

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (NGT),
WESTERN ZONE BENCH (WZ), PUNE

Original Application No: 27 of 2026

In the matter of:

Dipak Dhansukhbhai Patel & Ors.

Vs

State of Gujarat & Ors.

BOOK NO. = 01 =
PAGE NO. = 141 =
SR. NO. = 512 = Petitioner
DATE. 11/06/2026



NILESH R. PANDYA
NOTARY Respondents
GOVT. OF INDIA
11 JUN 2026

AFFIDAVIT IN REPLY ON BEHALF OF RESPONDENTS NO. 2 & 4.

I, T. C. Patel, Adult, Occupation: Service, serving as the Environmental Engineer with the Respondent No. 2 & 4, do hereby state on solemn affirmation and make this Affidavit in reply for and on behalf of the Respondents No. 2 & 4, as under:

I say that I am serving as the Environmental Engineer, with the Respondent No. 2 & 4. I am well aware and conversant with the facts and circumstances of the Dispute pertaining to the present original application, based on the records and documents and I am also duly authorised for and on behalf of the Respondent No. 2 as well as the Respondents No. 2, file this affidavit in reply, which I hereby do. I say that the present affidavit in reply is being filed for the limited purpose of placing on record the true and correct facts of the matter, and I crave leave of this Hon'ble Tribunal to file other and further Affidavit, at a later stage, if need arises.

1. At the outset, the Respondent Nos. 2 and 4 respectfully submit that the present Original Application is misconceived, based on



incomplete and selective facts, and proceeds on sweeping and omnibus allegations without properly appreciating the statutory roles, powers and actions already undertaken by the answering Respondents in accordance with law.

2. The answering Respondents further submit that the Applicants have attempted to portray the issue as one of complete governmental inaction, whereas the record itself demonstrates that upon receipt of information and complaints regarding alleged discharge of sewage and fish mortality near Mora/Damka area, immediate inspection and necessary regulatory action were initiated by the concerned authorities.
3. It is respectfully submitted that officers of the Gujarat Pollution Control Board, Regional Office, Surat, conducted inspection of the concerned site on 23.11.2025 pursuant to complaints and communications received from various sources including the Collector Office and local representations. During such inspection, water samples were collected and detailed field observations were recorded. A copy of the Inspection Report dated 23.11.2025 is annexed hereto and marked as "ANNEXURE – R1" and the answering Respondents crave leave to refer to and rely upon the same for its true and correct interpretation at the time of hearing.
4. The inspection and subsequent analytical report categorically recorded that no indications of industrial discharge, illegal disposal of hazardous waste or industrial sludge were found at the site. The analytical findings further indicated that the issue pertained to



untreated domestic sewage discharge. A copy of the Analysis Report dated 29.11.2025 is annexed hereto and marked as “ANNEXURE – R2” and the answering Respondents crave leave to refer to and rely upon the same for its true and correct interpretation at the time of hearing.

5. The answering Respondents submit that immediately after inspection and analysis, the Regional Office of the Gujarat Pollution Control Board, Surat addressed communication to the concerned local authority requesting it to develop and implement appropriate sewage treatment, management and disposal systems for Mora village and adjoining areas and to undertake interim remedial measures to prevent discharge of untreated sewage into the drainage channel. A copy of the communication dated 29.11.2025 addressed by the Regional Officer, Gujarat Pollution Control Board, Surat to the Taluka Development Officer, Choryasi is annexed hereto and marked as “ANNEXURE – R3” and the answering Respondents crave leave to refer to and rely upon the same for its true and correct interpretation at the time of hearing.

6. It is respectfully submitted that the grievance raised in the present proceedings substantially pertains to issues of sewage collection, treatment and disposal infrastructure, which fall within the statutory and operational domain of the concerned local authorities and civic bodies. The answering Respondents cannot be fastened with liability for execution and maintenance of sewage infrastructure works which do not statutorily vest with these Respondents.



