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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 61 OF 2025

IN THE MATTER OF:

Narender Sirohi

...APPLICANT

Versus

Central Pollution Control Board & Ors.

...RESPONDENTS


REJOINDERS ON BEHALF OF THE APPLICANT TO THE REPLY OF
RESPONDENT NO. 6 (DEPUTY COMMISSIONER, FARIDABAD) DATED
19.01.2026 UPLOADED ON 09.03.2026

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Place: Gurugram
Date: 13.04.2026

File By:


Sanjaya Kumar Mishra
Advocate for the Applicant
O-1047/2011
Contact No. 9818326647, 9310326647
Email: sanjayakmishra@gmail.com

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MOST RESPECTFULLY SHOWETH

1. That the Applicant respectfully submits the present rejoinder to the reply dated 19.01.2026 filed by Respondent No. 6 (Deputy Commissioner, Faridabad), the same having been uploaded on 09.03.2026.
2. That Paragraph No. 1 calls for no specific response.
3. It is respectfully submitted that although the Respondent in paragraph No. 2 of the reply has stated that necessary coordination has been ensured with all concerned departments, including the Haryana State Pollution Control Board (HSPCB), Municipal Corporation, Faridabad, Department of Town & Country Planning, Revenue Authorities, and other local enforcement agencies, the replies filed by various authorities are not consistent and are thus not reliable for ensuring effective environmental governance. Notably, **Respondent No. 4 (HSVP)** in its reply dated

19.12.2025 has stated that the industries mentioned at **Page No. 196**, i.e., Respondent Nos. 9 to 33, fall under the jurisdiction of the Municipal Corporation, Faridabad. However, on the contrary, **Respondent No. 7** (Municipal Corporation, Faridabad) in its reply dated 19.01.2026 (**uploaded on 09.03.2026**) has stated at **Page No. 843** that only 10 units fall within its jurisdiction.

It is further submitted that the Respondents have **conspicuously failed to clarify the status of the remaining 39 units, apart from the 25 units inspected by the Joint Committee (Page No. 101), and have completely omitted any reference to or consideration of the list of 366 units.**

It is respectfully submitted that the contradictory assertions of jurisdiction by different authorities create an inherent ambiguity, which would severely impede the effective implementation and enforcement of any Order passed by this Hon'ble Tribunal, unless the issue of jurisdiction is first conclusively determined and responsibility clearly allocated.

4. That the contents of the paragraph No. 3 are denied as being devoid of material particulars, inasmuch as no specific details of effective steps taken, in the form of an Order/Notice, nor any Standard Operating Procedure (SOP) formulated to prevent re-operation, have been placed on record, thereby rendering the averments unsubstantiated.
5. That with respect to Paragraph No. 4, which refers to the Action Taken Report (ATR) filed by Respondent No. 3, it is respectfully submitted that, as per the said ATR, certain units are stated to have been dismantled, some closed or sealed by HSPCB, enforcement action/Show Cause Notices (SCNs) have been initiated against certain units, some units are reported to be locked or non-operational, and several units are claimed to be outside the consent regime. **However, the ATR fails to furnish any**

details regarding compliance with the specific recommendation of the Joint Committee constituted by this Hon'ble Tribunal, which had recommended that all unauthorized industrial units operating in the identified areas be closed by the concerned local authorities, namely the Municipal Corporation, Faridabad (Respondent No. 7) and the District Town & Country Planning Department (DTCP), Faridabad (Respondent No. 4), following due process, so as to prevent further environmental degradation and unauthorized industrial activities.

It has further failed to place on record any confirmation regarding the implementation status of disconnection of electricity by Respondent No. 8, i.e., Dakshin Haryana Bijli Vitran Nigam (DHBVN), in respect of all illegal units, despite such action having been specifically recommended by the Joint Committee constituted by this Hon'ble Tribunal.

6. With respect to Paragraph No. 5, it is respectfully submitted that the Respondent has placed reliance on the ATR of HSPCB to claim that substantial progress has been made on the ground. However, a **mere assertion of 'substantial progress' neither satisfies nor ensures compliance with the Precautionary Principle**. It is pertinent to note that the Joint Committee constituted by this Hon'ble Tribunal had specifically recommended that all unauthorized industrial units operating in the identified areas be closed by the concerned local authorities.

Further, the Applicant has placed on record several latest geo-tagged photographs (in response to the ATR filed by the Respondent No. 3, HSPCB) clearly demonstrating that illegal industrial activities, resulting in rampant air pollution, continue unabated in the area. Thus, the reliance on the ATR is misplaced and does not reflect the actual ground situation.

