

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 549 OF 2025
[Earlier O.A. No. 42 OF 2025(CZ)]**

DHEERAJ TIWARI

...APPLICANT

VERSUS

**MINISTRY OF
ENVIRONMENT, FOREST
AND CLIMATE CHANGE &
ORS.**

...RESPONDENTS

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NEW DELHI

DATE: 21.11.2025

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 549 OF 2025
[Earlier O.A. No. 42 OF 2025(CZ)]**

DHEERAJ TIWARI **...APPLICANT**
VERSUS
MINISTRY **...RESPONDENTS**
OF
ENVIRONMENT, FOREST
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ORS.

**REJOINDER ON BEHALF OF THE APPLICANT TO THE
SHORT AFFIDAVIT-IN-REPLY FILED ON BEHALF OF
RESPONDENT NO. 6**

MOST RESPECTFULLY SHOWETH:

1. The Applicant has received a copy of the short affidavit-in-reply (hereinafter referred to as the “**said affidavit**”) filed by Respondent No. 6, Tethys Chem Private Limited (“**Respondent No.6**”).
2. The Respondent No. 6 has, at all material times, publicly represented itself as a coal tar distillation unit situated at Plot No. 17/N, Heavy Industrial Area, Hathkhoj, Bhilai, Durg, Chhattisgarh with an annual capacity of 36,000 MT, and has consistently advertised itself as a manufacturer and supplier of a wide range of coal tar derivatives such as coal tar pitch, creosote oil, refined naphthalene, heavy and light oils, and carbon black oil. These products, by their very nature and chemical characteristics, can only be produced through the process of coal tar distillation or coal tar processing, and it is scientifically impossible for such by-products to be generated by mere melting of coal tar pitch. Even a cursory examination

of the Respondent No. 6's own website, LinkedIn profile, commercial materials and public declarations makes it abundantly clear that the Respondent is engaged in an activity that squarely falls under the category of a "coal tar processing unit", which unequivocally and mandatorily requires prior Environmental Clearance ("EC") under the EIA Notification, 2006, as amended. Furthermore, the Respondent No. 6 by its own admission in the said affidavit has stated that it is carrying out a business with respect to Coal Tar Distillation/processing.

3. That based on applications available on public platform it is evident that:

- (a) Respondent No. 6 made an application on 15.06.2020 requesting for grant of consent for the expansion of capacity, the Respondent No. 3 granted a Consent to Operate ("CTO") to the Respondent No. 6 for its said unit, on 22.07.2020. Such CTO was to be valid for a period of one year from the date of issuance (i.e. 22.06.2020). Further, the CTO dated 22.07.2020 categorically mentioned that the consent issued vide letter Nos. 1071, 1072 dated 09.09.2013 shall be treated as cancelled from the date of issue of this letter. Pertinently, a note as specified in the CTO dated 22.07.2020 specifically prohibited the Respondent No. 6 from processing/distilling the coal tar pitch mentioned under S. No. 02 without obtaining the Environmental Clearance as per the EIA Notification, 2006. Therefore, it is abundantly clear that the authorities had expressly barred the Respondent No. 6

from operating a coal tar distillation/processing unit before obtaining an EC.

- (b) The Consent to operate dated 22.07.2020 was again renewed by the Respondent No. 3 vide letter having reference number 2147/RO/TS/CECB/ 2021 dated 02.09.2021 for a period of two years from 22.07.2021 to 21.07.2023. The CTO granted by the Respondent No. 3 was for the same products at the same production capacity as of the CTO dated 22.07.2020. The CTO dated 02.09.2021 also again clearly mentioned and categorically prohibited Respondent No. 6 from processing/distilling the coal tar pitch until obtaining the requisite Environmental Clearance.
- (c) The CTO dated 02.09.2021 was again renewed by the Respondent No. 3 vide its letter bearing reference no. 831/RO/TS/CECB/2023 dated 27.06.2023, for the period of from 27.06.2023 to 21.07.2028 for the same products and production capacity as per the CTO dated 22.07.2020. The said renewal allowed the Respondent No. 6 to only melt coal tar pitch and categorically prohibited the Respondent No. 6 from processing/distilling the coal tar pitch until obtaining the requisite Environmental Clearance.
- (d) The Respondent No. 3 being the Chhattisgarh Environment Conservation Board has from time to time renewed the CTO granted to the Respondent No. 6. Every CTO issued in the years 2020, 2021 and 2023 expressly imposed a clear and categorical prohibition

