents to immediately inspect the illegal operation of the captioned slaughter House from its back door entry and close down complete activities of the meat factory, when it has exceeded the limit of slaughtering from 500 to 2000 animals?
- (ii) Issue direction to the Respondents to appoint a team of expert to give report regarding Waste and Fuzla (Blood) going to gang neher is hazardous to the residents of the area or not?
- (iii) Issue direction to the Respondents to inspect by the team of experts to ascertain whether, small calves, ill and unhealthy animals are being slaughtered in this meat factory against the norms hazardous to Indian citizens.
- (iv) Issue a direction to the Respondents to cancel the licence of Al-Nasir Slaughter House of the above said factory after ascertaining/verifying the violations and illegal activities being carried out in it.

3. The facts leading to the filing of the present petition are being given hereunder:-

a. That the Applicant is law abiding citizen and peace loving person of India. He is permanent resident of Ghaziabad, U.P. He is earning his livelihood lawfully to feed his family. He feels to be duty bound to point out and convey the illegalities, irregularities and violations of Rule of Law by which the meat factory is creating pollution and polluted water, air and other sources for human consumption thereby the pollution is causing health hazards and damage to the health and lives of the residents of Dasna and nearby area of the meat factory.

b. That the Applicant has filed complaint dated 25.08.2023 regarding illegal and unauthorized slaughtering in the sealed Slaughter House mentioned above. It is shocking and surprising that the Applicant has given complaint to all concerned authorities but no inspection and legal action has been initiated against the aforesaid illegal operation of the Slaughter House.

A copy of complaint dated 25.08.2023 is annexed as **Annexure**

P-1

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- c. That the aforesaid Meat Factory was sealed on 18.08.2023 due to various violations of pollution norms by the PCB, U.P. because said Meat Factory was releasing waste polluted water (with blood and other fuzla) to the Gang Nahar through Nala, which is the cause to create various decease and environmental problem to the residents and villagers.
 - d. That the aforesaid Meat Factory is being run from the backdoor, main gate is sealed but the operation of slaughtering of restricted calves and unhealthy, ill animals are being slaughtered by the owners of the factory.
 - e. That it is very shocking and surprising that the Management and Owners of this Meat Factory daring to continue the operation of slaughtering the restricted animals, as the said factory is slaughtering around 2000 animals (buffalos) whereas it carries the licence only 500 buffalos/ animals.
 - f. That it is further submitted that the width of main road in front of factory should be not less than 14 meters wide but the present road of this Meat Factory is 25 feet wide only thereby, the licence cannot be issued to such factories when it does not

qualify the basic and mandatory norms, laws applicable to such factories.

g. It is further submitted and surprising that there are few boring well was made to drop into the waste blood to underground water from these bore wells, which are main cause of creating pollution in underground water in nearby areas and the residents of these locality are bound to use the blood contaminated water in their daily use which is main cause of decreasing and damaging their health system. The Applicant has further sent reminder to his previous complaint to the concerned authorities on 05.09.2023. Copy of reminder dated 05.09.2023 is annexed as **Annexure-P-3**

h. That the management of Al-Nasir Meat Factory is using Karan Frozen Foods for illegal slaughtering of its own buffalos, calves whereas this Karan Frozen Foods is only has the license of processing the meat and it has no license for slaughtering the animals. In this regard the Applicant has also filed complaints and representations to the concerned authorities in detail but they are keeping and maintaining silence, for the reasons best known to them.

- i. That all the aforesaid facts and contents discussed above are very important and warrant a speedy investigation, monitoring and surveillance by the authorities concerned into the aforesaid violations and damages being caused regularly and has become regular source of polluting air, water and climatic situation in the area especially polluting Gang Nehar. The neighbours hope that the licence of such kind of factories doing illegal and restricted activities should be cancelled immediately because the owners and Management of such factories are very powerful by finance and muscles, nobody can dare to speak against their illegal activities and interest, because of various reason which cannot be explained here.
4. That the Applicant again and again sending representations with complete detail of violation of environmental laws to all concerned authorities/Respondents for urgent and appropriate legal action, wherein the Applicant has narrated complete facts and circumstances and hazards causing damage to the health and environment of the area at Dasna, Ghaziabad, U.P. but no action

has been taken against the illegal operation of the aforesaid meat factory. Rather huge illegal slaughtering of about 2000 animals per day has been started in Karan Food and Frozen which is situated in front of Al-Nasir Slaughter House at Khasra No. 27700-72, Bhoorgarhi, Dasna, district Ghaziabad.

