

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**

**PRINCIPAL BENCH, NEW DELHI**

**ORIGINAL APPLICATION NO. 502 OF 2023**

**IN THE MATTER OF: -**

Society for Protection of Environment

& Biodiversity (SPENBIO)

.... Applicant

*Versus*

Union of India & Ors.

.... Respondents

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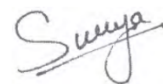
**NDoH: 09.04.2026**

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**DATE:** 08.04.2026

**PLACE:** New Delhi

**DRAWN BY:**



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**SETTLED BY:**

Mr. Sanjay Upadhyay

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**COMPREHENSIVE SUGGESTIONS BY THE ORIGINAL**

**APPLICANT IN TERMS OF THE ORDER DATED 26.08.2025**

**AND ORDER DATED 14.11.2025**

**MOST RESPECTFULLY SHEWETH: -**

1. That the Original Application has been filed raising the substantial question of environment regarding non-implementation of the 'Framework on Identification of Materials Generated from Industrial Processes as Wastes or By-Products' (hereinafter "**Framework**") issued by Respondent No. 2, Central Pollution Control Board (hereinafter "**CPCB**") in September 2019. Pertinently, the said Framework was issued to remedy the gap in the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 (hereinafter "**HOWM Rules**") in that the same does not clearly establish when a material generated from any production process should be considered as "by-product" or "waste", including hazardous waste.

**A. BACKGROUND TO THE 'FRAMEWORK ON IDENTIFICATION OF MATERIALS GENERATED FROM INDUSTRIAL PROCESSES AS WASTES OR BY-PRODUCTS'**

2. That the Framework was formulated by the CPCB in September 2019 in pursuance of the Orders passed by this Hon'ble Tribunal in the Original Application No. 804 of 2017 titled *Rajiv Narayan & Anr. vs Union of India & Ors.* wherein this Hon'ble Tribunal was considering the issue of non-implementation of the provisions of the HOWM Rules by all States/Union Territories, including the absence of a clear mechanism to distinguish between a hazardous waste and a by-product in the HWOM Rules.
3. That on 30.07.2018, this Hon'ble Tribunal in aforesaid case directed CPCB to constitute a Monitoring Committee to compile information about the status of compliance of the HOWM Rules. A Monitoring Committee headed by Dr. Ajay A. Deshpande, former Expert Member of this Hon'ble Tribunal, was constituted and it reviewed various aspects of enforcement of the HOWM Rules. The Committee submitted its Interim Report dated 29.01.2019 observing several glaring lapses - including lack of scientific examination or scrutiny for identification and quantity of hazardous waste prior to grant of authorization. The Committee also underscored the urgent need to put in place guidelines or protocol to determine by-products based on specific criteria in order to bring consistency in the approach. Taking note of this lacunae this Hon'ble Tribunal, vide Order dated 12.04.2019,

directed that the recommendations of the Committee needed to be fully implemented and monitored by the Chief Secretaries of the States and by the MoEF&CC and CPCB at the national level. The Hon'ble Tribunal also observed that States may be required to furnish performance guarantees in case progress was found inadequate. A True copy of the Order dated 12.04.2019 has been appended as Annexure A/10 at Pages 83 - 95 of the present OA.

4. That, accordingly, the 'Framework on Identification of Materials Generated from Industrial Processes as Wastes or By-products' came to be issued by CPCB on 23.09.2019. While the Framework came to be issued as early as 2019, no sincere efforts were made for its effective implementation for almost four years due to which the Applicant herein was constrained to institute the present proceeding.
5. That on 18.08.2023, this Hon'ble Tribunal issued Notice while recognizing that the issue raised in the present Application requires further consideration. Further, this Hon'ble Tribunal directed Respondent No. 1, Ministry of Environment, Forest and Climate Change (hereinafter "**MoEF&CC**") to take immediate measures for proper implementation of the said Framework in consultation with CPCB and the State Pollution Control Boards (hereinafter "**SPCB**"). The MoEF&CC was also directed to consider whether the Framework can become part of HOWM Rules.
6. That subsequently, the CPCB filed its Action Taken Report dated 22.11.2023 and the MoEF&CC filed its Compliance Affidavit

dated 02.04.2024 in the matter. In view thereof, the Applicant filed its Objections dated 09.04.2024 to the said Action Taken Report of CPCB and the Reply of MoEF&CC, both of which may also be read as a part of the present suggestions being submitted by the Applicant.

