

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

O.A. No. 622 of 2024

IN THE MATTER OF:

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

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FILED THROUGH:



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**REPLY / OBJECTIONS ON BEHALF OF BAHRI INDUSTRIAL
MANUFACTURER ASSOCIATION**

MOST RESPECTFULLY SHOWETH:

1. That the present reply/objections is being filed on behalf of the Bahri Industrial Manufacturer Association (hereinafter "*Association*"), duly impleaded as a party in the above-captioned matter vide Order dated 27.02.2025, wherein the Hon'ble Tribunal allowed IA No. 137 of 2025 filed by the Association for impleadment. The present reply/objection is submitted collectively on behalf of the Association, and separate objections by individual industries have been filed independently. The Respondent herein seeks leave of this Hon'ble Tribunal to kindly consider all replies/objections submitted by the industries to be read harmoniously and in consonance with this reply. That the Association represents 49 Respondents as the said industries have been impleaded as respondents in the present case; for ready reference of this Hon'ble Tribunal, the list of members of the Respondent association impleaded as individual respondents is herein below:

<u>Sr. No.</u>	<u>Name of the Company</u>	<u>Respondent Number</u>
1	M/S. Girja Dyeing	Respondent No. 52
2	M/S. Viscot Industries	Respondent No. 23
3	M/S. Budh Singh And Brothers	Respondent No. 14
4	M/S. Rajasthan Knitting Mills	Respondent No. 53
5	M/S. Babbar Hosiery	Respondent No. 54
6	M/S. M. K. Dyeing	Respondent No. 55
7	M/S. Sanjeev Enterprises	Respondent No. 22
8	M/S. SIA Pharma Pvt. Ltd.	Respondent No. 93
9	M/S. Design O Creation	Respondent No. 84
10	M/S. Brothers Stretch Pvt. Ltd.	Respondent No. 4
11	M/S. Such Exports Pvt. Ltd.	Respondent No. 29
12	M/S. Twenty First Century Creation P. Ltd.	Respondent No. 30
13	M/S. Vihan Textile Pvt. Ltd.	Respondent No. 31
14	M/S. Addagio Knit Creation P. Ltd.	Respondent No. 59
15	M/S. Magnet Industries	Respondent No. 60
16	M/S. Raja Industries	Respondent No. 96
17	M/S. Euro Threads Pvt. Ltd.	Respondent No. 15
18	M/S. Shree Gopal Enterprises	Respondent No. 6
19	M/S. Nutex Knit Fab	Respondent No. 76
20	M/S. Generous Textiles Pvt. Ltd.	Respondent No. 17
21	M/S. Samarth Industries	Respondent No. 94
22	M/S. Jai Hanuman Laminates P. Ltd.	Respondent No. 110

23	M/S. Swastik Multifiber Pvt. Ltd.	Respondent No. 77
24	M/S. Fine Dyeing Pvt. Ltd.	Respondent No. 33
25	M/S. Metro Pulp Industries	Respondent No. 112
26	M/S. Jyoti Dhaga Udyog Pvt. Ltd.	Respondent No. 28
27	M/S. Vardhman Gar-Tex Creators P. Ltd.	Respondent No. 65
28	M/S. Paxy Chem	Respondent No. 89
29	M/S. Jai Mata Plastic	Respondent No. 114
30	M/S. Dhruv Globals Ltd.	Respondent No. 48
31	M/S. Siddhi Vinayak Apparels P. Ltd.	Respondent No. 25
32	M/S. Shubhram Hospital Solution Pvt. Ltd.	Respondent No. 73
33	M/S. Dayanidhi Textiles Pvt. Ltd.	Respondent No. 103
34	M/S. PP Texofab Pvt. Ltd.	Respondent No. 43
35	M/S. Shree Sidhi Vinayak Texcolors P. Ltd.	Respondent No. 25
36	M/S. Ram Kishan & Co.	Respondent No. 46
37	M/S. Bansal Processing House	Respondent No. 38
38	M/S. Vibrant Yarns	Respondent No. 11
39	M/S. Denim Art	Respondent No. 61
40	M/S. Shree Jee Fabrics	Respondent No. 50
41	M/S. Modern Dyeing Pvt. Ltd.	Respondent No. 66