restraining the Respondent No. 6 from processing or distilling coal tar pitch without first obtaining the requisite EC. These conditions were not mere formalities, but statutory safeguards imposed to prevent unregulated distillation of a hazardous and carcinogenic chemical. Despite these prohibitions forming an integral part of its CTOs, Respondent No. 6 continued to run a full-fledged distillation facility, and notably, its affidavit offers no explanation and does not deny the existence of such prohibitions.

- (e) On or about August 2024, the Respondent No. 3 had issued an amendment in the consent under Section 25/26 of the Water (Prevention and Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 to the Respondent No. 6 on 18.06.2024. The amendment order was made pursuant to an application for expansion in the existing plant made by the Respondent No. 6 on 11.06.2024. Pursuant to the amendment the Respondent No. 3 allowed the addition of new products and also allowed the increase in the production capacity of the Respondent No. 6.
- (f) Pursuant to the amendment issued by the Respondent No. 3 on 18.06.2024, the Respondent No. 3 vide letter dated 23 August 2024 having reference number 3480/RO/TS/CECB/2024 renewed the CTO of the Respondent No. 6 for the period from the date 18 December 2024 to 17.06.2029. It is surprising to note

that the CTO renewed on 23.08.2024 did not contain the note prohibiting the Respondent No. 6 from processing/distilling the coal tar pitch without obtaining the Environmental Clearance as per the EIA Notification, 2006, as had been stated in the previous CTOs granted on 22.07.2020 and further renewed on 02.09.2021 and 27.06.2023. The deletion of such note in the amended CTO dated 23.08.2024 is without any basis.

- (g) Such action of arbitrarily removing/deleting the condition mandating obtaining of EC before processing/distilling the coal tar pitch, not only demonstrates collusion between the Respondent No. 3 and the Respondent No. 6 but also tantamount to a clear admission on the respondent authorities regarding the legal and factual position concerning applicability of Environmental Clearance for processing/distilling the coal tar pitch by the Respondent No. 6. In such circumstances, a sudden departure from its admitted stand and the unexplained deletion points to a clear procedural irregularity and undue haste on the part of the respondent authorities.
4. It is submitted that coal tar processing is expressly listed in Item 4(b) of the Schedule to the EIA Notification, 2006, as amended on 25.06.2014 and any new unit, expansion, modernisation or change in product mix relating to this category cannot commence without prior EC. The Respondent No. 6 has been in continuous violation of this statutory

mandate since 2020, and its affidavit completely avoids addressing this illegality.

5. It is also submitted that the Respondent No. 6 cannot take shelter under any permission to operate any coal tar distillation unit granted to M/s S.S. Udyog as because the CTO dated 22.07.2020 clearly states that the consent issued vide letter no. 1071,1072 dated 09.09.2013 shall be treated cancelled from the date of issue of the CTO dated 22 July 2020. Furthermore, the last publicly available CTO granted to M/s S.S. Udyog clearly mentions a production capacity of 2300 M.T. / Year for the products being Refine Naphthalene balls, Light furnace oil, Heavy furnace oil (Solvent Naptha), Super creosote fuels (Coal Tar), Black Paint Organic chemicals as against the production capacity of 36,000 M.T./Year granted in the year 2002 by the M.P. Pollution Control Board. Therefore, it is evidently clear that the CTO granted to M/s S.S. Udyog has been amended from time to time and finally it was cancelled. Furthermore, the submission that S.S. Udyog and Respondent No. 6 are one and the same entity, and that the industry has merely changed its name, is incorrect. This is evident from the certificate of incorporation dated 14.12.2018, which demonstrates that Respondent No. 6 was incorporated only on 13.12.2018.
6. The Respondent No. 6 with a mala fide intent has stated in the said affidavit that as per a police report and investigation in Bhilai, the applicant does not live or reside at the address mentioned in the Original Application and had also annexed an apparent police report. On a bare perusal of the alleged

police report, it can be understood that an informant going by the name of Ghyansham Giri being the plot supervisor of the Respondent No. 6, who had gone to the police station to lodge a report against the applicant was advised to approach the Hon'ble Court for any relief as the police authorities would not interfere in the matter. However, the applicant had still visited the police report and submitted a written representation providing the true and correct facts of the case. The police authorities on 05 July 2025 duly issued an information sheet under section 174 of BNSS stating that the identification of the Applicant is correct. Copies of the Police Report as annexed by the Respondent No. 6 together with its English translation, written representation made by the Applicant, and the police information sheet are annexed hereto and collectively marked as "**Annexure A**".

