

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

9

OA No. 77/2026

In the matter of

Smt Gosia Khatoon ... Applicant

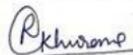
Versus

State of Haryana & Ors ... Respondents

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Filed by:



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Date: 01.04.2026

In the matter of

Smt Gosia Khatoon

... Applicant

Versus

State of Haryana & Ors

... Respondents

**REPLY ON BEHALF OF RESPONDENT No.3 i.e. HARYANA
STATE POLLUTION CONTROL BOARD**

MOST RESPECTFULLY SHOWETH:

1. That this Hon'ble Tribunal, vide order dated 09.02.2026, constituted a Joint Committee comprising representatives of HSPCB and District Magistrate, Nuh, with HSPCB designated as the nodal agency for coordination and compliance.
2. That in compliance of above directions, a meeting was convened under the chairmanship of the Deputy Commissioner, Nuh on 12.03.2026 and attended by officers of HSPCB, DDPO, Nuh, representative of Chief Medical Officer (CMO), Nuh, representative of Applicant/Complainant and representatives of the project proponent (unit). It was decided by Deputy Commissioner that applicant/complainant is at liberty to submit any documentary evidence substantiating the allegations of deaths allegedly caused due to pollution from the unit.
3. That subsequent meetings were also convened on 16.03.2026 and 19.03.2026, however, the complainant and/or her representative failed to attend the said meetings. Further, another meeting was held on 24.03.2026 and the complainant & her representative were present. That during the meeting on 24.03.2026, it was decided to conduct a random inspection of the unit as per the date and time convenient for the applicant/complainant

- 4. That pursuant to the above, the Joint Committee consisting of DDPO Nuh, & BDPO Nuh on behalf of the Deputy Commissioner, Nuh, Regional Officer & Assistant Environmental Engineer, HSPCB Nuh along with authorized representative of complainant, conducted an inspection of the unit on 25.03.2026. During the course of inspection, it was observed that: (i) No unscientific handling or disposal of waste was found. (ii) No illegal discharge of effluent was observed either within or outside the premises. (iii) No foul or objectionable odour was noticed in the surrounding area. That during inspection, any prima facie violation of environmental norms was not observed. Inspection Report with photographs is attached as **Annexure R-1**.

- 5. That during the inspection, samples of treated effluent from ETP, Plantation trench & Fish pond, ground water samples from within the premises of the unit, ground water samples from 2 different locations suggested by complainant outside the unit, in the village and air emissions from stack attached to Boilers were collected. The samples sent to Board's laboratory for analysis, and the results are awaited. That further regulatory action, if any, shall be taken strictly in accordance with the law & policy of the Board based on the outcome of the analysis reports.

- 6. That the CMO Nuh has submitted that Health Department has analysed the details of causes of deaths of persons, as per the list supplied by the applicant/complainant and no correlation has been found between alleged deaths and operations of the unit. Report attached as **Annexure R-2**.

PRAYER

In view of the facts and circumstances stated here in above, present reply may kindly be taken on record.

Respondent No. 3

THROUGH

R. N. Ch
(Regional Officer)

Haryana State Pollution Control Board, Nuh

Date: 1.4.26
Place: Nuh

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AFFIDAVIT

I, Ramniwas Sharma, Regional Officer, Haryana State Pollution Control Board, Nuh do hereby solemnly affirm and state as under:-

- S.M. 208*
27/04/26
1. That deponent is the authorized representative of Respondent No.3 in the aforesaid official capacity and I am well conversant with the facts and circumstances of the case, therefore, I am competent to swear this affidavit.
 2. That I have gone through the contents of accompanying reply which has been drafted under my instructions.



208.1
Deponent

Verification:

Verified at Nuh on 1st April, 2026 that the contents of affidavit are true and correct to my knowledge and on the basis of information derived from the official record which I believe to be true and no material fact has been concealed therein.

