

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH AT NEW DELHI**  
**(In O.A. 168 of 2024)**

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Place: Ludhiana  
Date: 23-07-2025



Kuldeep Singh Khaira

(Applicant No. 2 in Person)  
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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**  
**AT PRINCIPAL BENCH, NEW DELHI**  
**(In O.A. No. 168 of 2024)**

**Kapil Dev & ors. .... Applicants**

**vs.**

**State of Punjab & ors. .... Respondents**

Additional submission by the Applicants against toothless policy dated 12-09-2024 as well as inaction of Municipal Commissioner of Ludhiana & Horticultural JE Kirpal Singh of Municipal Corporation Ludhiana on incidents of illegal axing of trees in Ludhiana.

**Hon'ble sir,**

**Respectfully showeth,**

**The petitioners humbly submit as under:**

1. That vide rejoinder dated 12-05-2025, the Applicants submitted major loopholes in the impugned policy issued vide Notification No. DFWLP-45/144 /2024 -O/o FINANCIAL COMM.-FOREST & WILDLIFE //925874/2024 dated 12-09-2024 and it is a toothless tiger as there are no provisions relating to Environment norms for protection of trees located at Public Places. The provision of action under IPC (now BNS 2023) is mere an eyewash and overall, the policy made by Punjab Govt. is very weak and would not help in preservation of trees and will lead to harassment for complainants only. It is pertinent to humbly submit here that the Applicant Er. Kapil Dev ahs been called many times of Police Department to give statement on complaints given

against axing of trees but no FIR has been registered till date even after formulation of policy.

2. That on 19-07-2025, the Applicant Er. Kapil Dev found one tree (aged 25-30 years old – height around 35-40 feet high) missing from GPS location 30.891664, 75.817816\_which was seen in routine on the way to his office. The Applicant immediately informed JE Kirpal Singh of Horticultural department as well as Municipal Commissioner of Ludhiana on Whatsapp. As per the available remedy, the Applicant updated Municipal Commissioner as well as JE Kirpal Singh about the impugned policy and requested to register FIR against the culprits and gather evidences from CCTV installed at nearby locations. However, the law regulating authority, with intent to save the accused person/s from legal punishment failed to act as per law and submitted the complaint to Police Station but deliberately didn't get diary number (D-5) from the Police Station. Similar act has been done many times since last many years resulting in no action by SHO of concerned Police Stations. The copy of screenshots of Whatsapp depicting communication done by Applicant Er. Kapil Dev with Municipal Commissioner as well as JE Kirpal Singh are produced herewith as **Annexure P-10**. One Photograph with GPS location clicked on 23-07-2025 GPS location 30.891664, 75.817816 from where tree has been axed and stolen illegally by owner of building, is produced herewith as **Annexure P-11**.
3. That another tree standing very close to the crime site and that tree has also been brutally axed illegally in the recent past by the owner of illegally constructed building and only main trunk and some branches on top i.e. above the height of more than 30'. It is pertinent to humbly submit here that the Office of Municipal Commissioner of Ludhiana is located just within 300 meters from the impugned location. It is further pertinent to humbly submit here that the Applicants along with other citizens conducted peaceful protest at impugned location as well as in front of MC building on 23-07-2025 but the Public Servants have not moved an inch to abide by law. One Photograph

depicting present condition of second tree (done by owner of building) at impugned location at Sarabha Nagar, Ludhiana is produced herewith as **Annexure P-12**. Two Photographs depicting peaceful protest held by Applicants & other local residents on 23-07-2025 are produced herewith as **Annexure P-13**.

4. That another tree located at GPS Location **30.886217, 75.809164** main road of BRS Nagar Ludhiana is being partially axed frequently since last one year by the owner of 346-B and it is doubted that this tree may be axed completely during night hours or is likely to be poisoned by the adjoining building owner. The Applicant Er. Kapil Dev has been updated JE Kirpal Singh from time to time and requesting to register FIR against the culprit but no action has been taken by him till date. Three Screenshots of Whasapp communication done with JE Kirpal Singh regarding illegally partially axed tree are produced herewith as **Annexure P-14**. Four photographs of impugned tree depicting damage to tree being done from time to time by owner of 346-B, BRS Nagar, Ludhiana are produced herewith as **Annexure P-15**.