42	M/S. Manohar Filaments Pvt. Ltd.	Respondent No. 9
43	M/S. Denim Craze	Respondent No. 71
44	M/S. Tabi Creations Pvt. Ltd.	Respondent No. 24
45	M/S. Global Wash Creation Pvt. Ltd.	Respondent No. 67
46	M/S. Pooja Textile Industry	Respondent No. 58
47	M/S. Shadex Creations	Respondent No. 75
48	M/S. Vrishabh Industries	Respondent No. 8
49	M/S. BCL Fabrics Pvt. Ltd.	Respondent No. 57
50	M/S. Sino India Textiles P. Ltd.	Respondent No. 44
51	M/S. Cennet Biopharma P. Ltd.	Respondent No. 87
52	M/S. Kanodia Intercontinental P. Ltd.	Respondent No. 19
53	M/S. Anand Knit Fab	Respondent No. 45
54	M/S. First Pure Diet Milk Products	Respondent No. 99
55	M/S. Shivalik Processor	Respondent No. 34
56	M/S. Vinayak Dyeing House	Respondent No. 16
57	M/S. Papcoat (India) Pvt. Ltd.	Respondent No. 92
58	M/S. Denim Touch	Respondent No. 70
59	M/S. Shree Krishna Buttons P. Ltd.	Respondent No. 106
60	M/S. Kohinoor Ribbon Factory P. Ltd.	Respondent No. 27
61	M/S. Natraj Home Furnishing P. Ltd.	Respondent No. 49

62	M/S. Madni Textiles Mills P. Ltd.	Respondent No. 47
63	M/S. Oasis Texfab India	Respondent No. 10
64	M/S. GEE AAR Thread P. Ltd.	Respondent No. 20
65	M/S. Kuchal Fashion P. Ltd.	Respondent No. 21
66	M/S. Vardhman Creation P. Ltd.	Respondent No. 26
67	M/S. Abycons Textiles P. Ltd.	Respondent No. 37
68	M/S. Global Enterprises	Respondent No. 36
69	M/S. Rexolene India Manufacturing	Respondent No. 42
70	M/S. Nagpal Trading Company	Respondent No. 52
71	M/S. Sonu Enterprises	Respondent No. 63
72	M/S. Shivam Enterprises	Respondent No. 68
73	M/S. Color Zone	Respondent No. 69
74	M/S. M.S. Creations	Respondent No. 72
75	M/S. Novacare Appliances P. Ltd.	Respondent No. 78
76	M/S. Smart Enterprises	Respondent No. 80/81
77	M/S. Sumit Enterprises	Respondent No. 95
78	M/S. Indies Global Foods P. Ltd.	Respondent No. 100
79	M/S. Value Foods	Respondent No. 101
80	M/S. Supreme Surfactants P. Ltd.	Respondent No. 108
81	M/S. Chandni Industries P. Ltd.	Respondent No. 109
82	M/S. TSB Polychem P. Ltd.	Respondent No. 116

2. That the Association represents industries operating within the Barhi Industrial Area, Sonapat, Haryana. It was formed to safeguard the

collective interests of these industries, promote compliance with applicable environmental norms, and to address common grievances and issues related to infrastructure and compliance support. The Association plays an active role in facilitating cooperation among industries, regulatory bodies, and governmental authorities to ensure sustainable industrial development.

PRELIMINARY SUBMISSIONS / OBJECTIONS:

MAIN RELIEF HAS BEEN CLAIMED AGAINST HSIIDC IN THE ABOVE CAPTIONED MATTER:

3. That an Order was passed requiring the submission of a comprehensive environmental compliance report concerning the Barhi Industrial Area. It is crucial to highlight that the members of the Association, representing the entirety of the industries within this area, were not originally parties to these proceedings. The main allegations and the focus of the legal action have been directed solely against the Haryana State Industrial and Infrastructure Development Corporation (HSIIDC). No claims or relief were sought against the individual industries, which have been impleaded as parties solely based on the findings of the Joint Committee Report.
4. The Barhi Industrial Area was developed by HSIIDC and subsequently allotted to the members of the Respondent Association for the specific purpose of operating industries, including those involved in washing, dyeing, and related processes. HSIIDC, as the entity responsible for the planning and allocation of this industrial space, has long been cognizant of the nature of the activities undertaken within the area. It is well-established that such industries

typically involve processes that require certain operational and environmental considerations, which were known to HSIIDC when the land was allotted. Therefore, it is evident that HSIIDC has always had an understanding of the operational dynamics of these industries.

