

# 874

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. 7 (MUNICIPAL CORPORATION OF FARIDABAD) DATED  
19.01.2026 UPLOADED ON 09.03.2026

INDEX

S. No.	Particulars	Page No.
1.	Rejoinder on behalf of Applicant to the Reply of Respondent No. 7 (Municipal Corporation, Faridabad)	2-4
2.	Affidavit in support of Rejoinder	5
3.	<b>Annexure A-1:</b> Proof of Reply Uploaded Date	6
4.	<b>Annexure A-2:</b> Copy of Notice Issued by Respondent No. 7 to Respondent No. 12	7
5.	<b>Annexure A-3:</b> Copy of Media Report and its English Translation	8
6.	Advance Service Notice	9

File By:

Place: Gurugram  
Date: 13.04.2026



Sanjaya Kumar Mishra  
Advocate for the Applicant  
O-1047/2011

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875

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19.01.2026 UPLOADED ON 09.03.2026**

**MOST RESPECTFULLY SHOWETH**

1. That the Applicant respectfully submits the present Rejoinder to the reply dated 19.01.2026 filed by Respondent No. 7 (Municipal Corporation, Faridabad) through its Joint Commissioner, the same having been uploaded on 09.03.2026.
2. That the Paragraph Nos. 1 and 2 of the reply are formal in nature and call for no specific response.
3. The reply filed by the Respondent does not contain any Paragraph numbered as 3.
4. With respect to Paragraph No. 4 of the reply (Page 843) it is respectfully submitted that the Respondent No. 7 has admitted that out of 25 units named in the Original Application, only 10 fall within its jurisdiction. This contradicts the submission of **Respondent No. 4 (HSVP)** in its reply dated 19.12.2025 where it 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. This contradictory stand creates

a jurisdictional ambiguity that will severely impede enforcement of any order passed by this Hon'ble Tribunal.

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, thereby rendering their responses incomplete.

It is also submitted that Respondent No. 7 has failed to provide any details regarding the procedure or measures adopted for preventing further environmental degradation and unauthorized activities, as recommended by the Joint Committee appointed by this Hon'ble Tribunal. Such omission renders the averments vague, unsatisfactory, and unacceptable.

The statement regarding MANIDHARI METAL UDYOG is unsupported by any documentary evidence, including any affidavit from the unit owner.

5. That in Paragraph No. 5 (Page 844) the Respondent No. 7 states that it undertakes to provide requisite support to Haryana State Pollution Control Board for compliance with the directions passed by this Hon'ble Tribunal. However, the Respondent has not given any clear statement of acceptance of the letter dated 19.09.2025 issued by the Haryana State Pollution Control Board on the line of Joint Committee recommendation on Licensing coordination.

#### **ADDITIONAL SUBMISSIONS**

6. That without prejudice to the submissions made hereinabove, it is respectfully submitted that Respondent No. 7 had issued a Notice dated 18.12.2025 to I.S. Enterprises, Shed No. 9, Ward No. 8, Nangla Gujran, Faridabad (arrayed as Respondent No. 12), under Sections 261(1), 254, 401 and 49 of the Haryana

Municipal Corporation Act, 1994, pursuant to inspection dated 17.12.2025, alleging unauthorized construction without sanctioned plan and proposing demolition proceedings. The said notice was found affixed at the site during inspection by the Applicant. However, no subsequent action taken pursuant to the said notice has been placed on record by Respondent No. 7, thereby indicating absence of effective follow-up enforcement despite initiation of proceedings. Copy of the Notice annexed herewith and marked as **Annexure A-2**.

7. Most humbly submitted that as per recent media reports, authorities in other parts of the State have undertaken demolition drives and disconnected electricity supply to polluting and unauthorized units. However, no comparable enforcement action has been carried out in the present area, reflecting inconsistency and lack of uniform implementation of environmental norms. Copy of the Media Report annexed herewith and marked as **Annexure A-3**.

**PRAYER:**

In view of the facts and submissions made hereinabove, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to pass appropriate orders directing the Respondent to resolve the jurisdictional contradictions, ensure strict compliance of the recommendations of the Joint Committee constituted by this Hon'ble Tribunal, and take stringent measures against unauthorized industrial units including demolition as per law, in the interest of justice and protection of environment.

THROUGH

Place: Gurugram

Date: 13.04.2026



Sanjaya Kumar Mishra  
Advocate for the Applicant

O-1047/2011

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**878**  
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**IN THE MATTER OF:**

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**...Applicant**

**Versus**

**Central Pollution Control Board & Ors.**

**...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 the Respondent No. 7 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 13<sup>th</sup> 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**  
..... day of..... 2026  
by.....  
..... who is personally known to me and the contents of the affidavit were explained to the deponent.

