

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

**ORIGINAL APPLICATION NO. 273 OF 2025**

**IN THE MATTER OF:**

The Citizens Foundation

... Applicant

Versus

Central Pollution Control Board (CPCB) & Others

... Respondents

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Date: 16.12.2025

Filed by:

Place: New Delhi

Applicant

Through

**ANUJ AGGARWAL** CA, LL.B.

*Vikrant*  
**VIKRANT CHAWLA** B.Com, LL.B.

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**IN THE MATTER OF:**

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**REJOINDER ON BEHALF OF THE APPLICANT TO THE REPLY  
FILED BY RESPONDENT NO. 3 (UPPCB)**

**MOST RESPECTFULLY SHOWETH,**

**A. PRELIMINARY SUBMISSIONS**

1. The Applicant files this Rejoinder to the Reply dated 25.09.2025 filed by Respondent No. 3 — Uttar Pradesh Pollution Control Board (hereinafter “UPPCB” / “Respondent”). The Applicant denies each and every averment contained in the Reply except where expressly admitted hereunder. The Reply is evasive, incomplete, and fails to disclose the true and correct status of compliance with the Plastic Waste Management Rules, 2016 (“PWM Rules”).
2. The Reply seeks to divert attention to inspections conducted and “status of units”, but it fails to answer the core allegation in the Original Application that, notwithstanding the express prohibition under Rule 4(f) and Rule 4(i) of the PWM Rules, the gutkha / pan masala / tobacco industry in Uttar Pradesh continues to manufacture, store, distribute and sell products in

plastic-laminated multi-layered packaging (MLP) and aluminium-coated pouches which are prohibited per se.

3. The Reply conceals the fact that UPPCB has not initiated a single prosecution under Section 15 of the Environment (Protection) Act, 1986 (“EP Act”) against habitual/repeat offenders identified in the OA, despite clear documentary and on-ground evidence of continued violations by such units within the State.
4. The Respondent has also failed to disclose any continuous monitoring mechanism, no protocol for surprise inspections, no packaging-level verification, and no supply-chain scrutiny as mandated by the PWM Rules and as specifically prayed for by the Applicants in the OA.
5. The Respondent’s reply also fails to clarify why certain units, which were established in Uttar Pradesh and later found closed during inspection, had not obtained the requisite CTO at the time of their establishment. The Respondent has not disclosed the circumstances under which these units were closed, nor why such closures were not reported to the UPPCB.
6. The Respondent has not explained why inspections were carried out at addresses after the filing of this petition, despite those units already being closed or having shifted to other operations. This clearly indicates the absence of a proper inventory, database, or record-keeping system within the UPPCB for effective implementation of the PWM Rules.
7. The Respondent has also failed to justify the circumstances under which the CTO of certain units (e.g., M/s Kai Pai Pouches Pvt. Ltd., M/s Kay Flavour Pvt. Ltd.) was first revoked and later reinstated, without providing any cogent or valid reasoning.

## **B. REJOINDER TO SPECIFIC PARAGRAPHS OF THE REPLY**

### **Para 5 — Trimurti Fragrances Pvt. Ltd.**

8. The Applicants note that UPPCB admits that the unit was earlier closed by CPCB for violation of PWM Rules and that environmental compensation (EC) of ₹170 lakhs was imposed. The Reply is, however, silent and evasive on critical facts which go to the heart of compliance:
- a. Whether the packaging material which led to the earlier violation has been permanently discontinued and replaced by permissible alternatives in accordance with Rule 4(f) & 4(i) of the PWM Rules; and whether documentary proof of such change (photographs, purchase orders, invoices of compliant packaging, test reports, etc.) exists.
  - b. Whether the newly operating unit (described in the Reply as “Trimurti Freshner & Flavours” or any other name) is using prohibited MLP / pouch packaging; whether the production lines, packaging vendors, and supply-chains have been verified by UPPCB; and whether UPPCB has taken steps to ensure that change of name/firm has not been used as a subterfuge to continue illegal packaging.
  - c. Whether any compliance inspection was carried out by UPPCB after permission was allegedly granted up to 2028, and if so, whether a compliance report has been prepared and placed on record. The Reply is silent on whether UPPCB carried out random/surprise inspections or only allowed resumption on deposit of EC.
9. The Applicants submit that granting consent/allowing operations merely upon deposit of EC without independent, verifiable proof of elimination of prohibited packaging, is arbitrary and contrary to the express mandate of Rule 4(f) and 4(i) which prohibit such packaging outright. EC cannot function as a means to regularize or validate continued manufacture of prohibited packaging material.

