

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

**Original Application No. 51/2026**

**In the matter of:**

News Item titled "Parents object to metal Water bottle ban at private school"  
appearing in The Hindu Bureau dated 18.01.2026

**INDEX**

*N.D.H: 08.07.2026*

S No.	Particulars	Page No.
1.	Reply on behalf of Respondent No. 5 – R.S. Junior Modern School in compliance with the Order dated 17.03.2026 passed in O.A. No. 51/2026	1-9
2.	Annexure – 1 Copy of the Notice dated 31.10.2025	10
3.	Annexure – 2 Copy of the minutes of meeting dated 23.01.2026	11-12
4.	Annexure – 3 Page 19 of the School Almanac	13
5.	Annexure-4 Recognition of School by NGT	14-15
6.	<i>VAKAZANAMA AND PROOF OF SERVICE</i>	16-17

**Place:** New Delhi  
**Dated:** 03.07.2026

*[Signature]*

**Filed by:**  
**On behalf of Respondent No. 5**  
"Through  
KAMAL MEHTA  
Advocate  
A-188, Defence Colony,  
New Delhi-110024  
E-mail ID : Kamalnco@gmail.com  
Mobile No. 9810249271"

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, DELHI

ORIGINAL APPLICATION NO. 51/2026

IN THE MATTER OF:

NEWS ITEM TITLED "PARENTS OBJECT TO METAL WATER BOTTLE BAN AT PRIVATE SCHOOL" APPEARING IN THE HINDU BUREAU DATED 18.01.2026

REPLY ON BEHALF OF RESPONDENT NO. 5 – R.S. JUNIOR MODERN SCHOOL

1. That this Hon'ble Tribunal vide its Order dated 20.01.2026 took suo-motu cognizance of a news item published in The Hindu Bureau dated 18.01.2026, and subsequently vide Order dated 17.03.2026 impleaded the answering Respondent i.e. R.S. Junior Modern School (hereinafter referred to as the "Answering School") as Respondent No. 5.
2. That the Answering School is one of the premier private educational institution situated at Humayun Road, Central Delhi, imparting education to students from Nursery to Class XII. The present proceedings relate to a Notice issued by the Answering School on 31st October, 2025 addressed to parents/guardians of students of Classes Nursery to P5. Copy of the said Notice is annexed herewith as **Annexure – 1**.
3. That at the outset, the Answering School respectfully submits that the news item dated 18.01.2026, which forms the basis of the present suo-motu proceedings, has **grossly misrepresented** the contents and intent

2.

of the Answering School's Notice. The news item alleged that the School has "banned metal water bottles" and "permitted only plastic ones." The Answering School categorically states that these allegations are factually incorrect and are not borne out by any document or directive issued by the Answering School.

4. That the Answering School places on record the exact text of its Notice dated 31.10.2025: **"To help us maintain a safe environment for all the students, please refrain from sending a steel/metal water bottle with your child to school (please refer to page no. 19 of the school almanac). To ensure the safety of all students, we strongly recommend and encourage using alternative types of bottles (non-metal). Please note that if a steel water bottle is brought to school, it will be taken into safekeeping"**.
5. That a plain reading of the above Notice reveals the following undisputed facts:
  - a. The Notice **does not even contain the word "plastic"** at any place. There is no mention of plastic bottles, nor any mandate compelling the use of plastic bottles.
  - b. The Notice uses the phrase **"alternative types of bottles (non-metal)"** which is an inclusive and open-ended expression. It encompasses any bottle that is not made of metal, including but not limited to BPA-free plastic bottles, silicone bottles, fiber bottles, bamboo bottles, or any other lightweight non-metallic container. The choice of the specific type of non-metal bottle is left entirely to the discretion of the parents.

3.

- c. The sole rationale stated in the Notice is “**to ensure the safety of all students**” and “**to maintain a safe environment.**” The Notice does not purport to be an environmental measure, nor does it invoke any environmental consideration.
6. That the Answering School respectfully submits that the safety rationale underpinning the said Notice is bona fide, reasonable, and based on sound pedagogical and child-safety principles:
- a. The students of Classes Nursery to P5 are young children in the age group of approximately 3 to 10 years. At this developmental stage, children have developing motor skills, limited grip strength, and are prone to accidental drops, slips, and collisions.
  - b. Metal/steel water bottles are substantially heavier than non-metal alternatives. A standard 500ml stainless steel bottle weighs approximately 250-350 grams, whereas a similarly sized lighter or silicone bottle weighs approximately 50-100 grams.
  - c. Heavy metal bottles, when dropped, can cause significant injury to the child’s own feet or to other children. In crowded classrooms, corridors, and playgrounds, a metal bottle swung accidentally or thrown during play can cause bruises, contusions, dental injuries, and even fractures. Schools across India and internationally have adopted similar safety measures for primary-level students.
  - d. Page 19 of the School Almanac **Annexure – 3** contains the School’s long-standing safety guidelines, which have been consistently followed for several years. The impugned Notice is merely a reiteration of these pre-existing safety protocols.

