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PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION No. 203 OF 2023

IN THE MATTER OF-

TUSHAR GOSWAMI

....APPLICANT

VERSUS

UNION OF INDIA & ORS.

.....RESPONDENTS

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Filed By-

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**PRINCIPAL BENCH, NEW DELHI****ORIGINAL APPLICATION No. 203 OF 2023****IN THE MATTER OF-**

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**REPLY AFFIDAVIT ON BEHALF OF THE RESPONDENT NO. 11 M/S
PRAVEG COMMUNICATION (INDIA) LIMITED.****MOST RESPECTFULLY SHOWETH:**

1. That the deponent/ answering Respondent No. 11 is the authorised representative of the M/s Praveg (India) Communication Limited are fully acquainted with the facts and circumstances of the case.
2. That the deponents have gone through the contents of Synopsis, List of Dates and Original Application No. 203 of 2023 along with applications and deny each and every statement of facts and proposition of law contained therein save and except only those which will be specifically admitted by me in this affidavit.
3. That before filing Para-wise reply of Original Application No. 203 of 2023, answering respondents are intending to submit true facts by way of Preliminary submission before this Hon'ble Tribunal:-

PRELIMINARY SUBMISSION:

1. That the present matter pertains to the Tent City project in the river bed of Ganga at Varanasi (Respondent No.9) is the brain

child of the Varanasi Development Authority (VDA), Varanasi who has invited parties through e-tending on dated 21.07.2022 for development of the tent city in the bank of River Ganga at Varanasi, U.P. based on tendering process. Varanasi Development Authority (Respondent No.9) has issued letter of intent (Lol) on 01.12.2022 to the deponent M/s Praveg (India) Communication Limited and M/s Niraan the Tent City for the development of the tent, respectively.

4. That the Tent city is developed opposite side of Chet Singh Ghat on River Ganga, which is located right bank of River Ganga. Varanasi Development Authority (Respondent No.9) has made agreement with deponent on 01.12.2022 for the development of tent city. Both tent cities are located adjacent to each other.
5. That the deponent M/s Praveg Communications (India) Limited has allotted 20 hectare land to develop the tent city. It is located on the opposite side of Assi Ghat of River Ganga. The demarcation of area has been carried out by VDA (Respondent No.9) but at present the tent city has been developed only on 11hectare land.
6. The agreement between VDA (Respondent No.9) and deponent is for five years. That the construction of the tent city was started by the deponent on 01.12.2022. It is made operational on 15.01.2023 and same was closed by 31.05.2023. That the deponent informed that all the tents and structures has been removed on 30.06.2023 and the place was restored same as before building the tent city. That the photograph of the site after removing the setup is annexed herewith and marked as **ANNEXURE R 11/1 (Page to)**.
7. That the deponent herein did not make any permanent construction on the site all the setup are temporary in nature

and did not cause any harm to the flora and fauna as well as water of river ganga.

8. That the deponent has applied for the Consent to Operate (CTO) and the same was granted to him on 12.01.2023 by the Uttar Pradesh Pollution Control Board under Section-25 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention & Control of Pollution) Act, 1981. A true copy of the CTO dated 04.07.2023 is annexed herewith and marked as **ANNEXURE R 11/2 (Page to)**.
9. That the deponent is only operator for the tent city project and all the compliances was done by the nodal agency and the deponent took all necessary step to protect the flora and fauna as well as water of river Ganga.
10. That the deponent has installed 06 tanks for collection of waste water. The waste water is lifted through tanker and send to common waste water collection tank (capacity:13 KL) and waste water from collection tank is pumped to Ramnagar STP (Capacity-10 MLD) for the treatment.
11. That the deponent has obtained all environmental clearances from various departments before operating the Tent city.

PARA-WISE REPLY TO ORIGINAL APPLICATION:

1. That the para 1 of the Original Application is the matter of record hence no need to reply.
2. That the para 2 of the Original Application is the matter of record hence no need to reply it is further submitted that the deponent has developed tent city in 20 hectare land. It is located on the opposite side of Assi Ghat of River Ganga. The demarcation of area has been carried out by VDA (Respondent No.9) but last session the tent city has been developed only on 11 hectare land.