5. That the Applicant had filed a Writ Petition (C) No. 1056/2023 titled Surendra Vs. State of U.P. & Ors. before the Hon'ble Supreme Court of India, the same was listed on 17.10.2023 and the Hon'ble Supreme Court was pleased to permit withdrawn of the Applicant and granted to file the Applicant before the Hon'ble High Court of Allahabad or before any other appropriate court or forum. The copy of the order dated 17.10.2023 is annexed herewith as **Annexure P-3**
6. That the Applicant is filing the present petition before this Hon'ble on following, amongst other grounds:

GROUNDS

- (a) Because the inaction of the Respondent is allowing the Said Meat factory illegal slaughtering thereby creating hazardous and environmental polluting situation in the locality, leaving the

public, residents to face the dire consequences of various nature including air, water.

- (b) Because the Hon'ble NGT in its order dated 04.09.2018 in O.A. No. 173/2018 in the matter of Sudarshan Das Vs. State of West Bengal & Ors. inter-alia observed that, "there can be no two views that an effective institutional monitoring mechanism is required not only at the stage when Environmental Clearance is granted but also at subsequent stages".
- (c) Because the Respondents have failed in stopping the illegal operation, by way of searching and visiting the Al-Nasir meat factory, when it is in full operation, though it was sealed on 18.08.2023 for violating environmental norms and laws.
- (d) Because the Respondents are keeping their eyes closed. when the matter is being reported to them by way of detailed complaints and reminder about the various dangerous causes and hazards are reported by the Applicant to the concerned authorities/Respondents.
- (e) Because the Respondents are silent, when the owners of this meat factory made bore well to drop into the waste blood mixing in the underground water just to avoid heavy load of huge waste

blood, fuzla from dumping in the open nallah leading to the Ganga river.

- (f) Because the Respondents are taking no action for cancelling the licence for illegal slaughtering of 2000 buffalos including ill and unhealthy animals, when it has the license for slaughtering only (500) sound buffalos after verification by the concerned doctors. Whereas, presently complete operation is sealed by the authorities since 18.08.2023.
- (g) Because Section 20 of National Green Tribunal Act, 2010 states that while passing an order the Hon'ble Tribunal shall apply the principles of sustainable development, precautionary principle and the polluter pays principle.
- (h) Because a substantial question relation to environment has arisen since there is a direct violation of a specific statutory environmental obligation by Respondents whereby the community of villages is affected by the environmental consequential damages.
- (i) Because the Hon'ble Supreme Court in the case of M.C. Mehta Vs. Kamal Nath (1997)1 SCC 388 held that the Indian Constitution incorporates the "Public Trust Doctrine" whereby

the authorities bear the responsibility of protecting the river banks as its custodian.

- (j) Because it is duty of every citizen of India to protect the environment. Article 51(a)(g) of the Constitution requires every citizen of India to protect and improve the natural environment including forest, lakes, rivers, wildlife and to have compassion for living creatures as the Constitution provides right to life and the right to the clean environment.
- (k) Because the Respondents are paying no heed when the water is being polluted in the whole area by this factory by way of flouting and violating all norms and procedure, just to earn unlawful profits by doing unlawful and illegal slaughtering thereby playing with the life of the residents of the area Dasna Ghaziabad.
- (l) Because the factory owners of Al-Nasir are very powerful by muscle and finance and to manage administration in their favour, nobody can dare to speak against their interest, the reason is clear that they are doing and carrying illegal and unlawful slaughtering activities not on its own factory but in the

neighbouring processing unit i.e. Karan Frozen Foods in the same area and the same activities.

7. That the instant petition is within the period of limitation since the cause of action is persistent and continuous. No other similar petition has been filed by the present Applicants before any other court of law. The Hon'ble Tribunal has the jurisdiction to adjudicate upon the present matter.

PRAYER

In the facts and circumstances of the case, it is therefore, most respectfully prayed that this Hon'ble Court may graciously be pleased to:

- (a) direct the concerned authorities, Respondents to appoint a Team of Experts, make a visit to the meat factory and take legal action in accordance with law as early as possible; and
- (b) appoint a District Committee to assess environmental damages due to illegal slaughtering of prohibited animals in access of permissible laws;

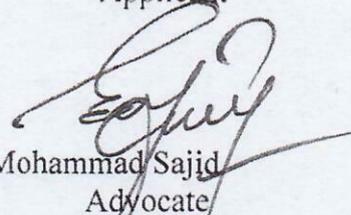
- (c) direct the Respondents to take legal action including cancelling the licence after ascertaining the over all violation of environmental laws;
- (d) pass any other or further order of directions in favour of the Applicant as deemed fit and proper in view of the facts and circumstances of this case.