7. Save and except what are matters of record and what has been stated in the reply herein, allegations and/or statements made in various paragraphs and its sub-paragraphs under reference of the Application are denied and disputed as if the same are set out in seriatim and specifically traversed.
8. With reference to paragraph no. 1 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that the Respondent No. 6 is carrying out any bona fide business with respect to Coal Tar Distillation/processing since 2001. It is denied that the Respondent No. 6 had been functioning in the

name of S. S. Udyog and thereafter in 2019, the name of the said Company was changed to M/s Tethys Chem Private Limited. The Respondent No. 6 has failed to provide any documents in support of its contention that it was operating under the name of S.S. Udyog since 2001 and thereafter it's name was changed to M/s Tethys Chem Private Limited. Furthermore, Clause 3 of the Amendment to Lease Deed dated 10.10.2019 as annexed by the Respondent No. 6 clearly states that the ownership of M/s S.S. Udyog, a partnership firm was transferred to M/s Tethys Chem Private Limited.

9. Moreso, SEAC only considered the application of Respondent No.6, as Respondent No.6 incorrectly stated that, "*Tethys Chem Pvt. Ltd. (Old name: SS Udyog) formed in 2001 and MP Pollution Control Board has been permitted the coal tar processing from 25.07.2001 and continue till now as per CTO No. 3480/RO/TS/CECB/2024. Hence, as per EIA Notification, 2006 the existing capacity of Coal Tar Pitch production of 36,000 MTPA does not require environmental clearanace as clearly mentioned and same is exempted to TCPL.*" (Pg. 250 of the Original Application). This statement made by Respondent No. 6 is entirely false and amounts to a deliberate misrepresentation on affidavit. As per the knowledge of the Original Applicant, if SS Udyog and Respondent No. 6 are indeed the same entity and there is merely a change of name, then the Renewal of Consent dated 12.01.2017 clearly demonstrates that SS Udyog had sought renewal only for "*Refined Naphthalene balls, Light Furnace Oil, Heavy Furnace Oil (Solvent Naphtha), Super Creosote Fuels (Coal Tar), and Black Paint Organic Chemicals,*" and no renewal

whatsoever was sought for Coal Tar Distillation. (*Pg.471 of the Original Application*)

10. With reference to paragraph nos. 2, 3 and 4 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim.
11. With reference to paragraph no. 5 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that the Respondent No. 6 has all requisite permissions or any CTO from the CECB for the operation, functioning of its business as alleged or at all. It is denied that the Respondent No. 6 is not violating any law regarding the running of the Coal Tar Distillation/Process as alleged or at all.
12. With reference to paragraph no. 6 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that the competent authority has duly verified or considered the documents submitted by the Respondent No. 6 as alleged or at all. It is denied that the Respondent No. 6's production capacity was 3000 tonnes per month and 36000 tonnes per year, which has been running since 2001 as alleged or at all. It is denied that any documents submitted by Respondent No. 6

justified the renewal of the CTO renewal till 17.06.2029 as alleged or at all. It is denied that the Respondent No. 3 could have granted an amended CTO to the Respondent No. 6 on the basis of any consent obtained in the year 2001. I state that the CTO granted to the Respondent No. 6 by the authorities on 23.08.2025 is contradictory to the earlier CTOs granted to it which specifically prohibited the Respondent No. 6 from processing/distilling the coal tar pitch without obtaining the Environmental Clearance as per the EIA Notification, 2006. The authorities in collusion with the Respondent No. 6 has acted contrary to its own stand and has violated the provisions of the EIA Notification, 2006.

