BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI

OA No. 306 of 2022

HARBANS SINGH

……PETITIONER

VERSUS

STATE OF HARYANA AND ORS.

…….RESPONDENT

INDEX

New Delhi
Dated: 08.07.2024

Respondent No. 9
Through Counsel

(M.F. KHAN & B. KRISHNA)
Advocate for Respondent No. 09
Ch: 417, Addl. Building Block,
Supreme Court of India
New Delhi-110001
+91 9818331923
lawyermfk@gmail.com

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI

OA No. 306 of 2022

Harbans Singh

Versus

State of Haryana and others

Objections on behalf of respondent No. 9 i.e. M/s Saharanpur Mines Management Services Pvt. Ltd. with regards to the Joint Committee Report submitted by HSPCB.

RESPECTFULLY SHOWETH:

1. That the answering respondent is submitting the present objections against the Joint Committee Report submitted by the Haryana State Pollution Control Board by way of Reply dated 20.03.2024.

2. That the answering respondent submits the following preliminary objections to the Joint Committee Report:

   a. **<u>The Joint Committee Report is in gross violation of the mandate of the Order dated 18.08.2023 passed by this Hon'ble Tribunal (in the present case):-</u>**

   SCOPE OF STUDY:- As per the Order dated 18.08.2023 passed by this Hon'ble Tribunal, two separate committees were constituted for two separate purposes. The **First**

Committee was constituted vide paragraph No. 39 of the Order dated 18.08.2023 and the scope of its study was: *to look into all relevant aspects of sand mining in non-governmental / private agricultural land and make its recommendations regarding environmental safeguards / measures for mining on agricultural land with the objective to ensure sustainable development*. {Para No. 39 of Order dated 18.08.2023}

The **Second Committee** was constituted vide paragraph No. 78 and the scope of its study was to provide report regarding the factual position of with respect to the sand mining at Mandewala and Jaidhar Mining blocks located at District Yamunanagar.

CONSTITUION OF COMMITTEES:- Apart from the difference regarding the scope of study of the two committees, the constitution of the committees was also different. The **First Committee** (constituted at paragraph No. 39) included one representative of Secretary, MoEF&CC; Central Pollution Control Board (CPCB), Indian Agricultural Research Institute (IARI); Indian Institute of Soil and Water Conservation (IISWC), Dehradun; Chaudhary Charan Singh Haryana Agricultural University (CCHAU), Hisar; Central Soil Salinity Research Institute (CSSRI), Karnal and Haryana State Pollution Control Board (HSPCB).

The **Second Committee** (constituted at paragraph No. 78) included representative of CPCB; HSPCB; CGWA,

Director General, Mines & Geology Department, Haryana and District Magistrate, Yamunanagar; District Town Planner and Executive Engineer, Water Service Division, Dadupur.

It shall be imperative to state that there is no representative on behalf of MoEF&CC (GOI), District Town Planner in the Joint Committee which had conducted the inspection and submitted the report. Furthermore, the inclusion of representative from Forest Department was beyond the mandate of the Order dated 18.08.2023.

b. **Joint Committee Report does not bear the signatures of all the members who were part of the Joint Committee:-**

The bare perusal of the Report shall reveal that as many as 20 officials from different departments and institutions were part of the Joint Committee which had conducted inspection on 05.03.2024. However, the report bears signatures of only 9 officials. The same creates great suspicion regarding the authenticity of the Joint Committee Report.

c. **Report does not take into consideration the reports submitted by HAU Committee and CSSRI Committee (paragraph No. 39 at page 34 of the Order):**

This Hon'ble Tribunal, while passing the Order dated 18.08.2023, had referred to the reports submitted by

Central Soil Salinity Research Institute (CSSRI), Karnal and Committee of Experts, Haryana Agricultural University (HAU) submitted before the Hon'ble Punjab and Haryana High Court, Chandigarh in CWP No. 8470 of 2004 titled as Ajeet Singh and others vs. State of Haryana and others and other connected matters. This Hon'ble Tribunal (at page 34 of the Order dated 18.08.2023) had directed the First Committee (constituted at paragraph No. 39) to take into consideration the reports submitted by HAU and CSSRI before the Hon'ble High Court for the purpose of submitting its report on the issues relating to its scope of study. However, perusal of the Joint Committee Report shall reveal that no reference was made to the aforesaid reports which renders the report of the Joint Committee *non est* in the eyes of law.

d. <u>Joint Committee Report is contrary to the guidelines enshrined of Sustainable Sand Mining Management Guidelines, 2016 (SSMMG, 2016) and Enforcement & Monitoring Guidelines for Sand Mining, 2020 (EMGSM, 2020):-</u>

As per the overall conclusion drawn by the Joint Committee, sand mining from fertile agricultural land should not be allowed as there is no possibility of replenishment; and in case of sand mining from barren land, sand mining can be allowed subject to strict compliance of the recommendations made in the report.