- 4.
7. That the Answering School categorically denies the allegation that it has “mandated” or “dictated” the use of plastic water bottles. The Answering School has never issued any directive, written or oral, compelling any student to use a plastic bottle. The parents retain full autonomy to select any non-metal bottle of their choice. Many parents have, in fact, provided silicone bottles and fiber bottles to their children, and the School has never objected to the same.
  8. It is further submitted that there has been instances where the students have got hurt due to heavy metal bottles. A serious incident occurred when one of the teachers got seriously injured when a child’s steel water bottle accidentally hit her falling from the stairs while she was engaged with other students. The hard metal /steel casing of the water bottles pose a serious risk to the safety of the students and staff.
  9. It is further pertinent to note that the concerns raised regarding the use of non-metal bottles was taken up in detail at a meeting held in presence of Parent Teacher Association on 23.01.2026. It was discussed that steel/metal bottles are heavy and bottles which have plastic casing outside and are insulated from inside may be brought by the children. Infact links of buying such bottles which are insulated from inside were also shared in the groups of the parents by the PTA members. Therefore, there is no question of any harm being caused by using plastic bottles when there are numerous options of bottles which are non-plastic from inside and are insulated are available. Copy of the minutes of meeting dated 23.01.2026 are attached herewith as **Annexure – 2**.

5.

10. That the Answering School respectfully submits that the provisions of the **Water (Prevention and Control of Pollution) Act, 1974** and the **Environment (Protection) Act, 1986** are **not attracted** to the facts of the present case:

- a. **Water (Prevention and Control of Pollution) Act, 1974:** This Act is concerned with the prevention and control of water pollution through regulation of discharge of pollutants into streams, wells, or water bodies. Section 24 of the Act prohibits the causing or permitting of any poisonous, noxious, or polluting matter to enter any stream, well, or sewer. The Answering School's safety notice does not involve any discharge of matter into any water body. The mere possession or use of plastic bottles (even assuming if mandated, which it is not) does not constitute an offence under the Water Act, as there is no element of "discharge into a stream or well."
- b. **Environment (Protection) Act, 1986:** This Act empowers the Central Government to take measures for protecting and improving the environment. It does not, however, regulate the internal choice of water bottles in a private school. The impugned Notice is a student safety measure, not an environmental measure. It does not violate any rule, standard, or guideline framed under the Environment (Protection) Act, nor does it cause or contribute to environmental degradation.
- c. That without prejudice to the above, the Answering School notes that even the news item which triggered the present proceedings quoted a group of parents as stating that the School's policy "creates a pathway for exposure to microplastics." The

6.

Answering School submits that there is no exposure to micro plastics, which is evident from the facts stated above. The Answering School's policy of permitting non-metal bottles (of which plastic cased bottles is only one among many options) is, in fact, more permissive than what the scientific evidence on microplastics might warrant.

11. That the Answering School craves leave of this Hon'ble Tribunal to file an additional reply, if required, in future.
12. That in light of the above submissions, it is respectfully submitted that the Answering School has not violated any environmental law, has not mandated the use of plastic bottles, and has acted solely in the interest of student safety. The Answering School shall abide by any order(s) or direction(s) passed by this Hon'ble Tribunal in the instant O.A. and render its full cooperation.
13. Recognition of the School by the Hon'ble National Green Tribunal is attached as **Annexure 4**.

In March 2025, the Hon'ble National Green Tribunal (NGT) recognised the sincere efforts of Raghubir Singh Junior Modern School as a responsible and law-abiding institution committed to promoting environmental sustainability through numerous green initiatives within the school community, one of which is its firm commitment to eliminating the use of single-use plastic.

7.

The school was honoured with the prestigious **Green School Award** in recognition of its dedication and significant contribution to environmental conservation. The award was presented by the then Hon'ble Vice President of India, Shri Jagdeep Dhankhar, reaffirming the school's commitment to being a responsible and environmentally conscious member of society.