ATTESTED
27/04/26
MOHD. IRFAN
NOTARY PUBLIC
GOVT. OF INDIA
DISTT. COURTS, NUH

208.1
Deponent

- 3 Details about deviation in the details / stack of Air Emission / type of fuel if any already provided to : No deviation
- 4 **1** Detail of Stacks/ Chimney / Vents : Chimney (Metal round)
- 5 Whether Height of all stacks /Chimneys as per norms : Yes, 30 m
- 6 Capacity of D.G Sets : 600 KVA & 62.5 KVA
- 7 Stack height of D.G Sets above programme and Whether as per norms : Yes, as per norms
- 8 Status of Acoustic Enclosure on D.G Sets : Yes, provided
- 9 Noise results of DG Sets Monitored during inspection : DG's not in operation during inspection
- 10 Type & Quantity of Fuel used Separate for each source) : Biomass Briquettes (1 TPD) & HSD (0.185 KLD) for DG sets
- 11 Status of Air Pollution Control Devices (APCD) :
- (a) Required or Not : Required APCD
- (b) Provided or Not : Provided APCD on common stack attached to both boilers
- (c) Detail of APCD provided with detail of all Components. : Cyclone Dust collector & Baghouse filter
- (d) Whether Structurally adequate or Not : Yes
- (e) Whether operating APCD Satisfactorily : Working (air emission samples collected)
- 12 Whether provided separate flow meters in case of wet scrubber : NA
- 13 Whether maintained Log Book for consumption of / Chemicals / water for APCD. : NA
- 14 Detail of treatment of effluent in case of wet scrubber its mode of disposal. : NA
- 15 Whether provided Sampling arrangements on all stacks /chemneys including DG sets. : Provided sampling facility
- 16 General Remarks :

C Water Consumption

- 1 Sources of water supply : Borewell (3 No.s)
- 2 Detail of measuring devices provided if any such as flow Meters, V- notch etc. : Yes, provided
- 3 Whether measuring devices has been sealed : Yes
- 4 Whether maintained the log book for supply of water From all sources & consumption for various uses : Maintained logbook
- 5 Detail of Water Consumption per day / month
- (a) Domestic Purpose : 10 KLD



(b) Boiler / Cooling

30-40 KLD

15

(C) Industrial use (Easily Biodegradable)

660 KLD

(d) Industrial use (Not Easily Biodegradable)

Nil

(e) Other

-

6 General Remarks

D Water Pollution

1 Source & processes of Water Pollution Including raw water treatment if any

Domestic effluent generation from unit premises & Trade effluent generation from process

2 No. of outlets for discharge of effluent

Domestic 01 (Taken at ETP Inlet)

Trade 01

3 Quantity of Effluent in KLD

Domestic 8 KLD

Trade 660 KLD (Cos per cto)

4 Status of Effluent Treatment Plant (ETP)

Sewage Treatment Plant (STP)

STP

ETP

(a) Required or Not

Required

Required

(b) Installed or Not

Installed STP

Installed ETP

(c) Detail of STP / ETP Provided (if required) with Detail of all components and technology used

collection - Solid separator - equalization - chemical dosing - flocculation/coagulation - Primary clarifier - Aeration - Sec. clarifier II - Aeration II - Sec. clarifier II - Filtration (ACF & DMF) - Disinfection

(d) Whether structurally adequate or Not

Yes, adequate

(e) Whether operating STP/ETP Satisfactorily

STP & ETP operating (samples collected)

(f) Whether provided online chemical dosing system/ pH meter

Yes

5 Mode of Discharge of effluent

Domestic STP - Taken at ETP Inlet after treatment

Trade ETP - Plantation - Migration, floor washing

6 Name of Water recipient body if any

NA

2 acre Plantation area outside premises (Karnal technology)

7 Detail of land in case effluent is discharged for Percolation / irrigation purpose with justification for its 100% utilization.

