

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

IA NO 545 OF 2024
IN
APPEAL No. 41 OF 2024

IN THE MATTER OF:

M/S PUNJAB DYERS ASSOCIATION (FOCAL POINT MODULE), SCF-36,
FIRST FLOOR, COMMERCIAL SITE, PHASE V, FOCAL POINT,
LUDHIANA THROUGH ITS DIRECTOR MR. VISHAL JAIN.

..... APPELLANT

VERSUS

PUNJAB POLLUTION CONTROL BOARD & ORS. ...RESPONDENTS

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PLACE: DELHI
DATE: 18.02.2025


A.R. TAKKAR, SHRIYA TAKKAR, MANAN TAKKAR,


ASMITA DUGGAL, AASTHA TYAGI, PRINCE SHARMA, UDIT SAINI,


SMRITI SRIVASTAVA & DEVIKA SINGH ROY CHOWDHURY
ADVOCATES FOR APPELLANT


M/S ARTLO
P-6/2E, DLF PHASE-2,
GURGAON-122002
9910100005
ARTAKKAR@ARTLO.IN

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

**IA NO 545 OF 2024
IN
APPEAL No. 41 OF 2024**

IN THE MATTER OF:

M/S PUNJAB DYERS ASSOCIATION (FOCAL POINT MODULE), SCF-36,
FIRST FLOOR, COMMERCIAL SITE, PHASE V, FOCAL POINT,
LUDHIANA THROUGH ITS DIRECTOR MR. VISHAL JAIN.

.....APPELLANT

VERSUS

PUNJAB POLLUTION CONTROL BOARD & ORS. **...RESPONDENTS**

**REPLY ON BEHALF OF THE
APPELLANT TO THE
IMPLEADMENT APPLICATION I.E.
IA NO. 545/2024 IN APPEAL 41/2024.**

MOST RESPECTFULLY SHOWETH:

1. That the present Appeal has been filed by the Appellant herein against the impugned directions dated 26.09.2024 passed under Section 33-A of the Water (Prevention & Control of Pollution) Act, 1974 , against the Appellant CETP i.e. 40 MLD CETP, whereby it has been inter-alia directed that discharge of effluent from this CETP shall be immediately stopped into Buddha Nallah or any other surface water body and in due compliance with the EC granted by the Ministry of Environment, Forest and Climate change dated 03.05.2013. That the present Appeal is pending adjudication before this Hon'ble Tribunal and is now listed for hearing on 20.02.2025.
2. That the present Appeal was listed before this Hon'ble Tribunal on 02.12.2024, when this Hon'ble Tribunal was pleased to pass the following orders:

“Learned Counsel for the appellants have submitted that copies of I.A. No. 544/2024 and I.A. No 545/2024 (filed by Nitin Dhiman) were not supplied due to which reply to the same could not be filed by the respective appellant.

Copy of I.A. No. 544/2024 and I.A. No 545/2024 be supplied to the respective appellant.

Reply to I.A. 544/2024 and I.A. No 545/2024 be filed at least one week before the next date of hearing. ”

Thus, the present reply to the IA No. 545/2024 in 41/2024 is being filed by the Appellant herein in compliance of the order dated 02.12.2024 passed by this Hon’ble Tribunal.

3. That at the outset, before giving para-wise reply to the impleadment Application, the Appellant herein would like to submit preliminary objections with respect to the impleadment of the Applicant who has filed the IA under reply, as Respondent to the present Appeal.

PRELIMINARY OBJECTION TO IMPLEADMENT OF THE LOCAL RESIDENTS TO THE PRESENT APPEAL:

1. That the present case is not an original proceeding where the applicant can seek themselves to be impleaded, as it is an Appeal specifically challenging the order dated 26.09.2024 issued by the Respondent Board against the Appellant CETP. The interlocutory applicant cannot, as a matter of right, get himself impleaded. The proposed party/applicant is not privy to the impugned order dated 26.09.2024. It is submitted that the Appeal filed by the Appellant herein is a Statutory Appeal under the provisions of the Water (Prevention and Control of Pollution) Act 1974 and the National Green Tribunal Act 2010 against the order of the Respondent Board, to which the proposed applicant is not a party.