**PRAYER:**

Keeping in view of the above produced facts & damage being done to Environment by the culprits, the Applicants humbly request this Hon'ble Tribunal as under:

1. For request to issue notice in the Original Application & directions to Respondents to strengthen the policy by including provisions of Environmental laws in it & major discrepancies & loopholes

submitted before this Hon'ble Tribunal in rejoinder dated 12-05-2025 by the applicants.

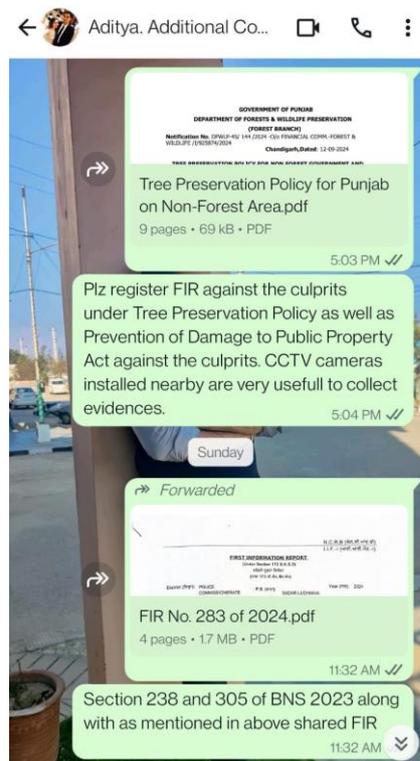
2. Directions to Respondent No. 4 to take action against the culprits (owner of buildings) on illegal axing of trees done by owner of 114-D & 346-B, BRS Nagar as well as owner of building at impugned location at Sarabha Nagar Ludhiana in front of which the trees have been axed.
3. Any other as deemed to be fit by this Hon'ble Tribunal

Date: 23-07-2025  
Place: Ludhiana



Kuldeep Singh Khaira  
(Applicant No. 2)

ANNEXURE P-10



**ANNXURE P-11**



**ANNEXURE P-12**



**ANNEXURE P-13**



ANNEXURE P-14



**ANNEXURE P-15**



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**Kapil Dev & ors. .... Applicants**

**vs.**

**State of Punjab & ors. .... Respondents**

**Affidavit of Kuldeep Singh Khaira (aged 48 years) s/o s. Ujjagar Singh Khaira, r/o #125, Ishar Nagar, Ludhiana.**

**RESPECTFULLY SHOWETH:**

I, the above mentioned deponent do hereby solemnly affirm and declare as under:-

1. That the deponent is one of the Applicants (in person) in Original Application No. 168 of 2024 filed before this Hon'ble National Green Tribunal.
2. That the contents of paras no. 1 to 4 of the accompanying the Additional Submission dated 23-07-2025 along with Annexures are true and correct to best of my knowledge.



Certified that the affidavit/S.P.A./GPA has been read over & explained to the deponent/executor who seemed directly to understand the same at the time making thereof.

Place: Ludhiana  
Dated: 23.07.2025

*Kuldeep Singh Khaira*  
**DEPONENT**

**Verification:**

Verified that the contents of para 1 and 2 of this affidavit are true and correct. No part of it is false, and nothing material has been kept concealed therefrom.

Place: Ludhiana  
Dated: 23.07.2025

*Kuldeep Singh Khaira*  
**DEPONENT**

Attested as Identified

**NOTARY PUBLIC**  
Distt. Courts, Ludhiana PB.

23 JUL 2025

I know the deponent/executor/demandant  
Personally He/She has signed/Thumb  
marked in my presence