*Narender Sirohi*  
13/04/2026  
**DEPONENT**

*Adv. Thakur Dass*  
**Oath Commissioner, Faridabad**

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

Home About us Cause List Case Status Judgement/Orders e-Filing Display Board Acts & Rules Contact Us

Chairperson Members Registry Office Orders / General Notices Judges Roster/ Weekly Cause List e-Journal Publications Staff Corner Status of Letter Petition

### Recent Reports

Back

Title

narender sirohi Search Reset

S.No.	Title	Uploaded on	Date of Report
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



880

Annexure A-2

**SHOW CAUSE NOTICE AND ORDER FOR STOPPAGE OF WORK**

**(Under Section 261 (1) read with Section 254, Section 401 and Section 49 of the Haryana Municipal Corporation Act, 1994)**

To

1. I.S. Enterprises through its owner  
 Owner Shed No 9, Ward no 8, nangla Gujran, Faridabad

**Subject: Notice under Section 261(1) of the Haryana Municipal Corporation Act, 1994 –  
 Unauthorised Construction / Erection of Work**

Whereas it has come to the notice of the undersigned, during inspection conducted by Junior Engineer on dated 17-12-2025 that you have erected of a building / structure at the premises bearing (Owner Shed no 9, ward no 8, Nangla Gujran, Ballabgarh, Faridabad, Haryana) without obtaining valid sanction under Section 254 of the Haryana Municipal Corporation Act, 1994, or in contravention of the conditions of the sanctioned plan / bye-laws.

**Unauthorised Construction at Ground floor**

And whereas such work has been executed without prior approval / in deviation from sanctioned drawings, thereby constituting a violation under Section 261(1) of the said Act.

Therefore, in pursuance of the proviso to Section 261(1), you are hereby called upon to show cause in writing within 3 (three) days from the date of receipt of this notice as to why an order for demolition of the said unauthorised construction / work should not be made against you.

You may also appear personally or through authorised representative before the undersigned on dated 29-12-2025 at 01:00 PM at the office of the Joint Commissioner (T), Municipal Corporation Faridabad, failing which it shall be presumed that you have nothing to state in your defence, and appropriate orders under Section 261(1) of the Act shall be passed for demolition of the unauthorised work without further notice.

This notice is issued without prejudice to any other action that may be taken under the provisions of the Haryana Municipal Corporation Act, 1994 or rules framed thereunder.

Joint Commissioner (T)  
 Municipal Corporation  
 Faridabad

Dated: 18-12-2025

Endst No: MCF/AE(B)/2025/ 1099

- 1- Assistant Engineer (Enforcement) Badhkal Zone for ensuring compliance after expiry of notice period.
- 2- Office copy

Joint Commissioner (T)  
 Municipal Corporation  
 Faridabad

Copy of Media Report Dated 22.02.2026

सीएचयूम के आदेश पर सोनीपत महानगर विकास प्राधिकरण, एचएसपीसीबी व जिला प्रशासन ने गांव निजामपुर में फैक्ट्रियों के विरुद्ध की कार्रवाई

प्रदूषण फैलाने वाली 23 फैक्ट्रियों पर चला बुलडोजर, 11 के बिजली कनेक्शन काटे

बंगलूरु, जम्मू : औद्योगिक क्षेत्रों में अविश्वसनीय रूप से चल रही फैक्ट्रियों पर सोनीपत महानगर विकास प्राधिकरण, एचएसपीसीबी व जिला प्रशासन ने बड़ी कार्रवाई की। टीम ने निजामपुर खुर्द व फिरोजपुर बंगर गांवों की जमीन में अविश्वसनीय रूप से बनाई गई इकाइयों को ध्वस्त किया। इस दौरान 23 फैक्ट्रियों पर बुलडोजर चलाते हुए जमीनदेन करा गया, जहाँ 11 के बिजली कनेक्शन काट दिए गए। यह कार्रवाई सोचे तौर पर डिसेंबर में केंद्रीय प्रदूषण कंट्रोल बोर्ड की तरफ से क्षेत्र के लिए गए वॉर को लेकर अंजाम दी गई है, जहाँ टीम की निरीक्षण के दौरान अविश्वसनीय इकाइयों जहर डगलती दिखाई दी थी। बुधस्थिति: को भारी पुलिस बल की अगुवाई में इस कार्रवाई को अंजाम दिया गया।

तीन महीने पहले सीएचयूम की टीम ने किया था चेहरा, इस दौरान उनकी नजर में आ गई थी प्रदूषण फैलाने वाली फैक्ट्रियां

इन फैक्ट्रियों में धातु को पिघलाने वाली, टायर व खरब जताने वाली फैक्ट्रियां भी शामिल, कार्रवाई के दौरान भी चल रहा था काम

फैक्ट्रियों की लिस्ट लेकर पहुंची थी टीम, इच्छुटी मजिस्ट्रेट नाथव तहसीलदार लेख शैली की अगुवाई में हुई कार्रवाई



