

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

Original Application No. 415/2025

IN THE MATTER OF:

Public action committee

Vs.

...Petitioner

State of Punjab.

...Respondent

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THROUGH



**UDIT MALIK
ADVOCATE FOR PETITIONERS**

Mob. No. 9811981128

Email: office@uditmalik.in

Office: C-4,LGF, Jangpura Extension,
New Delhi- 110014

Date: 17.10.2025

Place: New Delhi

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

Original Application No. 415/2025

1. Public Action Committee having its Head Office at 561-L, Model, Town, Ludhiana through its Member Er. Kapil Dev. Mobile: 9872007872, Email: mattewarasutlejpac@gmail.com
2. Er. Kapil Dev (aged 48 years) s/o Sh. Jagdish Chander, r/o #186-E, Bhai Randhir Singh Nagar, Ludhiana. Email: aroraengineers@gmail.com
M: 9872007872
3. Jaskirat Singh (aged 46 years) s/o S. Makhan Singh r/o 561-L, Model Town, Ludhiana. M: 9815781629 Email: jaskirats@gmail.com
4. Dr. Amandeep Singh Bains (aged 43 years) s/o S. Resham Singh, r/o #1120, Farmers Abode, Basant Avenue, Ludhiana. M. 9872710384
Email: amandeepsinghbains@yahoo.com
5. Kuldeep Singh Khaira (aged 46 years) s/o S. Ujjagar Singh Khaira, r/o #125, Ishar Nagar, Ludhiana. Contact: 9855544433,
Email: kuldeepsinghkhaira5@gmail.com
6. Gurpreet Singh Plaha (aged 45 years) s/o S. Davinder Singh Plaha
Regd. No. 489, S.A. Moharaj, 141016, Punjab Email: gurpreetsinghplaha@gmail.com, M: 9417700678
7. Er. Vikas Arora (Aged 34 Years) s/o Sh. Om Parkash r/o #1748/1, St. No. 8 Haibowal Khurd, Ludhiana. Email: ervikasarora90@gmail.com
Mobile 9256000217

.....Petitioners

Versus

1. State of Punjab through the Chief Secretary, Punjab Civil Secretariat, Sector-1, Chandigarh. Contact: 0172-2740860 Email: cs@punjab.gov.in

17 OCT 2025



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✓

2. The Member Secretary, Punjab Pollution Control Board, Vatavarn Bhawan, Nabha Road, Patiala. Email: msppcb@punjab.gov.in
3. The Principal Chief Conservator of Forests, Department of Forest & Wildlife Preservation, Forest Complex, Sector 68, S.A.S. Nagar. Mohali. Email: pccfcomplex@gmail.com
4. The Secretary Environment, Government of Punjab, Room No. 323, 3rd Floor, Punjab Civil Secretariat -2 Sector-9 Chandigarh. Email: secy.te@punjab.gov.in
5. The Regional Officer, Ministry of Environment Forests & Climate Change, MoEF&CC Indira Paryavaran Bhawan, Jorbagh Road, New Delhi, Email: secy-moef@nic.in
6. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi-110032. Mscb.cpcb@nic.in

.....Respondents

**REPLY BY WAY OF AFFIDAVIT OF Sh. S.P. ANAND KUMAR, IFS
SPECIAL SECRETARY TO GOVERNMENT OF PUNJAB, DEPARTMENT
OF FORESTS AND WILDLIFE PRESERVATION ON BEHALF OF
RESPONDENT NO.1 AND 3.**

Preliminary Submissions:

1. That the present petition has been filed by the petitioners based on false presumptions and inaccurate information and therefore, deserves to be dismissed qua the respondent No. 1 and 3.
2. That the Chief Secretary, Punjab in its meeting dated 07.08.2025 directed the Department of Forest and Wildlife Preservation, Punjab to deposit Rs. 44.00 Crore on account of sale proceeds of fallen trees

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(Royalty) and Rs. 40.00 Crore against unutilized funds for land acquisition in the Government Treasury. The minutes of the meeting are enclosed herewith at **Annexure R-1**.

3. That in pursuance of the aforesaid directions, a sum of ₹45.83 Crore (realized from sale proceeds of matured, fallen, dead and dry trees (Royalty) for the financial years 2023-24 and 2024-25 has been deposited in the State Government Treasury. It is respectfully submitted that the said amount constitutes State Government revenue and is part of consolidated fund of the State and was lying with the Punjab State Forest Development Corporation (PSFDC) and does not, in any manner whatsoever, related to the CAMPA funds.



