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BEFORE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
IN O.A. NO. 1149 OF 2024

IN THE MATTER OF:

Haider Ali

... Applicant

VERSUS

Haryana State Pollution Control Board & Others

...Respondent(s)

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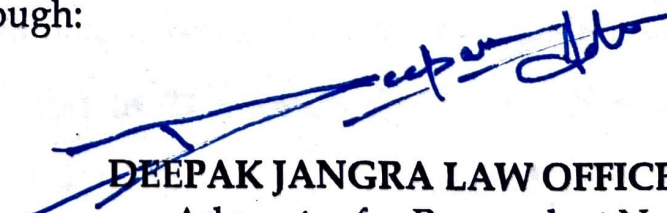
ALFINA PROPZONE PVT. LTD.


RESPONDENT NO.7 Director

through:

NEW DELHI

Date: .08.2025


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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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REPLY TO THE ORIGINAL APPLICATION ON BEHALF OF
RESPONDENT NO. 7 i.e. ALFINA PROPZONE PVT. LTD.

MOST RESPECTFULLY SHOWETH:

I. PRILIMINARY OBJECTIONS:

1. That the present Original Application is not maintainable against the answering Respondent as there are no specific allegations or evidence of any violation of environmental norms by Respondent No. 7. The application is based on vague and generalised statements and relies upon unauthenticated newspaper articles and social media posts which cannot form the basis of adjudication under the National Green Tribunal Act, 2010.
2. That the Applicant seeks a blanket direction for revocation of the Consent to Establish (CTE) granted to 21 proposed slaughterhouses, including the answering Respondent No. 7, on the ground that the District of Nuh is environmentally fragile, and the functioning of slaughterhouses would lead to health hazards and environmental degradation. However, no specific instance of violation has been alleged

or proved against this answering Respondent, who is still at the pre-operational stage.

3. That the present Original Application is based on newspaper articles, social media posts, and general assumptions, which do not constitute admissible evidence under the National Green Tribunal (Practices and Procedure) Rules, 2011. The Applicant has failed to bring forth any scientific or inspection-based evidence to show that Respondent No. 7 has either polluted or is likely to pollute the environment.
4. That Answering Respondent No. 7 has only been granted CTE (Consent to Establish) by the Haryana State Pollution Control Board (HSPCB) after following due process and satisfying all applicable statutory requirements.
5. That the answering Respondent has not commenced any physical activity, construction, or operation at the site and is thus not discharging any effluents, air pollutants, solid waste, or other emissions.
6. That the Hon'ble Tribunal, in exercise of jurisdiction under Section 14 of the NGT Act, 2010, may only entertain applications involving a "substantial question relating to the environment" arising from a "civil wrong". The present Application does not satisfy this statutory threshold insofar as Respondent No. 7 is concerned.
7. That the answering Respondent is willing to abide by all applicable conditions and guidelines prescribed by the HSPCB and CPCB, and remains open to inspection by any Competent Authority.

- 1-3. The contents of paragraphs 1-3 are a matter of record. It is admitted that the present application has been filed seeking directions to stop the establishment of new slaughterhouses in District Nuh, Haryana. However, the answering Respondent denies that it has undertaken any activity that may cause environmental degradation.
4. The contents of paragraph 4 are denied to the extent they refer to "existing slaughterhouses" without any connection to the answering Respondent. Respondent No. 7 has not commenced operations and therefore cannot be included in the reference to operational slaughterhouses.
- 5-6. That the contents of paragraphs 5-6 are not related to the answering respondent. The answering Respondent submits that while media reports may refer to certain issues relating to existing slaughterhouses, no such report pertains to Respondent No. 7. The reliance on newspaper and social media articles lacks evidentiary value and is not admissible as proof of violation.
- 7-9. The contents of paragraphs 7-9 are denied to be false. Respondent No. 7 has been granted CTE by HSPCB in accordance with due process. There has been no deviation from applicable rules or conditions. It is reiterated that no operations, construction or waste generation has commenced.
- 10-13. That the contents of paragraphs 10-13 refer to correspondence between the Applicant and the CPCB/HSPCB. The answering Respondent was not a party to any of such communication. No notice, inspection, or adverse finding has ever been issued to Respondent No. 7.
- 14-17. That the contents of paragraphs 14-17 are denied being a matter of record and not related to the answering Respondent. The answering Respondent submits that all mandatory environmental norms will be

fully complied with prior to operationalization. Further, since the unit is not operational, any concerns relating to groundwater, solid waste, ETP, air emissions, etc., are premature and speculative.

