

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

O.A. No. 285/ 2025

In the matter of:

SHIV KUMAR DUBEY

Applicant

Versus

Union of India & Ors

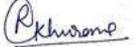
Respondent

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Place: New Delhi

Date: 28/07/2025

Through 

Sh. Rahul Khurana, Advocate

09811894060

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REPLY ON BEHALF OF RESPONDENT NO. 4

MOST RESPECTFULLY SHOWETH:

1. The applicant-Mr. Shiv Kumar Dubey has filed the present Original Application under sections 14 and 15 read with section 18 of the National Green Tribunal Act, 2010 seeking the following reliefs.
 - i. *Direct the official Respondents to immediately stop and seal all illegal and unauthorized pollution-causing activities over the Subject Land in Sector 27, Gurugram; and*
 - ii. *Order the sealing/confiscation of such illegal DG sets being used for commercial sale of electricity in violation of environmental norms, air quality guidelines, and Electricity Act, 2003 and prosecution and cancellation of licenses, wherever applicable; and*
 - iii. *Direct strict implementation of orders and directions passed by this Hon'ble Tribunal in OA No. 21 of 2014, Vardhaman Kaushik v. Union of India & Ors.; and*
 - iv. *Impose environmental compensation (EC) / fines on violators operating without consent under the Air (Prevention and Control of Pollution) Act, 1981 and in violation of other environmental laws; and*
 - v. *Direct strict enforcement of noise pollution standards under the Noise Pollution (Regulation and Control) Rules, 2000, and initiate action against violators under Section 15 of the Environment (Protection) Act, 1986; and*
 - vi. *Direct the Respondents to conduct zoning audit of the subject area to assess the extent of unauthorized construction and environmental damage and submit a detailed report before this Hon'ble Tribunal ; and*

Pass any other order or direction as this Hon'ble Tribunal deems fit in the facts, circumstances and in the interest of justice."

2. That present reply is being filed through Ms. Akansha Tanwar, Regional Officer, HSPCB, Gurugram who is authorized and competent to file the same on behalf of answering respondents.
3. That in the compliance of order dated 30.05.2025, HSPCB conducted inspection of the site on 27.06.2025 wherein all the units at the site were inspected. The details regarding inspection reports are given as below:-

Sr. No.	Name of the Unit	Activity involved	Status of Consent to establish & Consent to operate	Operational/Closed/Dismantled	Status of DG set	Action Taken by HSPCB
1.	S.S. Carrier/DH RUV Traders	Building Material Trader	CTE/CTO not required	Operational	No Dg set found	Not Applicable
2.	Chauhan Materials	Building Material Trader	CTE/CTO not required	Dismantled	No Dg set found	Not Applicable
3.	Himanshu Building Material	Building Material Trader	CTE/CTO not required	Dismantled	No Dg set found	Not Applicable
4.	Mahadev Materials Supplier	Building Material Trader	CTE/CTO not required	Dismantled	No Dg set found	Not Applicable
5.	Dealing Monster	No information available	NA	Dismantled	No Dg set found	Not Applicable
6.	Detailing addicts	Servicing of Vehicles, Washing and Detailing	Covered	Operational	DG set found	SCN for closure, prosecution & levy of Environmental compensation issued vide letter No. HSPCB/GRN

/2025/1181
dated
30.06.2025

7.	R.S. Automobiles	Dry Servicing of Vehicles	CTE/CTO not required	Operational	No Dg set found	Not Applicable
8.	3 M Car Care	Dry Servicing of Vehicles	CTE/CTO not required	Operational	No Dg set found	Not Applicable
9.	Car Zone Motors	Pre Owned Car dealers	CTE/CTO not required	Operational	No Dg set found	Not Applicable
10.	Nature Vibe-Restaurant	Restaurant	NA	Dismantled	No Dg set found	Not Applicable
11.	Gaddicart Car	No information available	NA	Dismantled	No Dg set found	Not Applicable
12.	Motor Spare Parts	Car Spare parts Shop	CTE/CTO not required	Operational	No Dg set found	Not Applicable
13.	Elite Medical	Medical Shop	CTE/CTO not required	Operational	No Dg set found	Not Applicable
14.	Deluxe Point	No information available	NA	Dismantled	No Dg set found	Not Applicable
15.	Yokobama Big Wheels	Tyre alignment, balancing and Tyre changing	CTE/CTO not required	Operational	No Dg set found	Not Applicable
16.	Shri Ram Estate	Real Estate Office	CTE/CTO not required	Operational	No Dg set found	Not Applicable
17.	Shree Shyam Enterprises	Retail Shop of Paint and Hardware	CTE/CTO not required	Operational	No Dg set found	Not Applicable
18.	Dry Cleaner Blue Bar (Blue Berry Laundry and	Dry Cleaner and Laundry Shop	Covered	Operational	No Dg set found	SCN for closure, prosecution & levy of Environmental

	Drycleaner s)					compensation issued vide letter No. HSPCB/GRN /2025/1181 dated 30.06.2025
19.	We Design Dream	No information available	NA	Operational	No Dg set found	Not Applicable
20.	Shree Shyam Steels	Steel Wire, TMT Bars Retail Shop	CTE/CTO not required	Operational	No Dg set found	Not Applicable
21.	Hamza Pets World	Selling of Pets	CTE/CTO not required	Operational	No Dg set found	Not Applicable
22.	Shiv Materials	Building Material Trader	CTE/CTO not required	Operational	No Dg set found	Not Applicable
23.	Bhardwaj Building Materials	Building Material Trader	CTE/CTO not required	Operational	No Dg set found	Not Applicable
24.	MoongFali Café	Restaurant	Covered	Operational	No Dg set found	SCN for closure, prosecution & levy of Environmental compensation issued vide letter No. HSPCB/GRN /2025/1191 dated 01.07.2025
25.	Kar Ades	Car accessory shop	CTE/CTO not required	Operational	No Dg set found	Not Applicable

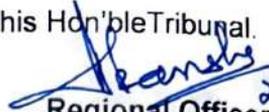
Photos taken on 27.06.2025 are annexed as **Annexure-R/1**.

4. That the answering respondent has already initiated applicable action under Water Act, 1974 and Air Act, 1981 against 03 no. of units and

recommendation of closer action has been sent to Head Office on 28.07.2025.

5. It is further prayed that the other issues regarding encroachment and nature of Land does not pertain to answering respondent.

The reply is being submitted for kind consideration of this Hon'ble Tribunal.


Regional Officer
Gurugram North
For Respondent No.4

Place: Gurugram
Date: 28.07.2025

O.A. No. 285/ 2025

SHIV KUMAR DUBEY

Applicant

Versus

Union of India & Ors

Respondent

AFFIDAVIT

I, Akansha Tanwar, Regional Officer, Haryana State Pollution Control Board, Gurugram (North) aged about 36 years do hereby solemnly affirm and state as under:-

1. That in the aforesaid official capacity, 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.


Deponent

Verification:

Verified at Gurugram on 28 day of July , 2025 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.


Deponent



28 JUL 2025