7. Without prejudice to the aforesaid, the answering Respondents submit that Respondent Nos. 2 and 4 have already discharged their statutory obligations by carrying out inspection, sampling, scientific analysis and issuance of necessary communications and recommendations to the concerned authorities upon noticing discharge of untreated domestic sewage. Hence, no case of deliberate inaction, negligence or dereliction of statutory duty is made out against Respondent Nos. 2 and 4.
8. The Applicants have failed to disclose that the authorities had already initiated regulatory intervention immediately upon receipt of complaint and prior to filing and/or entertaining of the present proceedings. The present Application therefore deserves to be considered in light of the remedial and regulatory measures already initiated by the competent authorities.
9. The answering Respondents further submit that the present Application contains vague, generalized and unsupported allegations against multiple governmental authorities without specifically identifying any individual statutory breach, omission or violation attributable to Respondent Nos. 2 and 4. The Application is therefore liable to be rejected insofar as these Respondents are concerned.
10. The answering Respondents submit that the Original Application fails to disclose any specific statutory breach, omission or actionable illegality attributable to Respondent Nos. 2 and 4. The pleadings merely contain vague, omnibus and generalized



G. J.

allegations without demonstrating any deliberate inaction or failure of statutory duty on part of these Respondents. The present Application is therefore liable to be rejected qua Respondent Nos. 2 and 4.

11. The answering Respondents further submit that the present proceedings proceed on an erroneous assumption that no action was undertaken by the answering Respondents, whereas inspection, sampling, analysis and regulatory communication had already been undertaken immediately upon receipt of information regarding the alleged incident. A copy of the Inspection Report dated 23.11.2025, Analysis Report dated 29.11.2025 and communication dated 29.11.2025 addressed by the Regional Officer, Gujarat Pollution Control Board, Surat to the Taluka Development Officer, Choryasi are annexed hereto and marked as **“ANNEXURE – R1”**, **“ANNEXURE – R2”** and **“ANNEXURE – R3”** respectively and the answering Respondents crave leave to refer to and rely upon the same for their true and correct interpretation at the time of hearing.

12. The answering Respondents submit that the substantive grievance raised in the present proceedings pertains to execution, establishment and maintenance of sewerage infrastructure, sewage treatment systems and civic facilities, which fall within the statutory and operational domain of the concerned local/self-government/planning authorities and not within the executionary jurisdiction of Respondent Nos. 2 and 4.



13. The answering Respondents submit that invocation of Section 17 of the National Green Tribunal Act, 2010 against Respondent Nos. 2 and 4 is wholly misconceived inasmuch as the answering Respondents are regulatory authorities and are neither polluters nor entities engaged in the alleged discharge activities.
14. The answering Respondents further submit that mere invocation of the principles contained under Section 20 of the National Green Tribunal Act, 2010 does not by itself establish any actionable violation or liability against the answering Respondents in absence of any specific statutory breach attributable to them.
15. Save and except what is specifically admitted herein, all allegations, averments, contentions and submissions made in the Original Application are denied in toto and the Applicants are put to strict proof thereof.
16. With reference to the contents of paragraph 1 of the Original Application, the answering Respondents submit that the same pertains to the description and particulars of the Applicants and therefore require no reply from the present answering Respondents. However, save and except what is borne out from the record, the answering Respondents do not admit any of the statements, averments or contentions made therein and the Applicants are put to strict proof of the same.
17. With reference to the contents of paragraph 2 of the Original Application, the answering Respondents submit that to the extent the contents pertain to the description of the answering



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Respondents, the same require no reply. However, the answering Respondents deny all other averments, implications and allegations, if any, contrary to or inconsistent with the records maintained by the concerned authorities.

18. With reference to the contents of paragraph 3 of the Original Application, the answering Respondents submit that the same appears to pertain to the personal assertions made by the Applicants regarding their residence and their alleged filing of the present Application on behalf of villagers of Village Damka. The answering Respondents have no independent knowledge of the same and therefore the Applicants are put to strict proof thereof.
19. With reference to the contents of paragraph 4 of the Original Application, the answering Respondents submit that it is true that Respondent No. 2 is the Gujarat Pollution Control Board constituted under the provisions of the Water (Prevention and Control of Pollution) Act, 1974 and other applicable environmental laws, while Respondent No. 4 is the Regional Office of the Gujarat Pollution Control Board, Surat. It is respectfully submitted that Respondent Nos. 2 and 4 undertake regulatory functions in accordance with the provisions of applicable environmental laws. Save as aforesaid, the answering Respondents deny the remaining averments made in the paragraph insofar as the same are contrary to the official records or seek to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4.