2. That in any case, the Applicant cannot be impleaded as a Respondent in the Appeal filed by the Appellant herein for setting aside of the impugned order dated 26.09.2024 to which the Applicant is not a party. It is submitted that the Appellant herein is the *dominus litis* and without its consent nobody can be permitted to be impleaded as Respondent.
3. It is relevant to mention herein that the NGT Act, 2010 is silent qua impleadment of parties in an Appeal filed before the Hon'ble Tribunal against an order of a Statutory Body and hence, the basic principles of Code of Civil Procedure, 1908 would apply with respect to impleadment of parties. That as per Code of Civil Procedure, 1908 the question of impleadment of a party has to be decided on the touchstone that only a necessary or a proper party may be added. A necessary party is one without whom no order can be made effectively. A proper party is one in whose absence an effective order can be made but whose presence is necessary for a complete and final decision on the question involved in the proceeding. The Supreme Court in *Ramesh Hirachand Kundanmal V Municipal Corporation of Greater Bombay, (1992) 2 SCC 524* interpreted legal provision as contained in Order I Rule 10(2) CPC and held as under:-

“Sub-rule (2) of Rule 10 gives a wide discretion to the Court to meet every case of defect of parties and is not affected by the inaction of the plaintiff to bring the necessary parties on record. The question of impleadment of a party has to be decided on the touchstone of Order 1 Rule 10 which provides that only a necessary or a proper party may be added. A necessary party is one without whom no order can be made effectively. A proper party is one in whose absence an effective order can be made but whose presence is necessary for a complete and final decision on the question involved in the proceeding.”

The Supreme Court in *Anil Kumar Singh V Shivnath Mishra, (1995) 3 SCC 147* interpreted Order 1 Rule 10(2) CPC and held as under:-

“By operation of the above-quoted rule though the court may have power to strike out the name of a party improperly joined or add a party either on application or without application of either party, but the condition precedent is that the court must be satisfied that the presence of the party to be added, would be necessary in order to enable the court to effectually and completely adjudicate upon and settle all questions involved in the suit. To bring a person as party- defendant is not a substantive right but one of procedure and the court has discretion in its proper exercise. The object of the rule is to bring on record all the persons who are parties to the dispute relating to the subject-matter so that the dispute may be determined in their presence at the same time without any protraction, inconvenience and to avoid multiplicity of proceedings.

In this case, the Applicant requesting impleadment is neither a necessary nor a proper party as it is an inter-se matter (dispute) between the Appellant and the Respondent Board only, concerning the issuance of the impugned order, adjudication of which does not require the presence of the proposed Applicant. As stated earlier, the current appeal is a statutory appeal challenging an order of the Statutory Body (Respondent Board). Therefore, the matter is solely between the Appellant and the Respondent Board, making the involvement of the Applicant seeking impleadment both unnecessary and unwarranted.

Para-Vise Reply to the Impleadment Application:

At the outset, the Appellant denies each and every statement and contentions set forth in the application to the extent the same are contrary to and/or inconsistent with the true and complete facts of the case and/or the submissions made on behalf of the Appellant in the present reply. That the Appellant further humbly submits that the averments and contentions, as stated in the application under reply, may not be taken to be deemed to have been admitted by the Appellant, save and except what are expressly and specifically admitted and the rest may be read as travesty of facts.

1. That the contents of the corresponding paragraph are a matter of record and hence need no reply from the Appellant herein. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.
2. That the contents of the corresponding paragraph are wrong and hence denied. It is denied that the Appellant has deliberately not brought on record the complete facts and background history leading to the passing of impugned direction by PPCB. It is submitted that the Appellant herein in the Appeal has brought on record the entire facts and circumstances since the inception of the CETP. It is relevant to mention herein that the Appellant in the appeal has not challenged the competence of the Respondent Board and however has stated that the 40 MLD CETP was conceived, planned, designed, approved, sanctioned, set up (after getting subsidies from the Ministry of Environment, Government of India and the Punjab Government) under the step-to-step close supervision of the Respondent Board. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.
3. That the contents of the corresponding paragraph are wrong and hence denied. It is denied that issue in the present Appeal is directly related to the issue involved in OA 225 of 2024. It is reiterated that the Applicant is not entitled to be impleaded as Respondent in the present Appeal. The proposed party/applicant is not privy to the

