

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
(In Original Application No. 829 of 2024 & 1042 of 2024)

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(Er. Kapil Dev)

Date: 27-01-2025

Place: Ludhiana

Applicant No. 2

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL
AT PRINCIPAL BENCH, DELHI**

(In O.A. No. 829 of 2024 and O.A. No. 1042 of 2024)

In the matter of:

Public Action Committee & ors.

.... **Applicants**

vs.

State of Punjab & ors.

..... **Respondents**

Objections by Applicant against reply dated 14-10-2024 and 16-10-2024 submitted by Executive Engineer, NH Division, PWD (B&R Branch), Mohali, Punjab.

Hon'ble sir,

It is most respectfully showeth:

1. That in O.A. No. 829 of 2024, the trees which were being axed for widening of Sirhind Patiala Road (starting from Sirhind to Patiala side- Partial stretch) are separate from issue of axing of trees raised in O.A. No. 1042 of 2024 (from Patiala to Sirhind Side), but for the same road. The auction for trees for standing along road of both portions of same Sirhind-Patiala Stretch has been done at difference occasion separately by the Forest Department. It is pertinent to humbly submit here that the axing of trees as raised in O.A. No.

829 of 2024 started before 04-07-2024 and news related to same was published has been produced as Annexure P-2 in the Original Application. It is pertinent to humbly submit here that the O.A. No. 829 of 2024 was filed on 06-07-2024 before this Hon'ble Tribunal whereas the result of Auction of trees (for remaining stretch Starting from Patiala side) as detailed in O.A. No. 1042 of 2024 was published on 18-07-2024 and axing of trees at this location was started after 18-07-2024. Keeping in view of axing/auction of two different stretches at different intervals, the Applicants filed second O.A. No. 1042 of 2024 and the above facts have been produced before this Hon'ble Tribunal by the Applicants in O.A. No. 1042 of 2024 at Para no. 8. Thus, both the petitions cannot be termed as filed for same issue and thus, such claim by Respondents may kindly be rejected and set aside.

2. That Respondent has raised the issue of MoEF&CC being not made party to the case on ground that the Governing Authority in present case of diversion of 22.59 Hectares of forest land for non-forest purpose is MoEF&CC. However it is pertinent to humbly submit here that the Applicants are not against diversion of 22.50 hectare of forest land for non-forest purposes but have raised the substantial issue of failure in acquisition of land along impugned Sirhind-Patiala Road for greenery as per the provisions of Indian Road Congress: SP:21-2009 Guidelines for Landscape and tree plantation AND IRC:SP:84-2019 (Manual for Specification and Standards for Four Laning of Highways) along with other norms. Keeping in view of the same, the MoEF&CC was not made respondent in the said case by the Applicants.

3. That the Applicants have filed both the petitions with facts and all mandatory norms like direction of this Hon'ble NGT, EC Conditions, all relevant IRC Codes, as well as other Environmental norms required to be followed by Respondent No. 5 (PWD-B&R). It is pertinent to humbly submit here that some of the important and relevant conditions of In principle Approval dated 01/08/2023 (Annexure R-3 – Page 193 onwards) and similar conditions are there in Final Approval dated 18-01-2024 (Annexure R-8 - Page No. 211) given by the MoEF&CC and same are produced as under:

Standard Conditions:

Point No. 9: User Agency shall raise strip plantation on both sides and central verge of the road as per the IRC norms.

Point No. 14: The Layout Plan of the proposal shall not be changed without prior approval of Central Government.

4. That as per Certificate (running page no. 210) issued under the signatures of Executive Engineer, National Highway Division, PWD (B & R) Mohali, it is mentioned as under:

It is certified that there is no further Forest Diversion case for Stage-I and Stage-II approval pending belongs to this Division except "Diversion of 22.59 Ha of Forest land permission for **Rehabilitation/Upgradation of 2 lane to 4 Lanning of Patiala-Sirhind road** Km. 7.800-29.551 B/S Distt. Patiala & Fatehgarh Sahib under Forest Division Patiala. Proposal No. FB/PB/ROAD/414057/2023".