Fish ponds approx. - 1.5 acre

Green belt & horticulture area - 1.5 acre approx. For irrigation - 2 acres

8 Status of ZLD as per CPCB directions if applicable

NA

9 Whether provided flow meters on outlet & inlet on

Provided flow meters

ETP/ STP

10 Whether provided separate electricity meter on ETP/ STP

Provided



Whether maintained Log Book for consumption of Electricity / Chemicals / Quantity of effluent : Yes, maintained

16 Status of online monitoring System, if applicable : Yes, provided

13 General Remarks :

Hazardous Waste Management

1 Category of Hazardous Waste generated as per Rules : Used oil (5-1), ETP Sludge (35-3)

2 Type & Qty. of Hazardous Waste generated :

(i) Incinerable -

(ii) Recyclable Used oil

(iii) Disposable for landfill ETP Sludge

(iv) Total.....

3 Stock-pile Quantity of Hazardous Waste : Used oil - 0.3 KL approx.

4 Mode of Disposal & treatment of Haz. Waste : Through TSDF & authorized recycler

5 Size of Hazardous waste storage site : Provided separate concrete floor room

6 Display board for Hazardous Waste at Factory Gate Provided or Not : Provided

7 Whether agreement made with the service provider For disposal of Hazardous waste (if yes, give detail with Validity) : Yes

8 Details of Hazardous Waste transported to service Provider : Yes

Hazardous Chemicals Handling & Management and PLI Act, 1991

1 List & Qty. of Hazardous chemical handled & used (if any) with threshold quantity : NA

2 Whether prepared on site emergency plan and taken Insurance Policy under PLI Act, 1991 : NA

3 Name of insurer agency with date 7 validity of policy :

4 Whether Hazardous chemicals handling & storage :

Facility is adequate (i) No unscientific handling or disposal of waste found at site.
 (ii) No untreated (illegal) discharge of effluent observed within or outside the premises.
 (iii) Unit has provided Bio-filter & movable joggers for control of odour. During inspection, no foul or objectionable odour noticed in the surrounding area of the unit.
 (iv) Samples from ETP, plantation trenches, fish pond, ground water from premises & surrounding field along with air emission has been collected.



Signature of the representative of the unit
 Name Designation & Address
 Inspection

Signature of the Officer / Officers
 of the Board who conducted the

[Signature]
25/3/2026
DD PO Nalk Name & Designation
25/3/2026

(Representative of complainant)
Mohsin Umar

Attendance Sheet - Inspection of M/s Adv Agro Foods Pvt. Ltd.
 village, Tapkan, Dist - Nuh

on 25/03/2026

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Sl. No.	Name of officer/person	Designation & office	Contact No.	Sign
1.	Moksia VMAA representative on behalf of Sarpanch Khatron (complainant).	on behalf of Sarpanch	8920086688	Mrs. Gausiya <i>M. VMAA</i>
2.	Manish Yadav	AEE, HSPCB	9582909942	<i>Manish</i>
3.	Ankit Yadav	BDO Nuh	9350775313	<i>Ankit</i>
4.	Navinendra Sarwan	DDPO, Nuh	9813488223	
5.	Awanish Alok	Plant Area NOV Tapkan	9871644224	<i>Awanish</i>





GPS Map Camera



Tapkan, Haryana, India 🇮🇳
4xrr+wq6, Tapkan, Haryana 122107, India
Lat 28.142746° Long 76.992513°
Wednesday, 25/03/2026 03:14 PM GMT +05:30



GPS Map Camera



Tapkan, Haryana, India 

4xrr+wq6, Tapkan, Haryana 122107, India

Lat 28.14226° Long 76.992088°

Wednesday, 25/03/2026 03:13 PM GMT

+05:30



 GPS Map
Camera Lite

Nuh, Nuh, 122107, Haryana, India

Latitude
28.142788

Longitude
76.993262

Local 04:21:23 PM
GMT 10:51:23 AM

Altitude 198.2 meters
Wednesday, 03/25/2026



GPS Map Camera



Tapkan, Haryana, India 

4xrr+wq6, Tapkan, Haryana 122107, India

Lat 28.142224° Long 76.992672°

Wednesday, 25/03/2026 03:16 PM GMT +05:30



 GPS Map Camera



Tapkan, Haryana, India 
4xrr+wq6, Tapkan, Haryana 122107, India
Lat 28.141381° Long 76.993104°
Wednesday, 25/03/2026 03:37 PM GMT
+05:30



