

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

O.A. No.606/2022

IN THE MATTER OF:

PUBLIC ACTION COMMITTEE

.... APPLICANT

VERSUS

STATE OF PUNJAB AND ORS.

.... RESPONDENTS

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PLACE: GURUGRAM

DATE: 15.01.2024




A.R. TAKKAR, SHRIYA TAKKAR, BHARGAVA RAVIKUMAR,




KAPIL BAKSHI, HIMANI BHADAURIA AND PRINCE SHARMA
ADVOCATES

ARTLO

A-25/12, DEODAR MARG, DLF PHASE 1,

GURGAON 122002

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MALBROS INTERNATIONAL PVT. LTD. TO THE REPLY
AFFIDAVIT DATED 23.11.2023 FILED BY CPCB
(RESPONDENT NO. 5)**

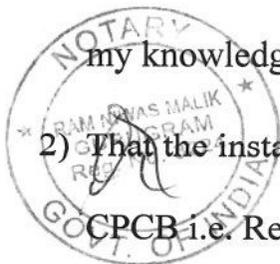
I, Sapan Kayat S/o Shri Kalu Ram, aged 50 years, R/o House No. 358, Sector 15, Panchkula, Haryana -134113, presently at New Delhi, do hereby solemnly affirm and declare as under:

1) That I am the authorized representative of the Respondent No. 7 in the above-mentioned matter and well conversant with the facts of the case and competent to swear this affidavit. That the contents of this affidavit are true to the best to my knowledge and belief, and I have not suppressed any material facts.

2) That the instant affidavit is being filed in response to the reply affidavit filed by CPCB i.e. Respondent No. 5 dated 23.11.2023.

3) At the very outset it is submitted that admittedly even CPCB in its aforesaid response agrees to the proposition of having a detailed environmental site assessment and the following observations are important for the just and proper adjudication of this matter:

"It is humbly submitted that NEERI has been engaged by PPCB for detailed environmental site assessment and suggesting remedial



(2)

measures. PPCB may provide the aforesaid reports of the four Committees to NEERI who may take into account necessary observations/findings of the reports and incorporate necessary remedial measures thereto in their on-going study.

It is also humbly submitted that Hon'ble National Green Tribunal may also like to consider engaging other subject matter expert Institutes such as CSIR - National Geophysical Research Institute (NGRI) and Central Ground Water Board (CGWB) for associating in the site assessment & remedial measures study being conducted by NEERI who has been engaged by PPCB."

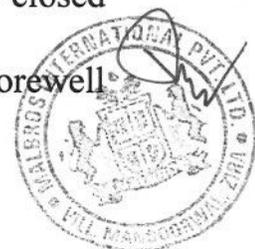
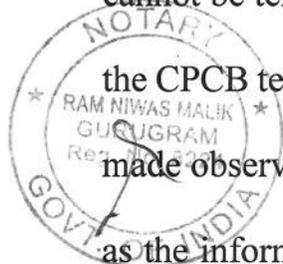
- 4) That CPCB in the aforesaid response has skirted the question and serious legal objection raised by the Answering Respondent i.e. the samples have been collected by CPCB in utter violation of not only the procedure but also in violation of Section 21 (3)(b) and (e) and as a necessary consequence thereof the same are inadmissible in evidence in any legal proceedings. The procedural violation while collection of sample is also fatal as the borewells were not operated for reasonable time expelling the stagnant water (the industry was lying closed for over one and half year) and samples were taken at the whims and fancies of the agitating villagers immediately on operating the borewell. In response to these allegations the only justification given by CPCB is that a legal notice in Form 1 was issued by CPCB and accepted and signed by the representatives of the Answering Respondent Industry. CPCB in its response is totally silent regarding not dividing samples into two parts even after the request in this regard was repeatedly made to the CPCB officials by the representatives of the Answering Respondent Industry.