Prayed accordingly.



Applicant

Through



Mohammad Sajid
Advocate

167, Lawyers Chambers' Block-II,
Delhi High Court,
New Delhi-110003

E-mail: msajidadv@gmail.com

Place: New Delhi
Dated: 3.11.2023

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI

Original Application No. of 2023

IN THE MATTER OF:

Surendra

S/o Shri Prakash

R/o 82, Shibban Pura,

Ghaziabad-201 001

... Applicant

Versus

Uttar Pradesh Pollution

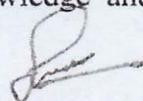
Control Board and Ors.

... Respondents

AFFIDAVIT

I, Surendra S/o Shri Prakash, Age 47 Years, r/o 82, shibban Pura, Ghaziabad-201001 (U.P.), presently at New Delhi, do hereby solemnly affirm and declare as under:

1. That I am the Petitioner and well conversant with facts and circumstances of the present case. Hence competent to swear the present affidavit.
2. That the accompanying application filed U/s 14, 15 and 18(1) of the NGT Act, 2010 have been drafted by me, the contents of the same are true and correct to the best of my knowledge and belief.


DEPONENT



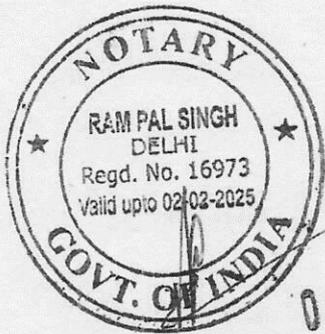
VERIFICATION:

Verified at New Delhi on this the 08th day of November, 2023; that the contents of the above affidavit is true and correct to my knowledge and belief; no part of it is false and nothing material has been concealed therefrom.

[Handwritten Signature]
D 17/11/23

[Handwritten Signature]
DEPONENT

I Identify the Deponent who has Signed in my Presence



STIPED THAT THE DEPONENT
Shri/Smt./Km.....
S/o, W/o, D/o.....
R/o.....
Identified.....
has Submitted me at Delhi
on.....
that the contents of the affidavit which
have been submitted to him are
true and correct to his knowledge.

08 NOV 2023

Notary Public, Delhi (INDIA)

To

Dt. 25.08.2023

The Chairman
Pollution Control Board
U.P.State Secretariat
Lucknow

Sub.: Complaint regarding illegal operation of Slaughter House named AL-NASIR EXPORT PVT. LTD., 2761, Bhoorgarhi, Dasna, Ghaziabad, U.P. (sealed by the Board)

Hon'ble Sir,

It is humbly and most respectfully brought to your kind notice that the aforesaid meat factory was sealed on 18.08.2023 due to various violations of pollution norms by the PCB because said meat factory was releasing waste polluted water (with blood and other fuzla) to the Gang Nahar through Nala.

It is further to bring to your kind notice that the aforesaid meat factory is being run from the backdoor. main gate is sealed but the operation of slaughtering of restricted ^{calves} child animals and unhealthy, ill animals are being slaughtered by the owners of the factory.

It is very shocking and surprising that the Management and Owners of this Meat Factory daring to continue the operation of slaughtering the restricted animals, as the said factory is slaughtering around 2000 animals (buffalos) whereas it carries the licence only 180 animals.

True copy

[Signature]

It is further submitted that the width of main road in front of factory should be not less than 14 meters wide but the present road of this Meat Factory is 25 feet wide only thereby, the licence cannot be issued to such factories when it does not qualify the basic and mandatory norms, laws applicable to such factories.

It is further submitted and surprising that there are few boring well was made to drop into the waste blood to underground water from these bore wells, which are main cause of creating pollution in underground water in nearby areas and the residents of these locality are bound to use the blood contaminated water in their daily use which is main cause of decreasing and damaging their health system.

All the aforesaid submissions and points discussed above are very important and warrant a speedy investigation into the aforesaid violations and damages being caused regularly and has become regular source of polluting air, water and climatic situation in the area. The neighbours hope that the licence of such kind of factories doing illegal and restricted activities should be cancelled immediately because the owners and Management of such factories are very powerful by finance and muscles, nobody can dare to speak against their interests in the neighbouring areas.

