

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
Original Application no. 432/2023

IN THE MATTER OF:

Radhey Shyam Sehara

..... Applicant

Versus

State of Uttar Pradesh & Ors

..... Respondents

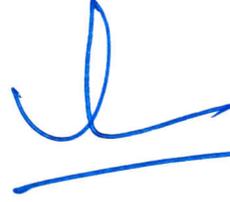
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Board Resolution

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**MIMANSA LAW OFFICES****KRISHNAMOHAN K MENON, GAUTAM DHAMIJA ,DANIA  
NAYYAR, PARUL SACHDEVA, PARTH DIXIT**

ADVOCATE FOR RESPONDENT NO.8,

C-6/50 , LOWER GROUND FLOOR,

SAFDARJUNG DEVELOPMENT AREA

NEW DELHI-110016.

+91- 9650840477, +91- 9871060130

parul@mimansalaw.in , [krishna@mimansalaw.in](mailto:krishna@mimansalaw.in)**Date:04.04.2024****NEW DELHI**

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO.432/2023**

**IN THE MATTER OF:**

Radhey Shyam Sehara

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**ADDITIONAL/SUPPLEMENTARY REPLY FILED ON BEHALF  
OF RESPONDENT NO.8**

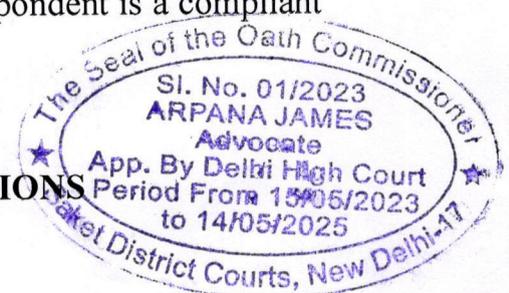
**MOST RESPECTFULLY SHOWETH:**

1. The Respondent No.8 has already filed its reply vide email dated 07.02.2024. It is most humbly submitted that the present additional reply is being filed in view of the liberty granted by this Hon'ble Tribunal vide order dated 08.02.2024. That in order to bring on record few additional facts supporting the bonafide case of the answering respondent, the present reply has been filed.
2. That the contents of the parent reply may be treated as a part and parcel of this reply. It is most humbly submitted that in addition to the parent reply filed earlier, the following submissions which are independent and without prejudice to each other, would conclusively establish that the answering respondent is a compliant entity.

**ADDITIONAL SUBMISSIONS**

**I. CSR Compliances**

3. It is submitted that CSR activities are not only about social uplifting but also involves contributions immensely in terms of



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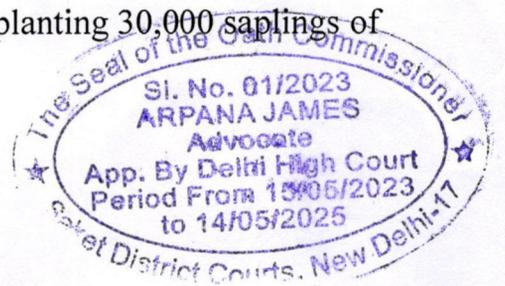
environment protection. That the Joint Committee vide its reports dated 10.10.2023 & 02.02.2024, found the answering respondent to be compliant. It is submitted that the answering respondent is committed to improve the quality of life of surrounding community through CSR and at present focuses on rural infrastructure development, health and education etc. This includes but is not limited to free medical camps for villagers, community welfare programmes, sponsoring and supporting local schools and underprivileged children, Safe drinking water, Livelihood, blanket distributions to poor, and oxygen facilities during covid times. The answering respondent has also been extending support towards environmental education and research. Photographs evidencing all the above CSR activities are enclosed herewith and marked as **Annexure R-1[Colly]**.