3. That the para 3 of the Original Application is wrong hence denied. It is further submitted that the charges of the tent city is depend upon the demand of particular time.
4. That the para 4 of the Original Application is wrong hence denied. It is further submitted that the deponent has followed all the direction related to environmental laws and always care to protect the flora & fauna of the river bed & and river water as well. It is also submitted that no sewage is directly discharged in the river deponent treat all the sewage water then only discharge that water and that is also not discharged in river.
5. That the para 5 of the Original Application is matter of record hence no need to reply.
6. That the starting portion of the para 6 of the Original Application is matter of fact and later part is wrong hence denied it is further submitted that this para is not related with the deponent so no need to reply and further submitted that deponent complied with all the direction issued by the various authority for the protection of the river.
7. That the para 7 of the Original Application is wrong hence denied. It is further submitted that this para is not related with the deponent hence no need to reply. It is further submitted that the present concept of the tent city is arise from the ancient religious practice of Kalpwas with all modern facility and it is also submitted that the deponent complied with all the direction issued by the various authority for the protection of the river and take necessary step to protect the river from pollution.
8. That the para 8 of the Original Application is wrong hence denied. It is further submitted that this para is not related with the deponent hence no need to reply. It is further submitted that deponent has complied with all the compliance as prescribed in the agreement

dated 01.12.2022 and also obtained NOC from the District Magistrate. The copy of NOC dated 01.12.2022 is annexed herewith and marked as **ANNEXURE R 3 (Page to)**.

PARA-WISE REPLY TO GROUNDS:

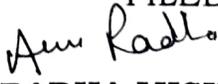
1. That the ground A upon which relief have been sought is misconceived and deserved to be rejected as there is no violation of the judgement passed by any Hon'ble Court or Tribunals done by the deponent in operation of the tent city and did not cause any harm to the flora and fauna as well as water of river Ganga.
2. That the ground B upon which relief have been sought is misconceived and deserved to be rejected as the Kachhua Wildlife Sanctuary was denotified vide Notification dated 17.03.2020 and the tent city was built by the deponent in January 2022 which is almost 2 years later.
3. That the ground C upon which relief have been sought is misconceived and deserved to be rejected as the same is not related with the deponent.
4. That the ground D upon which relief have been sought is misconceived and deserved to be rejected as the deponent is only followed the direction as directed by the appointing authority and the condition mentioned in the agreement dated 01.12.1022. it is further submitted that as per Section 6 (3) of The River Ganga (Rejuvenaion, Protection and Management) Authorities order, 2016", No person shall construct any structure, whether permanent or temporary for residential or commercial or industrial or any other purposes in the River Ganga, Bank of River Ganga or its tributaries or active flood plain area of River Ganga or its tributaries: *Provided that "in exceptional circumstances like natural calamities or religious events at*

traditional locations, temporary structures can be raised after prior permission of the National Mission for Clean Ganga acting through the State Ganga Committee and the District Ganga Committee. It is clear that both projects are constructed as against provision of The River Ganga (Rejuvenation, Protection and Management) Authorities order 2016”.

5. That the ground E upon which relief have been sought is misconceived and deserved to be rejected as the same is not related with the deponent and deponent did not done any activity which cause any harm to the flora and fauna as well as water of river Ganga.
6. That the ground F upon which relief have been sought is matter of law hence no need to reply.
7. That the petitioner herein has not raised any grounds or rely on any documents which are not forming records of court's below in this case.
8. In light of the facts & circumstances narrated hereinabove and submissions made by the respondent herein, the present Original Application is liable to be dismissed.

Pass such other or further orders which this Hon'ble Tribunal deems just and proper in the ends of justice and in the circumstances of this case;

And for this act of kindness and justice, your applicant, as in duty bound, shall ever pray.