7. That on 09.09.2024, this Hon'ble Tribunal directed for a fresh report responding to the main allegations in the OA and accordingly, Action Taken Report dated 23.12.2024 was filed by the CPCB and Reply Affidavit dated 23.12.2024 was filed by MoEF&CC.
8. That on 24.12.2024, this Hon'ble Tribunal granted liberty to the Applicant to file Rejoinder/Objections to the above Action Taken Report dated 23.12.2024 of the Respondent No. 2, CPCB as well as to the Reply of Respondent No. 1, MoEF&CC. Accordingly; Objections to both were filed by the Applicant on 29.05.2025.
9. That subsequently, the MoEF&CC filed an Additional Affidavit dated 19.08.2025. On the last date of hearing i.e. 26.08.2025, this Hon'ble Tribunal recorded the submission of the Applicant that while both the CPCB as well as the MoEF&CC has issued directions under Section 5 of the Environment (Protection) Act, 1986, but the same have not been effectively implemented at the ground level. With the said observation, this Hon'ble Tribunal granted the Applicant time to put forth suggestions for effective implementation of the Framework as well as the directions under Section 5 of the Environment (Protection) Act, 1986 and the HOWM Rules, 2016. On 14.11.2025, this Hon'ble Tribunal

granted time to the Applicant for providing its suggestions. Accordingly, the instant Suggestions are being filed.

**B. INCORPORATE THE 2019 FRAMEWORK BY CPCB  
IN THE HOWM RULES, 2016**

10. That on 18.08.2023 this Hon'ble Tribunal was pleased to direct MoEF&CC to consider whether the Framework could be incorporated in the HOWM Rules for its effective implementation. Considering that no steps were taken for compliance of the said direction, this Hon'ble Tribunal, vide Order dated 09.09.2024, again took note of the submission of the counsel for the Applicant and directed MoEF&CC to consider the said suggestion.

11. That in purported compliance with the said directions, MoEF&CC in its Reply Affidavit dated 23.12.2024, *inter alia* observed as under: -

*“Incorporating the guidelines into the regulations may not be practical, as the management of hazardous waste is a complex and evolving field. This necessitates regular revisions, particularly considering the challenges of ground-level implementation. Making the guidelines part of the regulations and amendments thereof will impede the implementation/updation of the same”*

12. That it is humbly submitted that while adopting such a stand, the MoEF&CC has completely disregarded the very rational and purpose for which the Framework was prescribed - namely, to fill a vital regulatory gap in the HOWM Rules. The Framework was intended to lay down a clear and scientific basis for determining

when a material generated during production process should be considered as a waste and as a by-product so that a 'waste' does not escape as a by-product thereby escaping the rigours of HOWM Rules. The MoEF&CC itself explicitly recognized this lacuna when it approved the said Framework, acknowledging the need for such a mechanism to ensure proper and uniform application of the HOWM Rules. However, the stand adopted by the MoEF&CC not only contravenes the directions of this Hon'ble Tribunal, but it also renders the entire exercise of implementing the Framework as illusory.

13. That while the MoEF&CC has termed incorporating Framework into Regulations as an impractical exercise which would necessitate "regular revisions": however, till date no revision/ amendment/ modification in the Framework has been introduced either by the MoEF&CC or the CPCB. Further, MoEF&CC has also ignored that the Framework mainly lays down methodology/ process to be adopted while leaving it upon SPCBs/PPCs to make the final determination.

14. That, therefore, it is humbly suggested that the HOWM Rules may be amended so as to make the Framework as a part of the Rules. This would not only strengthen the hazardous waste management regime, but it would also curtail the regulators from adopting a piece-meal and silo-based approach towards hazardous waste management which undermines the very objective of the HOWM Rules. A case in point is Direction dated 27.09.2024 issued by the MoEF&CC under Section 5 of the Environment (Protection) Act,

1986, which though ostensibly aimed at better implementation of HOWM Rules, conspicuously omits any reference to incorporate or make any reference/mention to the said Framework. Copy of Direction dated 27.09.2024 is annexed at Annexure 1, Pages 278-280 of Reply Affidavit dated 23.12.2024 of MoEF&CC. Under the said Direction SPCBs have been directed to ensure closure of unauthorized units and ensure implementation of HOWM Rules without first being required to comply with the procedure prescribed in the Framework which is sine qua non for proper implementation of the HOWM Rules. This defeats the entire purpose of the Framework which was intended to bolster the implementation of the HOWM Rules, 2016 by ensuring that hazardous wastes are not passed off as by-products and escape the strict scrutiny of the HOWM Rules.