## II. Adoption of Ponds for Rain Water Harvesting

4. The answering respondent submits further that as a responsible organization, it has adopted a pond in the village Tadwa Khurd [covering areas of village Achiapur, Piprahi and Tadwa Khurd] as a measure of rain water harvesting and natural recharge. Required permissions for adopting the ponds for restoration and augmenting ground water recharge were duly obtained from gram Panchayat and District administration. Photographs pertaining to the same are enclosed herewith and marked as **Annexure R-2**.

## III. Afforestation

5. That the answering respondent has taken efforts in developing a substantial green belt as is evidenced from the photographs enclosed in the principal reply. In addition to the same, the appreciation received from the DFO for planting 30,000 saplings of



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various species in the area is enclosed herewith and marked as **Annexure R-3.**

**IV. Ash Generation & Disposal**

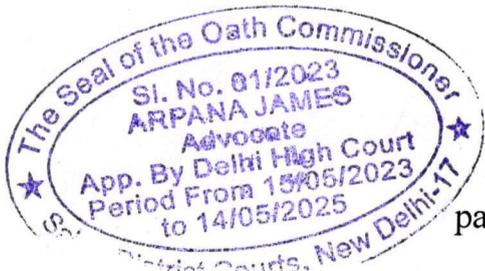
6. It is submitted that the ash generated from the plant operation is being disposed of scientifically as per the guidelines of Central Pollution Control Board (CPCB). The Details of ash generated/disposed-off during financial year 2022-2023 and 2023-2024 are enclosed herewith and marked as **Annexure R-4.**

7.F urther the ash fly generated from the plant is sold to prospective buyers who further use fly ash /pond ash for construction purposes. Certificate dated 19.03.2024 issued by M/s Apco Infratech to the answering respondent is enclosed herewith and marked as **Annexure R-5.**

8. In view of the above, it is most humbly submitted that the answering respondent is duly compliant with all Environment related laws, rules and regulations and any allegation to the contrary in the parent original application is devoid of merit. Hence it is most humbly prayed that the proceedings qua the answering respondent be closed.

DATED :04.04.2024

PLACE : NEW DELHI.



*Parul*  
INDIA GLYCOLS LIMITED  
NOIDA

**MIMANSA LAW OFFICES**  
**KRISHNAMOHAN K MENON, GAUTAM**  
**DHAMIJA ,DANIA NAYYAR,PARUL**  
**SACHDEVA, PARTH DIXIT**  
ADVOCATE FOR RESPONDENT NO.8,  
C-6/50 , LOWER GROUND FLOOR,  
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ORIGINAL APPLICATION NO. 432 OF 2023

IN THE MATTER OF:

Radhey Shyam Sehara

...Applicant

Versus

State of Uttar Pradesh &Ors.

...Respondent(s)

AFFIDAVIT

I, Mr. Peter Paul Dungdung, aged 49 years, Occupation: Service. Authorized representative of M/s India Glycols Ltd., Office at E-I, Sector -13, GIDA, Gorakhpur, U.P. - 273209, presently at New Delhi, do hereby solemnly affirm and declare as under:

1. That I am the Authorized Representative of Respondent No. 8 in Original Application No. 432/2023. I am conversant with the facts and circumstances of the case and as such competent to swear the present Affidavit.
2. That the contents of the Accompanying additional/supplementary reply are facts true to my knowledge and also contain submissions and prayers to this Hon'ble Tribunal based on legal advice and the same is believed to be true and correct.
3. That the Annexures filed along with the Accompanying Reply are true copies of their respective originals.

*I Identify the Executant/Deponent who has Signed in My presence*

04 APR 2024

DEPONENT  
INDIA GLYCOLS LTD  
NOIDA

VERIFICATION

04 APR 2024

Verified at .....on this .....day of 2024. that the contents of the present affidavit are true and correct and nothing material has been concealed therefrom.