**Para 6 — M/s J. B. Industries (Vimal Pan Masala)**

10. UPPCB admits that M/s J. B. Industries:

a. Did not possess Consent to Establish (CTE) or Consent to Operate (CTO) at the relevant time; and

b. Was manufacturing pan masala using aluminium-coated pouches (banned packaging).

11. Despite clear illegality, UPPCB has merely issued a routine notice and has not issued closure directions, nor initiated prosecution under Section 15 of the EP Act, nor seized the banned packaging material, nor stopped production. Without record of CTE, the UP Board claim itself a Green category in arbitrary manner. The notice dated 19.09.2025 (enclosed by UPPCB) itself demonstrates continued production and prima facie illegal operations. This demonstrates UPPCB's failure to take effective, preventive or punitive action against a repeat violator, and even allowing the unit to carry out their operation.

**Para 7 — Status of Remaining 11 Units**

12. UPPCB's Reply contains a tabulated "status" of other units but conspicuously fails to answer the central question: Do these units continue to use prohibited plastic/MLP packaging for gutkha/pan masala/tobacco? A mere recital of closure history, consent status, or change of name does not establish compliance with PWM Rules.

13. Several of the said units were earlier closed for violation of PWM Rules and were subsequently allowed to reopen on deposit of EC. UPPCB does not state, and has not recorded on the file, that compliance with Rule 4(f) & 4(i) was established prior to reopening. There is no evidence on record of

seizure or destruction of prohibited packaging material, nor of independent verification of packaging lines.

14. In many cases UPPCB states that the unit is “closed” or “operating under new name”. UPPCB has failed to indicate whether:

- a. Illegal packaging was seized and destroyed;
- b. Prosecution and show-cause proceedings were launched and pursued to their legal conclusion;
- c. There has been verification of alternate premises where production may be continuing clandestinely; or
- d. UPPCB has checked packaging vendors and supply chains that supply MLP/aluminium pouches to the units.

#### **Units “found not operating”**

15. The Applicants submit that inspection on a single date which finds a unit “not operating” does not establish compliance. UPPCB has failed to undertake:

- a. Random and unannounced checks across time;
- b. Packaging seizure and photographic documentation;
- c. Supply-chain and vendor verification to ensure that illegal pouches are not being supplied through third parties; and
- d. Independent laboratory testing or packing line audits to confirm use of permissible packaging.

#### **C. SYSTEMIC ILLEGALITY IGNORED BY UPPCB**

16. The Reply intentionally avoids recording the legal position that MLP/laminated plastic packaging for gutkha/pan masala/tobacco falls squarely within the ban and cannot be regularised by payment of EC or by grant of consent. Deposit of EC does not transform an illegal act into a legal one.
17. UPPCB has not created or implemented any robust mechanism for monitoring packaging compliance, even though:
- a. The Supreme Court and the NGT have repeatedly emphasized Extended Producer Responsibility (EPR), manufacturer accountability and prevention of MLP pollution; and
  - b. CPCB directions dated 22.10.2021 (and subsequent communications) require strict enforcement against gutkha/pan masala packaging violations and proactive inspections.
18. UPPCB's Reply conspicuously fails to indicate whether it has implemented the following minimum measures which are essential to curb MLP pollution in the context of the gutkha/pan masala/tobacco industry:
- a. Surprise inspections and joined raids with CPCB/State authorities;
  - b. Third-party packaging audits and independent verification of packaging composition;
  - c. Supply-chain traceability to identify and prosecute packaging suppliers;
  - d. Mandatory EPR registration checks and linking of consents to EPR compliance;
  - e. Compulsory seizure and destruction of non-compliant packaging material found on premises.

19. The stand taken by UPPCB in its Reply — that EC deposit and routine notices are a sufficient response — effectively encourages persistent violators and undermines the rule of law established by the PWM Rules and judicial directions.

**D. NON-COMPLIANCE WITH TRIBUNAL ORDER DATED 30.05.2025**

20. This Hon'ble Tribunal, by order dated 30.05.2025, required a comprehensive disclosure and compliance report from State Pollution Control Boards in respect of prohibited packaging material and measures taken to curb MLP use. UPPCB's Reply does not satisfy the Tribunal's directions.

21. Instead of filing a detailed, sworn affidavit demonstrating step-by-step compliance, UPPCB has supplied:

- a. A list of units and their historical status;
- b. A summary of closure orders/consents issued; and
- c. Sparse inspection notes.

None of these constitute a comprehensive compliance affidavit on the specific issue of packaging material, as required by the Tribunal.

22. UPPCB has not filed any affidavit of compliance detailing the precise packaging used by each unit, the results of any laboratory testing, the steps taken to ensure EPR compliance, the show-cause / prosecution actions initiated, or the photographic proof of seizure/destruction of illegal packaging.