impugned order dated 26.09.2024. It is submitted that the Appeal filed by the Appellant herein is a Statutory Appeal under the provisions of the Water (Prevention and Control of Pollution) Act 1974 and the National Green Tribunal Act 2010 against the order of the Respondent Board, to which the proposed applicant is not a party. The Applicant requesting impleadment is neither a necessary nor a proper party. As stated earlier, the current appeal is a statutory appeal challenging an order of the Statutory Body (Respondent Board). Therefore, the matter is solely between the Appellant and the Respondent Board, making the involvement of the Applicant seeking impleadment both unnecessary and unwarranted. Further, the Applicant has already filed an Original Application and can therefore raise any issue for consideration in the same Original Application and impleadment in the present Appeal is hence not warranted for. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

4. That the contents of the corresponding paragraph are wrong and hence denied. It is denied that untreated trade effluent is being discharged by the Appellant CETP into the Buddha Nallah. It is denied that the Environment Clearance required the Appellant CETP to be zero liquid discharged. That the EC granted to the Appellant CETP did not provide for the CETP to be zero liquid discharge. It is submitted that the Appellant CETP is discharging its treated trade effluent into the Budha Nallah in compliance to the conditions of Consent to Operate granted to the Appellant CETP by the Respondent Board. It is reiterated that the treated effluent from the Appellant CETP is being discharged into the Buddha Nallah with parameters of various pollutants well within the prescribed limits and as per the conditions of consent to operate granted to the Appellant CETP valid till 30th June 2026. That from time-to-time samples have been drawn by various statutory authorities including the Respondent Board and sample analysis reports from the laboratory of the Respondent Board as well as the state laboratory i.e. Punjab Biotechnology Incubator have always found all the

parameters including BOD/COD/TSS etcetera to be well within the prescribed limits. Further, even if for the sake of arguments if it is taken, though not admitted, that the treated trade effluent so being discharged into Buddha Nallah was contrary to the conditions prescribed in the Environmental Clearance granted to the CETP, it was for the State of Punjab as per their assurance given to MoEF in the appraisal committee meeting held on 03.03.2016 through Member Secretary Punjab Pollution Control Board to implement the project for carrying treated effluent from CETP/STP for irrigation. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

5. That in response to the contents of the corresponding paragraph it is submitted that the EC granted to the Appellant CETP did not provide for the CETP to be zero liquid discharge. It is submitted that the Appellant CETP is discharging its treated trade effluent into the Budha Nallah in compliance to the conditions of Consent to Operate granted to the Appellant CETP by the Respondent Board. It is reiterated that the treated effluent from the Appellant CETP is being discharged into the Buddha Nallah with parameters of various pollutants well within the prescribed limits and as per the conditions of consent to operate granted to the Appellant CETP valid till 30th June 2026. That from time-to-time samples have been drawn by various statutory authorities including the Respondent Board and sample analysis reports from the laboratory of the Respondent Board as well as the state laboratory i.e. Punjab Biotechnology Incubator have always found all the parameters including BOD/COD/TSS etcetera to be well within the prescribed limits. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.
6. That in response to the contents of the corresponding paragraph it is submitted that the Applicant has already filed an Original Application and can therefore raise any issue for consideration in the same Original Application and impleadment in the

present Appeal is hence not warranted for. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

7. That the contents of the corresponding paragraph relate to the proceedings in OA 225 of 2024 and the Appellant being one of the Respondent in the said OA has already filed its reply. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.
8. That the contents of the corresponding paragraph are wrong and hence denied. It is denied that the connection of members units with CETPs did not ensured 100% treatment of effluent generated by the member units. It is denied that the remaining 50 KLD of untreated water was undoubtedly being discharged in municipal sewer. It is denied that the CETPs did not have any mechanism to ensure that no such by pass is done. It is submitted that no untreated trade effluent is being discharged by the Appellant CETP into the Buddha Nallah and there is no bye pass of any treated effluent. That it is relevant to mention herein that the said observation in the report of the Amicus in OA 225 of 2022 was with respect to the 50 MLD CETP and not against the Appellant CETP herein. The relevant para from the report of the amicus (relevant page 692 of the court file in OA 225 of 2024) is reproduced herein below for the ready reference of this Hon'ble Tribunal:

“The Applicant has shown a report prepared by Guru Nanak Engineering College in respect of the units of Tajpur road connected to 50 MLD Tajpur Road CETP operated by Punjab Dyers Association. In the said report the 103 member units were assessed for the quantity of effluent discharge in event of their running at 100% capacity. In the report it was found that around half of the members units have taken a share of only 10% - 73% of their capacity. Thus, illegal discharge of effluent by member units in the public sewer lines cannot be denied.”