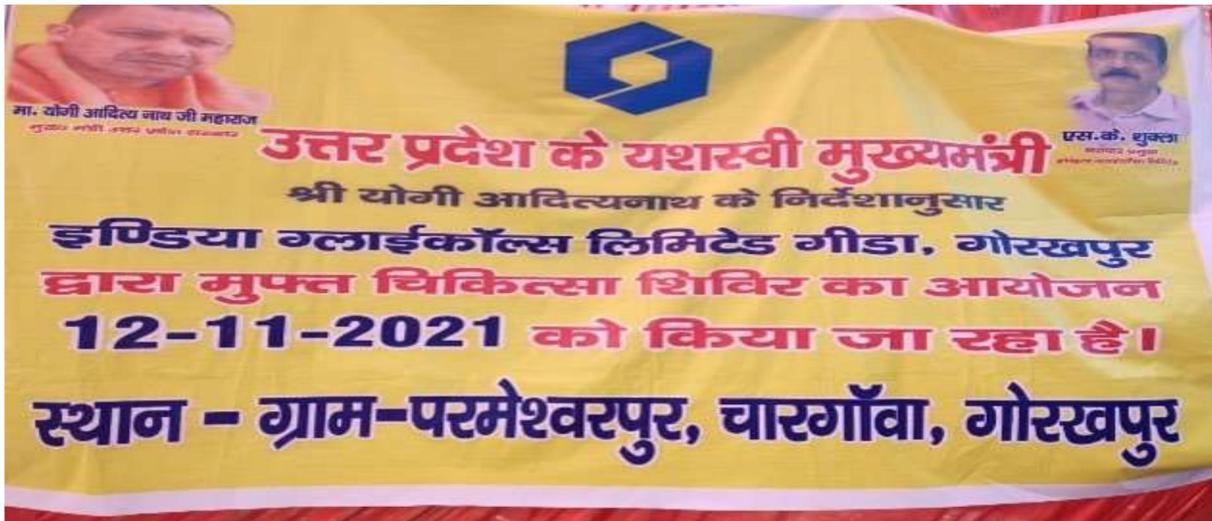
The Seal of the Oath Commissioner  
SI. No. 01/2023  
ARPANA JAMES  
Advocate  
App. By Delhi High Court  
Period From 15/05/2023  
to 14/05/2025  
Saket District Courts, New Delhi-11

CERTIFIED THAT THE DEPONENT  
Shri / Smt. / Km. Peter Paul  
R/o .....  
Identified by Shri / Smt. / Km. Krishna Meena  
has solemnly affirmed before me at  
Delhi. SI. No. 10  
that the contents of the affidavit which  
have been & explained to him are  
true and correct to the knowledge

Arpana James  
Oath Commissioner, Delhi  
ARPANA JAMES  
New Delhi

INDIA GLYCOLS LIMITED  
NOIDA

ANNEXURE R-1  
MEDICAL CAMP



**BOOKS AND STATIONARIES DISTRIBUTION**

## PHOTOGRAPHS OF SCHOOLS ADOPTED BY INDIA GLYCOLS LTD.



MODEL PRIMARY SCHOOL, JUDIYAN



MODEL PRIMARY SCHOOL, JUDIYAN

**PHOTOGRAPHS OF SCHOOLS ADOPTED BY INDIA GLYCOLS LTD.****MODEL PRIMARY SCHOOL, JUDIYAN**



MODEL PRIMARY SCHOOL, JUDIYAN

## PHOTOGRAPHS OF SCHOOLS ADOPTED BY INDIA GLYCOLS LTD.



PURVA MADHYAMIK VIDYALAYA, PIPROLI

**PURVA MADHYAMIK VIDYALAYA, PIPROLI**

**PHOTOGRAPHS OF SCHOOLS ADOPTED BY INDIA GLYCOLS LTD.****PURVA MADHYAMIK VIDYALAYA, PIPROLI**

**BLANKET DISTRIBUTION****आईजीएल ने जरूरत मंद को किया कंबल वितरण****स्वतंत्र प्रभात**

**सहजनवां** -इण्डिया ग्लाइकोल्स लिमिटेड के बिजनेस हेड एस के शुक्ल ने फैक्ट्री के पास के पांच गावों के वर्तमान जनप्रतिनिधि और पूर्व प्रतिनिधियों के माध्यम से जरूरत मंदों के बीच में 230 कंबल वितरित कराये। आईजीएल सदैव बिजनेस हेड एस के शुक्ल के नेतृत्व एवं