G. J.

20. With reference to the contents of paragraph 5 of the Original Application, the answering Respondents submit that Respondent Nos. 2 and 4, upon receipt of information regarding the alleged sewage discharge and related issues, promptly undertook inspection of the concerned site, collected samples and carried out necessary analysis in accordance with law. It is respectfully submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the answering Respondents deny any allegation suggesting deliberate inaction, negligence or statutory failure on part of Respondent Nos. 2 and 4.



21. With reference to the contents of paragraph 6 of the Original Application, the answering Respondents submit that the statements regarding geographical location of villages, population figures, revenue boundaries, dimensions and course of the creek, and other locational particulars are matters of record and the answering Respondents have no independent knowledge with regard to the exact correctness thereof and therefore the Applicants are put to strict proof of the same. It is further submitted that Respondent Nos. 2 and 4, upon receipt of information regarding the alleged sewage discharge and fish mortality in the concerned area, promptly undertook inspection of the site and carried out necessary analysis in accordance with law. The inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or

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industrial sludge was noticed at the site. Save as aforesaid, the answering Respondents deny any allegation suggesting deliberate inaction, negligence or statutory failure on part of Respondent Nos. 2 and 4.

22. With reference to the contents of paragraph 7 of the Original Application, the answering Respondents submit that the statements regarding declaration of Hazira Notified Area, applicability of the Gujarat Industrial Development (Notified Areas) Rules, 2007, constitution and functions of the Board of Management and other statutory and administrative particulars are matters of record. However, the answering Respondents deny any averment insofar as the same seeks to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4. It is respectfully submitted that Respondent Nos. 2 and 4 have undertaken inspection, sampling and analysis in accordance with law upon receipt of information regarding the alleged incident. The answering Respondents further submit that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge or hazardous waste disposal was noticed at the site. Save as aforesaid, the Applicants are put to strict proof of the remaining averments made in the paragraph.

23. With reference to the contents of paragraph 8 of the Original Application, the answering Respondents submit that the notification dated 09.12.2015 issued under the provisions of the Gujarat Town Planning and Urban Development Act, 1976 and inclusion of the



concerned area within the development area of Surat Urban Development Authority are matters of record. The answering Respondents deny the allegations insofar as the same seek to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4. It is respectfully submitted that upon receipt of information regarding the alleged incident, Respondent Nos. 2 and 4 undertook inspection, sampling and analysis in accordance with law. Save as aforesaid, the Applicants are put to strict proof of the remaining averments made in the paragraph.

24. With reference to the contents of paragraph 9 of the Original Application, the answering Respondents deny the allegations insofar as the same seek to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4. It is respectfully submitted that upon receipt of information regarding the alleged sewage discharge and fish mortality, Respondent Nos. 2 and 4 promptly undertook inspection of the concerned site, collected samples and carried out analysis in accordance with law. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the answering Respondents have no independent knowledge regarding the alleged quantity, exact source, manner or duration of discharge as stated in the paragraph and therefore the Applicants are put to strict proof thereof.




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25. With reference to the contents of paragraph 10 of the Original Application, the answering Respondents deny the allegations insofar as the same seek to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4. The answering Respondents further submit that the statements regarding alleged impact upon residents, fishermen, livelihood, health risks and extent of environmental degradation are matters requiring strict proof and the Applicants are put to strict proof thereof. It is respectfully submitted that upon receipt of information regarding the alleged sewage discharge and fish mortality, Respondent Nos. 2 and 4 promptly undertook inspection of the concerned site, collected samples and carried out analysis in accordance with law. The inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the Applicants are put to strict proof of the remaining averments made in the paragraph.

26. With reference to the contents of paragraph 11 of the Original Application, the answering Respondents submit that the contents relating to the Surat Development Plan 2035, sewerage details, planning aspects and observations contained therein are matters of record. However, the answering Respondents deny the allegations insofar as the same seek to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4. It is respectfully submitted that issues relating to establishment, execution and maintenance of sewerage infrastructure and sewage networks fall



within the domain of the concerned planning/local authorities under the applicable statutory framework. The answering Respondents further submit that upon receipt of information regarding the alleged incident, Respondent Nos. 2 and 4 undertook inspection, sampling and analysis in accordance with law. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the Applicants are put to strict proof of the remaining averments made in the paragraph.