That further in compliance with the said directions, a sum of ₹40.94 Crore which was placed with PSFDC by the State Government itself through a budgetary provision towards purchase of non-forest land for the purpose of afforestation and was lying unutilized. As such it has been deposited back in the Government Treasury. With respect to these funds, it is respectfully submitted that:

- The said amount had accrued pursuant to a State Government's own initiative to mobilize additional funds for purchase of non-forest land for afforestation.

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- The State Government however can always through its budgetary provision make this funds available as and when required, for purchase of non-forest land for afforestation purposes to the Forest Department.
 - It is further clarified that the aforesaid amount does not pertain to CAMPA funds and, therefore, its deposit in to State Treasury does not constitute any violation of the Compensatory Afforestation Fund Act, 2016 or the Compensatory Afforestation Fund Rule, 2018 or any other statutory provisions.
- 5 In view of the above, it is respectfully submitted that the State Government has acted strictly in accordance with law and there is no violation of any statutory provision with regard to the amounts deposited in the Government Treasury.



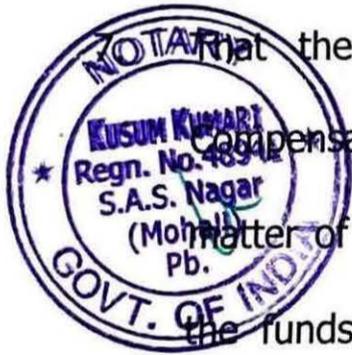
Reply on merits to the grounds:

1. That the contents of para no.1 of the grounds are denied for want of knowledge, however, the petitioners be put to a strict proof of the same.

2. That the contents of para no.2 are vague, without any substance and are wrong and denied. The petitioners have levelled baseless allegations without any proof in support.

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3. That the contents of para no.3 are a matter of record to the extent of directions issued by the Chief Secretary Punjab, however, it is clarified that the amount mentioned in this para were tentative and the actual deposited amount has been mentioned in the preliminary submissions.
4. That the figure mentioned in para no.4 were tentative and the actual deposited amount has been mentioned in the preliminary submissions.
5. That the contents of para no. 5 do not pertain to the answering respondent and are denied for want of knowledge.
6. That the contents of para no. 6 so far as the objectives and functions of PUNCAMPA are concerned are a matter of record. However, it is once again clarified that the said amounts deposited in the State treasury do not pertain to CAMPA funds.

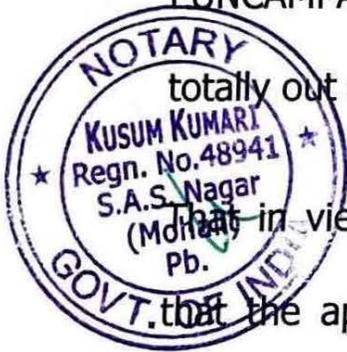


That the contents of para no. 7 so far as the provisions of Compensatory Afforestation Funds Rules, 2018 are concerned are a matter of record. However, at the cost of repetition it is clarified that the funds in question do not pertain to PUNCAMPA, therefore, the apprehension raised by the petitioners is totally misplaced.

8. That the contents of para no. 8 so far it states the contents of judgment passed by the Hon'ble Supreme Court of India are a matter of record and need no reply.

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9. That the contents of para no. 9 so far it states about the action taken pursuant to the judgment of the Hon'ble Supreme Court of India are a matter of record and need no reply.
10. That the contents of para no. 10 do not pertain to the answering respondent and are denied for want of knowledge.
11. That the contents of para no. 11 do not pertain to the answering respondent and are denied for want of knowledge.
12. That the contents of para no. 12 are wrong and denied. The order passed by Respondent no.1 qua the respondent No. 3 suffers from no illegality and is in consonance with all relevant rules. It is again clarified at the cost of repetition, the funds in question do not pertain to PUNCAMPA, therefore, the apprehension raised by the petitioners is totally out of place.



That in view of the above submissions it is most respectfully prayed that the apprehensions raised by the petitioners are totally baseless and without any substance or documentary proof and therefore the present petition deserves to be dismissed in the interest of justice.