13. With reference to paragraph no. 7 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that Respondent No. 6's operation or business has not caused or been reason to cause pollution due to its functioning or processing as alleged or at all.
14. With reference to paragraph no. 8 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that Respondent No. 6 has obtained appropriate permissions and is operating as per law. It is denied that Respondent No. 6 has appropriate

permission/s to operate as a concerned Company and has necessary clearances as alleged or at all.

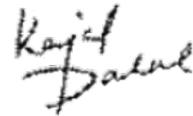
15. With reference to paragraph no. 9 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that the application against Respondent No. 6 is mala fide and that the Original Applicant has targeted the Respondent No. 6 without any due diligence or verification of facts. It is denied that the Original Applicant is targeting the Respondent No. 6 at the behest of any competitor or that the Original Applicant has any ill or *mala fide* intent as alleged or at all.
16. With reference to paragraph no. 10 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that the present Original Application against the Respondent No. 6 is a tool to humiliate and suppress the competitors or is an *abusus processus*. The Original Applicant states that the violations being committed by the Respondent No. 6 could be ascertained from a bare perusal of the records available publicly.
17. With reference to paragraph no. 11 of the said affidavit, save and except what are matters of record and save what appears therefrom, all other averments and/or allegations contrary thereto are denied and disputed as if the same are set out hereunder and denied in seriatim. It is denied that the present

application could be dismissed on any grounds mentioned in the said affidavit or the documents annexed thereto as alleged or at all. It is denied that the present original application is non maintainable or has mentioned incorrect facts or has cited incorrect law as alleged or at all. It is denied that the Respondent No. 6 could make any request for deferment of the present proceeding or request this Hon'ble Tribunal from passing any order. It is denied that the Original Applicant has any ill and *mala fide* purpose in filing the present original application as alleged or at all. It is denied that the Original Applicant is not a genuine applicant or that my genuineness has to be enquired as alleged or at all. It is denied that as per the any police report or investigation, the Original Applicant does not live or reside at the address given in the cause title of the present original application as alleged or at all. The Original Applicant states that from a bare perusal of police report as annexed by the Respondent No. 6, it is clear that the police authorities have refused to entertain the complaint made by the Respondent No. 6 and it has been directed to approach the competent court. The Original Applicant further states that in order to evade adjudication of the present original application, the Respondent No. 6 has filed a frivolous complaint against me before the Old Bhilai Police Station. However, the Original Applicant has duly made a written representation before the Old Bhilai Police Station stating true and correct facts.

18. The Original Applicant states that the said affidavit has been filed by the Respondent No. 6 in order to delay the hearing of the present original application on merits and to divert the

mind of this Hon'ble Tribunal to unnecessary facts, which is not germane to the present issue. The Respondent No. 6 has failed to address any or all of the allegations raised in original application or provide any documents to counter such allegations and has only filed the said affidavit for the purpose of wasting precious judicial time.

Filed by



KAJAL DALAL
[Advocate for the Applicant]

BEFORE THE HONORABLE MEMBERS OF THE NATIONAL GREEN TRIBUNAL

ORIGINAL APPLICANT NO. 549 OF 2025

APPLICANT: Dheeraj Tiwari / Sh. Lal Pratap Tiwari

VERSUS

RESPONDENTS: Ministry of Environment Forest and Climate Change & Ors.

AFFIDAVIT

I, Dheeraj Tiwari, S/o Sh. Lal Pratap Tiwari, aged about 35 years, resident of Hathkoj, Housing Board, Bhilai, Tehsil – Charoda, Zila – Durg, Chhattisgarh do hereby solemnly affirm, and state as follows:

1. That I am the Applicant in the instant Application and am fully conversant with the facts of the case, and competent to swear this affidavit.
2. That the accompanying application has been drafted on my instructions, and I have read and understood its contents.
3. That the contents of the attached application and its annexures are true and correct, based on my knowledge, information, belief.
4. That no part thereof is false and nothing material has been concealed therefrom.
5. That the present affidavit is of the same or subsequent date of the drafting of the application.