③

5) That further, CPCB has also skirted the allegation regarding inspection of the industry in about 45 acres and drawing samples from borewells and piezometers, all within a span of 2.5 hours by simply stating that in fact the CPCB team was there for 3 days i.e. 22.02.2023 to 24.02.2023. This is totally misleading as initially CPCB/CGWB team was not allowed to inspect/take samples on the first day and it is only when some kind of an agreement was arrived between the agitating villagers and CPCB that the latter inspected the industry and drew samples duly accompanied by the aforesaid agitators all within 2.5 hours in the evening and rest of the days were spent inspecting the area around the industry and taking samples from borewells thereof. The fact remains that the CPCB/CGWB team at the whims and fancies of the agitating villagers in a hurried manner without following due procedure prescribed by law drew samples from the borewells/ piezometers and even inspected the industrial plant spread in 45 acres approximately all within 2.5 hours approximately.

6) That the inspection/drawing of samples as well as the report submitted thereof cannot be termed to be a fair and impartial process as influenced and motivated, the CPCB team apart from the aforesaid illegalities committed have on their own made observations without taking into account the factual circumstances as well as the information provided by the industry. A lot has been stated in the report regarding existence of 10 borewells and 6 piezometers within the industrial premises whereas they were duly informed that while aggregating land for the industry from various farmers there pre-existed at least 5 borewells dug by the previous land-owning farmers for agricultural purposes which were duly closed and covered with soil and registration sale deeds mentioning existing borewell are already part of the record of this case.



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7) Out of the two borewells alleged to be present next to each other violating the provision regarding two borewells not to be within 200 meters of each other, it was informed to the team by the industry officials present that one of the borewell's pipe got busted as a consequence of which it had to be closed and another one dug nearby which was operational. The prescribed distance of 200 meters between the two borewells is applicable for two operational borewells and not when one of the borewells is lying closed. A comparative table showing the status of 10 borewells found by CPCB is already on record at Page No. 590- 595 of the paper book (I.A. NO 737 OF 2023) in O.A. 606 of 2022, the contents of which are reiterated here and not being repeated for the sake of brevity.

8) That the findings/reports of sample analysis by CPCB are also disputed for the reasons stated herein above (procedural and legal infirmities while collecting these samples) and further to bring home the point that analysis reports from reputed institutions i.e. Shriram Institute, Delhi, Punjab Biotechnology Lab etc.

of the samples collected by the NGT Monitoring Committee are authentic based upon legal sampling and the same vary from the CPCB lab reports, despite the fact that during the interregnum period the industry remained closed. A comparative chart of the said two borewells wherein fault was found by CPCB of the aforesaid sample analysis is being attached hereto as **Annexure R7/1**.

9) That the CPCB report itself suggests further investigation on most of the issues and even the Answering Respondent Industry wants and prays in the interest of justice and fairplay for appointment of expert agencies as deemed fit by this Hon'ble Tribunal to holistically look into and report regarding contamination caused and whether it is attributable to the industry or not especially with the underground water being from NE to SW i.e. from village Zira to village



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Sekhwan which has been wrongly shown by CPCB/CGWB as NNW rendering the entire calculations/ report of CPCB fallacious.

- 10) That in addition to what has been brought on record by Respondent Industry before this Hon'ble Tribunal by the Respondent Industry the following aspects are also important.
- 11) The Regional Director of the CPCB has earlier in his statement in the report of Joint Committee submitted to Hon'ble NGT endorsed that *“ it was felt by Joint Committee that the Govt. Agencies as well as NGT Monitoring Committee have already carried out monitoring on the observations of Public Action Committee and the Industry is laying closed w.e.f 24-07-2022 so no useful purpose will be served by repeating the exercise already conducted by the NGT Monitoring Committee . However the Joint Committee shall carry out visit to the site in case Hon'ble NGT considers so in view of facts explained above or as & when for monitoring the case, the industry re-commissions its operation. The status report may accordingly be filed for further of Hon'ble NGT pls.”*

Signed by :

- 1) Asst. Environmental Engineer ,PPCB , Faridkot
- 2) Environmental Engineer , PPCB , Faridkot
- 3) Regional Director , CPCB -Chandigarh
- 4) SDE , Dept of Water Resource , Ferozepur
- 5) Chief Environmental Engineer , PPCB , Bhatinda
- 6) ADC , Ferozepur



12. The Industry had remained closed during the time of visits of NGT Monitoring Committee on 18-08-2022, Joint Committee Constituted by Hon'ble NGT on 21-10-2022 ; CPCB visited on 22-02-2023 and CPCB tried



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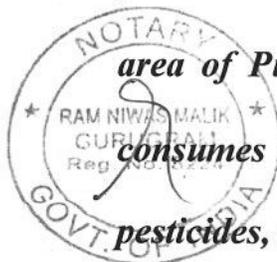
to perpetrate an assumptive, self-conflicting, contradictory report and without considering scientific facts and historical records.