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27. With reference to the contents of paragraph 12 of the Original Application, the answering Respondents submit that the contents relating to land use classification, zoning, development planning and projected population growth are matters pertaining to planning and development authorities under the applicable statutory framework and are matters of record to the extent reflected in official documents. However, the answering Respondents deny the allegations insofar as the same seek to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4. It is respectfully submitted that upon receipt of information regarding the alleged incident, Respondent Nos. 2 and 4 undertook inspection, sampling and analysis in accordance with law. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was



noticed at the site. Save as aforesaid, the Applicants are put to strict proof of the remaining averments made in the paragraph.

28. With reference to the contents of paragraph 13 of the Original Application, the answering Respondents submit that the contents relating to the alleged Detailed Project Report of 2014, proposed sewerage infrastructure, estimated costs, tax collections, utilization of funds and functioning of the Hazira Notified Area authorities are matters concerning the concerned local/planning authorities and the answering Respondents have no independent knowledge regarding the correctness of the same except to the extent borne out from official records. The answering Respondents deny the allegations insofar as the same seek to attribute negligence, inaction or statutory failure to Respondent Nos. 2 and 4. It is respectfully



submitted that Respondent Nos. 2 and 4, upon receipt of information regarding the alleged sewage discharge and fish mortality, undertook inspection, sampling and analysis in accordance with law. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the Applicants are put to strict proof of the remaining averments made in the paragraph.

29. With reference to the contents of paragraph 14 of the Original Application, the answering Respondents deny the allegations insofar as the same seek to attribute inaction, negligence or failure

on part of Respondent Nos. 2 and 4. It is respectfully submitted that Respondent Nos. 2 and 4, upon receipt of information and complaints regarding the alleged sewage discharge and related issues, promptly undertook inspection of the concerned site, collected samples and carried out necessary analysis in accordance with law. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the answering Respondents have no independent knowledge regarding the allegations pertaining to utilization of funds by Hazira Notified Area authorities and therefore the Applicants are put to strict proof thereof.

30. With reference to the contents of paragraph 15 of the Original Application, the answering Respondents deny the allegations insofar as the same seek to attribute deliberate negligence, inaction or statutory failure to Respondent Nos. 2 and 4. It is respectfully submitted that upon receipt of information regarding the alleged sewage discharge and fish mortality, Respondent Nos. 2 and 4 promptly undertook inspection of the concerned site, collected samples and carried out necessary analysis in accordance with law. The inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. The answering Respondents further submit that the statements regarding the alleged quantity of discharge, alleged

deliberate conduct of Respondent No. 7 and the alleged extent of environmental damage are matters requiring strict proof and the Applicants are put to strict proof thereof. Save as aforesaid, the answering Respondents deny the remaining averments made in the paragraph.

31. With reference to the contents of paragraph 16 of the Original Application, the answering Respondents deny the allegations insofar as the same seek to suggest complete inaction, negligence or statutory failure on part of Respondent Nos. 2 and 4. It is respectfully submitted that Respondent Nos. 2 and 4, upon receipt of information regarding the alleged incident, undertook inspection of the concerned site, collected samples and carried out necessary analysis in accordance with law. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the answering Respondents have no independent knowledge regarding the remaining inter se allegations and assertions made against other authorities in the paragraph and therefore the Applicants are put to strict proof thereof.

32. With reference to the contents of paragraph 17 of the Original Application, the answering Respondents submit that the same pertains to the reliefs sought by the Applicants before this Hon'ble Tribunal and therefore requires no reply. However, the answering



Respondents deny that Respondent Nos. 2 and 4 have turned a blind eye or committed any negligence, inaction or statutory failure as alleged or otherwise. It is respectfully submitted that Respondent Nos. 2 and 4 undertook inspection, sampling and analysis in accordance with law immediately upon receipt of information regarding the alleged incident. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site.

33. The so-called grounds as raised by the Applicants in paragraph 18 of the Original Application are neither legal nor valid grounds for maintaining the present Application against Respondent Nos. 2 and 4 and the same are ex facie misconceived, untenable and therefore denied. It is respectfully submitted that Respondent Nos. 2 and 4 had undertaken inspection, sampling and analysis immediately upon receipt of information regarding the alleged incident and the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site.

34. With reference to the contents of paragraph 19 of the Original Application, the answering Respondents submit that the contents thereof pertain to the alleged availability of remedy and maintainability as asserted by the Applicants. The answering

Respondents do not admit the correctness or validity of the same and the Applicants are put to strict proof thereof. Save as aforesaid, the paragraph requires no further reply.