Place: Mohali

Dated: 17/10/2025

ATTESTED

KUSUM KUMARI
 Notary, S.A.S. Nagar (Mohali)



DEPONENT

S.P. Anand Kumar, IFS
 Special Secretary to Government of Punjab
 Deptt. Of Forest and Wildlife Preservation, Punjab

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VERIFICATION

Verified that the contents of the above affidavit contained in Preliminary Submissions from Para no. 1 to 5 and Reply of merits to the grounds contained in Para no. 1 to 12 are true and correct to the best of my knowledge and belief and derived from official record and no part of it is false and nothing material has been concealed therefrom.

Place: Mohali

Dated: 17/10/2025



DEPONENT

S.P. Anand Kumar, IFS
Special Secretary to Government of Punjab
Deptt. Of Forest and Wildlife Preservation, Punjab

I identified the deponent/executed who sign./thumb marked in my presence.

Identifier Name & Sign.

The contents of this Affidavit/Document has been explained to the deponent/executants. He/She has admitted the same to be correct. The deponent/executant has signed Register at Sr. No. 280 P. No. 65 Date 17/10/2025

ATTESTED

KUSUM KUMARI
Notary, S.A.S. Nagar (Mohali)

I identified the deponent/executed who sign./thumb marked in my presence.

Identifier Name & Sign.

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(Annexure-R-1)

No. T&A (DDI/ACFA-IT)/2025/ 6756 Date 07/10/2025
(Treasuries & Accounts)

Vit-te Yojana Bhawan, Plot no-2B,
Sector-33A, Chandigarh.

(email: ifms.punjab@punjab.gov.in)

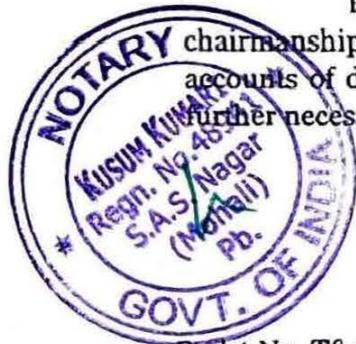
To,

The Administrative Secretaries

1. Department of Forest and Wildlife Preservation
2. Department of School Education
3. Department of Excise and Taxation
4. Department of Good Governance and Information Technology
5. Department of Food, Civil Supplies and Consumer Affairs
6. Department of Industries and Commerce
7. Department of Horticulture
8. Department of Science, Technology & Environment
9. Department of Home Affairs
10. Department of Social Security and Development of Women & Children
11. Department of Agriculture and Farmer Welfare
12. Department of Labour

Subject: Proceedings of the meeting under the chairmanship of worthy Chief Secretary regarding deposit of amount lying in bank accounts of departments including entities there under.

Proceedings of the meeting dated 07.08.2025 held under the chairmanship of worthy Chief Secretary regarding deposit of amount lying in bank accounts of departments including entities there under are attached herewith for further necessary action.



[Signature]
Deputy Director,
Treasuries & Accounts,
Finance Department, Punjab.

Endst No. T&A/DDI/ACFA-IT/2025/- 6757 Dated: 07/10/2025
A copy of the above may be forwarded to the below mentioned:

1. Member, Punjab Dev. Commission.
2. OSD/worthy Chief Secretary, Punjab.
3. PS/Additional Chief Secretary, Finance.
4. PA/Secretary, Expenditure, Deptt. Of Finance.
5. PA/Director, Institutional Finance & Banking.
6. PA/Director, Public Enterprise & Disinvestment, Punjab.

[Signature]
Deputy Director,
Treasuries & Accounts,
Finance Department, Punjab.

Attested

[Signature]
Superintendent

O/o Principal Chief Conservator of Forests (HOFF),
Punjab, Mohali

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Minutes of the meeting dated 07.08.2025 under chairmanship of W/Chief Secretary regarding the deposit of amount lying in bank accounts of departments including entities there under.

A meeting was held with all the concerned Administrative Secretaries to deliberate on the above mentioned subject after deliberations following decisions were taken.