You are therefore humbly requested to look into the matter and issue appropriate urgent directions to your subordinates to stop the menace and health hazards to the residents of neighbouring areas, thereby conducting investigation cancelling the license as per law in the interest of society at large.

Yours faithfully,



Surendra

S/o Sh. Prakash
82, Shibban Pura,
Ghaziabad-201001
Mob. 9818122932

Copy to:

- (1) Hon'ble Chief Minister of U.P.
Lucknow
- (2) Hon'ble Home Minister, GOI
New Delhi
- (3) Hon'ble Governor
Lucknow, U.P.

SP 1100320134 <110032>
 GSTN No: 07AAAGJ0057R222
 ED407651316 IN
 Counter No:1,OP-Code:OP1
 To:CHAIRMAN POLLUTION,CONT BOARD SECTT
 LUCKNOW, PIN:226024
 From:SURENDRA SHIBBAN PURA GZB , 201001
 Wt:20grams, ,29/08/2023 ,12:17
 Amt:41.00
 ,CGST @9% 3 ,UTGST @9%: 3.00



SP 1100320134 <110032>
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 ED407651333 IN
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 To:HOME MINISTER,MNO HOME AFFAIRS
 DELHI, PIN:110001
 From:SURENDRA SHIBBAN PURA GZB , 201001
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 ,CGST @9% 3 ,UTGST @9%: 1.50
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 LUCKNOW, PIN:226001
 From:SURENDRA SHIBBAN PURA GZB , 201001
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 Amt:41.00
 ,CGST @9% 3 ,UTGST @9%: 3.00



SP 1100320134 <110032>
 GSTN No: 07AAAGJ0057R222
 ED407651347 IN
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 To:LT GOVERNDR,UP M G MARG
 LUCKNOW, PIN:226027
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 Amt:41.00
 ,CGST @9% 3 ,UTGST @9%: 3.00



Ofc

REMINDER

To

Dt. 05.09.2023

The Chairman
Pollution Control Board
U.P.State Secretariat
Lucknow

Sub.: Reminder to the Complaint regarding illegal operation of Slaughter House named AL-NASIR EXPORT PVT. LTD., 2761, Bhoorgarhi, Dasna, Ghaziabad, U.P. (sealed by the Board)

Hon'ble Sir,

It is respectfully submitted that the Complainant has filed complaint dated 25.08.2023 regarding illegal and unauthorized slaughtering in the sealed Slaughter House mentioned above. It is shocking and surprising that the Complainant has given complaint 10 days ago to all concerned authorities but no action has been initiated against the aforesaid illegal operation of the Slaughter House.

The facts of the earlier complaint dated 25.08.2023 are being reproduced below for your ready reference:

It is humbly and most respectfully brought to your kind notice that the aforesaid meat factory was sealed on 18.08.2023 due to various violations of pollution norms by the PCB because said meat factory was releasing waste polluted water (with blood and other fuzla) to the Gang Nahar through Nala.

It is further to bring to your kind notice that the aforesaid meat factory is being run from the backdoor, main gate is sealed but the operation of slaughtering of restricted child animals and

unhealthy, ill animals are being slaughtered by the owners of the factory.

It is very shocking and surprising that the Management and Owners of this Meat Factory daring to continue the operation of slaughtering the restricted animals, as the said factory is slaughtering around 2000 animals (buffalos) whereas it carries the licence only 180 animals.

It is further submitted that the width of main road in front of factory should be not less than 14 meters wide but the present road of this Meat Factory is 25 feet wide only thereby, the licence cannot be issued to such factories when it does not qualify the basic and mandatory norms, laws applicable to such factories.

It is further submitted and surprising that there are few boring well was made to drop into the waste blood to underground water from these bore wells, which are main cause of creating pollution in underground water in nearby areas and the residents of these locality are bound to use the blood contaminated water in their daily use which is main cause of decreasing and damaging their health system.

All the aforesaid submissions and points discussed above are very important and warrant a speedy investigation into the aforesaid violations and damages being caused regularly and has become regular source of polluting air, water and climatic situation in the area. The neighbours hope that the licence of such kind of factories doing illegal and restricted activities should be cancelled immediately because the owners and Management of such factories are very powerful by finance and muscles, nobody can dare to speak against their interests in the neighbouring areas.