NOV 2025

6. That the Annexure(s) attached herewith are true copies of the originals thereof.

Deepmala
DEPONENT

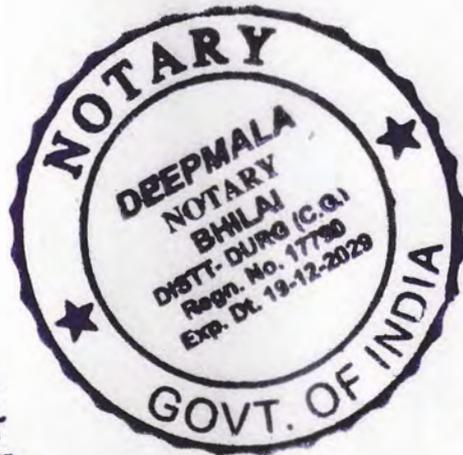
VERIFICATION

I, the abovenamed Deponent above named, do hereby state on solemn affirmation that the contents of Para Nos. 1 to _____ herein above are true and correct to my own knowledge, and that nothing material has been concealed there from.

Verified at Bhilai on this 21st day of November, 2025.

21/11/2025

Deepmala
DEPONENT



21/11/2025

Deponent & His Signature Identify by Witness

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संकेतित
समक्ष शापथकर्ता जिनका नाम/ पता,
ति का नाम व पता उपरोक्तानुसार है
वेरे समक्ष शापथ लिया जिसे पहचानकर्ता
/ गवाह ने पहचान लिया जिनके हस्ताक्षर
लिखन दिनांक 21 NOV 2025
को हस्ताक्षर
दीपमाला
नोटरी मित्रार्थी ३ सि १४

सोलह(क)-98

पुलिस

छत्तीसगढ़ शासन

पुलिस विभाग

पुलिस हस्तक्षेप अयोग्य अपराध की सूचना
(धारा 174 भारतीय नागरिक सुरक्षा संहिता)

दिनांक:-24.04.2025

जिला:-दुर्ग (छ0ग0)

क्रमांक:-.. 112 /2025.....

पुलिस स्टेशन:- पुरानी भिलाई.....

- (01) सूचना देने का दिनांक तथा समय:- 24.04.2025 के 14:40 बजे
 (02) अभियोगी या सूचना देने वाले का नाम,पता व निवास स्थान:- घनश्याम गिरी पिता स्व0 अवध किशोर गिरी उम्र 39 वर्ष निवासी म.नं. 268 सुभाष मार्केट जोन-2 खुर्सीपार थाना पुरानी भिलाई जिला दुर्ग मो.न. 7000401640
 (03) अभियुक्त का नाम, पता व निवास स्थान:- धीरज तिवारी पिता लाल प्रताप तिवारी उम्र 37 वर्ष निवासी हथखोज हाउसिंग बोर्ड, भिलाई तहसील चरोदा जिला दुर्ग
 (04) घटना का दिनांक, स्थान तथा समय:-17.04.2025 के पूर्व से

सूचना का संक्षिप्त विवरण

उपरोक्त सूचना के अपराध धारा 174 बी.एन.एस.एस. का होता है जो पुलिस हस्तक्षेप योग्य नहीं होगा अभियोगी को सक्षम न्यायालय में कार्यवाही करने को बतलाया गया।

इस प्रकार है सूचक थाना हाजिर आकर लिखित आवेदन पेश कर रिपोर्ट दर्ज कराया कि यह मेसर्स टेथिस केम. प्रा. लिमिटेड में प्लाट सुपर वायजर है अनावेदक द्वारा मेसर्स टेथिस केम. प्रा. लिमिटेड 17/एन हथखोज भिलाई दुर्ग के व्यापार में व्यवधान उत्पन्न करने के लिए कंपनी के नाम से एनजीटी एवं पर्यावरण विभाग में फर्जी कम्प्लेन कर रहे है जिससे कंपनी का छवि धुमिल हो रहा है अनावेदक का दिये गये पते पर पता किया गया जो उक्त पता गलत होना तथा संपूर्ण हाउसिंग बोर्ड कालोनी भिलाई हथखोज में अनावेदक धीरज तिवारी नाम से कोई व्यक्ति निवासरत नहीं होना पाया गया तथा मो.नं. 07580802300 संपर्क कर पता किया गया जिनके द्वारा उक्त नंबर शुभम रावत का होना बताया इस तरह अज्ञात अनावेदक द्वारा जान बुझकर कंपनी की क्षति व छवि झुठी शिकायत कर धुमिल किया जा रहा जो पुलिस अहस्तक्षेप योग्य होने सूचक को माननीय न्यायालय की शरण में जाने की राय दी गई।

सूचना की प्रतिलिपि प्राप्त हुई।

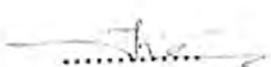
24 APR 2025

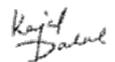


हस्ताक्षर

PHOTO COPY
ATTESTED

 MOTIRAM KOSHALE
 ADVOCATE NOTARY
 BHILAI (C.G.)