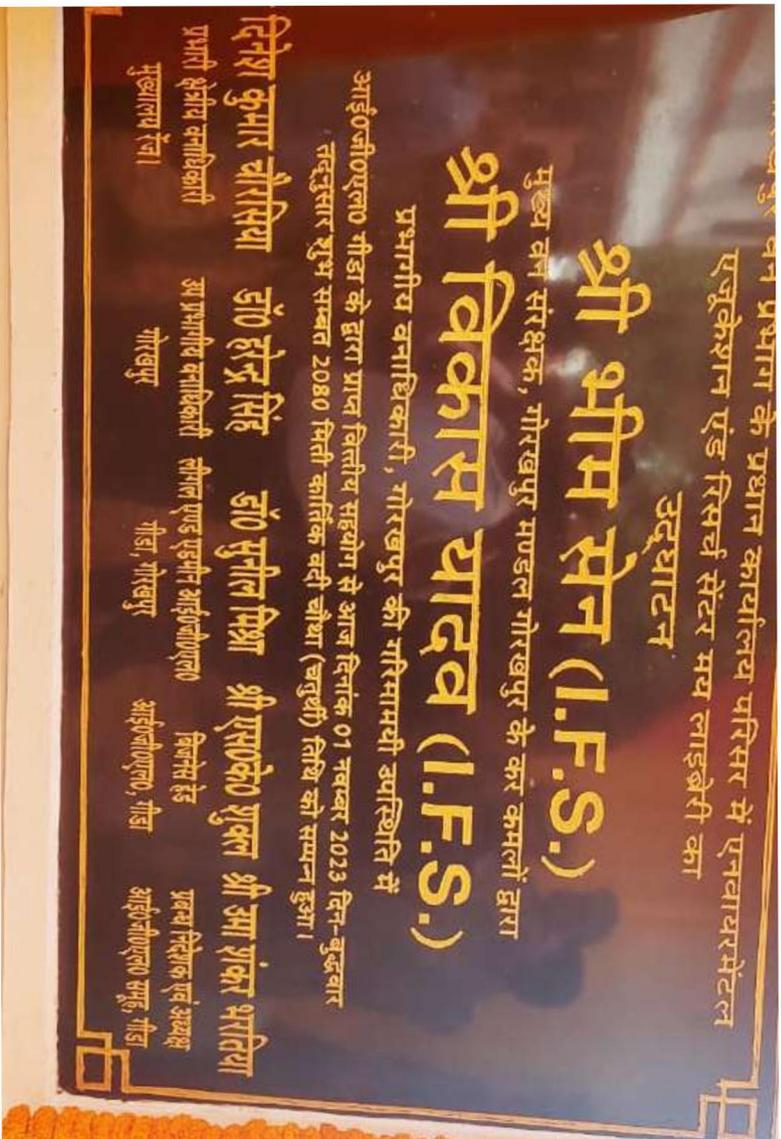
मार्गदर्शन में इस तरह के जनहित कार्यों में बढ़ चढ़ कर हिस्सा लेती है।आईजीएल के वरिष्ठ प्रबंधक प्रशासन एवं जनसम्पर्क डॉ सुनील कुमार मिश्रा को जनप्रतिनिधियों द्वारा कंबल हेतु अनुरोध किया गया था, जिसे डॉ सुनील मिश्रा ने बिजनेस हेड एवं प्लांट हेड से साझा किया और उन्होंने आग्रह को स्वीकार करते हुए कहा तत्काल मुहैया कराया जाए।

