

BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,

NEW DELHI

ORIGINAL APPLICATION NO. 1336 OF 2024

U/S 14 & 15 OF THE NATIONAL GREEN TRIBUNAL ACT

IN THE MATTER OF:

Taj Forging Pvt. Ltd.

...Applicant

Versus

Haryana State Pollution Control Board

and Others

...Respondents

AFFIDAVIT ON BEHALF OF THE APPLICANT

MOST RESPECTFULLY SHOWETH:

I, Navneet Goyal, s/o Sh. Shivcharan Goyal, residing at House No. 1204, Sector-15, Escorts Nagar, Faridabad, Haryana-121007 do hereby solely affirm and declares:



- That I am the authorised representative of the applicant company in the present Original Application and as such well conversed with the facts and circumstances of the case.
2. That the present Original Application has been filed challenging the Show Cause Notice dated 05/11/2024 issued by the Haryana State Pollution Control Board, inter alia, on the ground that the said Show Cause Notice has been issued without jurisdiction and is contrary to law. The Applicant continues to press all the grounds urged in the proceedings and reserves all its legal and factual rights and contentions.
 3. That during the pendency of the present proceedings, discussions have taken place amongst the stakeholders with a view to amicably

addressing the concerns relating to vibration, if any, allegedly emanating from the industrial unit.

4. That, with a view to maintaining harmonious relations with the neighbouring establishments and as a matter of abundant caution and good corporate practice, the Applicant has voluntarily decided to install an anti-vibration system on its 3.5-ton hammer and the installation of the same will be completed latest by 31.12.2026 as per the timeline provided by the system provider.

Timeline for installation of Anti vibration system on 3.5 Ton Forging hammer at our premises is as follows:

- i. Date of receipt of GERB AVM Equipment: - 30.09.2026
- ii. Date of completion of civil work and other works: - 30.11.2026
- iii. Date of complete installation and restarting of machine: - 30.12.2026

Copy of the Purchase order of the Anti-Vibration system is been annexed herewith as **Annexure A-1**.

5. That the Applicant respectfully submits that the installation of the said anti-vibration system is entirely voluntary, precautionary and without prejudice to its rights and contentions in the present proceedings. The same shall not be construed as an admission that:
- (a) the allegations contained in the impugned Show Cause Notice are correct;
 - (b) the Applicant has violated any provision of law;
 - (c) the State Pollution Control Board possesses jurisdiction under the applicable environmental statutes or the Noise Pollution (Regulation and Control) Rules, 2000 to issue the impugned Show Cause Notice on the basis of alleged vibration; or



(d) vibration, by itself, falls within the regulatory framework relied upon in the impugned Show Cause Notice.

6. That after successful installation, the performance of the anti-vibration system shall be monitored and evaluated for a reasonable period not exceeding 2 months. Based upon the efficacy of the technology and the results achieved, an appropriate decision shall thereafter be taken whether installation of similar systems on the other hammers/machines installed in the unit, is required or not in consultation with Poly Medicure Ltd.

That the deponent respectfully submits that the aforesaid voluntary steps have been undertaken in the larger interest of maintaining industrial harmony. These steps are without prejudice to the Applicant's challenge to the legality, jurisdiction and validity of the impugned Show Cause Notice, all of which are expressly reserved.

8. It is, therefore, respectfully prayed that this Hon'ble Tribunal may kindly take the present affidavit on record while preserving the rights and contentions of the Applicant in the pending proceedings.



Mx
DEPONENT

VERIFICATION

I, the above-named deponent, hereby verify that the contents of paragraphs 1 to 5 of this affidavit are true and correct to the best of my knowledge and belief and nothing untrue has been stated therein. Verified and signed on this 7th Day of July 2026 at New Delhi.

Certified that the above was deposed
on Oath / Affirmation before me on the
..... day of
by
by
I, the Oath Commissioner, do hereby
know the contents of the above
were true and correct.
Adv. T. Kumar Das
Oath Commissioner, Faridabad

Mx
DEPONENT