The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

9. That in response to the contents of the corresponding paragraph it is submitted that the Government of Punjab, through the Irrigation and Drainage Department, developed a project to collect wastewater from Ludhiana city that flows into the Buddha Nala and use it for irrigating approximately 80,000 acres of agricultural land after treatment at STPs (Sewage Treatment Plants) and CETPs (Common Effluent Treatment Plants). The Department prepared a Project Estimate for “*The Domestic Sewerage of Ludhiana City after treatment at S.T.P through Budha Nallah and by constructing network of distributory/water courses*”. That as per the report the objective of the project was to “*Prevent the direct discharge of polluted water of Sewerage System and Industrial discharge of Ludhiana city into the River Sutlej. The present condition of Budha Nalla is causing acute health problems to the people of Ludhiana city & these districts. Beside this, the water habitation of River Sutlej is being affected to the large extent due to this highly polluted water. Even the density of trees is decreasing alongside the Budha Nalla due to this highly polluted water. All these factors have necessitated to treat the highly polluted water of Budha Nalla and utilize this for irrigation purposes for approximately 13543 Ha CCA and to increase the production of State.*” It was also stated in the said report that: “*The sewage /effluent of Ludhiana city and Industry after treatment by STP /CETP will be utilized for irrigation purpose. To construct the New Disty in the existing abandoned land of the Gray Canal system of the Budha Nalla parallel to River Sutlej in the low lying area. Huge Number of pucca structures e.g. bridges, syphon crossing, aqueducts escapes, Cross regulator, heavy earth work filling to construct the proposed disty and parallel drains are required to be constructed. Hence high cost involved.*” Further, as outlined in Chapter 1 (Introduction) under the section "Introduction of Proposed Distributary," the project report notes that the topography of the region reveals that only the area situated between Buddha Nala and the Sutlej River can be irrigated with

treated water. The report further notes that the same will be achieved by constructing an open channel linked to a network of watercourses at appropriate locations and the proposed distributary will be built on surplus government land that has remained unused due to the abandonment of the Grey Canal System over the past 50 years. **That therefore, a perusal of the said project report prepared by the Govt. of Punjab (Department of Irrigation) univocally reveals that a distributary (disty) was proposed to be constructed in the existing abandoned land of the Gray Canal system of the Budha Nalla parallel to River Sutlej for utilization of treated trade effluent and sewage of Ludhiana City for irrigation purpose.** Further, even if for the sake of arguments if it is taken, though not admitted, that the treated trade effluent so being discharged into Buddha Nallah was contrary to the conditions prescribed in the Environmental Clearance granted to the CETP, it was for the State of Punjab as per their assurance given to MoEF in the appraisal committee meeting held on 03.03.2016 through Member Secretary Punjab Pollution Control Board to implement the project for carrying treated effluent from CETP/STP for irrigation. It is submitted that instead of passing directions prohibiting the CETP from discharging the treated trade effluent into Buddha Nallah, especially when it was a permitted mode of disposal as per the conditions of consent to operate granted to the said CETP, the Respondent Board should have collaborated with the State Government and conceived and implemented a project for using this trade effluent by mixing it with STP treated domestic effluent for irrigation. Even as of today the dyeing industry and the Appellant SPV are willing to extend all help for utilization of their treated trade effluent towards irrigation. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

10. That the contents of the corresponding paragraph are wrong and hence denied. It is denied that even untreated water is being by passed into municipal sewer by the CETP. It is relevant to mention herein that there is no fault on part of the Appellant regarding