5. That after raising the issue by Petitioner Association and then moving this Hon'ble NGT by filing the Original Applications and serving the set of documents along with orders in both the Original Applications on 02-08-2024 and 13-08-2024 respectively via email to all the Respondents, the Office of Advisor (Tech) to Govt. of Punjab sent one letter dated 23-08-2024 to the Chief Engineer (NH) PWD (B&R), Patiala (running Page no. 216-217) intimating them about **the change in layout plan of Project (width of the Road) as well as advising the Chief Engineer of Respondent No. 5 (PWD) that the Guidelines given in IPC: SP: 84 -2019 'Manual of Specifications and Standards for 4-Laning of Highways be followed.**

6. That after receiving Set of Documents from Petitioner Association, the layout plan of Project was changed due to which one Strip of Forest land has been left but such width of strip is not sufficient as per IRC norms which is mandatory to be incorporated as per In-principal Approval as well as Final Approval by MoEF&CC as well as letter dated 23-08-2024 issued to the Chief Engineer (NH) PWD (B&R), Patiala by the Office of Advisor (Tech) to Govt. of Punjab. However, despite receiving the letter from Technical Advisor, the Respondent PWD Department sent one letter (Annexure R-15 Running Page No. 226-227) on same day i.e. on 23-08-2024 to the Superintending Engineer, National Highway Circle PWD B&R Branch Chandigarh vide Memo No. 416 dated 23-08-2024 by mentioning at Point No. vii that **“The whole provision of IRC:SP:84-2019 could not be implemented as it is a brownfield alignment retrofitted within the**

available ROW, however the specification standards to the extent possible have been considered”

7. That the above correspondence was done by Respondent PWD Department on 23-08-2024 i.e. after issuing notice by this Hon'ble Tribunal. However, from the contents of In principle approval as well as Final Approval, it is crystal clear that the layout plan cannot be changed and IRC norms have to be followed in the project. **Any change in project cannot be done without prior Approval from MoEF&CC.** However, the Respondent PWD Department cleverly tried to manage the things by producing the correspondence dated 23-08-2024 which are baseless and prepared in order to mislead this Hon'ble Tribunal. No prior permission has been taken for amendments in Conditions as detailed in In-principle approval as well as Final Approval (supra) but the project was started with axing of existing trees in July and August 2024.
8. That the Respondent PWD Department has said that the widening of Sirhind-Patiala Road from 2 lane to 4 Lane is brownfield alignment retrofitted within the available ROW. However, it has deliberately not mentioned that the Right of Way (ROW) includes the converted Forest Land to Non-Forest Purpose also. Further, before 23-08-2024, the Respondent department was using the word Rehabilitation/Upgradation of Sirhind-Patiala Road from two lane to Four lane but after filing the case by the Petitioners, the new term

brownfield alignment retrofitted within the available ROW has been used but that too without mentioning that the desired ROW is available by including the diverted forest land too. It is pertinent to humbly mention here that the brownfield means upgradation of existing roads and IRC Codes as produced in O.A. are applicable to both, new as well as upgradation of existing roads.

9. That as already produced at Point No. 5 of Original Application No. 1042 of 2024, the Section 11 of IRC:SP:84-2019 Code for Four Laning Projects mandatory to be followed by the departments, one important aspect of same is reproduced as under:

11.1 General:

The Concessionaire shall plant trees and shrubs of required number and type at the appropriate locations within the Right of Way and in the land earmarked by the Authority for afforestation keeping in view the IRC Guidelines on Landscaping and Tree Plantation.