Sr. no.	Name of the Department	Proposal	Decision taken
1	Forest and Wild Life Conservation	a) 44.00 Crore from PSFDC in the form of Receipt in Treasury on account of sale proceeds of fallen trees b) 40.00 Crore from PSFDC in the form of Receipt in Treasury against unutilized funds for land acquisition Total 84.00 Crore as Receipt	The chair directed the department to deposit the money in the State treasury by tomorrow. Total amount to be deposited 84 Cr.
2	School Education (Secondary)	a) 62.49 Crore as one-time receipt from Department in the form of Receipt in Treasury on account of advance salary deposits from newly established private schools for staff salaries in case of closure b) New Scheme with Token Provision to be introduced for future payment on need basis Total : 62.49 Crore as Receipt	The chair directed the department to deposit the money in the State treasury by tomorrow Total amount to be deposited 62.49 Cr.
3	Excise and Taxation	35.00 Crore of available unutilized surplus as receipt from ETTSA Total : 35.00 Crore as Receipt	The chair directed the department to deposit the money in the State treasury by tomorrow. Total amount to be deposited 35 Cr.
4	Department of Good Governance and Information Technology	60.00 Crore of available unutilized surplus as receipt from PSeGS Total : 60.00 Crore as Receipt	The chair directed the department to deposit the money in the State treasury by tomorrow. Total amount to be deposited 60 Cr.



Attested

[Signature]

Superintendent
O/o Principal Chief Conservator of Forests (HOFF),
Punjab, Mohali

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5	Department of Food, Civil Supplies and Consumer Affairs	<p>a) 150.00 Crore as receipt from PUNGRAIN on account of unpaid Administrative Charges</p> <p>b) 25.00 Crore as receipt from UID Deposit. This can be withdrawn by the Department as and when required, on need basis.</p> <p>Total : 175.00 Crore as Receipt</p>	<p>The chair directed the department to deposit the money in the State treasury by tomorrow.</p> <p>Total amount to be deposited 90+25=115 Cr.</p>
6	Department of Industries and Commerce	<p>a) 250.00 Crore as receipt from PSIEC on account of unutilized land acquisition cost</p> <p>b) 250.00 Crore as deposit from PSIEC under Liquidity Management Facility.</p> <p>c) 20.00 Crore as receipt from INFOTECH on account of unutilized surplus</p> <p>d) 35.00 Crore from PSIDC as receipt on account of unutilized deposit. PSIDC to seek GIA in case of payment of bonds amount (Principal) to investors.</p> <p>e) Future Provision of GIA for PSIEC to be considered on the basis of surplus.</p> <p>f) 20.00 Crore to be received from PUNCOM unutilized surplus as receipt</p> <p>g) PUNCOM Disinvestment to be expedited considering the high-value land assets under its possession (300-400 Cr)</p> <p>h) 174.00 Crore from BIPB as receipt to be adjusted as book entry at treasury level.</p> <p>Receipt: 499.00 Crore Deposit: 250.00 Crore Total: 749.00 Crore</p>	<p>The chair directed the department to deposit the proposed balances except PUNCOM.</p> <p>For InfoTech the amount to be deposited is 25 Cr. Further FD will provide the necessary budget if needed and requested by department in Future.</p> <p>Total amount to be deposited by the department 250+250+25+35+174=734 Cr.</p>
7	Department of Horticulture	<p>20.00 Crore to be received from Citrus Estates on account of sale proceed of chemical, rent, testing fee etc.</p> <p>Total : 20.00 Crore as Receipt</p>	<p>The chair directed the department to deposit the money in the State treasury by tomorrow.</p> <p>Total amount to be deposited by the department :- 20 Cr.</p>
8	Department of Science, Technology & Environment	<p>a) 22.00 Crore to be received from Mission Tandrust Punjab Society from its unutilized surplus as receipt</p> <p>b) Non-NGT Funds out of surplus of PPCB may be considered for transfer.</p>	<p>The chair directed the department to deposit the proposed amount lying with Mission Tandrust Punjab Society and also Rs. 250 Cr from PPCB in the State</p>



Attested

[Signature]