FILED BY

(ANURADHA MISHRA)

Counsel for the Respondent no.11

Filed on 21.10.2023

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION No. 203 OF 2023

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AFFIDAVIT

I, Varun Pandey S/o Late Shri Rameshwar Pandey, aged about ...36... years, R/o F-22/1 Minthouse Colony, Nadser, Varanasi, presently at New Delhi do hereby solemnly affirm and declare as under:

1. That I am the authorized representative of the respondent no. 11 in the present Original Application as such I am well conversant with the facts and circumstances of the present case and competent to swear this present affidavit.
2. That I have read and understood the contents of the accompanying Reply affidavit and the contents thereof are true and correct to my knowledge and belief derived from the records of this case and on the basis of legal advice of my lawyer.
3. That the annexures if any, are true copies of their respective originals.

Amur Rast
I identified the deponent who has signed in my presence

Varun Pandey
DEPONENT

21 OCT 2023



day of October 2023 at New Delhi that the contents in Para nos. 1 to 3 of the above affidavit are true and correct to the best of my knowledge and belief.

ATTESTED
 NOTARY (Govt. of India)
 Neelam Sharma
 Advocate
 Ch No 165A, Gate No. No.11,
 Patiala House Courts,
 New Delhi-110001
 M: 9899408301

Neelam Sharma
DEPONENT

21 OCT 2023











Uttar Pradesh Pollution Control Board

Building. No TC-12V Vibhuti Khand, Gomti Nagar, Lucknow-226010

Phone:0522-2720828,2720831, Fax:0522-2720764, Email: info@uppcb.in, Website: www.uppcb.com

185912/UPPCB/Varanasi(UPPCBRO)/CTO/both/VARANASI/2023

Date: 04/07/2023

To,

M/s

Tent City Varanasi

TENT CITY VARANASI, CROSS RIVER OPPOSITE ASSI GHAT
VARANASI, VARANASI,221008

Application Id-
21508056

Consolidated Consent to Operate and Authorisation hereinafter referred to as the CCA (Consolidated Consent & authorization) (Fresh) under Section-25 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention & Control of Pollution) Act, 1981

CCA is hereby granted to **Tent City Varanasi** located at **TENT CITY VARANASI, CROSS RIVER OPPOSITE ASSI GHAT VARANASI, VARANASI,221008**. subject to the provisions of the **Water Act, Air Act** and the orders that may be made further and subject to following terms and conditions :-

1. This CCA Tent City Varanasi **granted for the period from 14/06/2023 to 31/12/2023** and valid for manufacturing of following products.

S No	Product	Quantity	Unit
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2. Conditions under Water(Prevention and Control of Pollution) Act -1974 as amended :-

(i) The daily quantity of effluent discharge (KLD) :-

Kind of Effluent	Quantity(KLD)	Treatment facility	Discharge point
Domestic	37 KLD	37 KLD domestic effluent is generated which shall be stored in a sump having capacity 16 KL. The stored domestic effluent shall be transferred to 10 MLD STP at Ramnagar for treatment	No Trade Effluent is allowed to Discharge

(ii) Trade Effluent Treatment and Disposal :-The applicant shall operate Effluent Treatment Plant consisting of primary/secondary and tertiary treatment as is required with reference to influent quantity and quality.

In case of stoppage of functioning of ETP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

(iii) The treated effluent shall be recycled to the maximum extent and should be reused within the premises for gardening etc. Quality of the treated effluent shall meet to the following general and specific standards as prescribed under Environment (Protection) Rules, 1986 and applicable to the unit from time-to-time :-

Industrial Effluent Quality Standard

S.No.	Parameter	Standard
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(iv) Sewage Treatment and Disposal :- The applicant shall provide comprehensive STP as is required with reference to influent quantity and quality. In case of stoppage of functioning of STP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

(v) The treated sewage shall be reused in gardening as far as possible. The STP shall be maintained continuously so as to achieve the quality of the treated sewage to the following standards.

S No.	Parameters	Standards
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3. Conditions under Air (Prevention and Control of Pollution) Act -1981 as amended :-

i) The applicant shall use following fuel and install a comprehensive control system consisting of control equipment as required with reference to generation of emissions and operate and maintain the same continuously so as to achieve the level of pollutants to the following standards.