**INSTALLATION OF OXYGEN GAS PLANT**





**CONTRIBUTION TO FOREST DEPARTMENT**





**POND AT VILLAGE TADWA KHURD**

**PHOTOGRPHS OF POND – ADOPTED BY INDIA GLYCOLS LTD FOR RAIN WATER HARVESTING****POND AT VILLAGE TADWA KHURD**



**POND AT VILLAGE TADWA KHURD**

As a responsible organization answering respondent has adopted pond in the village Todwa Khurd (Covering area of village Achiapur, Piprahi & Todwa Khurd) as measure to rain water harvesting. Required permissions for adopting the pond for restoration and augmenting ground water recharge were duly obtained from Gram Panchayat and District Administration.





कार्यालय प्रभागीय वनाधिकारी गोरखपुर वन प्रभाग गोरखपुर

पत्रांक- २२४९ / ३९-३ गोरखपुर

दिनांक - 25/11/2023

## प्रशस्ति-पत्र

प्रमाणित किया जाता है कि उत्तर प्रदेश में वर्ष 2023 में वृक्षारोपण लक्ष्य 35 करोड़ निर्धारित था। जनपद गोरखपुर में स्थित इण्डिया ग्लाइकॉल्स लिमिटेड गीडा गोरखपुर के व्यापार प्रमुख श्री एस०के० शुक्ल के नेतृत्व में कम्पनी परिसर एवं अन्य स्थानों पर 30000 पौधों का रोपण कराकर उक्त वृक्षारोपण लक्ष्य की प्राप्ति में वन विभाग को सहयोग प्रदान किया तथा पर्यावरण संरक्षण के क्षेत्र में अभूतपूर्व सहयोग किया। आईजीएल कम्पनी द्वारा विगत कई वर्षों से सघन वृक्षारोपण कराया जाता रहा है और अब तक इनके द्वारा 16 एकड़ से अधिक वृक्षारोपण कराया गया है। कम्पनी द्वारा वृक्षारोपण एवं पर्यावरण संरक्षण के प्रति निष्ठा अत्यन्त सराहनीय है, जिसके लिए इण्डिया ग्लाइकॉल्स लिमिटेड गीडा गोरखपुर को प्रशस्ति पत्र देकर सम्मानित किया जाता है।

दिनांक- 25.11.2023

 प्रभागीय वनाधिकारी  
गोरखपुर वन प्रभाग

(विकास यादव)

आई.एफ.एस.

प्रभागीय वनाधिकारी

गोरखपुर वन प्रभाग गोरखपुर

## ANNEXURE R-4

## E-1 SECTOR - 15 GIDA DISTRICT - GORAKHPUR, UTTAR PRADESH



<b>Details of Flyash Generation &amp; Disposal FY 2023-2024</b>				
Month	Ash Generation - Metric Ton (MT)	Ash Disposal		
		Road Construction (FOC)/ Construction Activity	As Fertilizer	Total Utilization - Metric Ton (MT)
April.2023	1875.4	0	1856.69	1856.69
May.2023	4656.8	3774	882.49	4656.49
June.2023	4068.7	3337	731.35	4068.35
July.2023	6589.1	6589	0	6589
August.2023	2517.3	2165	352.18	2517.18
September.2023	3226.2	3200.5	25.55	3226.05
October.2023	3541.8	3511	29.22	3540.22
November.2023	2555.8	1759	796.84	2555.84
December.2023	3237.3	2407	830.9	3237.9
January.2024	3583.9	3563	20.37	3583.37
February.2024	3157.2	3039	117.34	3156.34
March.2024	3477.8	3157	320.14	3477.14
<b>Total</b>	<b>42487.3</b>	<b>36501.5</b>	<b>5963.07</b>	<b>42464.57</b>