13. CPCB ignored the major issue of sewer water entering the ground water stream during the rainy flooding season. CPCB also deliberately ignored the fact that the villages mentioned were not having any STP's (Sewer Treatment Plants) henceforth the Industry cannot be held responsible for causes relatable to poor sanitary conditions in these villages which is verified by presence of e.coli and f.coli bacteria in all the reports of PPCB, NGT Monitoring Committee, CPCB, 4 Committees formed by the State Govt. *It is pertinent to mention that in Sept 2022 Hon'ble NGT has imposed a fine of Rs.2080 crores on the state Govt. of Punjab for failure to tackle the problem of solid and liquid waste management.*

14. CPCB deliberately ignored the fact that due to ignorance farmers are ruthlessly using chemical fertilizers, pesticides, insecticides, herbicides which has deteriorated the underground water quality causing cancer, ulcer and other ailments among the local people including farmers. *The most affected individuals are the agricultural workers who are directly exposed to pesticides. The Malwa region of Punjab, India, is less than 15% of the total*

area of Punjab (only 0.5% of the total geographical area of India but it consumes nearly 75% of the total pesticides used in Punjab. The high use of pesticides, along with environmental and social factors, is responsible for the high concentration of pesticide residues in the food chain of this region.

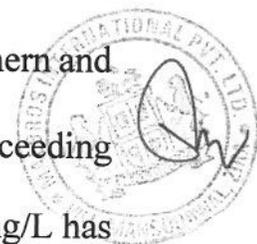
Proceedings in the Case of banning use of hazardous pesticides have been sub-judice in Hon'ble Supreme Court of India and in Feb 2023 an important observation has been made by the Highest Court in this matter regarding *banning of only 3 pesticides by GoI out of 27 hazardous pesticides.*



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15. That (Following are the Excerpts from the annual reports of CGWB, Planning Commission , WHO, World Bank , Indian Council of Medical Research , Baba Atomic Research Centre ,BIS , Indian Census Bureau , research journals published by PAU , Ludhiana , News Papers Cuttings and research journals by independent scientists , Department of Water Supply and Sanitation -Punjab , Report by Committee submitted in Punjab Vidhan Sabha in 2021)

(i) Ferozpur district of Punjab state, India occupies an area of about 5,305 km² in southwestern Punjab (India). Total population of the district is about 10 lakhs, out of which, 5 lakhs are male and 5 lakhs are female. About 95 % rural population depends upon groundwater for execution of daily routine activities like drinking, domestic and agricultural purposes. Impurities in drinking water were detected, the results of physico-chemical parameters confirmed the presence of heavy metals present in drinking water samples collected from selected sampling sites across district Ferozpur of Punjab state, India. The results of some physico-chemical parameters like pH, TDS, alkalinity, total hardness, fluoride, chloride and some heavy metals like arsenic and lead are observed. The Malwa region of Punjab, India, is facing an unprecedented crisis of environmental health linked to indiscriminate, excessive, and unsafe use of pesticides, fertilizers, and poor groundwater quality. According to a report entitled 'Water Logging in Punjab by Planning Commission', Government of India (2013), a considerable area of the southern and southwestern part of the state has nitrate concentration exceeding the critical level. High fluoride content, i.e., more than 10 mg/L has