As an institution that actively upholds such values and sustainable practices, the school remains committed to the well-being of its students and community.

Hence the school has an Environment Club– '**Verdant- Growing a Greener Tomorrow**'. The club has been established with the aim of fostering environmental awareness and promoting sustainable practices among students through a series of engaging activities and impactful campaigns.

**Dated:** 03.07.2026  
**Place:** New Delhi

*Nalini J. Rajput*

**Respondent No. 5**  
**R.S. Junior Modern School**  
"Through  
KAMAL MEHTA  
Advocate  
A-188, Defence Colony,  
New Delhi-110024  
E-mail ID : Kamalnco@gmail.com  
Mobile No. 9810249271"

8.

**BEFORE THE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH, NEW DELHI**

**Original Application No. 51/2026**

**IN THE MATTER OF:-**

**News Item titled "Parents object to metal Water bottle ban at private school" appearing in The Hindu Bureau dated 18.01.2026**

.....APPLICANTS

**VERSUS**

**Raghubir Singh Junior Modern School, Humayun Road,**  
**New Delhi-110003**

.....OPPOSITE  
**PARTY/RESPONDENTS**

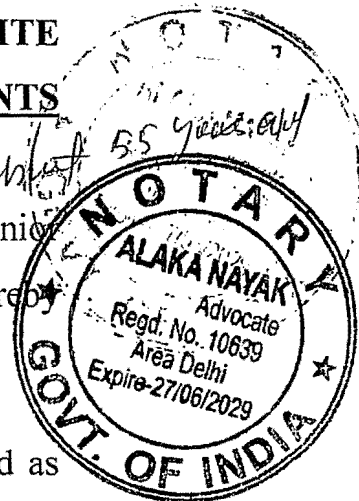
**AFFIDAVIT**

I, Nalini Singh Rajput, Headmistress, Raghubir Singh Junior Modern School, Humayun Road, New Delhi-110003, do hereby solemnly affirm and declare as under:

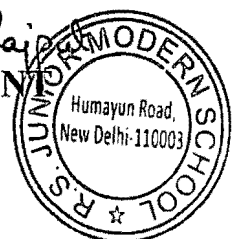
1. That I am the respondent, in the captioned matter and as such competent to depose the present affidavit.
2. That the accompanying reply has been drafted by my counsel under my instructions. I affirm that the contents of reply are true and correct based on my knowledge derived from the records of the case and nothing material is concealed.

*Agreed and verified*

*55 years: old*



*Nalini S. Rajput*  
**DEPONENT**



**VERIFICATION:**

I, the above named Deponent do hereby verify that the contents of the above affidavit are true and correct and nothing material has been concealed therefrom and no part of it is false.

Verified at New Delhi on this 03 day of July 2026.

**03 JUL 2026**

*Abhinav J. Rajput*  
**DEPONENT**



CERTIFIED THAT THE DEPONENT  
Sri/Smt./Km..... *Abhinav J. Rajput*  
S/o, W/o, D/o.....  
R/o.....  
Identified by Shri/Smt.....  
has Solemnly affirmed before me  
New Delhi on.....  
That the Contents of the affidavit which  
been read & explained to him are true and  
Correct to this knowledge

*[Signature]*  
Notary Public

**03 JUL 2026**

R.S. Junior Modern School  
Humayun Road, New Delhi-110003

31<sup>st</sup> October, 2025

**FOR CLASSES NURSERY TO P5**

Dear Parent,

To help us maintain a safe environment for all the students, please refrain from sending a steel/metal water bottle with your child to school (please refer to page no. 19 of the school almanac).

To ensure the safety of all students, we strongly recommend and encourage using alternative types of bottles (non-metal). Please note that if a steel water bottle is brought to school, it will be taken into safekeeping.

We appreciate your understanding and cooperation as we continue to prioritize the well-being and safety of our students.

Headmistress

प्रिय अभिभावक,

सभी छात्रों के लिए एक सुरक्षित वातावरण बनाए रखने में हमारी मदद करने के लिए, कृपया अपने बच्चे के साथ स्कूल में स्टील/धातु की पानी की बोतल न भेजें (कृपया स्कूल पंचांग के पृष्ठ संख्या 19 देखें)।

सभी छात्रों की सुरक्षा सुनिश्चित करने के लिए, हम वैकल्पिक प्रकार की बोतलों (गैर-धातु) के उपयोग की दृढ़ता से अनुशंसा और प्रोत्साहन देते हैं। कृपया ध्यान दें कि यदि स्कूल में स्टील की पानी की बोतल लाई जाती है, तो उसे सुरक्षित रखा जाएगा।

हम आपकी समझ और सहयोग के लिए आभारी हैं क्योंकि हम अपने छात्रों की भलाई और सुरक्षा को प्राथमिकता देते हैं।

मुख्याध्यापिका

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Minutes of the Meeting

Annexure - 2

(1)

**Date: 23rd January 2026**

A meeting was held in presence of PTA members to discuss suitable substitutes for metal water bottles to be used by students in the school.