### E-1 SECTOR - 15 GIDA DISTRICT - GORAKHPUR, UTTAR PRADESH

<b>Details of Flyash Generation &amp; Disposal FY 2022-2023</b>				
Month	Ash Generation - Metric Ton (MT)	Ash Disposal		
		Road Construction (FOC)	As Fertilizer	Total Utilization - Metric Ton (MT)
April.2022	3315.1	2432.66	882.66	3315.1
May.2022	4630.5	3425.31	1205.19	4630.5
June.2022	4978.1	2272.92	2705.18	4978.1
July.2022	5692.3	4765.1	927.2	5692.3
August.2022	1442.7	1442.7	0	1442.7
September.2022	0	0	0	0
October.2022	3042.4	2595.74	446.66	3042.4
November.2022	1803.1	40.76	1762.34	1803.1
December.2022	3274.5	2625.47	649.03	3274.5
January.2023	5311.5	4024.97	1286.53	5311.5
February.2023	4958.8	3221.65	1737.15	4958.8
March.2023	5093.8	3362.93	1730.87	5093.8
<b>Total</b>	<b>43542.8</b>	<b>30210.21</b>	<b>13332.81</b>	<b>43542.8</b>



Date: 19<sup>th</sup> March 2024

**TO WHOM SO EVER IT MAY CONCERN**

This is to certify that M/S APCO INPRATECH has taken the supply of Pond Ash from INDIA GLYCOLS LIMITED for the construction of embankment of Gorakhpur Link Expressway.

The quantum consumed is worked out as 56,952 MT is equivalent to 43,145 Cum (approx) during the Financial Year 2022-23 & 2023-24.

This certificate is issued on their request made on date 8<sup>th</sup> March 2024.

This Certificate cannot be used for any Commercial Purpose or claim and issued for environmental purpose only.

This Certificate is valid only for financial year 2022-23 & 2023-24.

**For APCO Infratech Private Ltd.**

  
19/03/2024  
(Authorized Signatory)



Plot No. 2-B, Sector - 126, NOIDA-201304, Distt. Gautam Budh Nagar, Uttar Pradesh, Tel. : +91 120 6860000, 3090100, 3090200  
 Fax : +91 120 3090111, 3090211, E-mail : iglho@indiaglycols.com, Website : www.indiaglycols.com

**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF THE BOARD OF DIRECTORS OF INDIA GLYCOLS LIMITED HELD ON 31<sup>st</sup> OCTOBER, 2008 AT 17, FRIENDS COLONY, (WEST) NEW DELHI – 110065.**

**AUTHORISATION FOR LEGAL CASES, EXCISE & SALES TAX MATTER, AUTHORISATION TO REPRESENT COMPANY AT DIFFERENT GOVERNMENT DEPARTMENTS, JUDICIAL AUTHORITY, LOCAL BODIES ETC.**

“RESOLVED THAT Mr. Peter Paul, Legal Advisor, be and is hereby authorised to file/defend legal suits, claims, writs and appeals before the statutory authorities/tribunals set up under various statutes viz. Central Excise, Customs, Sales Tax/VAT Act, Income Tax, U.P./Uttarakhand Excise, Companies Act, Pollution Control Laws and any other Central or State legislation and different subordinate courts and High Courts both within the jurisdiction where the Company’s registered office is situated and within the territorial jurisdiction of India and also to the Supreme Court of India.”

“FURTHER RESOLVED THAT Mr. Peter Paul, Legal Advisor, be and is hereby authorised to represent the Company, sign and file on oath affidavit, written statements/submissions, counter/rejoinder affidavits and any other paper, returns, document etc. and to make statement for and on behalf of the Company before the Central/State Government, statutory bodies and other related agencies and to generally do all acts, deeds and things in the best interest of the company.”

**For India Glycols Limited**

**Ankur Jain**

**Company Secretary**

**Membership No. A-13315**

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