- 18-19. That the contents of paragraphs 18-19 are denied being a matter of record and not related to the answering Respondent. The data referred to pertains to CPCB reports on general pollution trends. The same cannot be applied to Respondent No. 7 without any inspection or evidence. The answering Respondent undertakes to incorporate all recommended waste management and emission controls in its project.
20. That the contents of paragraph 20 are denied as being matter of record and not related to the answering Respondent. The reference to other respondents, such as AOV Agro Foods Pvt. Ltd. is irrelevant to the case of Respondent No. 7, who is not linked to those units, nor found in violation.
21. That the contents of paragraph 21 are matter of record. The cited judgment in *Laxmi Narain Modi v. Union of India* pertains to institutional oversight and generic regulatory concerns. The answering Respondent supports such measures and shall abide by any regulatory framework established therein.
- 22-24. That the contents of paragraphs 22-24 are denied as being wrong. The answering Respondent denies any negligence or omission. The grant of CTE does not amount to automatic permission to operate. The Respondent shall apply for CTO only upon readiness of all infrastructure in compliance with the law.

REPLY TO THE PRAYER CLAUSE

It is respectfully submitted that no cause of action arises against Respondent No. 7. The prayer clause seeking revocation of CTE may be rejected insofar as it concerns Respondent No. 7.

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PRAYER

In view of the foregoing submissions, it is most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to:

- A. Dismiss the Original Application as against Respondent No. 7 i.e., Alfina Propzone Pvt. Ltd. for being premature, misconceived, and not maintainable;
- B. Direct that no coercive or adverse action be taken against the answering Respondent without specific evidence of violation after due inspection by a competent authority;
- C. Pass such other or further order(s) as this Hon'ble Tribunal may deem just and proper in the facts and circumstances of the case.

ALFINA PROPZONE PVT. LTD.

RESPONDENT NO. 7

Director

through:

NEW DELHI

Date: .08.2025

DEEPAK JANGRA LAW OFFICES

Advocates for Respondent No.7

Ch. No.142, Patiala House Court, New Delhi-01

Email: deepakjangralawoffices@gmail.com

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VERIFICATION

I, Prashant Singh Siddhu, authorised representative of Respondent No. 7 i.e., Alfina Propzone Pvt. Ltd., do hereby verify that the contents of the foregoing reply from paragraph 1 to paragraph 7 of the preliminary objections and paragraph 1 to 21 of the para-wise reply are true and correct to my knowledge and belief, and based on records maintained by the company. No material facts have been concealed therefrom.

Verified at New Delhi on this ____ day of August, 2025

ALFINA PROPZONE PVT. LTD.

DEPONENT

Director

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AFFIDAVIT

I, Prashant Singh Siddhu, son of Sh. Santveer Singh, having an office at Office. No. 7-8, 4th Floor, Green India Place, Khora Labour Chowk, Opp. Sec-62, Noida, Gautam Buddha Nagar, Noida, Uttar Pradesh, India, 201301 presently at New Delhi, do hereby solemnly affirm and state as under:

1. That I am the authorised representative of Respondent No. 7 - Alfina Propzone Pvt. Ltd. and am fully conversant with the facts and circumstances of the case. I am competent to swear this affidavit.
2. That the accompanying reply to the Original Application has been drafted under my instructions and the contents of the same from paragraph 1 to paragraph 7 of the preliminary objections and paragraph 1 to 10 of para para-wise reply are true and correct to my knowledge and belief, based on the records of the company and legal advice received.
3. That the annexures filed with the reply are true copies of their respective

I identified the deponent who
has signed in my presence


DEPONENT

VERIFICATION

23 AUG 2025

Verified at New Delhi on this ___ day of August, 2025 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed therefrom.


DEPONENT



Solemnly sworn before me read
over & explained to the deponent
Admitted to be correct

Oath Commissioner, New Delhi
23 AUG 2025