**Members who attended the meeting:**

- Ms. Nalini Singh Rajput - Headmistress
- Mr. Rohit Nagpal , PTA , Vice Chairman
- Mr. Raja<sup>+</sup> Sehgal, PTA , Vice Chairman
- Mrs. Preeti Goel (Mother of Saumya Goel, P2 F) accompanied by 2 parents of P2

**Discussion Points:**

- It was discussed that steel/metal water bottles are heavy and should be avoided for the safety of the children, as they may get hurt while carrying or handling them. There have been incidents with metal bottles which were noticed and therefore the circular dated 31.10.2025 was issued.
- Parents were advised to avoid the use of steel/metal bottles and instead use bottles which are insulated from inside. High grade plastic bottles were also discussed as substitutes.
- Bottles which have plastic casing outside and are insulated from inside may be brought by the children as a suitable substitute.
- Links of such bottles were shared with the parents as examples.

The links are as follows-

<https://www.amazon.in/MILTON-Convex-Insulated-Bottle-Treking/dp/B0BTYRBDX7>

[https://www.amazon.in/Cello-Gliss-Insulated-Water-Bottle/dp/B07S6PD26H/ref=pd\\_lpo\\_d\\_sccl\\_1/259-7310129-9241505?pd\\_rd\\_w=KOsoN&content-id=amzn1.sym.e0c8139c-1aa1-443c-af8a-](https://www.amazon.in/Cello-Gliss-Insulated-Water-Bottle/dp/B07S6PD26H/ref=pd_lpo_d_sccl_1/259-7310129-9241505?pd_rd_w=KOsoN&content-id=amzn1.sym.e0c8139c-1aa1-443c-af8a-)

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145a0481f27c&pf rd r=J8M87GHW0HKE9QJJQ408&pd rd wg=raW4o&pd rd r=65e49367-7561-46e4-9c75-3bee4573daa8&pd rd i=B07S6PD26H&th=1

https://www.flipkart.com/milton-700-ml-plastic-bottle/p/itm1e9202f187bf?pid=BOTG3Y84HMVRQYGX&lid=LSTBOTG3Y84HMVRQYGXXDBOEO&marketplace=FLIPKART&cmpid=content bottle 8965229628 gmc

https://www.flipkart.com/milton-700-ml-plastic-bottle/p/itm6f943a23105d5?pid=BOTGZZV2TGDXMMP7&lid=LSTBOTGZZV2TGDXMMP7WBJRO0&marketplace=FLIPKART&cmpid=content bottle 23013654687 g 8965229628 gmc pla&tgi=sem,1,G,11214002,g,search,,774151532861,,,,c,,,,&entryMethod=23013654687&&cmpid=content 23013654687 gmc pla&gad source=1&gad campaignid=23013654687&gbraid=0AAAAADxRY58bztUUh4rVcl9 Rjk7FEyMB&gclid=CjwKCAiAssflBhBDEiwAcLpwfhUvh-DW3syINxpCk8ye9wzGTtto3Pv25wDrte1vOhWz2Z0Rj39jWBoCGEMQAvD BwE

- The examples shared are only suggestive in nature, and parents may choose any other safe and appropriate non-metal bottle for their child.

**Conclusion:**

Parents will be informed to ensure that children bring non-metal water bottles to school in order to maintain the safety and well-being of all students.

*True Copy*

## IMPORTANT FOR PARENTS

### COMPLIANCE WITH SCHOOL RULES:

As joint educators, parents should instil respect and strict obedience for all school rules and regulations in their children and encourage them to take a balanced interest in studies, co-curricular activities and sports. Parents must try to be good role models themselves by complying with the instructions/ guidelines issued by the school in the best interest of students. Any violation at the parents' end will be viewed as conflict in values being taught by the school and would not be appreciated.