35. With reference to the contents of paragraph 20 of the Original Application, the answering Respondents submit that the contents thereof pertain to the alleged absence of parallel proceedings as stated by the Applicants. The answering Respondents have no independent knowledge regarding the same and therefore the Applicants are put to strict proof thereof. Save as aforesaid, the paragraph requires no further reply.

36. With reference to the contents of paragraph 21 of the Original Application, the answering Respondents deny the allegations insofar as the same seek to attribute inaction, negligence or statutory failure to Respondent Nos. 2 and 4. It is respectfully submitted that Respondent Nos. 2 and 4, upon receipt of information regarding the alleged incident, promptly undertook inspection of the concerned site, collected samples and carried out necessary analysis in accordance with law. It is further submitted that the inspection and analytical findings indicated that the issue pertained to untreated domestic sewage discharge and no industrial discharge, hazardous waste disposal or industrial sludge was noticed at the site. Save as aforesaid, the contents relating to limitation, cause of action and maintainability are matters for consideration of this Hon'ble Tribunal and the Applicants are put to strict proof of the averments made in the paragraph.



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37. The answering Respondents submit that none of the reliefs as prayed for in paragraph 22 of the Original Application deserve to be granted against Respondent Nos. 2 and 4.

What is stated herein above is true and correct.

Solemnly affirmed at Gandhinagar on this 11th day of June, 2026.



[Signature]
Deponent.



IDENTIFIED BY ME

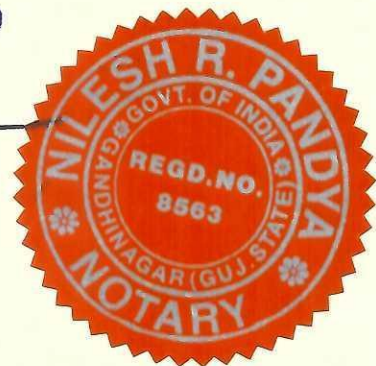
SOLEMNLY AFFIRMED
BEFORE ME

ADVOCATE/PERSON
NAME : BHUMI SHH.
ADD : G. NAGAR
DATE : 11/06/26

[Signature]
NILESH R. PANDYA
NOTARY
GOVT. OF INDIA

11 JUN 2026

11 JUN 2026



273 ANNEXURE - R1



GUJARAT POLLUTION CONTROL BOARD

Surat, Plot No. 11-12/2,3 , GIDC - Pandesara,
Surat - 394221,
(T) (0261) 2442696

Inspection Report

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

No.: GPCB / SURAT / PCBID-25360 / 67572-08/12/2025

1. Industry Details : **Complaints Only .. General File**
PLOT NO:For Ind. Name & Add. pl. see crux., For Ind. Name & Add. pl. see crux., -, Surat - 395003 DIST: Surat, TAL: Surat City
2. Scale & Category : Small/Red
3. Production Date : 01/01/2011
4. Date & time of visit : 23/11/2025 06:50, (Inspection ID : 893678)
5. Person Contacted : NA
6. Type of Inspection : OTH

7. Field Observations (Crux)

Type	Details
General	~ 29/11/2025 -----, Entry By AEE MR. SHUBHAM RAJESHBHAI SONAWADIYA Mr.V.B.Prajapati
Water	~ 29/11/2025 The inspection was undertaken in reference to (i) local news reports, (ii) an email dated 23/11/2025 received from the Collector Office making reference to a complaint submitted by Shri Darshan Nayak, Mahamantri, Gujarat Pradesh Congress Committee, and (iii) telephonic information received from Mr. Dipak Patel, regarding the alleged continuous discharge of untreated sewage from Mora Village into the natural drainage situated east of Damka Village in Choryasi Taluka and the resulting large-scale fish mortality in the said drainage. In view of the seriousness of the complaint involving potential public and ecological implications, an immediate field visit was carried out. The site inspection commenced during late evening hours, and low visibility was observed due to winter conditions. The complainant, Mr. Dipak Patel, was contacted telephonically and he remained available throughout the inspection to guide the team to the affected stretch. The area inspected lies downstream of Mora Village towards the eastern side of Damka Village in Choryasi Taluka, geographically located at Latitude 21.188723 and Longitude 72.651329. During the interaction, Mr. Dipak Patel informed that this has been a long-standing issue and several representations have been made over time to various authorities including GPCB. He stated that approximately 1,00,000 people reside in and around Mora Village and that there is no sewage treatment infrastructure available in the locality, due to which the entire domestic sewage is discharged directly into the natural drainage. He further emphasized that recurrent episodes of fish mortality and foul odour are routinely experienced in the downstream settlements and that a portion of this drainage also lies in the Coastal Regulation Zone (CRZ) area. A considerable number of dead fish were observed along the banks of the drainage channel and floating on the water surface. A strong and unpleasant odour associated with untreated sewage discharge was persistently noticeable. A water sample was collected from the flowing drainage for