Overall, the provisions of both **Indian Road Congress Code SP: 21-2009 Guidelines for Landscaping & Plantation as well as IRC:SP: 84-2019 (Manual for Specification and Standards for Four Laning of Highways)** are mandatory to be followed **for upgradation of road from two lane to Four lane (either it is new project or the brownfield project).**

The Respondent has failed to produce any policy document pertaining to brownfield alignment. The Respondent PWD department has failed to comply with such mandatory conditions of In-principle Approval, Final Approval, letter issued by Office of the Office of Advisor (Tech) to Govt. of Punjab and IRC norms resulting into Environmental damage by not acquiring the land for green spaces along the Sirhind-Patiala Road.

10. That the Respondent PWD Department has said that the project is **brownfield alignment** retrofitted within the available ROW, however as per the Policy Guidelines for land acquisition, tree felling, utility shifting across the alignment therefor – approach reg. dated 10-05-2018 issued by the Ministry of Road, Transport & Highways (Planning Zone) to the Chief Secretaries of all the State Governments/UTS along with many other departments including the Respondent PWD pertaining to brownfield i.e. upgradation of the existing roads and as per Clause No. (iii) of this policy produced as under:

(iii) For expansion of an existing two lane or two lane with paved shoulders road to 4 lane with paved shoulder Highways, the following guidelines shall be followed for end lane status and the stage development based on the present traffic (including the induced traffic:

Present traffic including induced traffic (PCU)	Present Lane Status	End Lane Status	Stage development	ROW
Upto 20,000 PCUs	Upto 2L+PS	8 Lane	4 lane highway with 4 lane structures	70m


10/05/2018

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 Government of India
 Ministry of Road Transport & Highways
 (Planning Zone)
 Transport Bhawan, 1, Parliament Street, New Delhi - 110001

Present traffic including induced traffic (PCU)	Present Lane Status	End Lane Status	Stage development	ROW
20,000 - 30,000 PCU	Upto 2L+PS	8 lane	6 lane highway with 8-lane structures	70m
30,000 – 40,000 PCU onwards	Upto 2L+PS	8 lane	8 lane highway with 8 lane structures	70m
40,000 PCU onwards	Upto 2L+PS	12 lane	8 lane highway with 8 lane structures	100 m
40,000 PCU onwards	4-Lane	8 Lane	<ul style="list-style-type: none"> Option of Green-field alignment or 8 lane with 8 lane structures (where lifecycle cost is lower) 6 lane with 6 lane structures in cases, where portion of the corridor has been 6 laned or 6 lane structures have already been developed on 4 lane highway or Cost of land acquisition for brown-field expansion is very high. 	70 m

From above contents of policy guidelines issued by MoRTH, it is clear that it is mandatory to acquire land for brownfield projects too. The copy of policy guidelines dated 10-05-2018 as issued by MoRTH regarding new and brownfield projects is produced herewith as **Annexure PA-1**.

11. That the clause 1.4 of Section 1 General of IRC:SP 84-2019 is produced as under:

1.4: The codes, standards, Technical Specifications and Guidelines applicable for the design and construction projects components are:

- i) Indian Road congress (IRC) Codes, Standards and Guidelines**
- ii) Specifications for Road and Bridge Works issued by the Ministry of Road Transport & Highways (MoRTH) hereinafter referred to as MoRTH or Ministry's specifications.**
- iii) Any other standards referred to in the Manual and any supplement issued with the bid document.**

From above, the policy guidelines as issued by MoRTH are applicable to State Road projects too and thus, the provisions of acquisition was mandatory before initiating the project of widening of Sirhing-Patiala Road.

The copy of relevant clause from IRC:SP:84-2019 regarding compliance of policy guidelines issued by MoRTH is produced herewith as **Annexure PA-2**.