It is submitted that the sand mining from agricultural lands in the State of Haryana is duly recognized by the MoEF&CC in its SSMMG, 2016 as well as EMGSM, 2020. The relevant extract of the SSMMG, 2016 is as follows:-

In so far as the recommendations enshrined therein are concerned, the same are taken into consideration at the time of grant of Environmental Clearance by the competent authority.

This Hon'ble Tribunal, while passing the Order dated 18.08.2023 had made extensive reference to the aforesaid guidelines which itself shows that the mandate of the aforesaid guidelines was to be taken into consideration for the purpose of making recommendations on the issues raised in the Order dated 18.08.2023.

e. <u>No reference was made to any empirical data or scientific analysis by the Joint Committee while making observations on issues relating to impact of sand mining on agricultural lands:</u>

The perusal of the Order dated 18.08.2023 shall reveal that the First Committee was required to provide a report on the issues relating to impact of sand mining on agricultural lands and the recommendations regarding environmental safeguards for sand mining on agricultural lands with the objective to ensure sustainable development (paragraph No. 39 & 39). The relevant extract of paragraph No. 39 is as follows:-

In order to conduct a comprehensive study on such issues, it was necessary for the committee to collect empirical data based upon scientific analysis. The said fact stems from the following:

i. That while passing the Order dated 18.08.2023, this Hon'ble Tribunal had made detailed reference to the reports submitted by HAU committee and CSSRI committee before the Hon'ble Punjab and Haryana High Court, Chandigarh. At paragraph No. 26 of the Order dated 18.08.2023, it was specifically mentioned that the CSSRI committee had made recommendations after conducting study of different mining sites at District Karnal, Panipat and Sonipat in order to ascertain the impact of sand mining on soil properties and crop yield.

ii. That apart from the fact that the report submitted by CSSRI Committee was based upon study of various mining sites, the report was also based upon study of mined and un-mined mining sites in those districts. The same was necessary for the purpose of comparison or comparative analysis.

iii. That this Hon'ble Tribunal, being mindful of the fact that recommendations on such larger issues shall require a comprehensive study based upon scientific analysis of empirical data, had directed the First Committee (constituted at Paragraph No. 39) to take into consideration the reports of HAU committee and CSSRI committee.

It is submitted that the joint committee had submitted the report on the aforesaid issues merely on the basis of single day inspection of two mining sites located at District Yamunanagar, Haryana. Neither the reports of HAU committee and CSSRI committee were taken into consideration nor any independent study of the mined and un-mined mining sites located in agricultural lands were conducted by the committee. On this score alone, the report is liable to be rejected.

3. That in the light of the above-mentioned preliminary objections, the para wise /specific objections to the comments/findings of the Joint Committee are as follows:

Sr. No.	**Direction**	**Comments of joint committee**	**Objections**
39 (i)	Whether the practice of sand mining in agricultural land adversely affects fertility/value of agricultural land and damages environment	The practice of sand mining can have significant adverse effects on both agricultural land fertility and the environment. Sand mining involves the removal of topsoil (09-meter-deep sand and gravel), which is rich in nutrients necessary for plant growth. If the sand mining is shallow and top fertile soil is not retained, this removal can result in soil erosion, and degradation, reducing the fertility of agricultural land. Sand mining can alter the hydrological balance of an area.	➢ There is no reference to any empirical data or any scientific test or analysis to support the view that sand mining has adverse effect on soil fertility and environment. ➢ The method of sand mining from agricultural land by way of removal and stacking of top layers of soil/sand and removal of lower layers upto 9 meters is duly recognized in the SSMMG, 2016. These guidelines further recognize the