GPCBID: 25360, InwID: 893678, Print by: 542 Print Date:
08/12/2025 09:53:36
0B9D6ABD-50A9-4FA4-85B6-3FDC9D3FC072



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GUJARAT POLLUTION CONTROL BOARD

Surat, Plot No. 11-12/2,3 , GIDC - Pandesara,
Surat - 394221,
(T) (0261) 2442696

Inspection Report

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

	<p>laboratory analysis. The upstream stretch of the same drainage was also inspected in the presence of local residents. Heavy accumulation of septic sewage, sludgy deposits, and solid waste was observed in the water channel and surrounding land area. No indications of discharge originating from industrial units were observed at or near the location. Similarly, no signs of illegal disposal of hazardous waste or industrial sludge were detected that could contribute to the current environmental condition. The analysis of the collected sample revealed extremely low–below detectable level–dissolved oxygen (DO), fecal coliform contamination, and absence of abnormally elevated COD/BOD values. These analytical results correlate with the characteristics of untreated domestic sewage and confirm that the source of pollution is not industrial in nature but domestic sewage discharge. These findings are consistent with the physical observations of sewage discharge and odour recorded during the inspection. It is further noted that the inspection could not include a discussion with the concerned Gram Panchayat due to night hours. Therefore, interaction with the local body to obtain information regarding drainage management, sewage handling responsibility, and any on-going or planned infrastructure development could not be carried out at this stage., Entry By AEE MR. SHUBHAM RAJESHBHAI SONAWADIYA Mr.V.B.Prajapati</p>
Air	~ 29/11/2025 -----, Entry By AEE MR. SHUBHAM RAJESHBHAI SONAWADIYA Mr.V.B.Prajapati
Hazardous	~ 29/11/2025 -----, Entry By AEE MR. SHUBHAM RAJESHBHAI SONAWADIYA Mr.V.B.Prajapati

8. Details of samples taken during inspection :

Sr. No.	Sample Type	Collect Date	Color & Condition	PH Range	Field Observation	Collect Charge	LAB
1	W	24/11/2025	Greenish	7-8		0	SUR

9. Instructions given during inspection:

Sr. No.	View Instruction	Type Of Instruction
1	-----	Water

10. Inspection Team :

MR. SHUBHAM RAJESHBHAI SONAWADIYA
Mr.V.B.Prajapati



275 ANNEXURE - R2

ANALYSIS REPORT FOR WATER / WASTE WATER SAMPLE

GUJARAT POLLUTION CONTROL
BOARD

SURAT, PLOT NO. 11-12/2,3 , GIDC - PANDESARA, SURAT -
394221, (T) (0261) 2442696

Sample ID:497448

Test Report No. : 56467

Date: 29/11/2025

1. Name of the Customer : Complaints Only .. General File
2. Address: : For Ind. Name & Add. pl. see crux., - - , Village: Surat Tal: Surat City Dist:
Surat Pin: 395003
3. Type of Sample : REP
4. Sample Collected By : 4777 - MR.V.B.PRAJAPATI
5. Quantity of Sample Received : 5 lit
6. Code No. of the Sample : 3656174
7. Date & Time of Collection & Inwarding : 23/11/2025 19:10 to 23/11/2025 19:10 & 24/11/2025
8. Date of Start & Completion of Analysis : 24/11/2025 & 29/11/2025
9. Sampling Point : Natural Drain at Lat: 21.1888723 Long:72.651329
10. Flow Details (Remarks) : Moderate
11. Mode of Disposal : Arabian Sea
12. Ultimate Receiving Body : Arabian Sea
13. Temperature on Collection : 28 & pH Range on pH Strip : 7-8
14. Carboys Nos : Barcode
15. Parameters : 9

