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**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

O. A. No. 164 of 2024

IN THE MATTER OF:

VARUN GULATI

...APPLICANT

Versus

STATE OF HARYANA & ORS.

....RESPONDENTS

**COMPOSITE REJOINDER TO REPLY OF
RESPONDENT NO. 5 & 6, ON BEHALF OF
APPLICANT**

(FOR INDEX:- Kindly See Inside)

New Delhi
Dated. 10.11.2025

Filed By

S.A Zaidi *Mansi*

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	herewith and marked as ANNEXURE A/4.	
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**COMPOSITE REJOINDER TO REPLY OF
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APPLICANT**

MOST RESPECTFULLY SHOWETH:

**1. REJOINDER TO REPLY OF RESPONDENT NO. 5
(ANSAL PROPERTIES & INFRASTRUCTURE
LTD.)**

1.1 That the applicant respectfully submits this rejoinder, to the reply filed by Respondent No. 5 which is misleading, incorrect, and contrary to the factual position on the ground as revealed in the Action Taken Report (ATR) dated 28.05.2024 submitted by the Joint Committee constituted by this Hon'ble Tribunal.

1.2 That the Joint Committee in its ATR dated 28.05.2024 had categorically directed Respondent No. 5 to install a STP of 2 MLD capacity to treat the domestic effluent generated from Sushant City, Phase I & II, Sector-19, Panipat. But despite clear directions and sufficient lapse of time, no such 2 MLD STP has been constructed or made operational till date. The Respondent No. 5 has wilfully violated the Committee's recommendation and continues to discharge untreated sewage, causing contamination of soil and water bodies in the vicinity.

1.3 That the plea of the Respondent No. 5 that they are under Corporate Insolvency Resolution Process (CIRP) and hence unable to construct the STP is untenable and evasive. It is worth submitting that the Environmental obligations are the continuing obligations that cannot be suspended even during insolvency. The

protection of environment and public health takes precedence over financial arrangements under any other law.

- 1.4** That furthermore, the Joint Committee's report 28.05.2024 recorded that Respondent No. 5 had not obtained any permission from the Haryana Shahari Vikas Pradhikaran (HSVP) for discharge of effluent from both Phase-I and Phase-II of the project into HSVP's main sewer line. It was observed by the joint committee that respondent No. 5 had made unauthorized and illegal connections to the HSVP sewer line without the approval of HSVP or the Haryana State Pollution Control Board (HSPCB). This amounts to direct violation of statutory provisions and constitutes unauthorized discharge of effluent in contravention of Sections 24 and 25 of the Water Act, 1974. Even as on date, the Respondent No. 5 continues to illegally use HSVP's sewer infrastructure without

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any sanctioned connection. The discharge of sewage without treatment is therefore illegal and unsustainable.

- 1.5** The Applicant reiterates that, in the absence of an operational STP of adequate capacity, the sewage generated from the entire township is being diverted either into open drains or through unauthorized connections, leading to severe pollution of nearby lands and water channels.
- 1.6** That the Respondent's claim that the project's sewage is being treated through HSVP's 30 MLD STP is false and misleading, as the same HSVP has never granted permission to Respondent No. 5 for such discharge.
- 1.7** That the respondent No. 5 continues to violate the environmental norms, till date.
- 1.8** It is further pertinent to mention that the Directorate of Enforcement (ED), Gurugram Zonal Office, vide its press release dated

01.10.2025, has provisionally attached immovable properties valued at ₹10.55 crore belonging to Respondent No. 5 and its promoters under the Prevention of Money Laundering Act, 2002, arising out of environmental violations under the Water (Prevention and Control of Pollution) Act, 1974, and Air (Prevention and Control of Pollution) Act, 1981. The said action was based on findings that Respondent No. 5 had failed to install STP in its Gurugram based projects and had discharged untreated effluent into HUDA's sewer lines. This clearly establishes a consistent pattern of non-compliance and habitual disregard of environmental norms by Respondent No. 5, reinforcing their continued failure to construct the 2 MLD STP in the present project at Panipat and their illegal discharge of sewage through unauthorized sewer connections even today.

The True Copy of the Press release by ED

dated 01.10.2025 is annexed herewith and marked as ANNEXURE A/1.

2. REJOINDER TO THE REPLY OF RESPONDENT NO. 6 (TDI CITY)

2.1. That the present objections are being filed by the Applicant against the reply filed by Respondent No. 6 (TDI City), wherein Respondent No. 6 has made false and misleading averments before this Hon'ble Tribunal claiming that their Sewage Treatment Plant (STP) is "operational and functional."