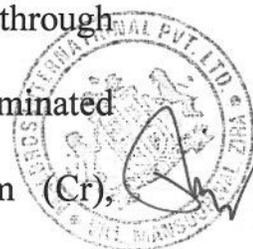


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been found in Fazilka, Muktsar, Bathinda, Sangrur, Barnala districts. According to Central Ground Water Board (2007). *Arsenic contamination is also strongly associated with high concentrations of iron, phosphate, and ammonium ions*, and anthropogenic activities such as excessive groundwater withdrawal for agricultural irrigation (Kumar et al. 2010). The Malwa region accounts for nearly 75 percent of pesticides used in the State. The entire southwestern belt of the State comprising of Ferozepur, Moga, Barnala, Bathinda and Sangrur Districts have high incidence of Uranium in groundwater. A study by the State government in collaboration with ICMR (Indian Council of Medical Research) has indicated the high incidence of cancer disease, especially *in Malwa region. It is also Observed that rate of cancer incidences in the State is 30.5/lakh population where as the rate is as high as 75/lakh in Bathinda and Muktsar Districts*. The pesticides have deleterious effects on health. Several of the pesticides are carcinogenic and cause long term harmful effect on health, in case contaminated water is continuously used for long term for human consumption).



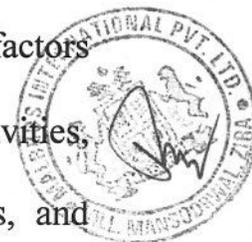
- (ii) Excess use of fertilizers threatens the groundwater and surface water on a large scale. Agricultural runoff is surface water leaving cultivated fields as a result of receiving water in excess of the infiltration rate of the soil. Pesticides can enter water through surface runoff or through leaching. Areas were contaminated maximally by some of the heavy metals. Chromium (Cr), Manganese (Mn), Nickel (Ni), Copper (Cu), Lead (Pb), Cadmium



(9)

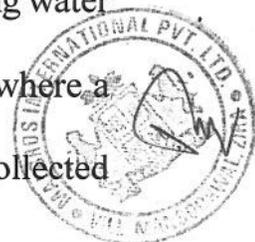
(Cd) and Uranium (U) had been found to be present in higher amounts. The concentrations of these heavy metals in all the vegetable samples were higher than the US EPA's/ WHO/BIS's guideline values. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into watersheds through lakes, rivers, wetlands, coastal waters, and even our underground sources of drinking water. Pollutants that result from farming and ranching include sediment, nutrients, pathogens, pesticides, metals, and salts. Excessive irrigation can affect water quality by causing erosion transporting nutrients, pesticides, and heavy metals or insecticides herbicides, and fungicides can enter and contaminate water through direct application, runoff, and atmospheric deposition. **The major source of metal pollution in water is use of pesticides in the form of calcium arsenate, lead arsenate, sodium arsenate and arsenic acid (Rasool et al. 2016).**

Conclusions The hydrochemical analysis of the study area in parts of Malwa region, Punjab (India) reveals that the groundwater is highly contaminated except for a few locations. The majority of water samples were found to be beyond desirable limits as prescribed by WHO standards and Indian standards for drinking water. Samples from almost all the locations were classified as hard and contained high TDS which indicate its unsuitability for drinking. A wide variation in EC and TDS is observed in samples during both the seasons indicating the influence of climatic factors including rock water interaction as well as anthropogenic activities, such as increase in pumping, excessive use of fertilizers, and



(10)

discharge of industrial effluents on the hydrochemistry of the study area. *During the rainy seasons heap of solid waste , plants residues and also the pesticides sprayed on the plants gets washed off with the rain water and mixed in to the underground water.* The total arsenic content in groundwater samples was higher than the safe limits of 10 lg/L set by WHO and BIS making water unsuitable for drinking purpose. Excessive use of phosphate fertilizer which is a common practice in this region seems to be the major anthropogenic sources of arsenic in the water samples. *The Malwa region (Cotton belt) accounts for nearly 75 percent of pesticides used in the State.* Overexploitation has caused continuous lowering of groundwater levels, Excessive fertilizer and pesticide use is leading to declining productivity and soil fertility, and at the same time, farmers are increasing their use to increase yields. In the last decade, there have been increasing reports of higher incidence of morbidity and mortality related to environmental factors, mostly in the 14 districts in the south known as the Malwa belt. Media reports have brought the issue to the fore, with reports of the '*cancer train*' which transports poor cancer patients from Punjab to a charitable cancer specialty treatment hospital in Bikaner, in the neighboring state of Rajasthan. In 2009 concern about metal exposure arose when hair and urine samples of children living in Faridkot were found to contain high amounts of barium, cadmium, manganese, lead and uranium, signifying long-term exposure. In response, drinking water was tested by the Baba Atomic Research Centre (BARC), where a total of 235 groundwater and surface water samples were collected



(11)

from Bhatinda, Mansa, Faridkot and Ferozpur, where found containing higher uranium contents.