Sr	Parameter	Unit	Test Method	Result
1	1 - Temperature	Centigrade	IS: 3025 (Part – 9) – 1984(Reaffirmed 2006)	28
2	2 - pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2017	7.38
3	11 - Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Methods 22nd edi.)2012	104
4	13 - Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Standard Methods 22nd edi.)-2012	22
5	30 - Fecal Coliform	MPN/100 ml	2.9221 E APHA 23rd Edition IS 1622-1981	84
6	33 - Dissolved Oxygen	mg/l	Winkler method – Azide modification. (4500-O– C APHA Standard Methods 22nd edi.)-2012	BDL
7	35 - Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2012	170
8	36 - Oil & Grease	mg/l	Liquid – Liquid Partition Gravimetric method. (5520 B APHA Standard Methods 22nd edi.)-2012	1.2
9	55 - B.O.D (3 Days 27oC)	mg/l	3 – Day BOD test. (IS 3025 (Part 44) 1993 Reaffirmed 1999)-2009	35

Laboratory Remarks : sample freezed By:542-Arun Patel, EE Dt.: 29/11/2025

Arun Patel, EE

Note :

1. The results refer only to the tested samples and applicable parameters. Endorsement of products is neither inferred nor implied.
2. Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
3. This report is not to be reproduced wholly or in part or used in any advertising media without the permission of the Board in writing.
4. The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
5. Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat jurisdiction only.
6. Permissible Limits : as per Schedule VI of EPA Rules, 1986 as ammended by second and third amendment 1993 for Effluents.
7. Physicochemical and microbiological parameters, Std. Methods for water and waste water-24th Edition by APHA.
8. Bioassay test (toxicity) – IS:6582: part-2: 2001; Reaffirmed 2007.



276 ANNEXURE - R3

Gujarat Pollution Control Board

Regional Office-SURAT

IS/ISO-9001:2005, IS/ISO-14001:2005 &
IS/ISO-45001:2018 Certified

Plot No.11-12/2,3, G.I.D.C., Pandesara, Dist.: Surat- 394221.

Phone: (0261) 2891696 Website : www.gpcb.gov.in

XGN website : <http://gpcbxgn.gujarat.gov.in> E-mail : ro-gpcb-sura@gujarat.gov.in

No. GPCB/SRT-RO/T-6(AN)/ 14796 /2025

Dated: 29 NOV 2025

To,
The Taluka Development Officer,
Choryasi Taluka,
Surat District Panchayat Bhavan,
Vesu Main Road, Piplod, Surat-395007.

Sub.: Requirement of sewage treatment, management and disposal system in Mora Village area

Sir/Madam,

A field inspection was recently conducted in reference to local news reports, an email dated 23/11/2025 from the Collector Office, and telephonic information regarding continuous discharge of untreated sewage from Mora Village into the natural drainage located at the east of Damka Village, which has reportedly resulted in large scale fish mortality. During the inspection, a strong foul odour characteristic of untreated sewage discharge was experienced and number of dead fish was observed along the drainage banks and floating on the water surface. Heavy accumulation of septic sewage, sludgy deposits and solid waste was found in the water channel and its surrounding land area. Water samples collected from the flowing drainage revealed extremely low Dissolved Oxygen (DO) levels along with presence of fecal coliform contamination, confirming that the water quality deterioration is attributable to untreated domestic sewage.

The inspection findings indicate that domestic wastewater from Mora Village and nearby habitations are directly entering the natural drainage without any form of treatment or scientific handling. The continued discharge of untreated sewage is causing significant deterioration of water quality, recurrence of fish mortality and persistent foul odour affecting downstream settlements, including stretches of the channel located in environmentally sensitive areas.

In view of the above observations and considering the environmental implications, it is requested to develop and implement a sewage treatment, management and disposal system for Mora Village and adjoining population. Interim measures may also be arranged to prevent direct disposal of untreated sewage into the drainage until permanent infrastructure is established. An action plan indicating the measures proposed and the expected timelines for implementation may be submitted to this office at the earliest.

Thanking You


29.11.25
(Arun G. Patel)

Regional Officer, Surat

Copy To :

1. Deputy District Development Officer ,Surat District Panchayat Bhavan, Vesu Main Road, Piplod, Surat-395007... for kind information please.
2. Unit Head-Surat, Gujarat Pollution Control Board, Paryvaran Bhavan, Sector-10A, Gandhinagar... for kind information please.