12. That this Hon'ble Tribunal vide orders dated 06-08-2024 in O.A. 1042 of 2024 is pleased to direct the respondents to explore the possibility of transplantation of trees but the Respondents even didn't try to transplant the Poles to some other location. Further, 95% of trees from Patiala side to Sirhind (as per list attached in O.A No. 1042 of 2024) have been completely axed i.e. negligible number of trees are left at this location. Further many trees which were located adjoining to private land have also been cut by the respondents whereas the Respondent has mentioned that they have left

atleast 0.60 m wide forest strip along this impugned road. From Google Map, it is clear that large number of trees which were standing at the end of forest strip (towards private land) have also been axed too and it is matter of investigation that how the Forest Department allowed such trees to be axed which could have been saved too. **The applicant humbly prays this Hon'ble Tribunal to issue directions for investigation into this matter through an independent committee.**

Keeping in view of the above facts as well as facts produced in both the original Applications, the Applicants humbly prays this Hon'ble Tribunal to reject the Counter Affidavit, being misleading as filed by the Respondents and issue directions as prayed in Original Application for directions to comply with IRC Code mandatory conditions for restitution of Environment by acquisition of land for green areas along road sides as per IRC norms and afforestation within 10 Km area of location as well as humble prayer for directions of investigation (through an independent committee) into axing of trees standing in small strip (Forest Area) left along the impugned road.

Dated 27-01-2025

Place: Ludhiana



Er. Kapil Dev

(Petitioner in person)

Government of India

Ministry of Road Transport & Highways

(Planning Zone)

Transport Bhawan, 1, Parliament Street, New Delhi - 110001

Dated: May 10, 2018

To,

1. The Chief Secretaries of all the State Governments/UTs
2. The Principal Secretaries/ Secretaries of all States/UTs Public Works Department dealing with National Highways, other centrally sponsored schemes.
3. All Engineers-in-Chief and Chief Engineers of Public Works Departments of States/UTs dealing with National Highways and other centrally sponsored schemes.
4. The Chairman, National Highways Authority of India, G-5&6, Sector-10, Dwarka, New Delhi-110075.
5. The Managing Director, NHIDCL, PTI Building, New Delhi-110001
6. All CE-ROs / ROs of the Ministry
6. The Director General (Border Roads), Seema Sadak Bhawan, Ring Road, New Delhi-110010.

Subject: Policy Guidelines for land acquisition, tree felling, utility shifting across the alignment therefor - approach reg.

Sir,

The Ministry of Road Transport & Highways, along with its executing agencies, has taken up development of highway projects of various standards namely, two lane with paved shoulder (10 mtrs. carriageway), 4 lane, 6 lane and 8 lane, both as greenfield projects as well as brownfield projects. A majority of these National Highway projects are brownfield i.e. upgradation of the existing roads.

2. Upgradation project of any National Highway involves, (i) Acquisition of additional land, (ii) Shifting of utilities, (iii) Felling of trees, and (iv) Removal of existing structures which fall in the Right of Way (ROW) of the proposed expansion. Meeting these pre-requisites not only entails heavy cost but also involves a lot of time and effort. Further, the felling of grown-up trees leads to adverse effects on environment. It has been observed that shifting of utilities, felling of trees and structures can be considerably reduced (by about 50%) if the land for expansion of any highway is acquired on one side of an existing road, as against doing the same on both sides.

3. Accordingly, in continuation of the Circular of even number dated February 26, 2018 issued with regard to alignment of NHs, it has been decided that the project implementation agencies shall undertake additional land acquisition on one side of an existing road to the extent feasible for expansion of existing roads to next level of configurations. It may also be noted that the acquisition side shall be decided based on the


Government of India
Ministry of Road Transport & Highways
(Planning Zone)

Transport Bhawan, 1, Parliament Street, New Delhi - 110001

intensity of the existing utilities and trees (following overall cost savings principle) and such side may change from one stretch to another stretch depending upon the most optimal alignment. Following policy guidelines shall be followed henceforth to minimize the requirement of additional land acquisition, optimization of utility shifting and felling of trees:

- (i) For roads being developed as **Two-lane with paved shoulders** and where traffic is below 5,000 PCUs, the expansion shall be carried out within the existing ROW and land acquisition shall be limited to only re-alignments and bypasses. In cases where the ROW permits expansion through eccentric widening (expansion of 3 mtrs on one side), the same shall be adopted as it reduces the need for utility shifting and tree felling to one side of the ROW, thereby reducing costs and saves the environmental footprints.
- (ii) For roads being developed as **Two-lane with paved shoulders with traffic between 5,000 to 10,000 PCUs**, and where the projected traffic may go up to 40,000 PCUs in due course of about next 25-30 years, the additional Land shall be acquired for achieving a total ROW of 45 meters (existing + additional) in such a manner that the present construction (eccentric widening to two lane with paved shoulders) and future expansion (4 lane eccentric widening) would impact utility shifting and tree-felling only on one side of the Right of Way (RoW). In nutshell, the development of the 2-Lane with PS will be undertaken on one side of the ROW of 45 mtrs so that as & when it matures for 4-laning, the other part of the divided carriageway and the Median do not disturb the existing carriageway of 2-Lane +PS. The additional land acquisition in these cases shall be done only when no parallel alignment is proposed or cannot be developed in future to diversify traffic. In case of traffic diversification potential, the two-lane with paved shoulders shall be developed within the available ROW.
- (iii) For expansion of an existing two-lane or two lane with paved shoulders road to 4 lane with paved shoulder Highways, the following guidelines shall be followed for end-lane status and the stage development based on the present traffic (including the induced traffic:

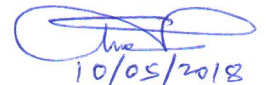
Present traffic including induced traffic (PCU)	Present Lane Status	End Lane Status	Stage development	ROW
Upto 20,000 PCUs	Upto 2L+PS	8 Lane	4 lane highway with 4 lane structures	70m


10/05/2018

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Government of India
Ministry of Road Transport & Highways
 (Planning Zone)
 Transport Bhawan, 1, Parliament Street, New Delhi - 110001

Present traffic including induced traffic (PCU)	Present Lane Status	End Lane Status	Stage development	ROW
20,000 - 30,000 PCU	Upto 2L+PS	8 lane	6 lane highway with 8-lane structures	70m
30,000 – 40,000 PCU onwards	Upto 2L+PS	8 lane	8 lane highway with 8 lane structures	70m
40,000 PCU onwards	Upto 2L+PS	12 lane	8 lane highway with 8 lane structures	100 m
40,000 PCU onwards	4-Lane	8 Lane	<ul style="list-style-type: none"> • Option of Green-field alignment or 8 lane with 8 lane structures (where lifecycle cost is lower) • 6 lane with 6 lane structures in cases, where portion of the corridor has been 6 laned or 6 lane structures have already been developed on 4 lane highway or Cost of land acquisition for brown-field expansion is very high. 	70 m

4. The project executing agencies may suitably advise their DPR consultants to follow these guidelines in all such cases where Section 3 (A) notifications are yet to be issued.


10/05/2018

(Sudip Chaudhury)
Chief Engineer (Planning)

Copy to:

1. All CEs in MoRT&H
2. The Secretary General, Indian Roads Congress
3. Technical circular file of S&R(R) Section
4. NIC- for uploading on Ministry's website under "What's new"

Copy for kind information to:

1. Sr. PPS to Secretary (RT&H)
2. PPS to DG(RD) & SS
3. PS to Addl. Secretary (RT&H)
4. PPS to AS&FA
5. PS to ADG (Zone-I)/ADG(Zone-III)/ADG(Zone-V)
6. PS to JS(T)/JS(H)/JS(LA&C)/JS(EIC)

SECTION 1

GENERAL

1.1 This Manual describes the planning, standards, design, construction, maintenance, operation, safety and environmental requirements to be fulfilled in execution of the works of [] under a concession or Contract agreement and shall be read harmoniously and in conjunction with the latter. This Manual is applicable for Four Laning of Highways through Public Private Partnership (PPP) mode. The general planning aspects laid out in this manual shall be applicable for widening from 2-lane to 4-lane or new construction of 4-lane highways. The scope of the work shall be as defined in the Concession Agreement. This Manual shall be read harmoniously with the intent of the Concession Agreement. The Manual may also be used for non-PPP projects.