2.2. That the said statement is wholly contrary to the record and stands falsified by their own internal communication, which is a letter issued by TDI City to its Resident Welfare Association (RWA) dated 19.07.2025. The said letter categorically states that: *"As per Sector Plan, sewerage line of TDI City was to be connected with the Trunk Line of HSVP, but HSVP till date has not acquired the land and laid down/provided Main Sewage line for*

connection of sewerage line of TDI City, which is HSVP's responsibility. Until HSVP executes the work of external sewerage line and sewerage line of TDI City is connected with the main line provided by HSVP, TDI will continue to manage the removal and disposal of sewage from the township by continuing with the contract of tankers for disposal of sewage from the township."

The True Copy of the Letter dated 19.07.2025 issued by TDI City (Respondent No. 6) to its Resident Welfare Association (RWA) dated is annexed herewith and marked as ANNEXURE A/2.

- 2.3.** That the above admission from Respondent No. 6 itself establishes that the STP is not operational and that sewage generated from the township is being collected and disposed of through tankers. The claim of an operational STP in their reply is therefore false, misleading, and amounts to

suppression of material facts before this Hon'ble Tribunal.

The Photographs of tankers discharging the untreated sewage of respondent No. 6 in open area/ drain are annexed herewith and marked as ANNEXURE A/3.

2.4. That the continuous transportation and disposal of untreated sewage through tankers clearly shows that the Respondent No. 6 has failed to establish and operate an effective sewage treatment mechanism, thereby causing discharge of untreated effluent and pollution in open areas, which is in violation of the provisions of the Water (Prevention and Control of Pollution) Act, 1974, and the Environmental (Protection) Act, 1986.

2.5. That the Respondent No. 6's contradictory stands—firstly admitting through their own letter that no external connection exists and that sewage is being managed via tankers, and

secondly claiming in their reply that the STP is functional—clearly indicate an attempt to mislead this Hon'ble Tribunal.

2.6. That such false statement, if accepted, would not only defeat the purpose of environmental protection but also undermine the credibility of proceedings before this Hon'ble Tribunal. It is therefore necessary that this Hon'ble Tribunal take serious cognizance of the contradictory and false statements made by Respondent No. 6.

2.7. It is pertinent to mention here that that the Directorate of Enforcement (ED), Gurugram Office, vide its press release dated 29.03.2025, has also provisionally attached certain properties belonging to respondent No. 6 i.e. M/s TDI Infrastructure Ltd of Kundli, Sonapat, valued at Rs. 5.6 crore, under the Prevention of Money Laundering Act, 2002, arising out of environmental violations under the Water

(Prevention and Control of Pollution) Act, 1974, and Air (Prevention and Control of Pollution) Act, 1981. The said action was based on findings that Respondent No. 6 failed to install and operate the statutorily mandated STP, instead, they collected untreated sewage water and then discharged it using tankers onto open land which caused enormous damage to public health and environment. This clearly establishes a consistent pattern of non-compliance and habitual disregard of environmental norms by Respondent No. 6, reinforcing their continued failure of illegal discharging their untreated sewage in Panipat based project even today.

The True Copy of the Press release by ED dated 29.03.2025 is annexed herewith and marked as ANNEXURE A/4.

3. Without prejudice and in addition to the aforesaid submissions, it is humbly submitted that the respondent No. 5 & 6 are still non-compliant and are

acting in flagrant violations of the environmental norms.

4. That the present rejoinder is being bonafide in the interest of justice.

New Delhi
Dated 10.11.2025

Applicant

Through

Shaiq

Mansi

**S.A. ZAIDI & MANSI CHAHAL
ADVOCATES**

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IN THE MATTER OF

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STATE OF HARYANA & ORS.

....RESPONDENTS

AFFIDAVIT

I Varun Gulati S/o Late Shri. R.P. Gulati R/o A-66, 1st Floor, Ganesh Nagar, Tilak Nagar, New Delhi, presently at New Delhi do here by solemnly affirm and declare as under:

1. That I am the Applicant in the above noted case therefore I am fully conversant with the fact of the case I am competent to sign and swear this Affidavit.
2. That the accompanying Rejoinder has been drafted by my counsel and the same has been read over and explain to me and I say and declare that the same are true and correct.
3. That the Contents of accompanying Rejoinder be read as part and parcel of this affidavit as the same are not repeated herewith for the sake of brevity.