**E. FALSE AND MISLEADING AVERMENTS**

23. UPPCB's suggestion that several units are "closed" is factually misleading and unsupported by the record. The Reply does not annex:

- a. Geo-tagged photographs of seals and closure;
  - b. Seizure memos or inventories of seized packaging material; or
  - c. Final orders of prosecution or proof that production is permanently stopped and not being carried out at alternate premises.
24. The practice by several units of re-opening under new names or as ostensibly different product lines (for example, use of trade names such as “Freshener & Flavours”) strongly indicates regulatory evasion. UPPCB’s Reply does not explain what verification has been carried out to determine whether the “new” entity is in substance the same manufacturing/packaging operation.
25. UPPCB’s omission to attach show-cause notices, prosecution records, sealing photographs, vendor lists, or vendor verification reports renders its Reply incomplete and misleading.

#### **F. Additional Submissions**

26. The Applicant submits that it has independently filed an RTI application seeking detailed information from the concerned State/UT Pollution Control Boards/Committees regarding the implementation of the Plastic Waste Management Rules, 2016. The RTI sought the following particulars:

- a. The number of Gutkha and Pan Masala manufacturing units that have been granted Consent to Establish (CTE) or Consent to Operate (CTO) by the SPCB from 08.01.2021 till date.*
- b. The number of such units to whom notices have been issued pursuant to CPCB’s directions under Section 5 of the Environment (Protection) Act, 1986, for storing, packing, or selling products in plastic packaging during the said period, along with copies of the notices.*
- c. The names and details of units that have been ordered to shut down, suspended, or closed following such notices.*
- d. The names and details of units upon whom Environmental Compensation has been imposed for violations of environmental laws or the PWM Rules during the period beginning 08.01.2021.*

*e. Details of revocation, suspension, or non-renewal of CTOs for Gutkha and Pan Masala units during the relevant period, including the grounds and dates of action.*

*f. Copies of Minutes of Meetings of the Pollution Control Board or other authorities wherein decisions regarding revocation of CTO, closure of units, or issuance of directions against these units were taken.*

*g. Copies of note sheets, file notings, or internal correspondence forming the basis of decisions relating to revocation of CTOs, closure orders, or statutory directions against such units.*

Copy of the RTI application dated 13.06.2025 is annexed herewith as **Annexure No. A-1**.

27. That pursuant to the said RTI, the UPPCB forwarded the request to its Waste Management Division on 02.07.2025, which in turn circulated it to all regional offices through communication dated 08.07.2025. The objective of the RTI was to verify the extent of compliance with the PWM Rules, 2016 within Uttar Pradesh. Copies of the letters dated 02.07.2025 and 08.07.2025 are annexed herewith as **Annexure No. A-2** and **Annexure No. A-3** respectively.

28. The UPPCB website indicates that the State has 7 Circles comprising 28 Regional Offices. However, despite the extensive scope of the RTI, only two regional offices—Unnao and Kanpur Nagar—furnished responses to the first point of information. These offices disclosed that they had issued 01 CTO and 6 CTOs respectively to Gutkha and Pan Masala manufacturing units between 08.01.2021 and 13.06.2025. Seven other regional offices submitted a nil response, while the remaining offices did not respond at all.

29. Accordingly, on the basis of the RTI replies received, UPPCB has admitted issuance of only 7 CTOs to Gutkha and Pan Masala manufacturing units across the entire State during the relevant period. Copies of the RTI replies from the Regional Office, Unnao dated 14.08.2025 and from the Regional Office, Kanpur Nagar dated 28.08.2025 are annexed herewith as **Annexure No. A-4** and **Annexure No. A-5** respectively.

30. The foregoing RTI disclosures further expose the systemic gaps, inconsistencies, and non-transparent functioning of UPPCB in enforcing the Plastic Waste Management Rules, 2016. Despite having 28 Regional Offices, only two offices provided substantive information, while all others claimed nil data—raising serious doubts about the accuracy of UPPCB’s monitoring, its record-keeping practices, and its enforcement of packaging-related violations by Gutkha/Pan Masala units. The limited replies received also confirm that only seven CTOs have been issued state wide, which is wholly inconsistent with the ground reality of numerous operational units identified in the Original Application and in the Respondent’s own Reply. This selective disclosure, absence of uniform reporting, and failure to produce complete records demonstrate that UPPCB lacks a coordinated, State-wide mechanism for tracking prohibited packaging, consent status, or compliance with statutory mandates. These deficiencies not only undermine regulatory oversight but also reinforce the Applicant’s contention that the Respondent has failed to effectively implement the PWM Rules, necessitating intervention by this Hon’ble Tribunal.