the operation of the 40 MLD CETP. The treated trade effluent, which has consistently met the prescribed parameters (except for TDS levels), is being discharged into Buddha Nallah in accordance with the conditions specified in the Consent to Operate granted by the Punjab Pollution Control Board (PPCB). This fact has been acknowledged by the Member Secretary in their reply dated 18.12.2024, submitted before the Hon'ble National Green Tribunal. It is the responsibility of the Government of Punjab to provide a conveyance system to transport the treated trade effluent from the CETP for irrigation purposes. As per the Consent to Establish, the treated effluent was supposed to be transported to the STP outlet through a dedicated conveyance system for mixing and dilution. However, at the time the 40 MLD CETP was commissioned, the 225 MLD STP was still under construction and not operational. Consequently, permission to lay the dedicated conveyance system was not provided to the CETP. Instead, Consent to Operate was granted, allowing the CETP to discharge the treated trade effluent into Buddha Nallah. Therefore, the CETP cannot be held responsible or penalized for circumstances beyond its control. As mentioned earlier, the undersigned is fully prepared to collaborate with the PPCB to lay a pipeline from the CETP outlet to the STP for mixing, as stipulated under the Consent to Establish. A proposal letter seeking permission for this was already submitted to the PPCB on 21.09.2024. Additionally, the SPV of the 40 MLD CETP is ready and willing to assist in utilizing the treated trade effluent for irrigation purposes, provided that the Government of Punjab fulfils its commitment to establish a conveyance system for the same. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

11. That the contents of the corresponding paragraph relate to the proceedings in OA 225 of 2024 and the Appellant being one of the Respondent in the said OA has already filed its reply. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

12. That the contents of the corresponding paragraph are wrong and hence denied. It is denied that even the treated effluent was not meeting the standard as prescribed by the PPCB. It is submitted that from time-to-time samples have been drawn by various statutory authorities including the Board and sample analysis reports from the laboratory of the Board as well as the state laboratory i.e. Punjab Biotechnology Incubator have always found all the parameters including BOD/COD/TSS etcetera to be well within the prescribed limits. That as per the various reports the treated trade effluent discharged into Buddha Nallah only has high TDS and rest all parameters have always been found to be within prescribed limits. It is however relevant to mention herein that in terms of the MoEF notification dated 01.01.2016 which is still in force except TDS all parameters were within limits whereas this notification did not prescribe any standard of TDS. With respect to TDS, compliance can be achieved by mixing it with the treated domestic effluent from the STP, which formed the basis for the planning and conception of the CETP and the Board is required to provide the appropriate mixing ratio for this purpose. That another aspect which needs to be highlighted here is that the method of bringing high TDS from CETPs by dilution with treated Domestic Effluent is a common method and the same has been used/approved by PPCB in case of CETP of Jalandhar leather complex where treated trade effluent of CETP of tanneries is being mixed with treated domestic effluent from STP at Focal Point Jalandhar. The notification dated 1st of January 2016 issued by the MoEF authorizes the State/Central Board to prescribe the mixing ratio so that the combined treated trade effluent does not harm the irrigated soil on account of high TDS. MoEF by way of this notification while amending Environment (Protection) Rules, 1986 substituted in schedule-1 the entry at serial number 55 in which note 3 reads as under:

“In case of discharge of treated effluent on land for irrigation, the impact on soil and groundwater quality shall be monitored twice a year i.e. pre and post monsoon by the CETP management. For combined discharge of treated effluent and

sewage on land for irrigation, the mixing ratio with sewage shall be prescribed by the State Board.”

That this method of dilution has already been adopted and approved by the Board in case of CETP of Jalandhar leather complex where high TDS treated effluent discharged from CETP is being mixed with the STP and then released into the drain leading to River Sutlej. That further it was incumbent upon the Government of Punjab in coordination with the Board to implement the project for taking the treated trade effluent from the CETP to the nearby STP at Jamalpur and then utilize the same for irrigation after mixing of both effluents i.e. treated trade effluent of CETP and treated domestic effluent of STP in a ratio as prescribed by the Board in terms of MoEF notification dated 1st of January 2016. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

13. That the contents of the corresponding paragraph relate to the proceedings in OA 225 of 2024 and the Appellant being one of the Respondent in the said OA has already filed its reply. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

14-16. That the contents of the corresponding paragraphs are wrong and hence denied. It is denied that the Applicant/ intervener herein is an interested party and will be grossly affected by the order passed in Appeal. That the present case is not an original proceeding where the applicant can seek themselves to be impleaded, as it is an Appeal specifically challenging the order dated 26.09.2024 issued by the Respondent Board against the Appellant CETP. The interlocutory applicant cannot, as a matter of right, get himself impleaded. The proposed party/applicant is not privy to the impugned order dated 26.09.2024. It is submitted that the Appeal filed by the Appellant herein is a Statutory Appeal under the provisions of the Water (Prevention and Control of Pollution) Act 1974 and the National Green Tribunal Act 2010 against the order of the Respondent Board, to which the proposed applicant is not a party.