Air Pollution Source Details

S No.	Air Pollution Source	Type of fuel	Stack no	Control Device	Height of Stack
1	250 KVA DG Set	Diesel Oil	1	Sulphur Dioxide	As per E(P)A Rules, 1986
2	250 KVA DG Set	Diesel Oil	2	Sulphur Dioxide	As per E(P)A Rules, 1986

Emmission Quality Standards

S No.	Stack no	Parameters	Standards
1	1	Sulphur Dioxide	As per E(P)A Rules, 1986
2	2	Sulphur Dioxide	As per E(P)A Rules, 1986

In case of stoppage of functioning of air pollution control equipment, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately

(ii) The unit will not use any type of restricted fuel.

iii) Noise from the D.G. Set and other source(s) should be controlled by providing an acoustic enclosure as is required for meeting the ambient noise standards for night and day time as prescribed for respective areas/zones (Industrial, Commercial, Residential, Silence) which are as follows :-

Day time : from 6.00 a.m. to 10.00 p.m., Night time: from 10.00 p.m. to 6.00 a.m.

Standards for Noise level in db(A) Leq	Industrial Area		Commercial Area		Residential Area		Silence Zone	
	Day Time	Night Time	Day Time	Night Time	Day Time	Night Time	Day Time	Night Time
	75	70	65	55	55	45	50	40

4. Essential documents to be submitted by the Industry/Unit as Applicable :-

- (i) Environment Statement in Form-V of Environment (Protection) Rules, 1986.
 - (ii) Quarterly compliance report of the CCA, photograph of ETP/APCs/Waste Storage Area.
5. Competent Authority reserves the right to change/modify/add any time any condition of this CCA.
6. Unit has to comply with the following specific & general conditions. Non compliance of any provision of this CCA and provisions of the Water Act, Air Act and Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 will result in legal action under the aforesaid Acts and Rules.
7. In compliance to the G.O 1011/81-7-2021-09 (Writ)/2016 dated.13.10.2021 issued by Department of Environment, Forest and Climate Change, Uttar Pradesh. You are directed to develop Miyawaki Forest as per the SOP available at URL:-<http://www.upecp.in/TrainingSession.aspx> for ensuring timely compliance of this direction, you are hereby directed to submit a bank guarantee with minimum validity of one year of the amount equivalent to the sum of initial consent fees (Air and Water) or Rs. 50,000/- (Rs. Fifty Thousand Only) whichever is more, within 30 days from the date of issuance of this certificate. In case of non-compliance of this direction, your consent will be revoked by the Board.
8. If the unit uses the ground water and requires the permission from SGWA/CGWA for water abstraction then the industry will have to obtain No objection certificate for abstraction of ground water. It will be the responsibility of the industry to comply with the various conditions of the NOC obtained from the competent authority and submit to the Board, within 3 months time failing which CTO will be revoked.

General Conditions:-

1. The applicant shall get analysed the samples of effluent/emission/hazardous wastes at least once in a three month from the laboratory recognized by the MoEF and shall report to the UPPCB.
2. The applicant shall however, not without the prior consent of the Board bring into use any new or altered outlet for the discharge of effluent or gases emission or sewage waste from the unit.
3. Treated Industrial waste water and domestic waste water shall be disposed jointly at one disposal point. The applicant shall provide discharge measurement equipment at final disposal point.
4. The applicant shall strictly comply with conditions of this CCA and submit compliance report of stipulated conditions within 30 days of receipt of this CCA. If at any point of time, it is found that the industry is not complying with stipulated conditions or any further direction/instruction issued by the Board, legal action shall be initiated against the applicant.
5. The applicant shall maintain good house keeping. All valves/pipes/sewer/drains etc. must be leak-proof
6. The industry shall provide uninterrupted entry to the STP/ETP inlet and outlet points, Air Pollution Control equipment and stack for smooth sampling/monitoring of efficiency of pollution control systems.
7. The industry shall provide Inspection Book at the time of inspection to the Board's officials.
8. Whenever due to any accident or other unforeseen act or event, such emission occurs or is apprehended to occur in excess of standards laid down, such information shall be reported to the Board's offices and all other concerned offices. In case of failure of pollution control equipment, the production process connected to it shall be stopped with immediate effect.
9. The industry shall operate in a manner so that all emissions be emitted through designated chimney/stack only.
10. In case of any damage to the agriculture productivity, human habitation etc. by the operation of industry, it shall be imperative to stop production in the industry with immediate effect and such information shall be reported to Board's offices. The industry shall be liable to pay compensation also in such cases as decided by the Competent Authority.
11. The applicant shall apply before the 60 days of expiry of CCA or any change in production types/production capacity/manufacturing process/capacity enhancement etc. or any change in effluent discharge point or emission point