MAJOR TAKEAWAYS FROM THE REPORT:

5. Allegations of Under-Capacity and Compliance of Common Effluent Treatment Plants (CETPs) is categorically wrong:

5.1. It has been wrongfully alleged that the CETPs are under capacity. However, the analysis and evidence from the Joint Committee Report assert that the CETPs are more than capable of handling the current effluent volumes. The allegations are baseless and do not consider the factual data presented in the official reports, which clearly outline that the facilities not only meet but exceed the required standards for effluent treatment.

5.2. The Joint Committee has noted the fact that the CETPs at Barhi Industrial Area, specifically with capacities of 10 MLD and 16 MLD, have been consistently operating above the required capacity. Thus, the allegations of under-capacity are factually incorrect.

10 MLD CETP Performance: Designed for BOD 550 mg/l, actual inlet BOD 160 mg/l, outlet BOD 33 mg/l, COD removal efficiency 81.1%, TSS removal 76.6%.

16 MLD CETP Performance: Designed for BOD 750 mg/l, actual inlet BOD 210 mg/l, outlet BOD 94 mg/l, COD removal efficiency 65.4%, TSS removal 95.2%.

Total effluent received: 17.4 MLD, with 3.9 MLD transferred to the 10 MLD CETP and 13.5 MLD to the 16 MLD CETP.

5.3. Contrary to the allegations made in the Original Application (OA), the Joint Committee Report's analysis (**see Annexure IV, Page 166 for 10 MLD CETP and Page 172 for 16 MLD CETP**) clearly demonstrates that these CETPs are not only compliant but are processing effluents well within the stringent standards set by HSPCB. The BOD and COD levels at these plants' inlets and outlets have consistently been within permissible limits, which is an indicator of their operational efficiency and environmental compliance. Any minor derailment in any of the values has always been endeavoured to be rectified and is only temporary, and never a permanent problem at the Barhi Industrial Area.

6. **Allegations of Pollution cannot be traced down to the Barhi Industrial Area:**

6.1. The detailed analysis provided in the Joint Committee Report from **pages 256 to 263** identifies that the primary pollution concerns within Drain No. 6 do not originate from the industrial outputs of the Barhi Industrial Area. The report specifically notes that the levels of BOD and COD decrease significantly where the treated effluent from the **CETPs at Barhi mixes into Drain No. 6 (D6) at sampling points Drain No. 7 (D7) to Drain No. 8 (D8), indicating effective treatment and dilution.** The subsequent increase in pollution levels downstream, specifically from D9 onwards into Sonipat city,

has been attributed to the *inflow of domestic sewage and solid waste*, which starkly contrasts with the treated outputs from our industrial area.

6.2. *Pollution Source Mapping of Drain No. 6 (Annexure - V, Pg. 256-270) is as follows:*

The report categorically divides Drain No. 6 into five stretches to assess pollution sources accurately. The focus is particularly on Stretch 2, which spans 22 km and includes the Barhi CETP outlet (D7). The Joint Committee's findings significantly negate the allegations that the industrial discharge from Barhi Industrial Area pollutes Drain No. 6. Instead, the data supports that CETP Barhi is effectively reducing contaminants:

D6 - Upstream of CETP Barhi Outlet (Rajulu Garhi Village): BOD 27 mg/l, COD 128 mg/l.
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D7 - Barhi CETP Outfall into Drain No. 6: BOD 36 mg/l, COD 195 mg/l.

D8 - Downstream of CETP Barhi Discharge (Rajulu Garhi Village): BOD drops to 19 mg/l, COD 171 mg/l, showing clear dilution.
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Pollution Escalation at Sonipat Entry (D9 and Beyond):

D9 - Entry to Sonipat City (Jawahari Village): BOD surges from 19 mg/l to 183 mg/l, COD 353 mg/l, clearly attributed to domestic sewage.

D10 - Beej Market Bridge, Sonipat: Heavy solid waste, floatable material, black effluent observed, BOD 111 mg/l, COD 331 mg/l.

D11 - Upstream of Ratadhana STP (Sonipat-Narela Road): BOD peaks at 186 mg/l, COD 691 mg/l, primarily due to sewage accumulation from Sonipat town.

7. Misrepresentation and Factual Inaccuracies:

- 7.1. Many of the conclusions drawn by the Joint Committee are based on misinterpretations and a lack of understanding of the operational dynamics within the Barhi Industrial Area. The association, through detailed logbooks and compliance reports, has demonstrated time and again that all operations are within the legal frameworks. These documents have been duly submitted and disregard any claim of non-compliance that the Joint Committee might suggest.
- 7.2. Given these clarifications and the detailed evidence provided, it is imperative that the Tribunal reassesses the findings of the Joint Committee Report. We urge a reconsideration of the allegations against the industrial operations in Barhi, which are not only unfounded but are also detracting from the genuine efforts made by these industries to comply with environmental regulations. The Association requests and urges that the Tribunal dismisses the baseless allegations made in the Original Application.