		Disruption of natural drainage patterns due to sand mining can lead to water logging. Sedimentation from shallow mining activities can pollute surface water bodies. Deep mining of sand and gravel, as was observed in the visited surrounding area, removes an important water filtering layer for infiltrating water. For excessively mined land agricultural chemicals in the runoff can pollute the groundwater aquifers. Changes in hydrology as well as surface topography can also have impact on the natural habitats which support local flora and fauna. Large-scale sand mining can result in land subsidence, where the ground sinks due to the removal of underlying materials. If an adequate buffer zone is not mined land, adjoining land can also erode over time. The natural replenishment of sand is not possible in the mined area which is not on the river bed. Jaidhar and Mandewala sites are not on the riverbed, so replenishment is highly unlikely. The overall assessment should be based on the	reclamation of land by spreading out the separately stacked upper layers and bringing the land under cultivation. The guidelines also recognize that the productivity is low in the initial years of cultivation but it improves with continued cultivation and addition of organic manure in the fields. ➢ The guidelines relating to sand mining from agricultural lands mentioned in SSMMG, 2016 were reiterated in EMGSM, 2020. ➢ The report of CSSRI Committee (reproduced at page No. 25 and 26 of order dated 18.08.2023) also supports the view that there is no permanent degradation of land due to sand mining and the reclamation of sand mining and agricultural activities leads to improvement in soil fertility as well as agricultural productivity in the longer run.

		considerations like buffer zone, the depth of mining, depth of groundwater table, intensity of agricultural activity around mining area. A comprehensive policy should be framed for, based on the geographical location, economic, social and environmental aspects, before a site is designed for mining. A comprehensive rehabilitation plan should also drawn based on these consideration. The deep mining in the agriculture field creates nuisance to the neighborhood farmers.	➢ The issues relating to impact on hydrology, surface topography, natural habitats, replenishment etc. are duly taken into consideration at the time of grant of environmental clearance by the competent authority. ➢ The aspects relating to buffer zone, depth of mining, depth of ground water table etc. are duly taken into consideration at the time of preparation of the Mining Plan prepared by the experts on the basis of scientific analysis and duly taken into consideration by the competent authority before granting environmental clearance. ➢ In so far as the aspect of framing policy is concerned, most of the states in the country have framed their respective sand policy and the same have been duly incorporated in Sand Mining Framework, 2018 (Chapter 3). ➢ There is no prohibition on sand

			mining from agricultural lands either in SSMMG, 2016 or EMGSM, 2020 or any other related guidelines. The mode and manner of conducting sand mining from agricultural lands is duly regulated in order to ensure sustainable sand mining with least impact on the environment.
(ii)	Whether the practice of sand mining in agricultural land needs to be permitted / continued.	The decision to permit or continue the practice of sand mining in agricultural land should be approached cautiously and based on a thorough assessment of its potential impacts and benefits. Before permitting sand mining in agricultural land, it's crucial to conduct a comprehensive environmental impact assessment (EIA). This assessment should evaluate the potential impacts on soil fertility, water resources, biodiversity, and local ecosystems. If sand mining is deemed necessary, measures should be implemented to ensure sustainable resource management and rehabilitation plan. This	➢ The assessment of potential impacts and benefits is done at the time of preparation of District Survey Report which is a necessary pre-condition before granting mining contracts. ➢ The conduct of comprehensive Environmental Impact Assessment (EIA) is mandatory as per EIA notification dated 14.09.2006 for the purpose of grant of environmental clearance. ➢ Measures to ensure sustainable resource management and rehabilitation plan are included in the

		includes regulations to minimize soil erosion, protect water bodies, and mitigate habitat destruction. Rehabilitation plans should be developed to restore mined areas to their natural state after mining activities cease. Authorities should explore alternative sources of sand and innovative technologies that minimize the need for mining in agricultural land. This might include recycling construction materials, and promoting the use of alternative materials. It is essential to engage with local communities, including farmers and residents, to understand their concerns and perspectives regarding sand mining in agricultural areas. Regulatory framework should prioritize environmental protection, sustainable land use, and community well-being. While sand mining may generate economic benefits, these should be weighed against the potential long-term costs, including environmental degradation, loss of agricultural productivity, and impacts on local livelihoods. Sustainable	Mining Plan which is a necessary pre-condition for grant of environmental clearance. ➢ Regulatory framework for sand mining is duly provided in chapter 2 of sand mining framework, 2018 which refers to the provisions of MMDR Act, 1957; SSMMG, 2016; the EP Act and Rules, 1986; various notifications by Central Government under EP Act, 1986; Sand Mining Framework, 2018 and the respective State Mining Rules. ➢ The aspect relating to alternative sources of sand is duly provided in the Sand Mining Framework, 2018 (chapter 5.3). ➢ The holistic assessment with regards to conduct of sand mining in agricultural lands is done by means of preparation of District Survey Report, Environment Impact Assessment Report, Public Consultation before grant of EC,