27

You are therefore humbly requested to look into the matter and issue appropriate urgent directions to your subordinates to stop the menace and health hazards to the residents of neighbouring areas, thereby conducting investigation cancelling the license as per law in the interest of society at large. The Complainant is awaiting urgent action on this complaint.

Yours faithfully,

Surentra
S/o Sh. Prakash
82, Shibban Pura,
Ghaziabad-201001
Mob. 9818122932

Copy to:

- (1) Hon'ble Chief Minister of U.P.,
Lucknow *U.P. Sachivalaya*
- (2) Hon'ble Home Minister, GOI
New Delhi
- (3) Hon'ble Governor *Raj Bhawan*
Lucknow, U.P.

भारतीय डाक
INDIA POST
आर.टी. 20 (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)

भारतीय डाक
INDIA POST
आर.टी. 20 (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)

भारतीय डाक
INDIA POST
आर.टी. 20 (आर.टी. 20)
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ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)

भारतीय डाक
INDIA POST
आर.टी. 20 (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)

भारतीय डाक
INDIA POST
आर.टी. 20 (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)
ऑफिस ऑफ पोस्टल प्रशासन (आर.टी. 20)

ITEM NO.7

COURT NO.15

S U P R E M E C O U R T O F I N D I A
R E C O R D O F P R O C E E D I N G SWRIT PETITION (CIVIL) NO(S). 1056/2023

SURENDRA

Petitioner(s)

VERSUS

STATE OF UTTAR PRADESH & ANR.

Respondent(s)

(FOR ADMISSION)

Date : 17-10-2023 This petition was called on for hearing today.

CORAM :

HON'BLE MRS. JUSTICE B.V. NAGARATHNA
HON'BLE MR. JUSTICE UJJAL BHUYANFor Petitioner(s) Mr. Mohd. Faisal, AOR
Mr. Mohammad Sajid, Adv.

For Respondent(s)

UPON hearing the counsel the Court made the following
O R D E R

Learned counsel for the petitioner sought permission to withdraw this writ petition which is filed under Article 32 of the Constitution of India reserving liberty to the petitioner to prefer a Writ Petition before the High Court under Article 226 of the Constitution of India or to avail any other remedy available in law.

His submission is placed on record.

Writ Petition is dismissed as withdrawn with the aforesaid liberty.

Validity unknown Pending application(s), if any, shall stand disposed of.

Digitally signed by
Rishi Sharma
Date: 2023.10.21
16:35:01 UTC
Reason:

(RADHA SHARMA)
COURT MASTER (SH)(MALEKAR NAGARAJ)
COURT MASTER (NSH)Tlc
h

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

Original Application No. of 2023

IN THE MATTER OF:

Surendra
S/o Shri Prakash
R/o 82, Shibban Pura,
Ghaziabad-201 001

... Applicant

Versus

Uttar Pradesh Pollution
Control Board and Ors.

... Respondents

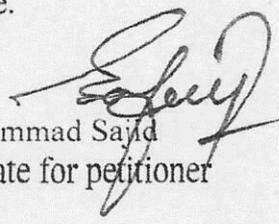
**APPLICATION FOR EXEMPTION FROM FILING THE
CERTIFIED COPIES OF ANNEXURE P-4.**

MOST RESPECTFULLY SHOWETH

1. That the petitioner has filed the accompanying Original Application alongwith the true copies of annexures thereto and craves leave of this Hon'ble Tribunal that the contents of the same may be read as part and parcel of this application.
2. That the Applicant is unable to file the certified copies of the annexures and undertakes to file the certified copies as and when directed by this Hon'ble Tribunal.

It is, therefore, most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to grant exemption from filing certified copies of the annexures at this stage.

New Delhi
Dated 03.11.2023


Mohammad Sayid
Advocate for petitioner

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI

Original Application No. of 2023

IN THE MATTER OF:

Surendra

S/o Shri Prakash

R/o 82, Shibban Pura,

Ghaziabad-201 001

... Applicant

Versus

Uttar Pradesh Pollution

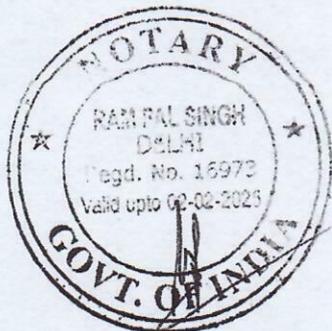
Control Board and Ors.