**G. PRAYERS:**

In view of the foregoing, it is most respectfully prayed that this Hon’ble Tribunal may be pleased to:

1. Record that the Reply dated 25.09.2025 filed by Respondent No. 3 (UPPCB) is incomplete, evasive and not in compliance with the PWM Rules and the directions of this Hon’ble Tribunal dated 30.05.2025.
2. Direct UPPCB to file, within a short time period to be specified by the Tribunal, a fresh, comprehensive, sworn compliance affidavit containing the following particulars for each unit listed in the Reply:

- a. The exact packaging material used (with supporting invoices, vendor details, and laboratory test reports confirming composition);
  - b. Status of EPR registration of the unit and of the packaging vendors;
  - c. Details of all prosecutions initiated under Section 15 of the EP Act (including dates of filing, FIR numbers/complaint numbers, current status, and copies of final orders, if any);
  - d. Details of all show-cause notices, closure orders, seizure memos, and orders of destruction (with geo-tagged photographs and time-stamped videos where applicable);
  - e. Reports and photographs of all surprise inspections and joint raids (with CPCB/other agencies);
  - f. Details of any renewal/grant of consents (CTE/CTO) and documentary proof that such renewals were granted only after verification of compliance with Rule 4(f) & 4(i);
  - g. Details of action taken against packaging vendors and supply-chain actors facilitating prohibited packaging.
3. Direct UPPCB and CPCB to carry out immediate statewide raids and coordinated enforcement action (including joint teams with CPCB and other enforcement agencies) on all gutkha/pan masala/tobacco manufacturing units and packaging suppliers, and to file a joint action plan within a short time period to be specified by the Tribunal for enforcement across the State.
  4. Direct UPPCB to initiate prosecution and closure proceedings under the EP Act / PWM Rules / other applicable provisions against all units found using

- prohibited packaging and to place on record proof of such prosecution and final orders.
5. Direct UPPCB to undertake systemic reforms for monitoring, including (inter alia):
    - a. Random and unannounced inspections of manufacturing premises;
    - b. Mandatory third-party packaging audits;
    - c. Supply-chain traceability and vendor verification;
    - d. Linkage of consent granting to EPR verification and packaging compliance;
    - e. Periodic public status reports to the Tribunal on enforcement actions.
  6. Pass such further or other orders as this Hon'ble Tribunal may deem fit in the interests of environmental protection and in the interest of justice.

AND FOR THIS ACT OF KINDNESS, THE APPLICANT, AS IN DUTY BOUND, SHALL EVER PRAY.

Date: 11.12.2025

Filed by:

Place: New Delhi

Applicant

Through

**ANUJ AGGARWAL** CA, LL.B.

**VIKRANT CHAWLA** B.Com, LL.B.

**MAYANK CHAUHAN** B.B.A, LL.B.

Advocates & Solicitors

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI  
Original Application No. 273/2025**

**IN THE MATTER OF:**

**The Citizens Foundation**

**... Applicant**

**Versus**

**Central Pollution Control Board (CPCB) & Others**

**... Respondents**

**AFFIDAVIT**

I, Saddam Mujeeb, son of Shri Mujeeb Ahmed, aged about 30 years, presently serving as the President of the Citizens Foundation, having its office at 151/1, Second Floor, Street No. 9, Zakir Nagar, Jamia Nagar, Okhla, New Delhi – 110025, do hereby solemnly affirm and state as under:

5. That I have filed the accompanying rejoinder to the reply submitted by Respondent No. 3, and I am fully acquainted with the facts of the case. I am, therefore, competent to swear this affidavit.
6. That the accompanying rejoinder has been prepared by my counsel under my instructions. The contents thereof may kindly be read as an integral part of this affidavit to avoid repetition.
7. That the contents of the rejoinder have been read out and explained to me in the vernacular language by my counsel.
8. That the contents of the said rejoinder are true and correct to my knowledge, and the same may be treated as part and parcel of this affidavit, the repetition of which is avoided for the sake of brevity.

*Saddam Mujeeb*  
DEPONENT



**VERIFICATION:**

I, the deponent above named, do hereby verify that the contents of this foregoing affidavit are true and correct to my knowledge and belief. No part of it is false and nothing material has been concealed therefrom.

Verified at New Delhi on this 10<sup>th</sup> Day of December, 2025.

*Saddam Mujeeb*  
**DEPONENT**



11 DEC 2025

**ATTESTED**

*AM*  
NOTARY PUBLIC DELHI (INDIA)

020/06/25

To,

The Public Information Officer,  
Uttar Pradesh Pollution Control Board (UPPCB),  
10-A, Vibhuti Khand, Gomti Nagar,  
Lucknow-226010, Uttar Pradesh, India.