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see
DEPONENT

VERIFICATION

10 NOV 2025

Verified at Delhi on this day of , 2025 that
the contents of my above Affidavit are true and correct to
my knowledge and nothing material has been concealed
there from.

see
DEPONENT



ATTESTED
[Signature]
NOTARY
DELHI/INDIA

10 NOV 2025



PRESS RELEASE
01.10.2025

Directorate of Enforcement (ED), Gurugram Zonal Office has provisionally attached 06 immovable properties under the provisions of Prevention of Money Laundering Act (PMLA), 2002, valued at Rs. 10.55 Crore, situated in Gurugram (Haryana), Greater Noida (UP) and Ludhiana (Punjab) held by Directors/shareholders/beneficial owners of accused company- M/s Ansal Properties and Infrastructure Ltd. (APIL) viz. Sushil Ansal, Pranav Ansal & Son HUF and Mrs. Kusum Ansal, in a money-laundering case stemmed from violation of provisions of The Water (Prevention and Control of Pollution) Act, 1974 and The Air (Prevention and Control of Pollution) Act, 1981. The attached properties consist of commercial units and space. Ansal Properties and Infrastructure Ltd. is engaged in the business of real estate development in residential, commercial and retail segments.

ED initiated investigation on the basis of Prosecution Complaints filed by Haryana State Pollution Control Board (HSPCB) for commission of scheduled offences U/s 43 of Water (Prevention and Control of Pollution) Act, 1974 and U/s 37 of Air (Prevention and Control of Pollution) Act, 1981, involving non-compliance of environmental norms by APIL in its two Gurugram-based real-estate projects- 'Sushant Lok-I' and 'Esencia'.

ED investigation revealed that APIL did not install any Sewage Treatment Plant (STP) in its project 'Sushant Lok Phase-I' and the effluent generated was passed through HUDA sewerage line whereas the STP installed in its other project 'Esencia' was of inadequate capacity. During inspection of HSPCB officials, the STPs installed were also found abandoned without any operation & maintenance.

ED investigation further revealed that by not treating the domestic effluent / untreated sewage water as per norms, APIL on one hand caused damage to public health & environment while at the same time kept enjoying the fruits of the resultant profit. The promoters of the company did not bother to treat the waste or to take any measures as per the HSPCB norms and thus, unduly benefitted to the tune of Rs.10.55 Crore which is nothing but the Proceeds of Crime, generated perpetually by said criminal activity.

Further investigation is under progress.

T. S. R.

Minutes of meeting

Date: 19th July 2025

Place : UGF Vandhana Building, 11 Tolstoy Marg, New Delhi

Person Present : the Residents' Welfare Association TDI City Panipat and Management of TDI Infracorp India Ltd.

Following points were discussed and resolved.

1. **Connection of Sewerage Line of TDI City to Trunk Line to be laid down/provided by HSVP :**
As per Sector Plan Sewerage Line of TDI City was to be connected with the Trunk Line of HSVP, but HSVP till date had not acquired the land and laid down/provided Main Sewage line for connection of sewerage line of TDI City, which is HSVP's responsibility. RWA and Representative of TDI will pursue the matter with HSVP and Government Departments jointly and request for the acquisition of the sector road and the execution of the external sewerage line.
2. **Sewerage Maintenance:** Until HSVP executes the work of external sewerage line and sewerage line of TDI City was not connected in the main line provided by HSVP, TDI will continue to manage the removal and disposal of sewage from the township by continuing with the contract of Tankers for disposal of sewage from the township.
3. **Electricity Connection (Street Light & STP):** The electricity connections for both the street lights and the STP will be disconnected by UHBVN due to unpaid bills for line losses. RWA will pursue the case to resolve the unpaid bills for line losses with UHBVN and take legal remedies available under law also including filing cases before appropriate forms/commissions/courts. All Litigation expenses shall be paid by TDI.
4. **Facility Management & Manpower:**
 - I. **Enhancement of Number of Security Guards:** Presently Total 12 security guards are working and on request of RWA, strength of security guards increased to 20 (10 day shift, 10 night shift) will be deployed to ensure round-the-clock vigilance.
 - II. **Staff Augmentation:** Horticulture and housekeeping manpower will be increased from 16 to 25 staff members for better upkeep.
5. **Internal Road Construction:**
 - I. **Internal Road Work:** Internal road work mutually agreed in earlier meeting has been completed by TDI and RWA requested that

TDI INFRACORP (INDIA) LTD.

(Formerly known as Taneja Developers & Infrastructure (Panipat) Ltd.)

CIN : U45201DL2006PLC146438

U G F, Vandhana Building, 11, Tolstoy Marg,

Connaught Place, New Delhi - 110 001

Tel. 4311 1111 (100 Lines) Fax 43111129

URL : www.tdiinfracorp.com E-mail : info@tdiinfracorp.com



additional total of 12,000 sq. meters of internal road work will be taken up for immediate construction. TDI had agreed for the same.