**Parents will be held responsible if their ward is found carrying to school any sharp object that can cause injury.** They must supervise the school bag and ensure that it is arranged according to the time table for the day. The notebooks, tiffin, water bottles and other belongings must be labelled with their ward's name, class and section. **Steel water bottles are strictly not allowed.** Parents must duly fill the information pages in the School Diary; acknowledge and sign teacher's remarks in the note books/School Diary to stay abreast with their ward's progress. They must attend scheduled Parent Teacher Meetings regularly and meet teachers whenever advised or needed.

### COMMUNICATION WITH THE SCHOOL:

All communication must be addressed to the Headmistress, quoting the child's name, class and section. The school must be immediately informed of any change in residential address or contact numbers. In case of any query or concern, parents are advised to directly contact the school on [modernschooljunior@gmail.com](mailto:modernschooljunior@gmail.com) instead of relying on Class WhatsApp groups for solutions. It is observed that discussions on the said social network group only results in frivolous comments and rumour mongering, that often misleads people. School authorities are always available to assist.

### PUNCTUALITY:

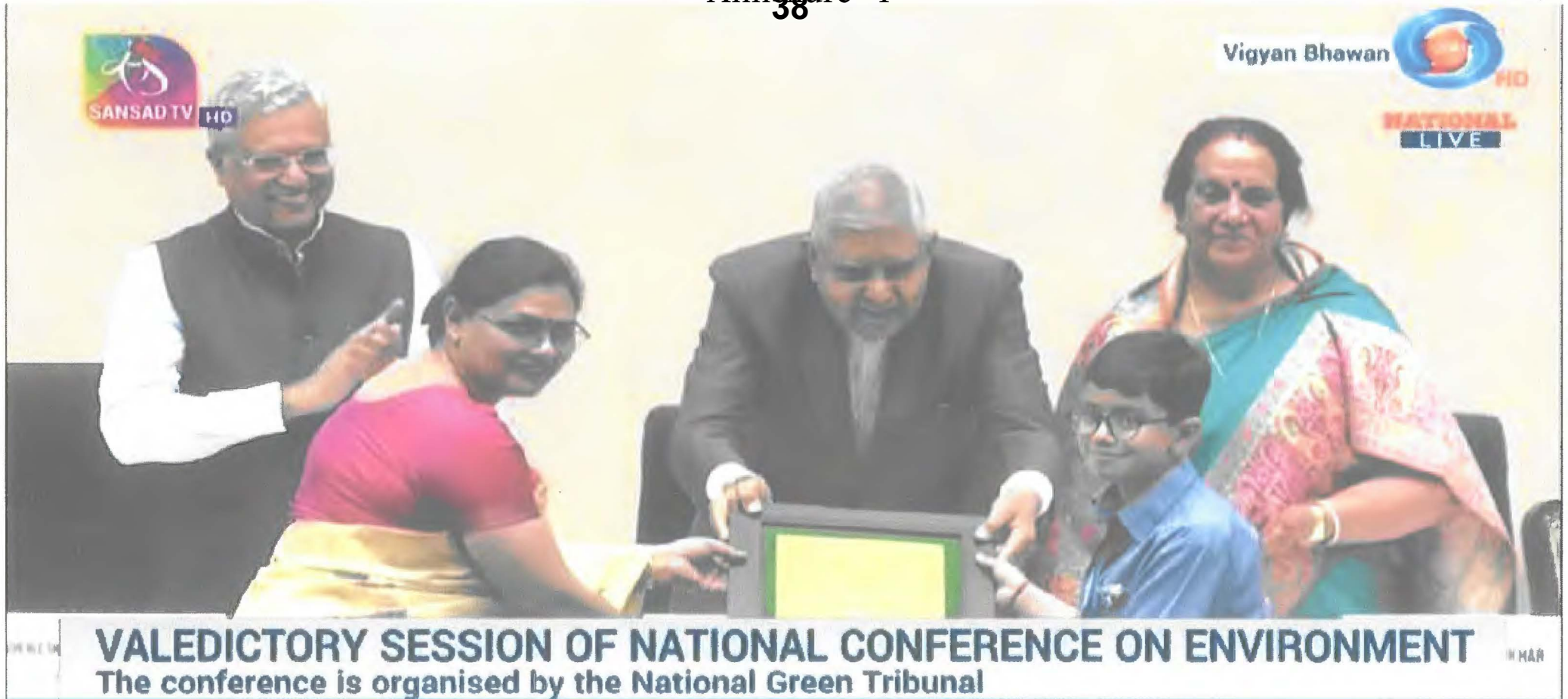
Parents must instil punctuality in their wards by practicing the same. Students should be dropped to school ten minutes before school starts and **picked up on time at the end of the day**. If a student has to leave the school premises before the scheduled time of dispersal, prior permission must be sought from the Headmistress.