12. The Board reserves the right to revoke/add/modify any stipulated condition issued along with CCA, as may be necessary.

Specific Conditions:-

1. This CTO is only valid for Temporary Structures for 02 patches of area 10 hectares each on which total 58 Tents (08 Ganga Vila Tents with Panch Pool, 12 Darbari Tents with Panch Pool and 38 Kashi Sweet Tent) and 82 Tents (18 Ganga Vila Darshan Tents with Panch Pool, 29 Premium Tents and 35 Deluxe Tent), 01 Spa with 02 Rooms, 01 Dining Hall having 180 Seating Capacity, 01 Conference Hall having 800 seating capacity and 01 Library with Art and Craft Room at Other Side of Ganga River (IN FRONT OF ASSI GHAT), Katesar, Ramnaga Varanasi, U.P. and Geo-coordinates-25.295705 & 83.012813 by M/s Praveg Communication Ltd. (Tent City Varanasi) having Geo-coordinates-25.295705 & 83.012813. In case of any change in capacity, the project will have to intimate the Board. For any enhancement of the above, fresh Consent to Establish has to be obtained from U.P. State Pollution Control Board.

2. This CTO is only valid for Temporary Structures and no case proponent is allowed to construct permanent structures, failing which this CTO would deemed void.

3. This CTO shall only be valid with the effect from the date on which the proponent obtained approval from National Mission for Clean Ganga (NMCG) or Competent Authority under the Provisions of notification dated 07.10.2016 of Ministry of Water Recourses, River Development and Ganga Conservation.

4. The proponent could not start construction for Patch-1 and Patch-2 activities before obtaining approval from National Mission for Clean Ganga (NMCG) or Competent Authority under the Provisions of notification dated 07.10.2016 of Ministry of Water Recourses, River Development and Ganga Conservation, failing which this CTO would deemed void.

5. This CTO is subject to the orders of Hon'ble National Green Tribunal in O.A. No. 203/2023 in the matter of Tushar Goswami Vs. Union of India & Ors.

6. The Project proponent shall submit Environmental Statement to the Board in time.

7. Implementation report of Compliance of consent conditions must be submitted within one month.

8. Audited Balance Sheet/ C.A. Certificate should be submitted within one month from the date of issue of this Certificate for verification of Consent fee payable.

9. 37 KLD domestic effluent is generated which shall be stored in a sump having capacity 16 KL. The stored domestic effluent shall be transferred to 10 MLD STP at Ramnagar for treatment.

10. The solid waste shall be disposed through Nagar Nigam, Varanasi.

11. D.G. sets must be equipped with acoustic enclosure to control noise pollution & stack height shall be maintained as per prescribed norms.

12. The Project proponent shall strictly comply with all the directions issued from UPPCB, CPCB and Hon'ble NGT from time to time.

13. The Project shall operate in such a way so that is does not affect the Surrounding Environment &

Population.

14. The Project shall obtain prior consents in the event of any addition of new emission generation sources such as- Boiler/ Furnace/ Heaters/ D.G. Sets or alteration of existing emission sources in accordance with section- 21/22 of air Act 1981 (as amended respectively).

15. The Project shall dispose the hazardous waste through authorized recyclers/TSDf and comply with the provisions of Hazardous and Other Wastes (Management and Trans-boundary Movement) Amendment Rules, 2016 and The Plastic Waste Management Rules, 2016 as amended.

16. The Order issued by Hon'ble Courts/Hon'ble NGT, MoEF & CC, Central Pollution Control Board, U.P Pollution Control Board and directions issued by Hon'ble National Green Tribunal, New Delhi in Order dated 13.07.2017 in OA no. 200/2014, M.C. Mehta v/s Union of India. Shall be complied with.