डाक प्राप्ति रसीद  
प्राप्ति दिनांक 19/06/25  
प्राप्तकर्ता के हस्ताक्षर  
उ०प्र० प्रदूषण नियंत्रण बोर्ड, लखनऊ

**Subject:** Request for information under the Right to Information Act, 2005 regarding enforcement of Plastic Waste Management Rules, 2016 against Gutka and Pan Masala manufacturers.

**Respected Sir/Madam,**

I, Saddam Mujeeb, son of Shri Mujeeb Ahmed, resident of 151/1, Second Floor, Street No. 9, Zakir Nagar, Jamia Nagar, New Delhi – 110025, mobile number: 9990544633, email id: [info.thecitizensfoundation@gmail.com](mailto:info.thecitizensfoundation@gmail.com), wish to seek information as under:

1. That the **number of Gutka and Pan Masala manufacturing units** to whom SPCB has issued CTO/CTE from 8th January 2021 to the present date
2. That, from 8th January 2021 to the present date, **number of Gutka and Pan Masala manufacturing units** to whom notices have been served after direction of CPCB under **Section 5 of the Environment (Protection) Act, 1986** for the enforcement of the Plastic Waste Management Rules, 2016, for **storing, packing, or selling** such products in plastic packaging **from 8th January 2021 to date**. Please provide the copies of notices.
3. That, from 8th January 2021 to the present date, the **names and details** of Gutka and Pan Masala manufacturing units that have been **ordered to shut down** or whose operations have been **suspended or closed** following the issuance of these notices.
4. That, from 8th January 2021 to the present date, the **names and details** of Gutka and Pan Masala manufacturing units upon which **Environmental Compensation** has been imposed for **violations of environmental laws or the Plastic Waste Management Rules**, during the period from **8th January 2021 till date**.

BK

1/7/25

WMD  
6/2

5. That, from 8th January 2021 to the present date, the details of **revocation, suspension, or non-renewal of Consent to Operate (CTO)** for any Gutka and Pan Masala manufacturing units during the same period, including **grounds and dates of action**.
6. That provide **copies of the Minutes of Meetings** held by the Pollution Control Board or relevant authorities wherein **decisions regarding revocation of Consent to Operate (CTO), closure of units, or issuance of directions** against Gutka and Pan Masala manufacturing units were discussed or approved, from **8th January 2021 to the present date**.
7. That provide **copies of the official note sheets, file notings, or internal correspondence** that formed the basis for taking decisions related to the **revocation of CTOs, issuance of closure orders, or any statutory directions** against Gutka and Pan Masala manufacturing units during the period from **8th January 2021 to the present date**.

**I hereby inform that following formalities have been completed by me:**

**That I have deposited the requisite fee of Rs. 10/- by way of Postal Order bearing number 66F 324678 ) favoring the PIO, Uttar Pradesh Pollution Control Board (UPPCB), 10-A, Vibhuti Khand, Gomti Nagar, Lucknow-226010, Uttar Pradesh, India, dated 13.06.2025.**

- **That I am 'Citizen' of India and I am asking the information as 'Citizen'.**

*Saddam Mujeeb*

(Saddam Mujeeb)

13.06.2025



उत्तर प्रदेश प्रदूषण नियंत्रण बोर्ड  
UTTAR PRADESH POLLUTION CONTROL BOARD



संदर्भ सं- 129773 / सी-7 / नोडल- आर0टी0आई0 / 2025  
सेवा में,

दिनांक:- 2-7-25

जन सूचना अधिकारी, (WMD)  
उ0प्र0 प्रदूषण नियंत्रण बोर्ड,  
लखनऊ।

विषय:- सूचना का अधिकार अधिनियम, 2005 की धारा-6(1) के अन्तर्गत सूचना प्रेषित किये जाने के संबंध में।

महोदय,

कृपया उपरोक्त विषयक सूचना का अधिकार अधिनियम, 2005 के तहत श्री सदाम मुजिद पुत्र श्री मुजिद अहमद पता, Resident of 151/1, Second Floor, Street No. 9, Zakir Nagar, Jamiya Nagar New Delhi के पत्र दिनांक 13.06.2025 का सन्दर्भ ग्रहण करने का कष्ट करें। उक्त पत्र बोर्ड मुख्यालय में दिनांक 20.06.2025 को एवं अधोहस्ताक्षरी को दिनांक 02.07.2025 को प्राप्त हुआ है, की छायाप्रति संलग्नकर सूचना का अधिकार अधिनियम, 2005 की धारा-6(1) के अंतर्गत आपको अंतरित करते हुए अनुरोध है कि कृपया प्रश्नगत प्रकरण में सूचना स्पष्ट रूप से आवेदक को नियमानुसार समायान्तर्गत उपलब्ध कराते हुए उसकी एक प्रति अधोहस्ताक्षरी को प्रेषित करने का कष्ट करें।