Supintendent
O/o Principal Chief Conservator of Forests (HOFF),
Punjab, Mohali

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			treasury by tomorrow. Total amount to be deposited by the department $22+250=272$ Cr.
9	Department of Home Affairs and Justice	a) 14.00 Crore to be received from Department of Home Affairs and Justice as receipt on account of Sanjh Kendra. b) 27.00 Crore to be received from Punjab Police Housing Corporation (PPHC) as receipt on account of incentive of passport verification. Total : 41.00 Crore as Receipt	The chair directed the department to deposit the money in the State treasury by tomorrow. Total amount to be deposited by the department $14+27=41$ Cr.
10	Department of Social Security and Development of Women and Children	18.00 Crore of undisbursed pension to be deposited back into treasury from Department of Social Security, Women and Child Development Total : 18.00 Crore as Receipt	The chair directed the department to deposit the money in the State treasury by tomorrow. Total amount to be deposited by the department :- 18 Cr.
11	Department of Labour	Unutilized funds lying in the Board, may be used to meet the portion of subsidies (Power, free travel etc.) being availed by the members (Construction labour/labourers) of the board.	The chair directed the department to make a provision for payment under Shagun Scheme , Power subsidies , pension etc from the funds lying in the board. Further the state will make readjustment of the budget already provided to other line departments making the same payments so as to avoid double payments for the same schemes.
12	Department of Agriculture and Farmer Welfare Punjab	Surplus funds available with the Warehousing Corporation/ Punjab Container Warehouse may be taken as Receipt or Deposit. Attested 	The chair directed the department to explore the feasibility of transfer of warehouses of Pungrain to



Superintendent

O/o Principal Chief Conservator of Forests (HOFF),
Punjab, Mohali

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			warehousing corporation.
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As directed by the Chair the total amount of Rs 1441.49 From all the concerned departments will be deposited in the state treasury by tomorrow and DTA will ensure the deposit of funds as nodal officer.

Meeting ended with vote of thanks

Attested

[Signature]

Superintendent

O/o Principal Chief Conservator of Forests (HOFF),
Punjab, Mohali

[Signature]
(K A P Sinha)
Chief Secretary, Punjab.



ATTESTED
[Signature]
KUSUM KUMARI
Notary, S.A.S. Nagar (Mohali)

The contents of this Affidavit/Document has been explained to the deponent/executants. He/She has admitted the same to be correct. The deponent/executant has signed Register at Sr. No. 280 P. No. 65 Date 17/10/2025

I identified the deponent/executed who sign. / thumb marked in my presence.

Identifier Name & Sign. *[Signature]*

17 OCT 2025

MEETING UNDER THE CHAIRMANSHIP OF CHIEF SECRETARY PUNJAB ON DATED
07.08.2025

Sr. No.	Name of Department	Name of the Participants
✓ 1	Department of Social Security, Women and Child Development	Smt. RAJEE SHRIVASTAVA, IAS
✓ 2	Department of Home Affairs and Justice/ Finance	Sh. ALOK SHUKHAR, IAS
3	Department of Good Governance and Information Technology	Sh. D.K. TIWARI, IAS
✓ 4	Department of Food, Civil Supplies and Consumer Affairs	Sh. RAHUL TIWARI, IAS
✓ 5	Department of Forest and Wild Life Conservation / Science, Technology & Environment ✓	Sh. PRIYANK BHARTI, IAS
6	Department of Finance (Secy. Expenditure)	Sh. VIJAY NAMDEORAO ZADE
✓ 7	Department of Industries and Commerce	Sh. KAMAL KISHOR YADAV, IAS
✓ 8	Department of Excise and Taxation	Sh. AJIT BALAJI JOSHI, IAS
✓ 9	Department of Labour	Sh. MANVESH SINGH SIDHU, IAS
✓ 10	Department of Agriculture and Farmer Welfare / Horticulture	Sh. BASANT GARG, IAS
✓ 11	Department of School Education (Secondary)	Smt. ANINDITA MITRA, IAS
	Director, Treasury and Accounts	Sh. ARAVIND KUMAR M K, IAS

Attested



Superintendent

O/o Principal Chief Conservator of Forests (HOFF),
Punjab, Mohali



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

Vakalatnama

In OA No. 415/2025

Public Action Committee

.....Petitioner(s)

Versus

State of Punjab and Others

.....Respondent(s)

I, S.P. Anandh Kumar, IFS, Special Secretary, Government of Punjab Department of Forest and Wildlife Preservation, Punjab on the behalf of Respondent no. 1 & 3 in above petition do hereby appoint and retain Smt./Sh Udit Malik to act and to appear for me/us in the above suit/Petition/Appeal/reference and on my/our behalf to conduct and prosecute (or defend) or withdraw the same and all connected with the same or any decree or order passed therein, including proceeding in taxation and application for review, to file and obtain return of documents and to deposit and receive money on my/our behalf in the said suit/appeal/Petition/Reference in the above matter. I/we agree to ratify acts done by the aforesaid in pursuance of this authority.

Accepted

Advocate

S.P. Anandh Kumar, IFS
Special Secretary Government of Punjab,
Department of Forest and Wildlife Preservation, Punjab