17. If closure order is issued by CPCB or UPPCB against any defaulting unit, then CTO issued earlier will suspended during the pendency of the closure period and after ensuring the compliance and after revocation of closure order, the CTO will be deemed to be restore subject to the effective date of revocation of the closure order, with imposed conditions thereof.

18. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this CTO and attract action under the provisions of Law.

Chief Environmental Officer, Circle-6

Copy to:

Regional Officer, U.P. Pollution Control Board, Varanasi for information and necessary action.

Chief Environmental Officer, Circle-6



मिशन LIFE - पर्यावरण के लिए जीवन शैली (Lifestyle For Environment) जनसहभागिता का सन्देश



- स्वच्छता – देशसेवा में अपने परिवेश की स्वच्छता हेतु अपना सक्रिय योगदान सुनिश्चित करें
- संकल्प लें -एकल उपयोग प्लास्टिक उत्पाद जैसे कप, तश्तरी, चम्मच, स्ट्रॉ, ईयरबड्स आदि का उपयोग न हो एवं पर्यावरण अनुकूल विकल्पों जैसे कागज/पत्तों से बने दोने या कटलरी को प्राथमिकता दी जाय |
- एकल उपयोग प्लास्टिक उत्पाद के प्रयोग को रोकने एवं प्लास्टिक बैग के बजाय कपड़े के थैले का उपयोग करने मात्र से 375 मिलियन टन ठोस (प्लास्टिक) कचरे का उत्सर्जन बचाया जा सकता है
- चक्रीय अर्थव्यवस्था (सर्कुलर इकोनॉमी) का समुचित कार्यान्वयन वर्ष 2030 तक लगभग 14 लाख करोड़ रुपये की अतिरिक्त बचत उत्पन्न कर सकता है | वेस्ट /अपशिष्ट फेकने के पूर्व सोचें, ये किसी का संसाधन तो नहीं ...?
- अनुपयोगी इलेक्ट्रिक / इलेक्ट्रॉनिक उत्पाद को कचरे में फेकने से रुकें | इसके उपयुक्त निस्तारण हेतु इसे प्राधिकृत ई – वेस्ट रीसाइकलर को दें | प्राधिकृत ई-रीसाइकिलिंग इकाई में अनुपयोगी इलेक्ट्रिक / इलेक्ट्रॉनिक उत्पाद को देने मात्र से 0.75 मिलियन टन तक ई-कचरे का पुनर्चक्रण किया जा सकता है एवं ई-कचरे के विषम पर्यावरणीय दुष्प्रभाव से बचा जा सकता है
- बाहर जाते समय - सोचें कि क्या आपको वास्तव में परिवहन की आवश्यकता है - वह भी क्या व्यक्तिगत रूप से ? छोटी दूरी के लिए पैदल चलना पसंद करें, अथवा सम्भव हो तो कार पूल के रूप में संसाधन को साझा करें अथवा सार्वजनिक परिवहन पर विचार करें
- घरेलू स्तर पर कम से कम ठोस अपशिष्ट का उत्सर्जन करें और इनका प्रथाक्रीकरण करें
- उपयोगी शेष खाद्य सामग्री आपके स्वयं प्रयास अथवा निकटस्थ सक्रिय स्वयं सेवी संस्थाओं की सहायता से समाज के वंचित वर्ग तक पहुंचाई जा सकती है | वहीं अनुपयोगी भोजन /खाद्य सामग्री को कंपोस्ट (वर्मी कम्पोस्ट) करने से 15 अरब टन भोजन को नष्ट होने से बचाया जा सकता है
- ध्यान रखें - उपयुक्त नल और शावर के उपयोग से पानी की खपत को 30 - 40% तक कम किया जा सकता है। एवं उपयोग में न होने पर नलों को बंद रखने मात्र से 9 ट्रिलियन लीटर पानी बचाया जा सकता है
- ट्रेफिक लाइट/रेलवे क्रॉसिंग पर कार/स्कूटर के इंजन बंद करने मात्र से 22.5 बिलियन kWh तक ऊर्जा की बचत हो सकती है
- परम्परागत बल्ब के स्थान पर CFL का उपयोग बिजली की खपत में प्रभावी कमी लाते हैं | उपयोग में न होने पर बिजली उपकरणों को बंद करें | स्टार रेटेड विद्युत उपकरणों के उपयोग को प्राथमिकता दें