संलग्नक:- उपरोक्तानुसार।

भवदीय

(जी0सी0 आर्या)  
जन सूचना अधिकारी, (समन्वय)

प्रतिलिपि:- श्री सदाम मुजिद पुत्र श्री मुजिद अहमद पता, Resident of 151/1, Second Floor, Street No. 9, Zakir Nagar, Jamiya Nagar New Delhi, मोबाईल नं0 9990544633 को सूचनार्थ प्रेषित।

जन सूचना अधिकारी (समन्वय)



उत्तर प्रदेश प्रदूषण नियंत्रण बोर्ड  
UTTAR PRADESH POLLUTION CONTROL BOARD

Ref. No. H29961  
सेवा में,

/WMD-2/RTI/2024

ई-मेल के माध्यम  
Dated: 8-7-25

समस्त जन सूचना अधिकारी, वृत्त,  
उत्तर प्रदेश प्रदूषण नियंत्रण बोर्ड।

**विषय: सूचना का अधिकार अधिनियम, 2005 की धारा-6 की उपधारा-(3) के अन्तर्गत आन्तरित किये जाने के सम्बन्ध में।**

महोदय,

कृपया सूचना का अधिकार अधिनियम, 2005 के अन्तर्गत सूचना उपलब्ध कराये जाने विषयक श्री सदाम मुजिद पुत्र श्री मुजिद अहमद पता, Resident of 151/1, Second floor, Street No. 9, Zakir Nagar, Jamiya Nagar New Delhi के आवेदन पत्र दिनांक 13.06.2025 (छायाप्रति संलग्न) जो अद्योहस्ताक्षरी को जनसूचना अधिकारी (समन्वय) के संदर्भ सं० एच29773/सी-7/नोडल- आर0टी0आई/2025 दिनांक 02.07.2025 को सूचना का अधिकार अधिनियम, 2005 की धारा 6(3) आन्तरित किया गया जो दिनांक 07.07.2025 को प्राप्त हुआ है।

अतः उक्त आवेदन आपको स्थानान्तरित किया जा रहा है क्योंकि मांगी गयी सूचना आपके वृत्त से सम्बन्धित है अतः वांछित सूचनाये आवेदक को अपने स्तर से उपलब्ध कराने का कष्ट करें, तथा एक प्रति अद्योहस्ताक्षरी को भी प्रेषित करें।

संलग्नक:-यथोपरि।

भवदीय

जनसूचना अधिकारी  
डब्ल्यू0एम0डी0

प्रतिलिपि: निम्नलिखित को सूचनार्थ प्रेषित:-

1. नोडल जनसूचना अधिकारी, उ०प्र० प्रदूषण नियंत्रण बोर्ड, लखनऊ को सूचनार्थ एवं आवश्यक कार्यावाही हेतु प्रेषित।
2. श्री सदाम मुजिद पुत्र श्री मुजिद अहमद पता, Resident of 151/1, Second floor, Street No. 9, Zakir Nagar, Jamiya Nagar New Delhi, मो० नं० 9990544633 को सूचनार्थ।

At  
जनसूचना अधिकारी  
डब्ल्यू0एम0डी0

प्रारूप-6

पत्र संख्या 461 / आर0टी0आई-269 / 2025

दिनांक-14 / 08 / 2025

प्रेषक:

जन सूचना अधिकारी,  
उ0प्र0 प्रदूषण नियंत्रण बोर्ड,  
बी-18/3, आवास-विकास कालोनी,  
उन्नाव दूरभाष: 0515-2830488

सेवा में,

श्री सदाम मुजिद पुत्र श्री मुजिद अहमद,  
पता-1511 11<sup>nd</sup> फ्लोर नं0-09 जाकीर नगर, जामिया नगर,  
नई दिल्ली।

महोदय,

कृपया सूचना का अधिकार अधिनियम, 2005 के अधीन सूचना उपलब्ध कराये जाने के संबंध में बोर्ड मुख्यालय के पत्रांक-एच 30168/सी-5/सा0-20/आर0टी0आई0/2025 दिनांक 14.07.2025 के माध्यम से प्रेषित पत्र इस कार्यालय में दिनांक 14.07.2025 को ई-मेल के माध्यम से प्राप्त है, का संदर्भ ग्रहण करने का कष्ट करें।