7. That the contents of Paragraph No. 6 are mere assertions of a **general nature and do not address the two specific and significant recommendations of the Joint Committee** constituted by this Hon'ble Tribunal, namely "**Restriction/disconnection of electricity supply**", and "**Licensing coordination**". The reply is silent on the implementation status of these crucial directions, thereby rendering the averments incomplete and unsatisfactory.
8. That the contents of Paragraph No. 7 and 8 are not supported by any material document; hence, the averments are incomplete and unconvincing.
9. That Paragraph No. 9 does not call for any reply.

PRAYER:

In view of the facts and submissions made hereinabove, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to direct Respondent No. 6 to place on record a clear and categorical statement regarding the jurisdictional contradictions between Respondent No. 7 (Municipal Corporation, Faridabad) and Respondent No. 4 (HSVP), so as to remove any ambiguity in the implementation of the directions issued by this Hon'ble Tribunal, and further to ensure strict compliance with the recommendations of the Joint Committee constituted by this Hon'ble Tribunal, including, inter alia, 'restriction/disconnection of electricity supply' and 'licensing coordination'.

THROUGH

Place: Gurugram

Date: 13.04.2026



Sanjaya Kumar Mishra
Advocate for the Applicant

O-1047/2011

Contact No. 9818326647, 9310326647

Email: sanjayakmishra@gmail.com

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...Respondents

AFFIDAVIT

I, Narender Sirohi, S/o Badle Ram, R/o House No. 5, Gali No. 2, Village Kureshipur, NIT Faridabad-121004, Haryana, do hereby solemnly affirm and state as under:

1. That I am the Applicant in the above-mentioned Original Application and am fully conversant with the facts of the case. I am competent to swear this Affidavit.

That the contents of the accompanying Rejoinder to the reply filed by Respondent No. 6 may be read as part and parcel of this Affidavit and are not repeated herein for the sake of brevity. That I have read and understood the contents of the said Rejoinder, which are true and correct to the best of my knowledge and belief, and have been drafted under my instructions.

Narender Sirohi
13/04/2026
DEPONENT

VERIFICATION:

Verified at Faridabad on this 13th Day of April 2026 that the contents of the above Affidavit are true and correct to the best of my knowledge and nothing material has been concealed there from.

Certified that the above was deposed on Oath/Affirmation before me on the 13 day of April by Narender Sirohi who has known to me and the contents above are explained to the deponent
Adv. Thakur Dass
Oath Commissioner, Faridabad

Narender Sirohi
13/04/2026
DEPONENT

https://www.greentribunal.gov.in/news-update?title=narender+sirohi

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1	Additional Reply by R 2 HSPCB OA No 1330 of 2024 Narender Sirohi Vs State of Haryana and Ors	06-Apr-2026	06-Apr-2026
2	REPLY BY R-6 DC FARIDABAD IN OA NO 61 of 2025 NARENDER SIROHI Vs CENTRAL POLLUTION CONTROL BOARD	09-Mar-2026	19-Jan-2026
3	REPLY BY JOINT COMMISSIONER MC FARIDABAD IN OA NO 61 of 2025 NARENDER SIROHI Vs CENTRAL POLLUTION CONTROL BOARD	09-Mar-2026	19-Jan-2026
4	Common Rejoinder by Applicant to the Reply of R- 2 4 amp 7 in OA No 1330 of 2024 Narender Sirohi Vs State of Haryana and Ors	28-Jan-2026	27-Jan-2026
5	ATR BY R-3 HSPCB IN OA NO 61 of 2025 NARENDER SIROHI Vs CENTRAL POLLUTION CONTROL BOARD	16-Jan-2026	13-Jan-2026
6	SHORT REPLY AFFIDAVIT BY ESTATE OFFICER HSVP FARIDABAD IN OA NO 61 of 2025 NARENDER SIROHI Vs CENTRAL POLLUTION CONTROL BOARD	03-Jan-2026	19-Dec-2025

10:26
10-04-2026

Advance service of Rejoinder in O.A. No. 61 of 2025 in the matter of Narender Sirohi v. State of Haryana & Ors., in reply to Respondent No. 6 (DC, Faridabad)

1 message

S.K. Mishra, Advocate <skmishra1047.advocate@gmail.com>
To: rkhranalegal@gmail.com

Mon, Apr 13, 2026 at 4:12 PM


Sir,

Please find the attached copy of the Rejoinder being filed in O.A. No. 61 of 2025 titled Narender Sirohi vs. State of Haryana & Ors., in response to reply filed by Respondent No. 6 (DC, Faridabad) for your kind record and perusal.

Thanks & regards

Sanjaya Kumar Mishra
Advocate for Applicant
 **Mobile:** +91-98183 26647, 9310326647
 **Email:** sanjaykmishra@gmail.com

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 **Rejoinders to R-6 in OA 61 of 2025.pdf**
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