1.2 The Project Highway and the project facilities shall conform to the requirements of design and specifications set out in this Manual, which are the minimum prescribed. The project report and other information provided by the Authority shall be used by the Concessionaire only for its own reference and for carrying out further investigations. The Concessionaire shall be solely responsible for undertaking all the necessary surveys, investigations and detailed designs in accordance with good industry practice with due diligence, and shall have no claim against the Authority for any loss, damage, risk, costs, liabilities or obligations arising out of or in relation to the project report and other information provided by the Authority.

1.3 At least 2 weeks prior to commencement of the work, the Concessionaire shall draw up a Quality Assurance Manual (QAM) covering the Quality System (QS), Quality Assurance Plan (QAP) and documentation for all aspects of the bridge and road works, which shall include the standard Operating Procedures which the Concessionaire, his personnel, his Contractors and their sub-contractors shall follow during execution and send three copies of each to the Independent Engineer (IE) for review. The class of quality assurance shall be as per IRC:SP:112-2017 “Manual for Quality Control in Road and Bridge Works.”

1.4 The Codes, Standards, Technical Specifications and Guidelines applicable for the design and construction of project components are:

- i) Indian Roads Congress (IRC) Codes, Standards and Guidelines.
- ii) Specifications for Road and Bridge Works issued by the Ministry of Road Transport & Highways (MoRTH) hereinafter referred to as MoRTH or Ministry's Specifications.
- iii) Any other standards referred to in the Manual and any supplement issued with the bid document.

1.5 The version of the Codes, Standards, Specifications, etc. notified/published at least 60 days prior to the last date of bid submission shall be considered applicable.

1.6 The terms ‘Ministry of Surface Transport’, ‘Ministry of Shipping, Road Transport & Highways’ and ‘Ministry of Road Transport and Highways’ or any successor or substitute thereof shall be considered as synonymous.

- 1.7**
- a) The terms ‘Inspector’ and ‘Engineer’ used in MoRTH Specifications shall be deemed to be substituted by the term “Independent Engineer” for PPP projects to the extent, it is consistent with the provisions of the Concession Agreement and this Manual. The role of the Independent Engineer shall be as defined in the Concession Agreement.
 - b) In case of EPC contracts the term ‘Independent Engineer’ shall be replaced by ‘Authority Engineer’ and the terms ‘Concessionaire’ and ‘Concession Agreement’ shall be replaced by ‘Contractor’ and ‘Contract Agreement’ respectively.

1.8 In case of any conflict or inconsistency in the provisions of the applicable IRC Codes, Standards or MoRTH Specifications, the provisions contained in this Manual shall prevail.

1.9 This Manual generally provides for design and construction as per Codes, Standards, Specifications, Guidelines, etc. as published by IRC, MoRTH and BIS for road and bridge works. Where the Concessionaire intends to use an alternative to these Standards and Guidelines for delivering an equal or better product, he shall be permitted to use such alternative subject to the following conditions:

- i) He shall demonstrate that the proposed alternative conforms to any of the following International Standards, Codes of Practice, Specifications, Guidelines, etc.
 - a) American Association of State Highway and Transportation Officials (AASHTO)
 - b) American Society for Testing of Materials (ASTM)
 - c) Euro Codes and British Codes
- ii) In case the Concessionaire intends to use any alternative material, technology/ method, whether patented or otherwise, that is not specifically covered in the Indian or International Standards as listed above, but the use of which has been permitted on similar projects (similar in category of road, traffic and climatic conditions) as the Project Highway, he would be permitted its use on certification by the owners of such similar projects regarding the continued successful performance of such materials, technologies, methods, procedures or processes for design life of the project. Such a certification shall be supported with details of critical performance parameters.

