

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI
O.A. No. 262/of 2017

K.K Muhammed
Iqbal

Applicant

v

Kerala State
Pollution Control
Board & Ors

Respondents

REPLY STATEMENT FILED BY 4TH RESPONDENT

Karthika Ganesh
COUNSEL FOR THE 4th RESPONDENT

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

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Kerala State Pollution Control Board & Ors Respondents

REPLY STATEMENT FILED BY THE 4th RESPONDENT

TO THE REPORT DATED 20/08/2025

FILED BY 1ST ADN 2ND RESPONDENT

1. The 4th Respondent respectfully submits this reply to the report filed by the Chief Environmental Engineer on behalf of the Kerala State Pollution Control Board (1st and 2nd Respondents), dated 20th August 2025.
2. The 4th Respondent acknowledges the factual position stated in the report, including the history of plastic waste dumping by M/s. Sreesakthi Paper Mills Ltd., and the interventions by the Hon'ble High Court of Kerala and the National Green Tribunal (NGT).
3. The 4th Respondent submits that it has acted in accordance with the law and in good faith in the matter of managing and remediating the site in question. Upon closure of the operations of M/s. Sreesakthi Paper Mills Ltd., the possession of the site passed to the Kadungalloor Grama Panchayat, which is currently using the land for waste collection, i.e. collection of plastic waste. The company has been already closed since 2016.

For CELLA SPACE LIMITED




VINOD KUMAR
General Manager

4. The 4th Respondent further states that the presence of micro plastics in the river and soil, as detected in the report, is attributed to multiple sources. It is not attributable to the actions of this respondent alone. The Joint Committee itself concluded that contamination in the river cannot be solely linked to the site in question. As such, further damages cannot be imposed on this respondent.
5. The 4th Respondent submits that the financial liability assessed by the Chairman, PCB, upon directions of this Honourable Tribunal, including Environmental Compensation (EC) and Environmental Damage costs, has been already paid. Total amount computed was 2 crores 15 lakhs and after adjusting amount spend on remediation by this respondent, the balance amount was fully paid to the PCB.
6. Admittedly, the entire remediation work including, the removal of waste, compacting the site with earth GSB and D Sand has been carried out under the strict supervision of the PCB and this is confirmed by the committee. The only permission granted in the final order of this Honourable Tribunal is for this respondent to challenge the finally fixed Compensation. There is no challenge on the finally fixed compensation from any quarter. Therefore, the demand if any for more compensation is illegal and ultra vires.
7. All remediation measures as instructed by the experts deployed by the Pollution Control Board had been already carried out. We have compacted the land, and levelled the area and it was specifically instructed by the Board that the area shall not be used for any kind of construction. As such, the area now in



FOR CELLA SPACE LIMITED


VINOD KUMAR
General Manager

11. It is respectfully prayed that the Honourable Tribunal may be pleased to consider the above submissions in the interest of justice and direct the necessary containment and monitoring measures as deemed appropriate.


IN VERIFICATION


I, M/s Cella Space Ltd. (formerly Sree Shakti Paper Mills Ltd.), Company having Registered Office at, Sree Kailas, Paliyam Road, Kochi 682016, Ernakulam, Kerala, represented by its General Manager (Legal and Administration), V. Vinod Kumar, aged 61 years, Sho Late Sri. V. Raman Nair, residing at Kripa, Thuruthiparambu Road, Vazhakkala, Ernakulam 682021, Kerala, do hereby verify that the contents are true to the best of our personal knowledge and belief and that I have not suppressed any material facts.

Place: Ernakulam

Date: 16.09.2025

For CELLA SPACE LIMITED


V. Vinod Kumar
General Manager


Karthika Ganesh
COUNSEL FOR THE 4th RESPONDENT