		development should be prioritized over short-term gains. The decision to permit or continue sand mining in agricultural land should be based on a holistic assessment that considers environmental, social, and economic factors. Sustainable practices, effective regulation, and stakeholder engagement are essential to minimize adverse impacts.	preparation of Mining Plan etc. All these measures have been put in place to ensure sustainable sand mining and to minimize adverse impact.
(iii)	In case the practice of sand mining in agricultural land is allowed/continued what are the environmental safeguards/ measures required to be undertaken for ensuring sustainable agriculture and achieving sustainable development and	If sand mining in agricultural land is permitted or continued, stringent environmental safeguards and measures are essential to ensure sustainable agriculture and achieve sustainable development. These measures include, 1. Environmental Impact Assessment (EIA): Conduct comprehensive EIAs before initiating any sand mining activities in agricultural land. Assess the potential impacts on soil fertility, water resources, biodiversity, and ecosystem services. Use the findings to inform decision-making and design mitigation measures. 2. Regulatory Framework: Establish and enforce robust regulations	1. Environment Impact Assessment Report is a necessary pre-condition for the purpose of grant of EC; and the issues relating to soil fertility, water resources, biodiversity and eco system services are duly taken into consideration. 2. Regulatory framework, as mentioned herein above, is already in place to ensure sustainable practices and to mitigate adverse impact on environment. 3. Rehabilitation and restoration of land

	make its recommendations regarding the same including environmental safeguards/ measure for undertaking mining, reclamation/rehabilitation of mined land for making it suitable for sustainable agriculture and achieving sustainable development.	governing sand mining activities in agricultural areas. These regulations should include zoning restrictions, environmental permits, and guidelines for sustainable extraction practices. Ensure that regulations are regularly updated and effectively enforced. 3. Rehabilitation and Restoration: Implement measures to rehabilitate and restore land affected by sand mining. This may include reclamation of mined areas, soil stabilization, re-vegetation using native species, and restoration of water bodies. Aim to restore ecosystem functions and enhance agricultural productivity. 4. Water Management: Implement measures to manage water resources effectively, especially in areas where sand mining affects water availability and quality. Promote water conservation practices, such as drip irrigation and rainwater harvesting, to mitigate the impacts of water table depletion and pollution. 5. Biodiversity Conservation: Protect and conserve biodiversity in agricultural landscapes impacted by sand mining.	affected by sand mining is provided in the Mining Plan. Furthermore, these aspects are also incorporated while granting environmental clearance. 4. The State of Haryana has enacted the **Haryana Water Resources (Conservation, Regulation and Management) Authority Act, 2020** for the purpose of water management. Moreover, various conditions are incorporated while granting environmental clearance to ensure water conservation and to mitigate adverse impact on ground water. 5. The aspect concerning bio diversity conservation are duly provided in the environmental clearance. 6. The aspect relating to community engagement and participation is

		Preserve natural habitats, establish buffer zones around sensitive ecosystems, and implement measures to mitigate habitat fragmentation and loss. Promote agro ecological approaches that enhance biodiversity and ecosystem resilience. 6. Community Engagement and Participation: Involve local communities, including farmers, landowners, and indigenous peoples, in decision-making processes related to sand mining and its impacts on agricultural land. Ensure that their perspectives, knowledge, and rights are respected and incorporated into planning and management efforts. 7. Monitoring and Reporting: Establish monitoring programs to track the environmental impacts of sand mining on agricultural land and ecosystems. Monitor changes in soil quality, water resources, biodiversity, and land use over time. Use this information to evaluate the effectiveness of mitigation measures and adjust management strategies as needed. 8. Capacity Building and Education: Provide training and	fulfilled during the course of public consultation which is mandatory as per paragraph No. 7 of EIA notification dated 14.09.2006. Public consultation is also mandatory at the time of preparation of District Survey Report as provided in EMGSM, 2020. 7. Monitoring and reporting with regards to the impact of sand mining is duly provided in EMGSM, 2020 (chapter 6, 9.4, 9.5). It is also provided in Sand Mining Framework, 2018 (chapter 5.11). 8. There are various measures already in place to involve all the stake holders in the process of sand mining and to raise awareness regarding the importance of sustainable of sand mining.