(iii) *In 2018, farmers in Punjab consumed 232 kg per hectare of fertilizers, over the national average of 133 kg per hectare. Despite the fact that Punjab occupies only 1.57% geographical area of India, it contributes more than 50 % grain in the central grain pool. More than 83% of land in Punjab is under agriculture as compared to 40.38% of national average. The cropping pattern of wheat and paddy rotation has led to manifold increase in irrigation water demand.* Injudicious surface water irrigation policies, indiscriminate / excessive ground water pumpage due to free electricity coupled with irrational irrigation and agricultural practices have led to situation wherein fresh ground water resources of the state have depleted at an alarming rate in most parts of the state. On the other hand, the south-western parts of Punjab are facing severe water logging problems.



(iv) Traditionally, the farmers had followed the Maize-Wheat or Sugarcane-Maize-Wheat cropping pattern but during last about four decades, they have shifted to Wheat-Rice cropping pattern thereby leading to increased demand on irrigation water and fall in underground water. The quality of groundwater in southwestern districts of Punjab is deteriorating due to anthropogenic pollution including excessive use of fertilizers and pesticides. As per *Report of Punjab Vidhan Sabha Committee in 2021, 94.3 % of total water of Punjab is used in the agriculture sector, 3.8 % domestic*



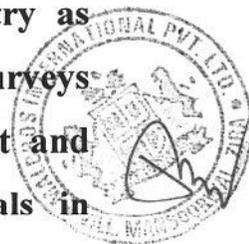
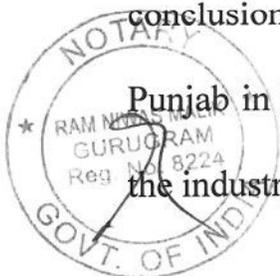
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purpose and merely < 2 % is used by Industrial Sector . The economy of Punjab is 75 % depending upon the agriculture sector.

16. CPCB , despite of having report on drinking water prepared by the *Department of Water Supply and Sanitation 2021* failed to appreciate that nearly 1525 villages across Punjab do not have potable drinking water due to presence of Arcenic , Floride , Sodium , Chloride , Iron and Uranium other heavy metals and hazardous chemicals in the underground water due to geogenic and anthropogenic reasons . Hence it is an established fact that the problems in these areas is due to low water recharge , manifold rise in the demand of ground water leading to deep boring in earth causing heavy metals coming-up along with ground water and lack of sewerage management systems in the villages.

17. The CPCB report is Politically biased, perpetrated with malicious intent to hurt the business interests of the industry. CPCB deliberately ignored the important conclusions / references made by the 4 Committees formed by the Govt. of Punjab in Dec 2022 in the matter of Malbros International which have visited the industry and nearby areas and clearly revealed that in their reports that :

- (i) Deaths due to cancer 16.9/lac is much below than the national average of 20/Lac on cancer in the nearby areas hence it cannot be attributable to Industry.
- (ii) No death was caused to the cattle in the nearby areas of the Industry as high value of nitrate was found in green fodder in their postmortem reports.
- (iii) No loss of Soil Fertility was caused due to industry as observed by the agriculture scientists through field surveys except due to vicious cropping pattern of rice -wheat and rampant usage of hazardous pesticides and chemicals in farming.



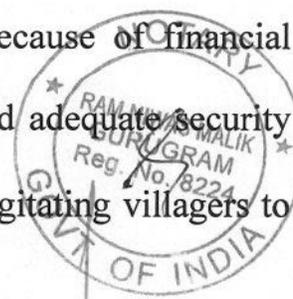
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(iv) Industry cannot be held responsible for prevalence of Hepatitis B & C in the region.