GPS Map Camera

Tapkan, Haryana, India



4xrr+wq6, Tapkan, Haryana 122107, India

Lat 28.142284° Long 76.991373°

Wednesday, 25/03/2026 02:55 PM GMT +05:30



Google

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NATIONAL PROGRAM FOR NON-COMMUNICABLE DISEASES
DISTRICT NUH - 122108

EMAIL ID- ncdcellmewat@gmail.com

Landline No - 01268-298018

क्रमांक :- NCD/CS/2025-26/2705

दिनांक :- 30-03-2026

प्रेषक

सिविल सर्जन
नूहँ।

प्रेषित

उपायुक्त महोदय
जिला नूहँ।

विषय: - टपकन ग्राम के सरपंच द्वारा लगाई गई शिकायत के सन्दर्भ में सूचना देने बारे।

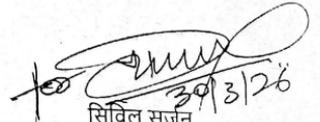
उपरोक्त विषय के सन्दर्भ में आपको यह सूचित किया जाता है की टपकन ग्राम के सरपंच द्वारा आपके समक्ष ए०ओ०वी० एगो प्राईवेट लि० कम्पनी की शिकायत की गई थी जिसमे ए०ओ०वी० एगो प्राईवेट लि० कम्पनी के द्वारा टपकन ग्राम के लोगो में कैंसर, टीबी और हार्ट अटैक से की बीमारी फैलना बताया गया था। इस शिकायत पत्र में उन्होंने कुल 64 ग्रामीणों की सूची प्रदान की जिसमें 15 ग्रामीणों में कैंसर, 23 ग्रामीणों में टीबी तथा 24 ग्रामीणों में हार्ट अटैक की बीमारी से ग्रस्त होने की सूचना थी।

इस सन्दर्भ में स्वास्थ्य विभाग नूहँ द्वारा जाँच करने पर यह पाया गया की 15 में से 13 लोग कैंसर से ग्रस्त हुए थे जिनमे जीभ के कैंसर के 02 मरीज, मुहँ के कैंसर के 02 मरीज, रक्त के कैंसर के 02 मरीज, फेफड़े के कैंसर के 01 मरीज तथा 06 मरीजों की सूचना उनके परिजनों द्वारा उपलब्ध नहीं करवाई गई।

उपरोक्त सभी कैंसर के मुख्यता: धूम्रपान, तम्बाकू चबाना तथा अनुवांशिक कारण है। टीबी का रोग केवल टीबी से ग्रस्त मरीज के खासने या छीकने से फैलता है तथा यह रोग Mycobacterium TB जीवाणु द्वारा होता है। हार्ट अटैक कई कारणों से हो सकता है जिनमे मुख्यता: धूम्रपान, मद्यपान और खराब जीवन शैली कारण है।

ग्रामीणों द्वारा लगाए गई शिकायत में कैंसर, टीबी तथा हार्ट अटैक की बीमारियों का फैलना बताया गया है परंतु वैज्ञानिक दृष्टिकोण से यह संभव नहीं है वयोकी किसी भी वैज्ञानिक अनुसन्धान में कन्साईखानों से निकलने वाली दुर्गंध से ये सभी बीमारियों का उद्भव होना नहीं पाया गया है।

यह आपको सूचनार्थ एव आवश्यक कार्यवाही हेतु प्रेषित किया जाता है


30/3/26
सिविल सर्जन
नूहँ।