आप द्वारा मांगी गई सूचना दी जाती है, जो निम्नवत् है:-

क्र0 सं0	चाही गई सूचना	सूचना/उत्तर
1	That the number of Gutka and Pan Masala manufacturing units to whom SPCB has issued CTO/CTE from 8th January 2021 to the present date.	One number of Gutka and Pan Masala manufacturing units, SPCB has issued CTO from 8th January 2021 to the present date.
2.	That, from 8th January 2021 to the present date, number of Gutka and Pan Masala manufacturing units to whom notices have been served after direction of CPCB under Section 5 of the Environment (Protection) Act, 1986 for the enforcement of the Plastic Waste Management Rules, 2016, for storing, packing, or selling such products in plastic packaging from 8th January 2021 date. Please provide the copies of notices.	सूचना कार्यालय अभिलेखों में धारित नहीं है।
3.	That, from 8th January 2021 to the present date, the names and details of Gutka and Pan Masala manufacturing units that have been ordered to shut down or whose operations have been suspended or closed following the issuance of these notices.	सूचना कार्यालय अभिलेखों में धारित नहीं है।
4.	That, from 8th January 2021 to the present date, the names and details of Gutka and Pan Masala manufacturing units upon which Environmental Compensation has been imposed for violations of environmental laws or the Plastic Waste Management Rules, during the period from 8th January 2021 till date.	सूचना कार्यालय अभिलेखों में धारित नहीं है।
5.	That, from 8th January 2021 to the present date, the detail of revocation, suspension, or non renewal of Consent to Operate (CTO) for any Gutka and Pau Masala manufacturing units during the same period, including grounds and dates of action.	सूचना कार्यालय अभिलेखों में धारित नहीं है।

(2)

6.	That provide copies of the Minutes of Meetings held by the Pollution Control Board or relevant authorities wherein decisions regarding revocation of Consent to Operate (CTO) closure of units, or issuance of directions against Gutka and Pan Masala manufacturing were dispenses, I or approved, lives Rit January 2021 in the present date.	सूचना कार्यालय अभिलेखों में धारित नहीं है।
7.	Than provide copies of the official not sheets, file noting, or internal correspondence that formed the bases to talking decision related be the revocation of CTOs, issuance of closure orders, or any statutory directions against Gutka and Pan Masala manufacturing units during the period from 8th January 2021 to the present date.	सूचना कार्यालय अभिलेखों में धारित नहीं है।

यदि आप उपर्युक्त उत्तर से संतुष्ट नहीं है तो आप सम्बन्धित अधिनियम की धारा 19(1) के अधीन इस पत्र के प्राप्त होने के दिनांक से तीस दिन के भीतर प्रथम अपीलीय प्राधिकारी के समक्ष अपील दायर कर सकते हैं, जिनका पता निम्नवत् है:-

प्रथम अपीलीय प्राधिकारी, क्षेत्रीय कार्यालय, उ०प्र० प्रदूषण नियंत्रण बोर्ड, बी-18/3, आवास विकास कालोनी, उन्नाव दूरभाष नं०-0515-7962487।

भवदीय

(महेन्द्र सिंह)

सहायक अभियंता/जन सूचना अधिकारी  
उ०प्र० प्रदूषण नियंत्रण बोर्ड, उन्नाव

प्रतिलिपि:-जन सूचना अधिकारी (वृत्त-5), उ०प्र० प्रदूषण नियंत्रण बोर्ड, लखनऊ को सूचनार्थ सादर प्रेषित है।

जन सूचना अधिकारी

सूचना का अधिकार अधिनियम 2005 के अधीन मांगी गयी सूचना उपलब्ध कराये जाने हेतु प्रारूप

प्रारूप-5

पत्र सं० 613/आ-78/25

दिनांक 28-8-25

प्रेषक,

जनसूचना अधिकारी  
उ०प्र० प्रदूषण नियंत्रण बोर्ड,  
कानपुर।

सेवा में,

श्री सददाम मुजिद पुत्र श्री मुजिद अहमद  
पता- 151/1 द्वितीय तल, स्ट्रीट नं०-9  
जाकिर नगर, जामिया नगर  
नयी दिल्ली।

महोदय

कृपया सूचना का अधिकार अधिनियम, 2005 के अधीन सूचना उपलब्ध कराये जाने के सम्बन्ध में आप द्वारा प्रेषित आवेदन पत्र जो बोर्ड मुख्यालय के माध्यम से दिनांक 29.07.2025 को इस कार्यालय में प्राप्त है, का संदर्भ लेने का कष्ट करें। आप द्वारा मांगी गयी सूचना दी जाती है, जो निम्नवत् है:-