 पुलिस अधिकारी
 धा-पुलिस-स्टेशन
 जिला-दुर्ग (छ.ग.)



//TRUE COPY//

Sixteen (a)-98

Police

Government of Chhattisgarh

Police Department

Information of Crime Inappropriate for

Police Interference

(Section 174 Bharatiya Nagarik Suraksha Sanhita)

No.: 112/2025 _____

Date:24.04.2025

Police Station: - Old Bhilai _____ District: -Durg (C.G)

(01) Date and time of giving information: 24.04.2025 at
14:40 hrs

(02) Name, address and place of residence of the
plaintiff or informant: Ghanshyam Giri, Son of Late
Awadh Kishore Giri, Age 39 years, resident of H. No.
268, Subhash Market Zone-2 Khursipar, Police Station
Old Bhilai, District Durg. Mobile No. 7000401640

(03) Name, address of the accused, place of residence:
Dheeraj Tiwari, Son of Lal Pratap Tiwari, age 37 years,
resident of Hatkhaj Housing Board, Bhilai Tehsil
Charoda, District Durg.

(04) Date, place and time of the incident: - Before
17.04.2025

Brief description of the information

The offence in the above information is of section 174 B.N.S.S. which will not be subject to police interference. The plaintiff was told to take action in the Competent Court.

It is as follows that the informant came to the Police Station and submitted a written application and lodged a report that he is a plot supervisor in M/s Tethys Chem. Pvt. Ltd. The opposite party is making fake complaints to NGT and Environment Department in the name of the company to create hindrance in the business of M/s Tethys Chem. Pvt. Ltd. 17/N Hathkhoj Bhilai Durg, due to which the image of the company is getting tarnished. The opposite party was traced at the given address, which was found to be wrong and no person by the name of opposite party Dheeraj Tiwari was found residing in the entire Housing Board Colony Bhilai Hathkhoj and Mobile no.07580802300 was contacted and it was found out that the said number belongs to Shubham Rawat. In this way, the unknown applicant is deliberately causing damage to the company and

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tarnishing its image by making false complaints. The informant was advised to seek refuge in the Hon'ble Court as the police is not capable of interfering.

Copy of the information received.

Sd/- illegible 24 APR2025

Signature

Sd/- illegible

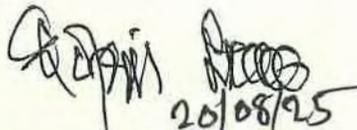
Police Officer

Police Station

District Durg (C.G)

Sd/- illegible
Motiram Koshale
Advocate Notary
Bhilai (C.G)

Certified to be the English translation of an
Information in Hindi.


20/08/25
R Islam
Rtd. Senior Interpreting Officer (C.)
O. S. High Court, Calcutta

04.07.2025

To
Officer in Charge
Old Bhilai Police Station

Dear Sir,

I have been aware of a complaint filed before your good self by one Ghanshyam Giri, Plot Supervisor Tethys Chem Private Limited. I have been made aware by my Advocate that the same was filed by way of an affidavit before the Hon'ble National Green Tribunal, Bhopal ("NGT Bhopal") in Original Application 42/2025 (CZ). At the outset, it appears that the said complaint was not entertained, and the complainant was required to approach the competent Court.