By submitting an ambiguous, baseless and unscientific report the CPCB has clearly caused delusion in the fair judicial process harming the interests of the Industry along with livelihood of workers employed. Henceforth any consequential aftermath actions of such report/directions should also be immediately rendered illegal, unsustainable and should be declared null and void.

18. It is therefore most respectfully prayed that this Hon'ble Tribunal in order to provide substantial justice in this matter may kindly be pleased to appoint an independent agency/agencies who may be directed to scientifically investigate and report the source of contamination and its remedifications methodology and further take legal samples from the Industry after allowing it to operate and stabilize for the requisite reasonable period and file a report before this Hon'ble Tribunal at the earliest as otherwise the Industry may not be able to operate at all because of financial constraints. It is further prayed that such agencies be provided adequate security cover and two persons each from the Industry as well as the agitating villagers to allowed to be associated with the said agency/agencies;

Pass any such or further order as this Hon'ble Tribunal may deem fit and proper in the interest of justice and fairplay.

ATTESTED

 DEPONENT

VERIFICATION

Verified that the contents of above affidavit are true and correct to my personal knowledge and that nothing has been concealed therein.

DATED: 15-01-2024


 DEPONENT

(14)

ANNEXURE-R-7/11

Borewell Near CO2 Plant (Closed Borewell) Sample taken from 120-150 ft

			Standards as per IS: 10500:2012		NGT TESTING			CPCB Testing
S.No.	PARAMETERS	Units	Acceptable Limit	Permissible Limit	Punjab Biotechnology lab, Mohali	Shriram Institute, Delhi	PPCB Lab	CPCB LAB
1	pH		6.5-8.5	No relaxation	7.5	8.1	7.8	8
2	TDS	mg/l	500	2000	798	784	777	704
3	TSS	mg/l			447	160	486	-
4	Turbidity	NTU			-	-	-	1191
5	BOD	mg/l			<1	6	BDL	-
6	COD	mg/l			28	48	27	105
7	Odour				-	-	-	Unpleasant Smell
8	Colour	Hazen	5	15	-	-	-	145 (Blackish Color)
9	Arsenic	mg/l	0.01	0.05	0.009	Not Detected	BDL	0.1
10	Lead	mg/l	0.01	No relaxation	BDL	Not Detected	BDL	0.13
11	Chromium	mg/l	0.05	No relaxation	BDL	Not Detected	BDL	0.28
12	Copper	mg/l	0.05	1.5	BDL	Not Detected	BDL	0.18
13	Iron	mg/l	0.3	No relaxation	0.69	0.6	1.13	206.62
14	Magnesium	mg/l	30	100	3.4	5	3	10
15	Calcium	mg/l	75	200	12	6	9	42
16	Nickle	mg/l	0.02	No relaxation	BDL	Not Detected	BDL	0.21
17	Mercury	mg/l	0.001	No relaxation	BDL	Not Detected	BDL	-
18	Cadmium	mg/l	0.003	No relaxation	BDL	Not Detected	BDL	BDL
19	Chlorides as Cl	mg/l	250	1000	49	48	55	60
20	Sulphates as SO4	mg/l	200	400	185	166	134	451
21	Total Hardness as CaCO3	mg/l	200	600	44	35	37	143
22	Alkalinity As CaCO3	mg/l	200	600	355	322	322	378
23	Nitrate as NO3	mg/l	45	No relaxation	5.6	Not Detected	0.43	1
24	Boron	mg/l	0.5	1	0.59	1.1	0.4	1.7
25	SAR				5.2	16.9	17.3	-
26	Total Coliform / E.coli.	MPN per 100ml / cfu per 100 ml	Shall not be		T. Coli. 161	T. Coli. 14000(organism)	T. Coli. 110	-
27	Faecal Coliform/ E.Coli.	MPN per 100ml / cfu per 100 ml			F.Coli. <1	F.Coli. 940 (organism)	F.Coli. BDL	-
28	Cynide	mg/l		0.05 Max	-	-	-	BDL
29	Phenolic Compounds	mg/l		0.001 Max	-	-	-	-



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Borewell Main Gate Near Parking