That in any case, the Applicant cannot be impleaded as a Respondent in the Appeal filed by the Appellant herein for setting aside of the impugned order dated 26.09.2024 to which the Applicant is not a party. It is submitted that the Appellant herein is the *dominus litis* and without its consent nobody can be permitted to be impleaded as Respondent. It is relevant to mention herein that the NGT Act, 2010 is silent qua impleadment of parties in an Appeal filed before the Hon'ble Tribunal against an order of a Statutory Body and hence, the basic principles of Code of Civil Procedure, 1908 would apply with respect to impleadment of parties. That as per Code of Civil Procedure, 1908 the question of impleadment of a party has to be decided on the touchstone that only a necessary or a proper party may be added. A necessary party is one without whom no order can be made effectively. A proper party is one in whose absence an effective order can be made but whose presence is necessary for a complete and final decision on the question involved in the proceeding. The Supreme Court in *Ramesh Hirachand Kundanmal V Municipal Corporation of Greater Bombay, (1992) 2 SCC 524* interpreted legal provision as contained in Order I Rule 10(2) CPC and held as under:-

“Sub-rule (2) of Rule 10 gives a wide discretion to the Court to meet every case of defect of parties and is not affected by the inaction of the plaintiff to bring the necessary parties on record. The question of impleadment of a party has to be decided on the touchstone of Order 1 Rule 10 which provides that only a necessary or a proper party may be added. A necessary party is one without whom no order can be made effectively. A proper party is one in whose absence an effective order can be made but whose presence is necessary for a complete and final decision on the question involved in the proceeding.”

The Supreme Court in *Anil Kumar Singh V Shivnath Mishra, (1995) 3 SCC 147* interpreted Order 1 Rule 10(2) CPC and held as under:-

“By operation of the above-quoted rule though the court may have power to strike out the name of a party improperly joined or add a party

either on application or without application of either party, but the condition precedent is that the court must be satisfied that the presence of the party to be added, would be necessary in order to enable the court to effectually and completely adjudicate upon and settle all questions involved in the suit. To bring a person as party- defendant is not a substantive right but one of procedure and the court has discretion in its proper exercise. The object of the rule is to bring on record all the persons who are parties to the dispute relating to the subject-matter so that the dispute may be determined in their presence at the same time without any protraction, inconvenience and to avoid multiplicity of proceedings.

In this case, the Applicant requesting impleadment is neither a necessary nor a proper party as it is an inter-se matter (dispute) between the Appellant and the Respondent Board only, concerning the issuance of the impugned order, adjudication of which does not require the presence of the proposed Applicant. As stated earlier, the current appeal is a statutory appeal challenging an order of the Statutory Body (Respondent Board). Therefore, the matter is solely between the Appellant and the Respondent Board, making the involvement of the Applicant seeking impleadment both unnecessary and unwarranted. The contents of the preliminary objection are reiterated and not repeated herein for the sake of brevity.

PRAYER

In light of the facts and circumstances mentioned herein above, it is prayed that this Hon'ble Tribunal may be graciously pleased to: -

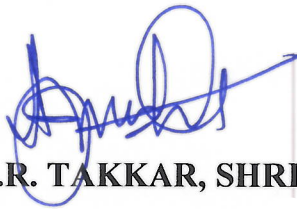

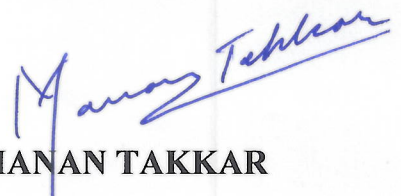
- i. Take the present Reply on record;
- ii. Dismiss the Impleadment Application filed by the Applicant as he is neither a necessary party nor a proper party to the present Appeal;

Pass such and/or further orders as deemed fit and proper in the peculiar facts and circumstances of this case in favor of the Appellant.

Note : Affidavit in support is attached.