		capacity-building initiatives for stakeholders involved in sand mining and agricultural activities. Raise awareness about the importance of sustainable land management practices and the potential impacts of sand mining on agricultural productivity and environmental sustainability. By implementing these environmental safeguards and measures, it is possible to mitigate the negative impacts of sand mining on agricultural land and achieve sustainable development goals that prioritize the well-being of both people and the environment.	
44 (i)	Whether there is a possibility of replenishment of the mineral in mining sites in villages Jaidhar and Mandewala	The replenishment of minerals, including sand, in mined agricultural sites depends on various factors such as the geological context, the rate of extraction, and natural processes of deposition and erosion. Overall, while there is a possibility of replenishment of minerals in mined agricultural sites, it depends on a combination of natural processes, human interventions, and regulatory measures. Sustainable land	Single day visit at the mining sites located at Village Mandewala and Jaidhar is not sufficient to assess the possibility of replenishment at those mining sites. Moreover, since there was no mining activity at Village Jaidhar and only few days mining at Village Mandewala, the aspect relating to replenishment of minerals cannot be commented upon.

		management practices, coupled with informed decision making and monitoring, can help optimize the potential for replenishment while minimizing adverse impacts on agricultural productivity and environmental sustainability. Since proposed sites are far away from the river course and surrounded by fertile agricultural lands, even erosion from the surrounding area is not sufficient to fully restore the site to its original condition.	
(ii)	Whether there is riverbed mining possibility within 5 KMs of mining site in village Mandewala .	The approximate distance of the Mandewala mining block from the nearest river is 2 ¼ K.M.	The finding of the committee does not address the question correctly.
	Present Status of agricultural land site along with the type of crop presently grown and crop	At Jaidhar Block/YNR B34 the crops like wheat, Sugarcane and wheat with popular agro forestry were found at fields during inspection. Under current circumstances (un-mined land), any type of crop can be taken up as soil seemed fertile with good Crop	Only narrates the factual position at the time of inspection.

	suggestion for future	stand. At Mandewala Block/ YNR B-38 the crop present during the survey was wheat and the mined site seemed reclaimed to agriculture after the top soil, which was removed and retained before mining, was restored over the top of mined area. Agro forestry-based models, with suitable tree species (high value or local) and Crops like wheat forage grasses, and rice can be taken up.	
	Flood situation	During inspection and as per the discussion held with farmers at both the sites i.e. Mandewala Block/ YNR B-38 and Jaidher block /YNR B34 no flood like situations in near past was witnessed.	Only narrates the factual position at the time of inspection.
	Soil fertility	During inspection at both the sites the soil was fertile with good crop standing at fields. Mandewala Block/ YNR B-38 was Seemed reclaimed to some extent, Since the top soil, which was removed and retained before mining, was restored over the top of mined area. More details are needed for fair assessment. The sand mining disturbs the natural soil profile which has been developed as a	Only narrates the factual position at the time of inspection. However, even the committee was of the considered opinion that more details are required for fair assessment with regards to soil fertility. In so far as the comments regarding degradation of soil profile etc. are concerned, the same are a mere reiteration

		result of factors and process of soil formation occurring over a period of long time. Sand mining may result in land degradation due to soil erosion by water in the adjacent fields of the mined area as a consequence of which fertile soils of these fields are being washed due to runoff.	of the previous comments by the committee and are general in nature. In this regard, the objections submitted herein above are reiterated.
	Discussion with nearby farmers/residents	Farmers present at Jaidhar Block/YNR B-34 site were on the opinion that the mining activity should not be carried out at this location as the water table is around 1.8 Metres. List of Farmers present at site is attached as **Annexure 'A'.** Whereas the farmers present at Mandewala block/YNR B-38 site were on the opinion that mining activity should be carried out at this site as the water table at this is more than 10 Meter. List of Farmers present at site is attached as **Annexure 'B'.**	The actual statements of the farmers are not appended with the report in order to gather the exact stand of the farmers.
	Crop cultivation	Sand mining has adversely affected the texture, structure, organic matter and available nutrients status of the soil, which would obviously decrease the crop productivity of the affected area. Gullies have	The comments are general in nature and are reiteration of the previous comments by the committee. In this regard, the objections submitted herein above are reiterated.

