

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI
ORIGINAL APPLICATION No.184 OF 2025 (SZ)**

Ravula Brahmananda Reddy

... Applicant

Versus

Union of India and 9 others

...Respondents

REPLY FILED ON BEHALF OF THE 10TH RESPONDENT

The 10th respondent above named respectfully submits as follows:

- 1) It is submitted that the above Original Application has been filed seeking direction to the official respondents to recover and pay monetary compensation of Rs.75,00,000/- or as per the assessment by the official Respondents to the applicant for the loss of agricultural income cause by the unofficial respondents.
- 2) At the outset it is submitted that Original Application itself is not maintainable in as much as the same has been filed making baseless allegations and after coming to know of the institution of another case by one Vaspari Lingaiah in O.A.108/2023.
- 3) It is submitted that the applicant do not have any genuine grievance and after coming to know of another similar case is filed by one Vaspari Lingaiah he has now come forward with the present application which is clear abuse of process of law.
- 4) The 10th respondent is involved in the manufacture of Bulk Drug Intermediates and this factory is situated at Sy.No. 300, Malkapur (V) Choutuppall (M), Yadadri Bhuvanagiri District Telangana-508252 District and the industry is operating with valid Consent for Operation and also hazardous waste authorization. The consent has been last renewed on 29.05.2021 with validity up to 31.12.2025 for manufacturing of certain Bulk




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Drug Intermediates. The respondent industry is permitted to generate 6.85 KLD of High TDS effluents. The industry is also permitted to generate 2.2 KLD of Low TDS effluents. The respondent industry is having Multiple Effect Evaporation (MEE) system consist of striper, MEE (30 KLD), ATFD for handling of High TDS effluents. Low TDS effluents along with MEE condensate will be treated in the RO System. This industry is having 2 Nos double stage scrubber for production block I and III with online PH meter, condensers and activated charcoal bed and single stage scrubber to the effluents collection tanks to control odour nuisance.

- 5) It is submitted that the applicant's agricultural land is situated at Jiblakpally Village, Bhudan Pochampalli Mandal, Yadadri Bhuvanagiri District, which is approximately 13 kilometers away from the 10th respondent industry located at Malkapur Village, Choutuppal Mandal, Yadadri Bhuvanagiri District. The applicant is not the aggrieved party. The present application has been filed by the applicant only with the intention of extracting money from the 9th respondent industry.
- 6) It is respectfully submitted that the applicant has neither specifically pleaded nor established in the application as to how he has suffered any loss or damage on account of the alleged pollution said to have been caused by the 10th respondent industry. The application merely reproduces and relies upon certain earlier reports of the official respondents, without disclosing any independent cause of action to substantiate the alleged damage suffered by the applicant.
- 7) It is further submitted that the reports relied upon by the applicant pertain to the year 2021. Subsequently, the 10th respondent industry was inspected by the official respondents during the years 2023-2024, and updated inspection reports were filed before this Hon'ble Tribunal in a pending Original Application. However, without considering or analysing the present operational status and compliance position of the 9th



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respondent industry, the applicant has chosen to file the present application based on baseless allegations.

- 8) It is further submitted that the 10th respondent industry has duly complied with all the conditions imposed by the Pollution Control Board from time to time and is presently operating in full compliance with the applicable statutory norms. After due compliance of all pollution norms the temporary closure order issued against this industry was revoked by the board.
- 9) The respondent board has reviewed the industry and tested ambient air quality and as per their report ambient air quality is within the limits.
- 10) It is pertinent to submit that another individual has already filed an Original Application viz., O.A.No.108/2023 before this Hon'ble Tribunal seeking directions against the official respondents for recovery of compensation from this 10th respondent industry. In the absence of any specific averments regarding the loss suffered by the applicant, the present application appears to have been filed solely seeking compensation against the 10th respondent industry despite the industry functioning in compliance with the directions of the regulatory authorities.
- 11) It is reliably understood that the said applicant in O.A.No.108/2023 is none other than the brother or a very close relative of Ravula Viswaroopa Reddy who is the applicant in O.A.No.176/2023. It is strongly suspected that individuals unconnected with the area who have failed in their attempt of extortion against the 10th respondent industry are farming cartel targeting the 10th respondent industry by filing one application against another.
- 12) It is further submitted that the applicant has not produced any documents to show that his agricultural lands suffered loss due to the alleged pollution caused by the 10th respondent industry. The applicant has made bald allegations against this



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respondent, which are not supported by any material evidence. The applicant has failed to make out any case against this respondent with respect to the alleged pollution caused by the industry. Furthermore, since another person has already filed an application against this respondent claiming compensation, the present application appears to have been filed as an afterthought.