			Standards as per IS: 10500:2012		NGT TESTING			CPCB TESTING
S.No.	PARAMETERS	Units	Acceptable Limit	Permissible Limit	Punjab Biotechnology lab, Mohali	Shriram Institute, Delhi	PPCB Lab	CPCB LAB
1	pH		6.5-8.5	No relaxation	7.87	7.8	7.7	7.8
2	TDS	mg/l	500	2000	944	1060	960	936
3	TSS	mg/l			730	824	824	-
4	Turbidity	NTU			-	-	-	1323
5	BOD	mg/l			2	4	BDL	-
6	COD	mg/l			18	36	23	101
7	Odour				-	-	-	Unpleasant Odour
8	Colour	Hazen	5		-	-	-	18 (Blackish Colour)
9	Arsenic	mg/l	0.01	0.5	0.009	0.01	BDL	0.14
10	Lead	mg/l	0.01	No relaxation	0.04	0.08	BDL	0.08
11	Chromium	mg/l	0.05	No relaxation	BDL	0.02	BDL	0.36
12	Copper	mg/l	0.05	1.5	0.12	0.2	BDL	0.15
13	Iron	mg/l	0.3	No relaxation	0.54	1.3	0.66	243.53
14	Magnesium	mg/l	30	100	28	29	25	27
15	Calcium	mg/l	75	200	30	21	28	50
16	Nickle	mg/l	0.02	No relaxation	BDL	0.01	BDL	0.22
17	Mercury	mg/l	0.001	No relaxation	BDL	Not Detected	BDL	-
18	Cadmium	mg/l	0.003	No relaxation	BDL	Not Detected	BDL	BDL
19	Chlorides as Cl	mg/l	250	1000	73	76	77	90
20	Sulphates as SO4	mg/l	200	400	216	366	292	436
21	Total Hardness as CaCO3	mg/l	200	600	190	173	175	230
22	Alkalinity As CaCO3	mg/l	200	600	435	387	395	415
23	Nitrate as NO3	mg/l	45	No relaxation	14.2	Not Detected	10.2	0.2
24	Boron	mg/l	0.5	1	0.577	0.8	BDL	2.4
25	SAR				8.1	10.7	8.8	-
26	T.Coli/ E.Coli.	MPN per 100ml / cfu per 100 ml	Shall not be		T.Coli. 7.9x10 ²	T.Coli. 940(organism)	T.Coli. 720	-
27	F.Coli / E.Coli	MPN per 100ml / cfu per 100 ml			F.Coli. 3.4x10 ²	F.Coli. 542(organism)	F.Coli. 94	-
28	Cynide	mg/l		0.05 Max	-	-	-	BDL
29	Phenolic Compounds	mg/l		0.001 Max	-	-	-	-

True Copy Ady



Public Action Committee & Ors vs State of Punjab & Ors.

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Rahul Chaudhry <rahul@artlo.in>

Mon 1/15/2024 5:46 PM

To:naginder.benipal@gmail.com <naginder.benipal@gmail.com>;officeofbalendu@gmail.com <officeofbalendu@gmail.com>;
balendushekhar@gmail.com <balendushekhar@gmail.com>;kawalpreet303@yahoo.in <kawalpreet303@yahoo.in>
Cc:Ajneesh Raj Takkar <artakkar@artlo.in>;Himani Bhaduria <himani@artlo.in>;Prince <prince@artlo.in>

📎 1 attachments (4 MB)

Malbros 15 jan 2024 (1).pdf;

Dear Sir/ma'am

Please find attached herewith a scanned copy of the Affidavit in response by Respondent No. 7. in the captioned matter. i.e. Public Action Committee & ors vs State of Punjab & Ors.

Rahul Choudhary

Clerk

ARTLO

email :rahul@artlo.in

website : www.artlo.in

NEW DELHI :

A-25/12, Deodar Marg, DLF Phase 1, Gurgaon 122001, India

Mob : +91 9643014849

Tel : +91 124 6469005

Fax: +91 124 4210005

CHANDIGARH :

#844 , Sector-8 ,Panchkula-134109

Chamber No-19 ,New Bar Room ,

High Court Complex, Chandigarh

Tel: +91 172 2562681

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