फैक्ट्री बरखाई होने पर बंद पर रहने वाले श्रमिक समान बाहर निकालने हुए • गाजियाबाद

औद्योगिक क्षेत्र में अविश्वसनीय रूप से चल रही फैक्ट्रियों पर कार्रवाई की गई है। यह इकाइयों रात के समय चलाई जाती थी और दिल्ली आदि से वेस्ट स्क्रैप मंगवाकर यहां पर उसे पिघलाया जाता है। जिससे यह इकाइया खतरनाक वायु उत्सर्जन का प्रमुख स्रोत बनी हुई थी। इसका पटवारेण व जन स्वास्थ्य पर जतिकूल प्रभाव पड़ रहा था। ऐसे में इन इकाइयों पर ध्वस्तकरण और बिजली कनेक्शन काटने की कार्रवाई की गई है।

ड. निमल नगर, सरखीय, खरखीय



अनेक फैक्ट्रियों को ध्वस्त करता बुलडोजर। कार्रवाई के दौरान कई रिपिट अधिकारी मौजूद रहे • गाजियाबाद

खुद गुणवत्ता प्रबंधन अयोग (सीएचयूम) के आदेश पर बुधस्थिति: की उपयुक्त सुशील साखुवन ने एएसएमडीए की एसीओ बोन हड्ड को अगुवाई में एक टीम का गठन किया था, जिसके द्वारा खरखीय के इस औद्योगिक क्षेत्र में अविश्वसनीय रूप से चल रही इकाइयों पर कार्रवाई को अंजाम दिया गया। इच्छुटी मजिस्ट्रेट नाथव तहसीलदार लेखा, सोनीपत शैली की देखरेख में टीम 11 बजे निजामपुर खुर्द क्षेत्र में पहुंची, जहां पर डिसेंबर माह में एएसपीएम डा. निमल नगर की अगुवाई में हुई कार्रवाई के समय अविश्वसनीय रूप से चटने बचने की मिली युक्ति से कार्रवाई को शुरू किया गया। इस दौरान जर्मन मॉलिक ने जर्मन पर स्टेट होने का हवाला दिया, लेकिन उन्हें कार्रवाई पर हटाने नहीं कर पाया। एएसपीएम डा. निमल नगर ने अमने



मीके पर तैनात भारी पुलिसबल • गाजियाबाद



जमींदारों की गा रहे अविश्वसनीय इकाइयों के चलते उठती धूल • गाजियाबाद



कार्रवाई के दौरान मौजूद एएसपीएम डा. निमल नगर • गाजियाबाद

कुछ महिलाओं ने कार्रवाई का विरोध किया, लेकिन भारी पुलिस बल के आगे एक न चली। पुलिस ने सभी को पीछे करवाते हुए कार्रवाई का शुरू करवाया। इस दौरान प्रदूषण नियंत्रण बोर्ड के आरओ अजय मॉलिक, सोनीपत एएसपीएम नीलम शर्मा, तहसीलदार किर्लो नंदन, एटीपी अनिल रानी व भारी संख्या में पुलिस बल मौजूद रहा।

शुरू होने के बाद नवीं रुखी कार्रवाई टीम की तरफ से एक बार अविश्वसनीय रूप से चलाते हुए कार्रवाई को गैराने का सिलसिला शुरू किया तो वह कई घंटों तक चलता रहा। इस दौरान खंडेप विधायक स्तैव बनाने, नकल चटने बनाने जनी इकाइयों को सिलसिलेवार तरीके से गिराया गया। इसके साथ ही 11 इकाइयों ऐसी भी रही, जिनके बिजली निचम को टीम को बुलकर कनेक्शन काट दिया

गए। गा के अंधेरे में होता है फाला कार्रवाई सरखीय के फिरोजपुर बंगर में करीब तीन इकाइयों पहले दिल्ली से मिलाती गई फैक्ट्रियां बरखाई गई थी, यह अविश्वसनीय रूप से है। जिसमें जटौला, सैरपुर, फिरोजपुर

बंगर, कुंडल, रामपुर व सीडो आदि गांवों की जमीन पर करीब 200 इकाइयां हैं, बाधकार में अविश्वसनीय रूप से काम किया जाता है, इन इकाइयों के टूट पर ताते लटके रहते हैं, जबकि अंतर रात के समय में काम होता है।

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882

Sanjaya Kumar Mishra <skmishra1047.advocate@gmail.com>

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**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. 7 (MCF)**

1 message

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**S.K. Mishra, Advocate** <sanjayakmishra@gmail.com>  
To: rkhuranalegal@gmail.com

Mon, Apr 13, 2026 at 4:05 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. 7 (MCF) for your kind record and perusal.

Thanks & regards

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

Disclaimer: This communication is intended solely for the addressee and may contain privileged information. Please do not construe this as solicitation or advertisement as per BCI rules.

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 **Rejoinders to R-7 in OA 61 of 2025.pdf**  
1913K