NO DIRECT ALLEGATION OR CONTENTION AGAINST THE ASSOCIATION OR THE MEMBER INDUSTRIES IN THE ORIGINAL APPLICATION:

8. That there is no direct allegation or contention against the Association or the member industries in the Original Application, however, based on the allegations raised in the OA, this Hon'ble Tribunal vide its Order dated 28.05.2024 in the captioned matter, constituted a Joint Committee of Central Pollution Control Board (CPCB) and Haryana State Pollution Control Board (HSPCB) to examine environmental compliance of the industries situated at the Barhi Industrial Area. This Joint Committee conducted inspections across operational industrial units at the Barhi Industrial Area from the period of July-August 2024, based on which a voluminous report was filed by the Joint Committee. For the sake of brevity and to avoid prolixity, the Respondent Association while taking objection to the contents of the OA and the report, is hereby responding to the wider aspects of the allegations levelled against the units at the Barhi Industrial Area, while the member industries reserve their rights to file objections to the specific allegations against their units.

THE APPLICANT IN THE ORIGINAL APPLICATION IS A HABITUAL LITIGANT WITH MALA-FIDE INTENTIONS:

9. That it is respectfully submitted that the Original Application filed by the Applicant is self-serving and lacks bona fide intentions. It appears to be motivated by malice with an objective of extracting financial benefits at the expense of diligent industrialists who contribute significantly to the nation's economy and employment through the textile sector.

10. That the Applicant, Mr. Varun Gulati, was previously engaged in the garments washing and manufacturing industry. However, due to certain reasons, including commercial setbacks, he was unsuccessful in sustaining his business ventures. Subsequently, driven by apparent dissatisfaction and mala fide intentions, the Applicant has resorted to initiating frequent and habitual litigations specifically targeting businesses engaged in garments washing and manufacturing.
11. That the Applicant's approach involves selectively identifying garment washers and manufacturers, wherein he anticipates discovering minor procedural or technical discrepancies, given his familiarity with the trade. Thereafter, he initiates complaints before various judicial and regulatory forums, including this Hon'ble Tribunal, leveraging such proceedings as a means to unduly pressure the targeted industries.
12. That further substantiating his mala fide intent, various public communications made by the Applicant on social media platforms such as Facebook and Twitter clearly demonstrate his habitual and calculated strategy of targeting garment industries for personal gain or undue leverage. This conduct reveals a deliberate and methodical pattern of behaviour intended not to serve public interest or environmental protection but rather to misuse the judicial process. In light of the above, it is humbly submitted that the Hon'ble Tribunal may appreciate the Applicant's conduct as reflecting habitual and frivolous litigation, pursued with mala fide motives, and therefore may consider dismissing the present application to prevent undue harassment of compliant industries.

13. That it is pertinent to highlight that the Hon'ble Prime Minister of India, Shri Narendra Modi, in his recent address at Bharat Tex 2025, underscored the critical importance of the textile industry as a cornerstone of India's economic growth and development. During this address, he articulated the government's vision of making India a global leader in textile production and exports, announcing significant initiatives aimed at boosting investment, innovation, sustainability, and global competitiveness within the textile sector. He specifically emphasized that the government is dedicated to achieving a textile export target of Rs 9 lakh crore by the year 2030, thus recognizing textiles as a strategic sector for job creation, economic empowerment, and national prosperity. However, in stark contradiction to this visionary agenda, the Applicant herein seeks to target and disrupt industries within the Barhi Industrial Area, most of which are actively contributing towards these ambitious national goals while maintaining substantial compliance with environmental regulations. Such undue litigation creates unnecessary hurdles and diverts crucial resources and attention from productive and compliant industrial activities.

OBJECTION TO FINDINGS AGAINST BARHI INDUSTRIAL AREA IN THE JOINT COMMITTEE REPORT:

14. That it is submitted that out of the total 113 industries in Barhi Industrial Area, 74 are textile industries and 39 are non-textile. Importantly, out of these, 19 industries are already compliant with environmental norms and are declared the same in the report. The Joint Committee Report identifies 43 industries as non-compliant primarily based on allegations concerning *dilution of effluent with*

freshwater. The parameters such as Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), pH levels, and other relevant environmental indicators have consistently been found within permissible limits.

