

**BEFORE THE NATIONAL GREEN TRIBUNAL
AT NEW DELHI**

O.A. No. 114 OF 2020

Between:

St. Mark Educational Institution, Society
Group of Institution rep by its Secretary

... Applicant

And

State of Andhra Pradesh and others

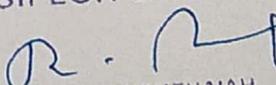
... Respondents

AFFIDAVIT FILED ON BEHALF OF M/s SIFLON DRUGS, Sy. No. 25/4, RACHANAPALLI VILLAGE, ANANTHAPUR DISTRICT OF ANDHRA PRADESH MOST RESPECTFULLY SHOWETH:

1. The address of the Industry is as given above for the service of Notice in this Application.

2. The present material is placed on record respectfully before this Honourable Tribunal to substantiate the conscious efforts and the bonafide of the subject matter industry as regards its commitment to the cause of a better environment in the locality and also to place on record that the applicant is an organization which has come into existence and commenced its activities admittedly after 2003 which much subsequent to the

For SIFLON DRUGS

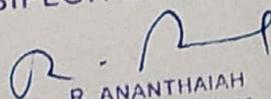

R. ANANTHAIAH
Partner

establishment of M/s Siflon Drugs, the subject matter industry which commenced its operations after obtaining all the requisite statutory permissions and compliances.

3. The Respondent herein respectfully submits that the applicant has commenced an educational institution only in the year 2003 and stopped the said activity by 2008. Subsequently the very same person who has started the educational institution changed his line of activity to one of Real Estate and desires to have layout drawn and plots to be sold. With the said intention in his mind he has come up with the ploy of complaint against the subject matter industry and to see that the same is relocated to have his land values boosted. The bonafide of the litigant is suspect in the subject matter case on hand. It is also pertinent to mention that when an industry is located in a particular area from the year 1999 how can any residential locality be permitted by the Local body by grant of permissions within the vicinity of an industrial unit. The very effort itself is therefore unjust on the part of the Local Body and the Planning Department of the State for Housing.

4. This industry respectfully submits that even though no notice has been ordered to this industrial unit, as the proceedings relating to inspection

For SIFLON DRUGS

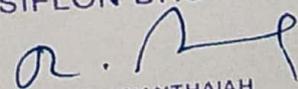

R. ANANTHAIAH
Managing Partner

of the unit, ordering of Environmental Compensation (EC) by the SPCB has forced this industry to ascertain the reasons for this activity and has thus come to know of the pendency of the above Original Application filed under Section 19 of the National Green Tribunal Act, 2010. The industry is therefore advised to file this material along with this affidavit as reply in the above application to assist this Honourable Tribunal to come to a clear, comprehensive and complete adjudication of the real areas of controversy relating to the subject matter Unit,

5. This industry respectfully submits that at the outset, the industrial unit is situated in Sy. No. 25/4, Rachanapalli Village, Ananthapur District of Andhra Pradesh in the year 1999 operating the Veterinary drugs and drug intermediates manufacturing unit after obtaining all the necessary statutory licences and permission. The SPCB has been extending the Consent for Operations (CFO) from time to time and the same is valid and subsists till 30.04.2022. .

6. While matters stood thus, the persons inimically disposed against the present subject matter industry got issued a complaint by the Local Member of Legislative Assembly, (MLA) and the SPCB immediately reacted to the

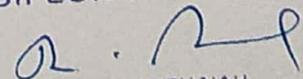
For SIFLON DRUGS


R. ANANTHAIAH

same without appreciating the commitment of the industry for the cause of prevention of environmental pollution and issued a STOP PRODUCTION ORDER on 16.06.2020, which may be read as Annexure A. Immediately the industry by its letter dated 08.07.2020 made a representation to the SPCB for revocation of the Stop Production Order dated 16.06.2020 substantiating the reasons and also producing evidence showing compliance of the infirmities pointed out by the SPCB, which may be read as Annexure B. Pursuant to the said compliances made and having been satisfied by the same, the SPCB issued Revocation of Stop Production Order dated 22.07.2020, which may be read as Annexure C.

7. The industry respectfully submits that along with the revocation of stop production order the SPCB also got issued a show cause notice dated 04.09.2020 proposing to levy environmental compensation, which may be read as Annexure D. The industry by its letter dated 19.01.2021 paid the compensation laid by the Board without prejudice to its contentions by way of DD No. 0485582 dated 12.01.2021. The said letter may be read as Annexure E. It is further submitted that the SPCB officials caused further inspection and have been satisfied with the compliances made except for some excessive production being made by the industry and for maintenance

For SIFLON DRUGS

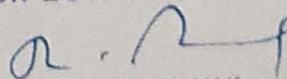


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of separate Stack for the boilers. Subsequently the SPCB issued orders forfeiting the Bank Guarantee furnished by the industry by their letter dated 03.05.2021 which may be read as Annexure F.