- 13) After filing of the present application and after notice was ordered by this Hon'ble Tribunal the industry has been inspected on 08.09.2023 and report has been filed by the board on 03.10.2023. In the report it is also been observed that there is no discharge of effluent from the unit. However, it has been noted that the industry has to carry out certain other measures.
- 14) The land belonging to the applicant is no way connected to 10th respondent industry and the present application is filed for compensation only.
- 15) It is submitted that land adjacent to industry does not have any kind of irrigation facility like Bore, or well for water source. The land comes under DRY METTA which is defined by Agriculture Dept, the soil is very rocky. As per report, soil is not suitable for commercial crops, because paddy and cotton needs black soil or minimum clay soil with medium water retention capacity. This land is almost has a gradient of 20 degree from hill footing to industry boundary. Hence cultivating paddy itself is not possible and soil is not suitable for cotton cultivation also
- 16) The 10th respondent industry was reviewed by the Task Force Committee in which certain points were raised for which the industry has submitted the following compliance status:
 - a) The industry has established the Effluent load as 9.05 KL/day as per the existing CFO
 - b) The industry has established Biological ETP for the CFE (Expansion)



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- c) The industry has taken all necessary steps to control the odor nuisance.
- d) All other defects pointed out by the TF have been complied with by the industry and a compliance report was submitted on 02.09.2025.

17) It is submitted that one Vaspari Lingiah has filed Original Application viz., O.A.No.108/2023 before this Hon'ble Tribunal against the 10th respondent industry claiming compensation for the alleged loss suffered by him. On 29.08.2023 this Hon'ble Tribunal has directed the official respondents to file their report after inspecting the 10th respondent industry.

18) Pursuant to the direction issued by this Hon'ble Tribunal, the 9th respondent industry has been inspected on 08.09.2023 and report has been filed by the board before this Hon'ble Tribunal on 03.10.2023. In the report, the board has noted that on an earlier occasion the board had issued closure order dated 21.10.2022 but after compliance of various measures the board has issued a temporary revocation of closure order dated 12.11.2022. The same has been extended periodically. In the report it is also been observed that there are no discharge of effluent from the unit. However, it has been noted that the industry has to carry out certain other measures.

19) It is submitted that thereafter once again the industry was inspected on 18.01.2023. Pursuant to which a report has been filed before this Hon'ble Tribunal on 05.12.2023. In the said report it has been noted that the industry has installed various equipments as suggested and certain other suggestions were also been given regarding minor lapses. Based on which certain directions were also issued vide order dated 15.11.2023 to the industry. It is respectfully submitted that the industry has complied with all directions of the board.




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- 20) It is further submitted that once again the industry was inspected on 16.12.2023 by the Task Force Committee of the board and a report dated 24.01.2024 has been filed before this Hon'ble Tribunal. The report notes that the industry has provided single stage scrubber for the existing ATFD and installation of new ATFD and Civil Construction Work of ETP are under progress. It is also noted that there is no specific odour and no discharge of effluent.
- 21) It should be pointed out that another Original Application viz., O.A.No.176/2023 has been filed by one Ravula Viswaroop Reddy alleging violation of pollution norms by 10th respondent industry. In fact Application No.108/23 & 176/23 has been heard together by this Hon'ble Tribunal and periodical inspection reports have been filed. In fact by report dated 10.12.2024 TSPCB has reported an Environmental Compensation of Rs.26,80,000/- was levied on the 10th respondent industry and 100% of the said Environmental Compensation has been already paid by the 10th respondent.
- 22) It is to be noted that despite the fact that independently the 10th respondent industry has paid compensation to the farmers for the year 2019-20 till 2024. It is respectfully submitted that even though the industry had lot of objections on the nature of violation pointed out and in the quantum of compensation levied, the industry proceeded to pay 100% environmental compensation as well as compensation directed to be paid by the Collector only out of good will and grant of subsequent renewals for the smooth running of the industry. Any further claim of violation of pollution control norms by one individual or another located several kilometers away from the 10th respondent industry will ruin the industry itself and the same will go against the Principle of Sustainable Development.
- 23) It is submitted that on 20.11.2025 Telangana Pollution Control Board has issued directions to the 10th respondent industry for compliance of certain conditions stipulated in the consent order.



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- 24) On 09.01.2026, the Telangana Pollution Control Board issued a show cause notice to the 10th respondent industry for non-compliance with the earlier directions contained in its order dated 20.11.2025. In the said show cause notice dated 09.01.2026, the TSPCB granted three months' time to the 10th respondent industry to comply with the directions issued in the order dated 20.11.2025. The 10th respondent industry has submitted its reply on 30/03/2026, stating that it had complied with the conditions stipulated in the show cause notice dated 09.01.2026 issued by the TSPCB.

Under these circumstances, the application is not maintainable and the same be dismissed lacking bonafide and devoid of merits and thus render justice.

[Signature]

Counsel for 10th Respondent



[Signature]
10th Respondent



VERIFICATION

I, G.Venkata Ramana S/o.Venkata Swamy of M/s. Vineet (Ortin) Laboratories Ltd, the 10th Respondent herein do hereby verify that what are all stated above are true and correct to the best of my knowledge, information and belief.

Verified at *Hyderabad* on this the 23rd day of May 2026

[Signature]
10th Respondent



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COUNSEL FOR RESPONDENT No. 10**