15. That a number of industries within the association have received show-cause notices (SCNs) from the Haryana State Pollution Control Board (HSPCB) based on various recommendations. While these industries contest the factual accuracy of the shortcomings identified, they are committed to adopting the recommended measures to ensure full compliance with environmental regulations
16. That the primary allegation revolves solely around alleged dilution. In this context, it is respectfully submitted that if freshwater usage is verifiably within prescribed limits, which is evidenced by maintained and regularly submitted logbooks, the very premise of dilution is fundamentally flawed. There is no credible documentation or evidence suggesting unauthorized or excess extraction of freshwater beyond permissible limits.
17. That the Joint Committee Report has recorded certain observations regarding alleged non-compliance by various industries situated in the Barhi Industrial Area, including those which are members of the answering Association. At the outset, the Association submits that many of these observations do not accurately represent the true compliance status of its member industries. A detailed and careful perusal of individual industrial records, logbooks, and compliance documentation would reveal significant discrepancies and inaccuracies in the Report.

18. That the Joint Committee Report's reliance on certain assumptions and generic calculations has resulted in inaccuracies, particularly in relation to freshwater consumption limits and BOD levels. For instance, the Committee has erroneously generalized freshwater consumption across diverse processes without accounting for variations in production techniques and seasonal fluctuations. It is submitted that the Central Pollution Control Board's (CPCB) Charter for Water Recycling & Pollution Prevention in Textile Industries (2022) clearly prescribes specific permissible limits based on different types of textile manufacturing activities. Many member industries of the Association have, in fact, demonstrated freshwater consumption significantly below the prescribed limits. Any allegations of over-consumption are, thus, based upon incorrect interpretation and application of outdated or inappropriate production data.
19. That similarly, the allegation of dilution of effluent due to lower-than-expected BOD values at Primary Effluent Treatment Plant (PETP) inlet points is based on assumptions that do not account for the advanced environmental management systems adopted by the industries. It is pertinent to state that the lower BOD levels recorded are not the outcome of dilution but rather the result of advanced chemical management systems, use of environmentally friendly detergents, and highly efficient effluent treatment processes. Independent third-party laboratory reports from NABL-accredited laboratories, as submitted along with replies to the SCNs, further

substantiate the absence of dilution and affirm strict compliance with discharge standards.

20. That it is noteworthy that certain allegations raised in the Joint Committee Report pertain to issues which were procedural or technical and have already been effectively addressed through corrective measures undertaken by the industries subsequent to the inspections. Such corrective actions include installation of advanced digital flowmeters, optimization of PETP operations through multi-stage treatment processes, and implementation of enhanced compliance monitoring mechanisms. These proactive corrective measures demonstrate the responsible attitude of the industries toward environmental protection and compliance.
21. That it is submitted that the Association raises strong objection to the manner in which certain findings have been recorded by the Joint Committee. Many of the findings are based merely on assumptions rather than scientific evidence or accurate data collection methods. Additionally, procedural fairness was compromised, as sampling and inspection methodologies did not provide member industries with adequate opportunities for clarification, representation, or immediate correction. Moreover, delays between the date of inspection and issuance of SCNs have raised legitimate questions about procedural fairness and accurate representation of present compliance status.
22. That is also submitted that several industries operating within the Barhi Industrial Area had their Consent to Operate (CTO) granted around the time of, just prior to, or shortly after the recent inspection.

Traditionally, and in accordance with the provisions of the Water Act and other relevant environmental regulations, a CTO is issued only after a thorough inspection of the premises has confirmed compliance with all applicable standards. This sequence of events casts doubt on the reliability of the inspection process, as no objections were raised during the CTO inspections. It is perplexing that issues were suddenly identified in a subsequent separate inspection, raising questions about the consistency and thoroughness of the enforcement actions within the area.