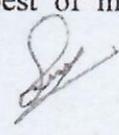
... Respondents

AFFIDAVIT

I, Surendra S/o Shri Prakash, Age 47 Years, r/o 82, Shibban Pura, Ghaziabad-201001 (U.P.), presently at New Delhi, do hereby solemnly affirm and declare as under:

1. That I am the Petitioner and well conversant with facts and circumstances of the present case. Hence competent to swear the present affidavit.
2. That the accompanying application has been drafted by me, the contents of the same are true and correct to the best of my knowledge and belief.




DEPONENT

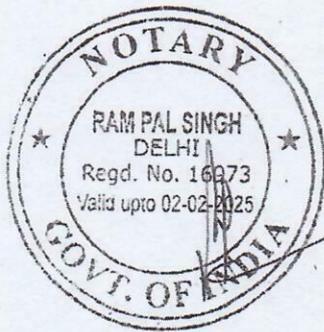
VERIFICATION:

Verified at New Delhi on this the 08th day of November, 2023; that the contents of the above affidavit is true and correct to my knowledge and belief; no part of it is false and nothing material has been concealed therefrom.

[Handwritten Signature]

8-179/03
I Identify the Deponent who has Signed in my Presence

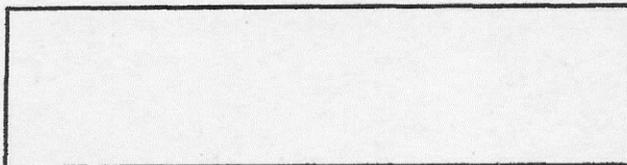
[Handwritten Signature]
DEPONENT



CERTIFIED THAT THE DEPONENT
S/o. Smt. *[Handwritten Name]*
Shri *[Handwritten Name]*
has Subscribed this Affidavit
on *[Handwritten Date]*
that the contents of the Affidavit
have been read to him and
true and Correct to his Knowledge.

[Handwritten Signature]
Notary Public, Delhi (INDIA)

08 NOV 2023



C.C. No. 32
FIR No.
U/S
P.S.

IN THE COURT OF NATIONAL GREEN TRIBUNAL, NEW DELHI.

Suit / Appeal No. OA / 2023 JURISDICTION OF 202

In re :-

Surendra

Plaintiff(s) Or Petitioner(s)
Appellant(s) Complainant(s)

VERSUS

Uttar Pradesh Pollution Control Board & ors. Defendant(s) / Respondent(s) / Accused

KNOW ALL to whom these present shall come that I/ We Surendra S/o
Shri Prakash R/o D2, Shibban Pura, Ghaziabad-201001

The above named Petitioner do hereby appoint

Mohd Sajid Admi D-179/1983

(herein after called the advocate/s to be my/our Advocate in the above-noted case authorize him:-

To act, appear and plead in the above-noted case in this court or in any other court

or heard and also in the appellate court including High court subject to payment of fees as

To sign file, verify and present pleadings, appeals cross-objections or petitions for execution review, revision, withdrawal, compromise or other petitions or affidavits documents as may be deemed necessary or proper for the prosecution of the said case stages subject to payment of fees for each stage.

To file and take back documents, to admit and/or deny the documents or oppose

To withdraw or compromise the said case or submit to arbitration any difference disputes that may arise touching or in any manner relating to the said case.

To take execution proceedings on paying separate fee.

To deposit, draw and receive money, cheques, case and grant receipts hereon do all other acts and things which may be necessary to be done for the progress a course of the prosecution on the said case.

To appoint and instruct any other Legal Practitioner authorizing him to exercise conferred upon the Advocate whenever he may think fit to do so and to sign the pleadings

And I/ We the undersigned do hereby agree to ratify and confirm all the acts and things done by his substitute in the matter as my/our own facts, as if done by me/us

And I/We undertake that I/ We or my/our duly authorised agent would appear and will inform the Advocate for appearance when the case is called.

And I/We undersigned do hereby agree not to hold the advocate of his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the court shall be of the Advocate which he shall receive and retain for himself.

And I/We undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settle is only for the above case and above Court. I/We hereby agree that once the fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us

IN WITNESS WHERE OF I/We do hereunto set my/our hand to these presents the contents of which have

been understood by me/us on this 3 day of 11 2023
Accepted subject to the terms of the fees

[Signature]
Advocate

[Signature]
Client

I identify the Signature/Thumb Impression of the Below Mentioned Person, Who Has been Signed in my presence. The Client.