15. That it is also a settled law that statutory rules cannot be amended/ modified/ changed through administrative and/or executive instruments and would require an amendment.

**C. CPCB NEEDS TO BE PROACTIVELY INVOLVED  
IN IMPLEMENTING THE FRAMEWORK BY  
ISSUING DIRECTIONS UNDER ENVIRONMENT  
(PROTECTION) ACT, 1986**

16. That at Page 261 of its Action Taken Report, the CPCB has discussed the “Guiding Factors” outlined in the Framework and admitted that the identification of a material as a by-product requires a case-to-case assessment considering factors such as the production process and the demand and supply within the State.

Thus, the mandate for implementation of the Rules lies with the SPCBs/PCCs. It is, however, humbly submitted that while the ground level implementation and monitoring is the mandate of the SPCBs/PCCs, the HOWM Rules (Schedule VII) do make the CPCB duty bound to:

- i. Co-ordinate activities of the SPCBs/PCCs;
- ii. Conduct training courses for authorities dealing with management of hazardous and other wastes;
- iii. Recommend standards and specifications for treatment and disposal of wastes and leachates, recommend procedures for characterization of hazardous wastes;
- iv. Inspect facilities handling hazardous wastes as and when necessary;
- v. Maintain sector specific documentation to identify waste for inclusion in the Rules;
- vi. Prepare and update Guidelines to prevent or minimize the generation and handling of hazardous and other wastes;
- vii. Prepare and update guidelines/Standard Operating Procedures for recycling, utilization, pre-processing, co-processing of hazardous and other wastes;
- viii. Prepare annual review report on management of hazardous waste; and
- ix. To undertake any other function assigned to it by the Respondent No. 1, MoEF&CC.

In view of the above, it is humbly submitted that besides conducting consultations that are few and far in between, the

Respondent No. 2, CPCB has not clarified or even mentioned whether it has carried out any inspections of its own or whether it has introduced any interim measures or clarifications or revisions to the Framework for better implementation based on ground level application of the Framework by the SPCBs/PCCs. In this regard the CPCB may issue Directions under Section 5 as well as Section 18(1) to bind the SPCBs/PCCs to implement the Framework as well as the HOWM Rules, 2016.

17. That this laxity on the part of Regulators has led to a situation where hazardous wastes and by-products are not being appropriately identified and being handled in accordance with the Framework Guidelines. For example, Spent Acid generated incidentally with the production of Linear Alkyl Benzene Sulphonic Acid ('LABSA') (for which SOP was also issued by CPCB in June 2024), heavy Alkyl Benzene Sulphonic Acid, saccharin, some basic drugs such as Ibuprofen, 3, 5-Dichloro Nitro Benzene Nitro spent and Chloro Spent arising out of dyes and dye intermediates are being used to the detriment of the environment with total disregard of the Framework Guidelines that have now been formulated at the behest of this Hon'ble Tribunal.
18. That the CPCB may be directed to ensure that the Common Application Form for industries for identification of material as

‘waste’ or By-product’ issued in 2024 is publicized and circulated to all the SPCBs/PCCs for adoption.

19. The CPCB & MoEF&CC may be directed to place on record a plan to action laying down the manner in which they propose to monitor and regulate the implementation of the HOWM Rules and the Framework.

#### **D. REPORTING ON SPCB’S COMPLIANCE THROUGH A COMMON DATABASE**

20. That while the Respondent No. 2, CPCB had asked all SPCBs/PCCs to adopt the Common Application Form for Identification of material as ‘waste’ and ‘by-product’ as well as to report on implementation of the Framework annually along with the Annual Report on Hazardous Waste Management (Page 220/Annexure II of Affidavit dated 08.04.2024 by CPCB), The Respondent No. 2, CPCB may accordingly be directed to bring on record the reporting format issued by it to all SPCBs/PCCs to report compliance on the Framework of 2019.