23. That the Association further objects to the finding of non-availability of valid Groundwater No Objection Certificates (NOCs). Several industries were wrongly shown as lacking valid groundwater extraction permissions when, in fact, their renewal applications were pending before the Haryana Water Resources Authority (HWRA). These industries have subsequently received renewed NOCs, copies of which have been duly submitted to HSPCB along with the replies to the SCNs.
24. That it is also respectfully emphasized that compliance is a continuous and dynamic process, and the industries represented by the Association have always strived to keep pace with evolving environmental laws and regulations. Findings based upon inspection data several months old fail to capture the present and accurate compliance status of industries, especially given the prompt corrective and proactive compliance measures undertaken post-inspection. Environmental compliance is integral to industrial operations and is inherently dynamic due to frequent legislative

updates and technological advancements. The member industries of the Association have consistently demonstrated their commitment to environmental sustainability by promptly adapting to regulatory requirements. It is noteworthy that even industries identified temporarily as non-compliant by the Joint Committee have already undertaken significant remedial measures and upgraded their systems to ensure ongoing and future compliance.

25. That all the members industries of the Respondent Association hereby undertake to comply with and implement environment relating to environmental compliance as recommended by HSPCB.
26. *That any adverse decision based upon inaccurate findings and outdated data of the Joint Committee Report would lead to severe operational disruptions and financial distress not only to the industries but also to the vast number of workers and their families who rely on these industries for their livelihoods. The textile industry is a critical sector, significantly contributing to the economy and employment. Therefore, adverse action based on misinterpreted data and unverified allegations would unjustly harm legitimate, environmentally compliant businesses.*
27. That the Association thus vehemently denies the adverse and incorrect findings contained within the Joint Committee Report. It requests that this Hon'ble Tribunal reassess the entire matter, taking into account accurate, updated compliance documentation already submitted by the industries. Further, the Association requests that member industries be granted fair opportunities verification by an independent

agency to conclusively establish compliance and clarify any remaining doubts.

28. That the Association reiterates that the present submissions are filed without prejudice to the individual submissions made by member industries. Individual replies by respective industries shall be read in consonance with this general submission by the Association, and none of the submissions shall be considered contradictory to each other.
29. That the Answering Respondent remains committed to environmental sustainability, regulatory compliance, and responsible industrial operations and prays for a just and fair assessment of its compliance status.
30. The Answering Respondent further reserves its right to file additional pleadings or affidavits, if necessary, in response to any subsequent developments in the present proceedings.

FILED THROUGH:



[SIDDHARTH BATRA], [ARCHNA YADAV] [SHIVANI CHAWLA]



[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent- Bahri Industrial Manufacturer Association

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Phone: 011 4704 6111

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 622/2024**

**IN THE MATTER OF:
VARUN GULATI**

...APPLICANT

VERSUS

STATE OF HARYANA & ORS.

....RESPONDENTS

AFFIDAVIT

I, Amit Goel S/O Sh. Parvesh Goel, aged about 43 years R/o 1018, Sector 15, Sonapat, Haryana, do hereby solemnly affirm and state as under:

1. That I am the authorised signatory of the Respondent i.e., M/S. Barhi Industrial Manufacturers Association (President), having its office at 367, Phase I, HSIIDC, Barhi, Sonipat, Haryana in the aforesaid Original Application. I am aware of the facts and circumstances of the case in my official capacity as stated above and hence, entitled to swear this affidavit.
2. That the accompanying reply has been drafted by my counsel under my instructions and I say that the statements and submissions made in the said reply are true and correct to the best of my knowledge based upon the records and my belief. I pray that the said reply to be treated as part and parcel of this Affidavit and the same is not being reproduced for the sake of brevity,
3. I say that the documents/annexure produced along with the reply are true copies of its originals.



[Signature]
DEPONENT

VERIFICATION:

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

Verified at _____ on this ____ day of _____ 2025.

31 0 MAY 2025

[Signature]
DEPONENT



ATTESTED

[Signature]
Notary Public Delhi

31 0 MAY 2025



Vijay Kumar <vijay.kumar@satramdass.com>

Advance service copy of Reply/ Objections on behalf of Barhi Industrial Association in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

1 message

Vijay Kumar <vijay.kumar@satramdass.com>

Tue, May 20, 2025 at 7:13 PM

To: Mansi Chahal <mansichahal104@gmail.com>, Varun Gulati <jansewajanhit@gmail.com>

Cc: Shivani Chawla <shivani.chawla@satramdass.com>, Archana Yadav <archana.yadav@satramdass.com>, Rhythm Katyal <rhythm.katyal@satramdass.com>, Chinmay Dubey <chinmay.dubey@satramdass.com>

Dear Sir,

PFA.

Advance service copy of Reply/ Objections on behalf of Barhi Industrial Association in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

Kindly treat the same as Proof of service.

Regards

Vijay Kumar
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Satram Dass B & Co. made the following annotations

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