For Punjab Dyers Association
DIRECTOR

APPELLANT
PUNJAB DYERS ASSOCIATION
THROUGH ITS DIRECTOR MR. VISHAL JAIN




(A.R. TAKKAR, SHRIYA TAKKAR, MANAN TAKKAR)




ASMITA DUGGAL, AASTHA TYAGI, PRINCE SHARMA, UDIT SAINI,

SMRITI SRIVASTAVA, DEVIKA SINGH ROY CHOWDHURY)
ADVOCATES
M/S ARTLO
P-6/2-E, DLF PHASE 2,
GURGAON – 122002
9582209633
EMAIL ID: ARTAKKAR@ARTLO.IN
PRINCE@ARTLO.IN

VERIFICATION

I, Vishal Jain S/o Vipan Kumar, Aged about 44 years, Director of Punjab Dyers Association, SCF- 36, 1st Floor, Commercial site, phase - 5, Focal point Ludhiana, Punjab – 141010 hereby verify that the contents there of are true and correct to my knowledge No part of it is false and no material fact has been kept concealed therefrom

For Punjab Dyers Association
DIRECTOR

APPELLANT
PUNJAB DYERS ASSOCIATION
THROUGH ITS DIRECTOR MR. VISHAL JAIN

Place: New Delhi
Date: 18/02/2025

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

APPEAL NO OF 2024

IN THE MATTER OF:

PUNJAB DYERS ASSOCIATION
THROUGH ITS DIRECTOR MR. VISHAL JAIN

...APPELLANT

VERSUS

PUNJAB POLLUTION CONTROL BOARD & ORS.

...RESPONDENTS

AFFIDAVIT

I, Vishal Jain S/o Vipin Kumar, Aged about 44 years, Director of Punjab Dyers Association, SCF- 36, 1st Floor, Commercial site, phase 5, Focal point Ludhiana, Punjab – 141010 the above named deponent do hereby solemnly affirm and state as under:



1. That the Reply has been drafted under the authority and instructions of the deponent and after perusing its contents, the deponent has duly signed it, and the contents of paragraph Nos. 1 to 16 thereof are true and correct to the knowledge of the deponent, and the same may be read as contents of this affidavit also, which are not being reproduced for the sake of brevity. No part of it is false and nothing material has been kept concealed therefrom.

2. That the contents of paragraphs no. 1 to 16 of above tilted Reply are true and correct to my knowledge, no part of it is false and nothing material has been kept concealed therefrom.

3. That the Annexures attached with the Reply are true copies of their respective original.

Place:

Date:

Verified that the affidavit has been read over and explained to the deponent / executant who has affirmed correctly to understand the same at the time of making above there of

For Punjab Dyers Association
DIRECTOR

DEPONENT

VERIFICATION:

Verified that the contents of para 1 and 3 of my affidavit are true and correct to my knowledge. No part of it is false and nothing material has been kept concealed therefrom.

Place:

Date:

Witnessed As Identified

NOTARY PUBLIC
LUDHIANA, (PUNJAB)

For Punjab Dyers Association
DIRECTOR

DEPONENT



13 FEB 2025

Reply to IA No 545 of 2024 in Appeal No 41 of 2024 Punjab Dyers Association vs Punjab Pollution Control Board and Anr.

From Prince <prince@artlo.in>

Date Tue 2/18/2025 5:53 PM

To mattewarasutlejpac@gmail.com <mattewarasutlejpac@gmail.com>; aroraengineers@gmail.com <aroraengineers@gmail.com>; jaskirats@gmail.com <jaskirats@gmail.com>; amandeepsinghbains@yahoo.com <amandeepsinghbains@yahoo.com>; kuldeepsinghkhaira5@gmail.com <kuldeepsinghkhaira5@gmail.com>; msppcb@gmail.com <msppcb@gmail.com>; complaint.sewakendra@gmail.com <complaint.sewakendra@gmail.com>; office@markleagal.co.in <office@markleagal.co.in>; nitindhiman09@gmail.com <nitindhiman09@gmail.com>

Cc Manan Takkar <manantakkar@artlo.in>; Aastha Tyagi <aastha@artlo.in>

📎 1 attachment (2 MB)

REPLY TO IA 545 OF 2024.pdf;

Dear Sir/Ma'am,

Please find attached herewith scanned copy of Reply to IA No 545 of 2024 in Appeal No 41 of 2024 titled as Punjab Dyers Association vs Punjab Pollution Control Board & Anr.