1.10 All items of building works shall conform to Central Public Works Department (CPWD) Specifications for Class 1 building works and standards given in the National Building Code (NBC). To the extent specific provisions for building works are made in IRC/MoRTH Specifications, the same shall prevail over the CPWD/NBC provisions. For this purpose, building works shall be deemed to include toll plaza complex, road furniture, road side facilities, landscape elements and/or any other works incidental to the building works.

1.11 Alternative Standards and Specifications

- a) Where alternative standards and specifications are intended to be used in accordance with **Para 1.9**, all such proposals shall be submitted by the Concessionaire to the Independent Engineer together with certification and details mentioned in **Para 1.9**. In case, the Independent Engineer is of the opinion that the proposal submitted by the Concessionaire is not in conformity with any of the International Standards or Codes or evidence by successful performance,

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
AT PRINCIPAL BENCH, NEW DELHI
(in O.A. No. 829 of 2024 and O.A. No. 1042 of 2024)

AFFIDAVIT

Public Action Committee & ors. Applicants

vs.

State of Punjab & ors. Respondents

Affidavit of Er. Kapil Dev (aged 48 years) s/o Sh. Jagdish Chander, r/o #186-E, BRS Nagar, Ludhiana against the reply dated 14-10-2024 in O.A. 1042 of 2024 & 16-10-2024 in O.A. 829 of 2024 submitted by R-5.

RESPECTFULLY SHOWETH:

I, the above mentioned deponent do hereby solemnly affirm and declare as under:-

1. That the deponent (Petitioner No. 2) along with other petitioners has filed O.A No. 829 of 2024 and 1042 of 2024 (clubbed together) before this Hon'ble National Green Tribunal.

That the deponent is filing combined Objections dated 27-01-2025 from para no. 1 to 12 against the reply dated 14-10-2024 in O.A. 1042 of 2024 & 16-10-2024 in O.A. 829 of 2024 submitted by R-5.



Place: Ludhiana
Dated: 27.01.2025

Verification:

Verified that the contents of para 1 and 2 of this affidavit are true and correct. No part of it is false, and nothing material has been kept concealed therefrom.

Place: Ludhiana
Dated: 27.01.2025

I know the Deponent/Executants personally and he/she has Signed/Thumb Impression in my presence.

Certified that the affidavit SPA/GPA has been readover & explained to the deponent executant who seemed directly to understand the same at the making above statement

Depono
DEPONENT

ATTESTED AS IDENTIFIED DEPONENT

Harjinder Pal Singh
27-01-2025

NOTARY PUBLIC
LUDHIANA (P.B.)

127 JAN 2025

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PAC MattewaraSutlej <mattewarasutlejpac@gmail.com>

Service of documents - Objections by Applicant in OA No. 829 of 2024 and O.A. 1042 of 2024 (Public Action Committee & ors. vs State of Punjab & Others)

PAC MattewaraSutlej <mattewarasutlejpac@gmail.com>

Fri, Jan 31, 2025 at 2:13 AM

To: cs@punjab.gov.in, pccf-pb@nic.in, pccfcomplex@gmail.com, dc.ptl@punjab.gov.in, "eecwdmohpwdpb@gmail.com" <eecwdmohpwdpb@gmail.com>, eero_patiala@yahoo.com, dfopta@gmail.com, dfowildlifepatiala@gmail.com

Dear sir,

PFA - Objections by Applicant in OA No. 829 of 2024 and O.A. 1042 of 2024 (Public Action Committee & ors. vs State of Punjab & Others) against Reply submitted by Respondent PWD NH Division, B&R Branch, Mohali.

Regards

Er. Kapil Dev
Applicant No. 2
O.A. No. 829 & 1042 of 2024
Mobile: 9872007872

**Objections by Applicant in O.A. 829 & 1042 of 2024 to reply by Respondent PWD****Department.pdf**

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