21. That the Framework provides a step-by-step process while leaving it upon SPCBs/ PCCs to make a final determination of whether a material is ‘waste’ or ‘by-product’ on a case-to-case basis taking into account all the relevant factors. This is evident from the fact that while laying down “Guiding Factors” for SPCBs for accepting a material as “by-products”, the Framework explicitly notes that the said the applicability of these Guiding Factors would vary depending on the materials being generated and its

intended use (refer Page 50 of the OA). In this regard, it is the humble submission of the Applicant herein that such determination be made available for the benefit of uniformity and as guidance for all SPCBs and User Agencies. Any discrepancy on same or similar waste generated being classified differently may be immediately brought before the CPCB to ensure uniformity.

#### **E. FUNCTIONING OF TECs**

22. That the Chart provided at Page 264 to 266 of the Action Taken Report dated 23.12.2024 filed by the Respondent No. 2, CPCB, is without any supporting material and is inadequate to reflect whether there has been any actual compliance with the Framework at the ground level. Moreover, the bare Chart does reflect the shocking state of affairs, as illustrated from the below observations from Objections dated 29.05.2025 filed by Applicant to the said Action Taken Report:

- a. CPCB has noted at 44 places that “Information has not been provided by the SPCB/PCC”;
- b. No information at all has yet been provided by the States of Sikkim, Manipur and Meghalaya;
- c. The States of Assam, Madhya Pradesh and Gujarat are the only ones that have received applications for identification of material as “by-product” but none have been classified as such;
- d. State of Gujarat is the only one where a waste has received the recommendation of the TEC to be classified as a by-product

(Hydrochloric acid generated from Chlorinated Paraffin Wax having concentration >32%).

That, in view of the above, the Applicant humbly submits that the Respondent No. 2, CPCB may be directed to clarify whether any action is being taken in situations where units generating hazardous waste are also, in effect, utilising material that is generated incidentally as a byproduct without the mandated categorization as envisaged in the Framework of 2019.

23. That even for the State of Gujarat, wherein one waste has received the recommendation of the TEC to be classified as a by-product, the information submitted by the Respondent No. 2, CPCB does not reflect whether any final decision was taken by the SPCB based on the recommendation of the TEC and whether further directions were issued to the generator to obtain revised consents and authorization.

**F. MONITORING OF IMPLEMENTATION OF  
FRAMEWORK AND DIRECTIONS ISSUED  
THEREUNDER**

24. That notwithstanding the Framework, the Reply dated 23.12.2024 of MoEF&CC is also conspicuously silent on the extent of implementation of the said Direction which was issued in 27.09.2024. As per the Directions, SPCBs were required to *inter alia* - close down units generating hazardous wastes without possessing valid authorization; ensure maintenance of manifest system by units for all types of hazardous waste as required under HOWM Rules; ensure submission of Annual Returns by units to

SPCBs regarding the generation and management of hazardous wastes. Significantly, SPCBs were also directed to levy penalties on non-complying units as required under Rule 23(2) of HOWM Rules and submit Action Taken Report to CPCB *within 20* days from the date of the directions. Further, CPCB would review the ATR and submit comments/ remarks to MoEF&CC for further action.

25. That despite the direction being issued on 27.09.2024 and considerable time having been elapsed, the MoEF&CC has failed to specify as to how many units have been closed down for having been operated without authorization and whether any environmental compensation has been imposed against such units. Further, nothing has been mentioned regarding the extent of adoption of the manifest system. More importantly, no information has been provided qua the penalties levied on erring units and whether such penalties have been realized. Equally significant, there is no mention of whether the Action Taken Reports have been submitted by all the SPCBs and whether the extent of compliance has been found to be satisfactory. Details of consideration of said ATRs by the CPCB and MoEF&CC have also not been provided.

**G. IMPORT OF HAZARDOUS WASTE TO ACTUAL  
USERS WITHIN THE COUNTRY**

26. That, further, it is humbly submitted by the Applicant herein that the Respondent No. 1, MoEF&CC is also the nodal agency under the HOWM Rules to regulate the import of hazardous waste to

actual users within the country. Despite this, there is not a whisper in the Replies dated 02.04.2024 and 24.12.2024 of the Respondent No. 1, MoEF&CC on the action taken by it to ensure that imported materials apprehended by it to be hazardous waste are not getting misclassified or sold as a by-product. In this regard, the Applicant had even produced (at Annexure A/3 of the instant Original Application, Page 58) tabulated data available with the Indian Chemical Council on various chemicals which have observed a surge in imports since December 2017.