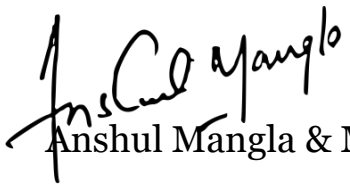
		been formed at the junction of mined and unmined fields. It has affected the natural vegetation of the area. During sand mining operations, air pollution is caused due to drifting of fine dust particles of soil. Crops like Wheat and fodder crops are suggested for cultivation.	Furthermore, the comments are general in nature and are not specific to the mining sites in question.
	Impact of Insecticides / pesticides on groundwater table, if any	It is expected that the insecticides, pesticides and fertilizers applied in nearby agricultural field would enter into the mining pit during rainy season at Mandewala Block/YNR B-38. There is every possibility of ground water contamination as the pit is about 10 m deep and hence the buffer i.e soil layer and sand layer which filters these chemicals has been reduced. However, at Jaidher Block/YNR B34 no Mining activity was started.	The committee could not have ascertained the impact of insecticides/pesticides on ground water in the absence of any expert analysis on the basis of scientific study. Moreover, the comments are more in the nature of estimation and not as per the ground reality.
	Protection measures, environmental safeguards/ reclamation/rehabilitation of mined area/land	1) The mining should not affect the land of nearby farmers due to soil erosion and collapsing of side walls of mining pit. Sufficient buffer should be kept. 2) The water should not be allowed to enter the mining pit from all sides particularly if adjacent	The objections with regards to the regulatory framework are already mentioned herein above. The same are reiterated.

	required to be taken/prepared before allowing sand mining activity on agriculture fields for achieving sustainable agriculture and development.	areas are agricultural lands. This should be done to avoid contamination of ground water at the mining site. 3) The side wall should not be vertically cut, it should have a slope less than 45 % to avoid collapsing of the sides of the sand pit. 4) Preservation of top soil. 5) Use of soil N-fixing and P solubilising microbes. 6) Right amount of fertilizers should be applied for the establishment and maintenance of crop cover/vegetation 7) Use of soil amendments (like compost, poultry manure, farmyard manure etc. 8) Selection of plant species suited to the properties of mined soil, establish quickly, control erosion and have fast growth. 9) Erosion control measures should be taken in to account. 10) Mulching should be done. 11) Proper irrigation of crop/plant.	
Overall conclusion		The Committee is of the opinion that mining should not be allowed in any case at fertile agricultural land as there is no possibility of replenishment. In case of there is urgent requirement of mining at barren land the above-	In this regard, it is submitted that the recommendations made by the Joint Committee are liable to the rejected in view of the objections submitted herein above.

	mentioned proponents and strict monitoring mechanisms should be enforced.	

NEW DELHI

DATE: 08.07.2024



Anshul Mangla & Mohd. Fuzail Khan

Advocates

For Respondent No. 9

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI

OA No. 306 of 2022

Harbans Singh

Versus

State of Haryana and others

AFFIDAVIT

I, Sushil Kumar S/o Sh. Mam Chand R/o House No. 360, East Bhatia Nagar, District Yamunanagar, Haryana. do hereby solemnly affirm and declare as under:-

1. That the deponent is filing an accompanying Objections on behalf of respondent No. 9 i.e. M/s Saharanpur Mines Management Services Pvt. Ltd. with regards to the Joint Committee Report submitted by HSPCB.
2. That the facts and circumstances mentioned in the accompanying objections are true and correct as per the knowledge and belief of the deponent.

THE CONTENTS OF THE AFFIDAVIT HAVE BEEN READ & EXPLAINED IN HINDI/PUNJABI AFTER UNDERSTANDING THE SAME DEPONENT HAS SIGNED IN HINDI/ENGLISH/PUNJABI THUMB MARKED

CHANDIGARH

DATED: 8.7.24

DEPONENT

NOTARY Rajni Chandigarh (U.T.)

Verification:-

Verified that the contents of my above affidavit are true and correct to my knowledge and belief. No part of it is false and nothing material has been concealed there from.

ATTESTED AS IDENTIFIED RAJNI NOTARY, Chandigarh 8.7.24

CHANDIGARH

DATED: 8.7.24

DEPONENT