बिन्दु सं०- 1 कार्यालय अभिलेखानुसार 06 इकाइयाँ।

बिन्दु सं०- 2 कार्यालय अभिलेखानुसार शून्य।

बिन्दु सं०- 3 कार्यालय अभिलेखानुसार सन्दर्भित सूचना संलग्न है।

बिन्दु सं०- 4 बिन्दु सं० 3 के अनुसार।

बिन्दु सं०- 5 बिन्दु सं० 02 के अनुसार।

बिन्दु सं०- 6 कार्यालय अभिलेखानुसार सन्दर्भित सूचना कार्यालय अभिलेखों में उपलब्ध नहीं है।

बिन्दु सं०- 7 बिन्दु सं० 02 के अनुसार।

यदि आप उपर्युक्त उत्तर से संतुष्ट नहीं है तो आप सम्बन्धित अधिनियम की धारा 19(1) के अधीन इस पत्र के प्राप्त होने के दिनांक से तीस दिन के भीतर प्रथम अपीलीय प्राधिकारी के समक्ष अपील दायर कर सकते हैं, जिनका पता निम्नवत् है:-

क्षेत्रीय अधिकारी/प्रथम अपीलीय अधिकारी  
5243, सदभावना नगर, आवास विकास फेस-3,  
कल्यानपुर, कानपुर नगर।

जनसूचना अधिकारी

प्रतिलिपि:-निम्नलिखित को सूचनार्थ सादर प्रेषित।

1. जनसूचना अधिकारी (वृत्त-2), उ०प्र० प्रदूषण नियंत्रण बोर्ड, लखनऊ।
2. प्रथम अपीलीय अधिकारी, उ०प्र० प्रदूषण नियंत्रण बोर्ड, कानपुर नगर।

जनसूचना अधिकारी

Sr. No	Name & address of Pan Masala units
1	Maa Vindhyavasini tobacco pvt ltd, 133/P-1/217 Transport nagar kanpur
2	Trimurti Fragrances pvt ltd, 133/233, 234 & 235 Transport nagar, kanpur
3	Trimurti Fragrance pvt ltd (Trimurti freshner and flavours) 133/231 A Transport nagar, kanpur
4	Pan Parag india ltd(Kothari products) Factory no- 6 & 7 Ind area fazalganj kalpi road, kanpur
5	Maa vindhyavasini tobacco pvt ltd, 133/P-1/217 transport nagar, kanpur



Vikrant Chawla <vikrantchawlaadv@gmail.com>

## Advance Service - Rejoinder to the reply filed on behalf of respondent no.3 in the matter titled 'The Citizens Foundation vs. Central Pollution Control Board (CPCB) & Ors'

5 messages

**Vikrant Chawla** <vikrantchawlaadv@gmail.com> Tue, Dec 16, 2025 at 10:06 PM  
To: imc.moefcc@gov.in, ccb.cpcb@nic.in, mscb.cpcb@nic.in, grievance@uppcb.in, chdpcc@nic.in, accounts@panbahar.in, Shikhar Pan Masala <shikharpanmasalacompany@gmail.com>, vishnuexportcompany@gmail.com, contact@dilbaghgroup.com, njainfca@yahoo.co.in, signature.panmasala@yahoo.com, vimalpanmasalacompany@gmail.com, "S. Jaina & Associates" <sjainaassociates@gmail.com>, abhatra2001@gmail.com  
Cc: The Citizens Foundation <info.thecitizensfoundation@gmail.com>

Dear Sir/Madam,

Please find attached an advance copy of the rejoinder on behalf of the applicant to the reply filed by the respondent no.3, UPPCB, in the matter titled 'The Citizens Foundation vs. Central Pollution Control Board (CPCB) & Others'. The matter is next listed before the Hon'ble National Green Tribunal tomorrow, i.e. on 17.12.2025.

Kindly acknowledge receipt of this email.

Sincerely,  
**Vikrant Chawla**  
Advocate  
Delhi High Court

Off : B-244, Greater Kailash-I, New Delhi - 110048.  
Phones: 011 - 4064 8883/4  
Mobile: +91- 9818384438  
Connect me on : [LinkedIn](#)

PS: Mr. Suraj Sharma +91-88001 85828 (Whatsapp/ Call)

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 **Final Rejoinder to reply filed by the R-3 UPPCB.pdf**  
2257K

**Mail Delivery Subsystem** <mailer-daemon@googlemail.com>  
To: vikrantchawlaadv@gmail.com

Tue, Dec 16, 2025 at 10:07 PM