### ABSENTEEISM FROM SCHOOL:

Each day in school is of value. Absenteeism from school without a valid reason and without permission is not appreciated. Vacations should be planned during school holidays. Through an application addressed to the Headmistress, parents must inform beforehand if leave has to be taken under unavoidable circumstances. Long leave without permission is viewed seriously. If a child is absent from school without intimation for six consecutive days, his name will be struck off the rolls. Absenteeism from school on medical grounds should be supported by a fitness certificate once the child is fit to rejoin. Also as per the new assessment policy, at least 75% actual attendance of the total attendance is must during the Academic Session to be eligible to appear in Annual Exam.

### HEALTH AND HYGIENE ADVISORY:

Children must be made to bathe daily and taught to clean their eyes, ears and nose



*True Copy*

15.



On the occasion of  
National Conference on Environment - 2025

NATIONAL GREEN TRIBUNAL  
appreciates

the commitment and contribution  
of  
Raghabir Singh Junior Modern School, Delhi  
in the field of Environment  
(Category) - Green Infrastructure)



True Copy



IN THE COURT OF NATIONAL GREEN TRIBUNAL, Principal Bench,  
 Suit/OMP/Appeal No./CWP OA.No. 51 of 2026 JURISDICTION of 200 New Delhi  
 In re: Parents object to metal water at Pvt. School. Plaintiff/Appellants/Petitioner/Complainant  
 VERSUS  
 Defendant/Respondent/Accused

KNOW ALL to whom these present shall come that I/We Nalini Singh Rajput,  
Headmistress, R.S. Junior Modern School, Delhi-11003.  
 the above named Respondent No. 5. do hereby appoint

**KAMAL MEHTA, ADVOCATE**

Enrl. No.- D/752/1990  
 A-188, LGF, DEFENCE COLONY, NEW DELHI-110024  
 (Ph.: 9810249271) KAMALNCO@GMAIL.COM

(herein after called the advocate/s) to be my/our Advocate in the above noted case authorized in :-  
 To act, appear and plead in 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 objections or petitions for execution, review, revision, withdrawal compromise or other petitions or affidavits or other documents as shall be deemed necessary or proper for the prosecution of the said cause in all its stages.

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 and disputes that may arise touching or in any manner relating to the said case.

To take execution proceedings.

The deposit, draw and receive money, cheques, cash things which may be necessary to be done for the progress and



to appoint and instruct any other Legal Practitioner, hereby conferred upon the Advocate whenever he may think it to do so and to sign the Power of Attorney on our behalf.

And I/We the undersigned do 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 purposes.

And I/We undertake that I/We or my/our duly authorized agent would appear in the court on all hearings and will inform the Advocates 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 himself.

And I/We the undersigned to 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 settled is only for the above case and above Court. I/We here by agree that once the fee is paid. I/we will nontitled for the refund of the same in any case whatsoever. If the case lasts for more than three years, the advocate shall be entitled for additional fee aquivalent to half of the agree fee for every addition three years or part thereof.

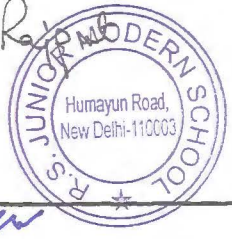
IN WITNESS WHEREOF I/WE hereunto set my/our hand to these presents the contents of which have been understood by me/us on this 3rd day of July 2026

Accepted subject to the terms of fees.

[Signature]  
 Advocate

Nalini S. Rajput  
 Client

I identify Nalini Singh Rajput has signed in my presence



Client



---

**Parents object to metal Water bottle ban at private school11.pdf OA  
No. 51 of 2026 Reply filed Raghuvir Singh junior modern school  
humayan New delhi Before National green tribunal New Delhi  
principal bench**

1 message

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**Kamal Mehta** <kamalnco@gmail.com> Fri, 3 Jul, 2026 at 3:18 pm  
To: Jyoti Mendiratta <jyoti.legal@gmail.com>, anjubhandari123@gmail.com

PFA

Kamal Mehta  
Advocate for  
RS Junior Modern school  
Humayan Road New Delhi

Mob. 9810249271  
9650366248

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 **Parents object to metal Water bottle ban at private school11.pdf**  
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