हमारे द्वारा अपनी जीवन शैली की प्राथमिकताओं का उचित और पर्यावरण अनुकूल पुनर्निर्धारण समाज और पर्यावरण के प्रति हमारा दायित्व है |



Anuradha Mishra <officeofanuradha@gmail.com>

Service Reply Affidavit on behalf of the Respondent No. 11 in Original Application No. 203 of 2023 Tushar Goswami Vs. Union of India & Ors.

1 message

Anuradha Mishra <officeofanuradha@gmail.com>

Sat, Oct 21, 2023 at 6:29 PM

To: saurabhitiwarihighcourthighcourt@gmail.com, dmvar@nic.in, secy-mowr@nic.in, dg@nmcg.nic.in, mscb.cpcb@nic.in, pccf-up@nic.in, psforest2015@gmail.com, eincididuplu-up@nic.in, up327@ifs.nic.in, vdavaranasi@gmail.com, chairman@uppcb.in

Dear Sir/ Ma'am

Please find the attached copy of the reply affidavit in the above mentioned subject on behalf of Respondent No 11 namely M/s Paraveg Communications (India) Ltd. PFA

Best Regards

Anuradha Mishra

Counsel for Respondent No 11

**Reply on behalf of Respondent 11.pdf**

5794K

IN THE COURT OF HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI

Suit/Appeal No. Original Application No. 203/2023 JURISDICTION OF 201

In re:-

Tushar GoswamiPlaintiff(s) or Petitioner(s)
Appellant(s) Complainant(s)

VERSUS

Union of India & OrsDefendant (s)/ Respondent(s) / Accused Know all to whom
 these Present shall come that I/we

The above named Authorised Representative of M/s Praveg Communications (India) Limited
 (Respondent No. 11)do hereby appoint

ANURADHA MISHRA

MP/ 2872/2009

Mob.: 9971391034

(Office At: 3, FIRST FLOOR, BIRBAL ROAD, JANGPURA EXTENSION, NEW DELHI - 110014)

(herein after called the advocate/s) to be my / our Advocate in the above – noted case authorize him:-

To act, appear and plead in the above-noted case in this court or in any other court in which the same may be tried or heard and also in the appellate court including High Court subject to payment of fees separately for each court by me/us.

To sign file, verify and present pleadings, appeals cross-objection or petitions for executions review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subjects to payment of fees for each stage

To file and take back documents, to admit and/or deny the documents of opposite party.

To withdraw or compromise the said case or submit to arbitration any differences of dispute that may arise touching or in any manner relating to the said case.

To take execution proceedings on paying separate fee.

To deposit, draw and receive money, cheques, cash and grant receipts hereof and to do a other acts and things which may be necessary to be done for the progress and in the course of the prosecution on the said case.

To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.

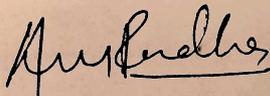
And I/we undersigned to hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purpose.

And I/we undertake that I/We or my/our duly authorized agent would appear in court on a hearings and will inform the Advocate for appearance when the case is called.

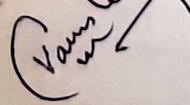
And I/We undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the court shall be of the Advocate which he shall receive and retain for himself.

And I/we undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settle is only for the above case and above Court. I/We hereby agree that once the fee is paid, I /We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

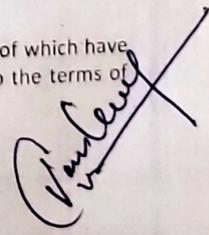
IN WITNESS WHERE OF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on thisDay of.....201 Accepted subject to the terms of the fees.



Advocate



Client



Client

I Identify the Signature/Thumb Impression of Below Mentioned Person,
 Signed in My Presence. The Client.