- II. The other Builders who are using TDI City sector Road to approach their colony will be made to contribute to the maintenance of the internal roads. Mr. Malhotra will coordinate directly with these other builder to expedite the process.
 - III. **Fencing near Bhatta Road:** RWA suggested that Tree Guards fixed around the tress are no more required as Trees has grown up and Iron Tree Guards be removed and used in fencing by welding with each other for frncing near the bhatta. Work will be completed in accordance with RWA suggestions.
6. **Horticulture Measures:**
A round-up machine will be deployed in the horticulture areas for 1 month to control unwanted growth.
 7. **Handover Process:** The RWA will begin the formal process to take over of maintenance services of the TDI City and in future RWA shall be responsible for maintenance of essential services of TDI City. The handover is expected to be completed soon.
 8. **Ending of all disputes between RWA and TDI:** The RWA will amicably withdraw all complaints and applications related to their grievances pending before Grievances Committee, police and court. RWA will ensure that no legal proceedings remain pending against TDI, for better co-ordination and to make TDI City again a great place to live.
 9. RWA sincerely appreciate the cooperation extended by the TDI Management and look forward to progressing on all action items in a timely and collaborative manner.
 10. It is already approved by the Government Department that the road will be construction by HUDA Department from TDI Flyover to TDI Main gate.

RWA TDI City Panipat



T.S.

TDI INFRACORP (INDIA) LTD.
(Formerly known as Taneja Developers & Infrastructure (Panipat) Ltd.)
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U G F, Vandhna Building, 11, Tolstoy Marg,
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URL : www.tdiinfracorp.com E-mail : info@tdiinfracorp.com



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Annexure A/4



Press Release

29.03.2025

Directorate of Enforcement (ED), Gurugram Office has provisionally attached Proceeds of Crime (POC) in the form of immovable properties viz. 8 Commercial space/shops in "TDI Mall" situated at G.T. Road, Kundli, Sonipat, Haryana valued at Rs. 5.61 Crore of M/s TDI Infrastructure Ltd. under the provisions of the Prevention of Money Laundering Act (PMLA), 2002 on being found involved in the offence of money laundering.

ED initiated investigation on the basis of three Criminal Complaints dated 17.08.2020 filed by Haryana State Pollution Control Board (HSPCB) in the Hon'ble Special Environment Court, Kurukshetra against M/s TDI Infrastructure Ltd. and its Directors viz. Ravinder Kumar Taneja, Kamal Taneja and Devki Nandan Taneja, for violation of provisions of the Water (Prevention & Control of Pollution) Act, 1974 and the Air (Prevention & Control of Pollution) Act, 1981 in its developed residential townships viz. "Kingsbury Apartments", "My Floor 2" and "Tuscan City" located at Kundli, Sonipat.

The above investigation revealed that the company was statutorily mandated to treat the sewage water/ domestic effluent, generated since the start of occupation, by installing standardized STPs after obtaining CTO from HSPCB followed by its regular operation & maintenance. However, the company failed to comply and found collecting untreated sewage water in a cemented collection tank and discharging the same using Tankers on open land for percolation thereby, causing enormous damage to public health and environment. By contravening above mandatory provisions of Air Act and Water Act, M/s TDI Infrastructure Ltd. thus generated POC to the extent of Rs. 5.61 Crore and kept enjoying the same.

Further investigation is under progress.

T. D.
C

11/10/25, 3:35 PM

Gmail - SERVICE OF REJOINDER FILED ON BEHALF OF APPLICANT IN OA 164 OF 2024 TITLED AS VARUN GULATI VS...



kapil sagar <kapilsagar1990@gmail.com>

**SERVICE OF REJOINDER FILED ON BEHALF OF APPLICANT IN OA 164 OF 2024
TITLED AS VARUN GULATI VS. STATE OF HARYANA & ORS.**

1 message

kapil sagar <kapilsagar1990@gmail.com>

Mon, Nov 10, 2025 at 3:34 PM

To: lohit.bimal@anilbimal.com, "vikas@singhania.in" <vikas@singhania.in>

RESPECTED SIR,

PFA COPY OF REJOINDER FILED ON BEHALF OF THE APPLICANT IN O.A. NO. 164 OF 2024 TITLED AS VARUN GULATI VS. STATE OF HARYANA AND ORS.

MATTER IS LISTED ON 12.11.2025 FOR HEARING.

KINDLY ACKNOWLEDGE THE SAME.

THANKS & REGARDS

S.A. ZAIDI AND MANSI CHAHAL
ADVOCATES FOR THE APPLICANT



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