**H. SETTING UP A CENTRALIZED NATIONAL  
REGISTRY OF ALL MATERIALS APPROVED AS BY-  
PRODUCTS UNDER THE FRAMEWORK**

27. That the Framework of 2019 clearly envisages that classification of a material as a by-product is an exception and not the norm. A material can qualify as a by-product only upon cumulative satisfaction of essential conditions, including certainty of further use, direct usability without further processing, generation as an integral part of the production process, and demonstrable compliance with environmental and health standards. The Framework expressly cautions that improper classification risks hazardous wastes escaping the regulatory compliances of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, thereby rendering the Framework ineffective if not strictly enforced.

28. That it is respectfully submitted that to ensure uniformity, transparency and enforceability of the Framework across the

country, this Hon'ble Tribunal may be pleased to direct Respondent No. 2-CPCB, to establish a centralized national registry of all materials approved as By-Products under the Framework. The registry would mandatorily disclose the identity of the generator, industrial process, quantity approved, conditions imposed, validity period and the approving SPCB/PCC. It is further submitted that no material shall be treated, transported or utilized as a by-product unless its approval is duly reflected in such registry, and any movement or utilization in the absence thereof shall be treated as handling of hazardous waste in violation of the HOWM Rules, 2016.

29. That along with the above, the classifications of a by-product shall be uploaded on the websites of the concerned SPCBs along with recorded reasons, conditions imposed and validity period. Such disclosure would enable Public Scrutiny by affected communities, civil society and regulatory authorities and act as a safeguard against arbitrary or industry-driven classifications. [*Refer to Para 42 of APPCB v. Prof. M.V Nayudu (1992) 2 SCC 718*]. It is necessary to ensure transparency and public accountability during the classification process, further aligning with the *Principle of Good Governance*. [*Refer to Para 42 of APPCB v. Prof. M.V Nayudu (1992) 2 SCC 718*]
30. That effective implementation of the Framework requires moving beyond paper compliance. SPCBs must be directed to conduct periodic joint inspections with CPCB officials in respect of industries generating large volumes of hazardous waste claimed as

by-products, specifically to verify actual quantities generated, the identity and compliance status of actual users, environmental safeguards at the point of utilization, and whether the claimed by-product undergoes any processing or dilution prior to sale rendering it as hazardous de facto.

31. That lastly it is submitted that this Hon'ble Tribunal may further be pleased to direct Respondent No. 2-CPCB, in exercise of its statutory coordinating and supervisory functions under Schedule VII of the HOWM Rules, 2016, to undertake periodic audits of by-product classifications granted by SPCBs/PCCs, including examination of adherence to the Framework, adequacy of reasoning, compliance with conditions imposed and post-approval monitoring. CPCB may be directed to place the findings of such audits, along with corrective directions issued to erring SPCBs/PCCs, before this Hon'ble Tribunal at periodic intervals, to ensure accountability and prevent arbitrary or inconsistent classifications.

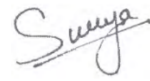
32. That it is recommended that Respondent No. 2-CPCB may issue a binding clarification under Section 5 of the Environment (Protection) Act, 1986, in light of the HOWM Rules, 2016 clarifying that the onus to prove a claimed by-product lies squarely on the generator. While submitting an application for the aforesaid to the CPCB and MoEF&CC, the generator shall prove that the said product was produced without any deliberate alterations or additions thereto. Furthermore, prove that the primary aim was not to produce the said product. The Principle of

Burden of Proof lying squarely on person(s) attempting to alter the status quo of the product under the ambit of precautionary principle may be reiterated herein to further strengthen the scrutiny of such classification. The same has been elaborately explained in A. P Pollution Control Board v. Prof. M.V. Nayudu (Retd.) And Others, Civil Appeal No.s 368-371 of 1999 with No. 372-273 of 1999 while referring to Vellore Citizens Welfare Forum v. Union of India, (1996) 5 SCC 647. (Refer to Para 31, 32, 36-38 and 39, Page XX of A.P PCB v. M.V. Nayudu and Para 11 of Vellore Citizens v. Union of India).