However, since the said complaint and the information report has been incorrectly used in the NGT Bhopal, I wish to state the following correct facts:

- i. I have filed a bona fide application before the NGT, Bhopal against the environmental violations being committed by M/s Tethys Chem Private Limited. M/s Tethys Chem Private Limited is involved in polluting the environment in and around Hathkhoj, Durg, Chhattisgarh. The Company has been violating environmental norms and has been operating without an environmental clearance.
- ii. Previously, I had lodged several complaints against the company before the authorities in Chhattisgarh, however no action has been taken and therefore I was compelled to approach the Hon'ble National Green Tribunal, Bhopal in order to pursue actions against the company. I vehemently deny that the complaint has been filed by me for the purpose of tarnishing the image of M/s Tethys Chem Private Limited.
- iii. In the past I have filed complaints against M/s M.P. Tar Products as well.
- iv. I had in the year 2024 filed an application before the NGT, Bhopal against the environmental violations being committed by M/s M.P. Tar Products since the Company has been violating environmental norms and has been operating without an environmental clearance.

I would also like to address the allegations levied against me in the complaint filed by the representative of M/s Tethys Chem Private Limited.

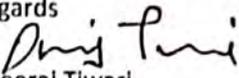
- i. I am a practicing advocate and have been practicing in the courts of Madhya Pradesh and Chhattisgarh. For the purpose of my profession, I keep travelling and for that purpose I have taken a residential place at both Jabalpur, Madhya Pradesh and Durg, Chhattisgarh.

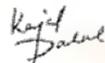
ए. व. शर्मा
वकील, याना पुराना
1454
P.S. Old Bhilai

- ii. The address mentioned in my Aadhar is that of House Number 429/2, Ward Number 13, Jai Bhawani Colony, Khitoula Bazar at Jabalpur, Madhya Pradesh.
- iii. I also stay at Hathkhoj, Housing Board Bhilai, Tehsil – Charoda, at Bhilai, i.e. Durg, Chhattisgarh, from time to time, as stated above.
- iv. Secondly, the mobile number provided against my name in the Vakalatnama filed before the NGT Bhopal belongs to my Advocate on Record, Mr. Subham Rawat. The same has been done for ease of communication between my advocates and the advocates for the respondent. The name of Mr. Subham Rawat appears in serial no. 5 in the second table provided in the Vakalatnama filed before the NGT, Bhopal.
- v. Needless to mention all allegations in connection with any alleged filing of false and frivolous complaint before the NGT, Bhopal are denied and vehemently disputed. The complainants have misused the process of law by filing the instant complaint and the same have been done in order to pressurize me into withdrawing my application filed before the NGT, Bhopal. The complainants are using dilatory tactics by referring to this instant complaint before the NGT Bhopal and have already delayed the hearing of the matter on previous occasions.

This is for your information, record and necessary action(s).

Regards


Dheeraj Tiwari



//TRUE COPY//

Government of Chhattisgarh
Police Department
Information of non-cognizable offence
(Sec. 174 BNSS)

Sr. N. 236/2025

Date: 05.07.2025

Police Station - Purani Bhilai, Dist. Durg

01) Date and time giving Information: 05.07.25 Time
13/45 hrs.

02) Name of Complainant or informant and place of
address : Dhiraj Tiwari, Son of Sri Lal Pratap Tiwari,
aged about 75 years, resident of Housina, Ward Hatkoj,
under Tahsil Charoda, District Durg, Chhattisgarh.

03. Name and address of the accused: Ghaneshyam Giri,
son of late Awadh Kishore Giri, aged 39 years, resident
of House No. 268 Subhas Market, Zone -2 Khursi Park,
P.S. Khursi park, District Durg. Chha. Ga.

04) Date and time of incident: before 17.04.25

Brief particulars of the Information

The brief particulars of the case is that the applicant
coming to Sadar Police Station filed a written report
case no. 112/25 dated 24.04.25 in the Police Station
being present personally gave clarification about the

said complaint and made particulars regarding his address and identification. The Application of the respondent is enclosed and one copy of the same is submitted to the Police Station. Identification is correct as the case is found non cognizable the applicant is advised to approach the Court by giving the copy of case no. 236/25 under section 174 BNSS. Receipt the copy of the notice.

Sd/- illegible

Sign.

Signature
 HC1454
 Police office,
 P.S. Purana Bhilai
 District Durg,
 Chha. Ga.

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in Hindi

R. Islam
 77/25

R. Islam
 Rtd. Senior Interpreting Officer
 Q.S. High Court, Calcutta

*Kajal
 Dabur*

//TRUE COPY//