8. The industry respectfully submits that it reserves its right to challenge the order of the SPCB forfeiting the Bank Guarantees and imposing of the EC by the SPCB before an appropriate forum under Law. The particulars of the Compliances made, the Photos of the industry showing the infrastructure put in place for the unit to achieve a Zero Liquid Discharge (ZLD) status, the Photo showing the residence of the Managing Partner of the industry within a vicinity of 150 meters from the unit of the industry, the Tax receipt evidencing the same, are filed herewith to be read as Annexure G to I. It is pertinent to mention that in a requirement under statute for a green belt of 30% the industry has put in place a green belt to a tune of 60%. Even though the Centrifuges are sufficient under the statutory requirements to reduce odour and vapour emitting at the time of centrifuging, the industry has used Agitated Nutsche Filter cum Driers (ANFD) designed for solid liquid separation processes by filtration under pressure and vacuum drying. It has further attached a scrubber to the Agitator Thin Film Drier (ATFD) used for isolation of salt from the effluent, using caustic soda solution as media for

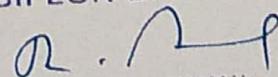
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Managing Partner

scrubbing. The receivers used for scrubbing media in Blocks B and C are replaced with jacketed receivers with cooling water circulation to control the temperature during scrubbing of gases. These efforts of the industry though not expected by the SPCB provided the confidence for the SPCB to appreciate the ZLD status of the unit of the industry in a better fashion and also to notice the false frivolous nature of the complaints made by the locals for the sake of complaints alone.

9. The industry respectfully submits that it is catering to the needs of the veterinary medical hospitals with manufacturing of the drugs useful for livestock. It has invested heavily to make the unit a State of the Art unit for exports of our drugs, and any orders affecting the unit will be detrimental to the interests of several persons seeking out their livelihood on the prospects of the subject matter industry. It is also respectfully submitted that in the light of the industry achieving ZLD and also placing all the compliance of all the norms for the requirement of a better environmental there is no justification to doubt the sincerity of the commitment of the management of the industry for adherence to the Environmental laws in vogue by it.

For SIFLON DRUGS



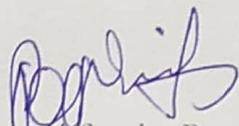
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It is therefore just and essential that this Honourable Tribunal may be pleased to close the Original Application taking note of the aforesaid material placed on record.

Dated; 28.12.2021

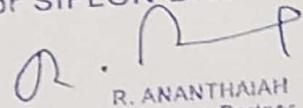
Place: Hyderabad.

Before Me,


Counsel for the Respondent Industry.

For M/s Siflon Drugs.

For SIFLON DRUGS


R. ANANTHAIAH
Managing Partner

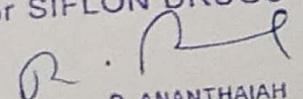
VERIFICATION

I, R. Ananthaiah, S/o Sri Pedda Anjaneya, aged about 59 years, Business, residing at S. No. 25/4, Rachanapalli, Ananthapur District. being the Managing Partner of M/s Siflon Drugs, but now temporarily come down to Hyderabad do hereby verify that the contents of the above Paras of the Affidavit filed herein are true and correct to the bests of my knowledge and belief.

Hence verified on this the 28th day of Dec, 2021 at Hyderabad

Respondent

For SIFLON DRUGS


R. ANANTHAIAH
Managing Partner

ATIONAL GREEN TRIBUNAL:
NEW DELHI

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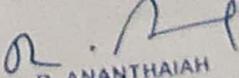
AFFIDAVIT FILED ON BEHALF OF M/S
SIFLON DRUGS.

Filed on: 28-12-2021

Filed by:

M/s P. VENKAIAH NAIDU,
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040- 42215469.

For SIFLON DRUGS


R. ANANTHAIAH
Managing Partner

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI

APPLICATION No. 400 Of 2019

Plaintiff
Petitioner
Respondent

VERSUS

Defendant/s
Respondent/s

I/We R. ANANTHAIAH

In the above Appeal/ Petition do hereby appoint and retain

P. VENKATAIAH NAIDU, Advocate

Advocates of the High Court, to appear for ME/US in the above APPEAL/PETITION And to conduct and prosecute (or defend) the same and all proceedings, that may be taken in respect of any application for return of documents or the receipt of any money that may be payable to ME/US in the said APPEAL/PETITION and also to appear in all appeals and applications under clause XV of the Letters Patents and in all applications for review and for leave to the Supreme court of India and in all applications for review of judgment and to compromise the same before this Honourable Court.

For SIFLON DRUGS

R. Ananthaiah

I certify that the contents of this Vakalath were read out and explained in (presence to the executant or executants who appeared perfectly to understand the same, made His/Her / Their signatures or marks in my presence.

R. ANANTHAIAH
Managing Partner

Executed before me this the^{28th}.....day of *December*.....2021

For SIFLON DRUGS

R. Ananthaiah
R. ANANTHAIAH
Managing Partner



ADVOCATE

BEFORE THE NATIONAL GREEN
TRIBUNAL, NEW DELHI

O.A. No. 400 OF 2019

VAKALAT ACCEPTED

Appellant
Advocate for Respondent
Petitioner

Dated — 28.12.2021

Accepted
[Signature]

Appellant
Advocate for Respondent
Petitioner

Address for Service:

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