**DATE:** 08.04.2026

**PLACE:** New Delhi

**DRAWN BY:**



**Eisha Krishn, Gitanjali Sanyal & Surya Gupta**

Advocates for the Applicant

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**SETTLED BY:**

Mr. Sanjay Upadhyay

*Senior Advocate*

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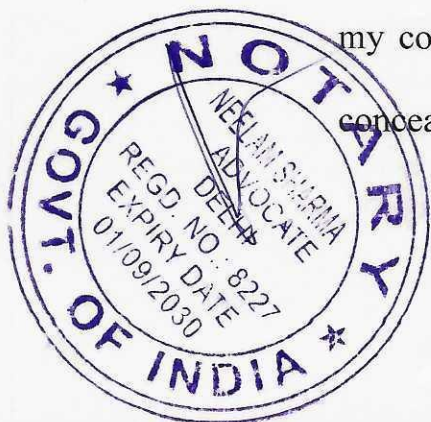
**AFFIDAVIT**

I, Sri Prasoon Pant, aged about 49 years, S/o Late Prof. Mahesh Chandra Pant, R/o 17 D, 108 Konark Enclave, Vasundhara, Ghaziabad, Uttar Pradesh – 201012, do hereby solemnly affirm and state as under:

1. That I am the Policy Director and Programme Planner as well as the authorized representative of the Society for Protection of Environment and Biodiversity (SPENBIO), which is the Applicant in the above captioned Original Application.

Further, I am familiar with the facts and circumstances of the case and am competent to swear this Affidavit.

2. That I have read and understood the contents of the accompanying Suggestions and the same has been drafted by my counsel on my instructions and nothing material has been concealed therefrom.



3. That the Annexures in the accompanying Application are true and correct to the best of my knowledge.

*P. Pant*

**DEPONENT**

**VERIFICATION:**

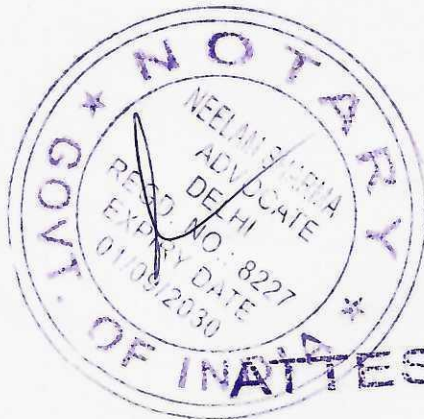
I, the above-named Deponent do hereby verify that all the facts mentioned in the Affidavit are true to my knowledge and no part thereof is false and nothing material has been concealed therefrom.

**08 APR 2026**

Verified at \_\_\_\_\_ on this \_\_\_\_\_ day of April, 2026.

*P. Pant*

**DEPONENT**



**NOTARY (Govt. of India)**  
**Neelam Sharma, Advocate**  
**Enrol. No.-D1281/2001**  
**Ch. No. 165A, Gate No. 11**  
**Patala House Courts,**  
**New Delhi-110001**  
**(M): 9899408301**

**08 APR 2026**



ENVIRO LEGAL DEFENCE FIRM &lt;eldflegal@gmail.com&gt;

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**Service in SPENBIO Vs. Union of India & Ors. [OA. No. 502 of 2023/PB]**

1 message

**ELDF** <eldflegal@gmail.com>

Wed, Apr 8, 2026 at 1:15 PM

To: sakshi popli &lt;sakshipopli@gmail.com&gt;, Balendu Shekhar &lt;balendushekhar@gmail.com&gt;, pradeepmisra@yahoo.com, daleepdhayani@yahoo.co.in

Cc: Eisha Krishn &lt;eisha@eldfindia.com&gt;, Gitanjali Sanyal &lt;gitanjali@eldfindia.com&gt;, Surya Gupta &lt;surya@eldfindia.com&gt;

Dear Sir/Ma'am

Please find attached the Comprehensive Suggestions filed on behalf of the Applicant in the above-mentioned case.

*Thanks & Regards***Fahimul Hassan***Clerk**Enviro Legal Defence Firm**29, Presidential Estate LGF,**Nizamuddin East New Delhi – 110013**Ph. No. 011-40573181***2026.04.08 - Suggestions final.pdf**

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