

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 91 OF 2026

GRAM PANCHAYAT, VILLAGE TEHANG

....APPLICANT

VERSUS

UNION OF INDIA & ORS.

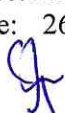
....RESPONDENTS

INDEX

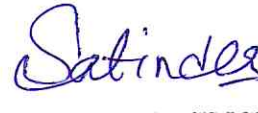
SER. NO.	PARTICULARS	DATED	PAGE NO.
1	REPLY ON BEHALF OF RESPONDENT NO. 7 AND 8 TO THE ORIGINAL APPLICATION FILED UNDER SECTIONS 14, 15 AND 18 OF THE NATIONAL GREEN TRIBUNAL ACT, 2010.	26.06.2026	1-32
2.	AFFIAVIT IN SUPPORT	26.06.2026	33-34
3.	<u>ANNEXURE R-7/1</u> GST Registration Certificate	21.11.2024	35-37
4.	<u>ANNEXURE R-7/2</u> ANALYSIS REPORT	17.06.2026	38-39
5.	<u>ANNEXURE R-7/3</u> CONSENT FEE RECEIPTS	26.02.2026	40-41
6.	<u>ANNEXURE R-7/4</u> ALLOTMENT LETTERS	02.02.2026	42-43
7.	<u>ANNEXURE R-7/5</u> NOTICE	25.06.2026	44-45
8.	VAKALATNAMA ALONGWITH AADHARCARD OF ANSWERING RESPONDENT NO. 8	26.06.2026	46-47
9.	PROOF OF SERVICE OF ADVANCE SERVICE		48

Place: PANCHKULA

Date: 26.06.2026



Through



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P-754/2005

P-2186/2014

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8 TO THE ORIGINAL APPLICATION FILED
UNDER SECTIONS 14, 15 AND 18 OF THE
NATIONAL GREEN TRIBUNAL ACT, 2010.

MOST RESPECTFULLY SHOWETH:

PRELIMINARY SUBMISSIONS

1. That at the outset, it is submitted that the present Original Application is wholly misconceived, based upon conjectures, surmises and unverified allegations and is liable to be dismissed in limine. The applicant has failed to place on record any credible scientific material, technical study, expert report issued by any competent statutory authority or any environmental data establishing actual environmental damage or violation of any statutory provision by the answering respondent.
2. That it is submitted that Respondent No. 7, namely M/s Dhingra Brothers (India), is a sole proprietorship concern and Respondent No. 8, namely Sh. Jatinder Dhingra, is its sole proprietor and person responsible for the management and affairs of the unit. The GST



Registration Certificate having Sh. Jatinder Dhingra as the legal name issued by the competent authority is annexed **Annexure R-7/1**.

3. That merely because Respondent No. 9 happens to be related to Respondent No. 8 being a real brother, no liability can be attributed to Respondent No. 9 in the absence of any material demonstrating ownership, partnership, managerial control, financial interest or operational involvement in the project in question. The Respondent No. 9 has been unnecessarily and wrongly impleaded in the present proceedings. The Applicant has failed to disclose any cause of action whatsoever against Respondent No. 9 and has also failed to place on record any document demonstrating ownership, control, management, partnership, agency or any legal relationship between Respondent No. 9 and Respondent No. 7 - M/s Dhingra Brothers (India), Bitumen Plant, Village Tehang, Tehsil Phillaur, District Jalandhar. It is settled law that a person against whom no relief is claimed and against whom no cause of action is disclosed cannot be compelled to contest litigation. The impleadment of Respondent No. 9 is therefore liable to be struck off from the array of parties and the proceedings qua Respondent No. 9 deserve to be dismissed with costs.
4. That the Applicant has intentionally or negligently impleaded Respondent No. 9 without verifying the constitution of Respondent No. 7, despite the fact that public records including the GST Registration Certificate clearly establish that Respondent No. 7 is a sole proprietorship concern exclusively owned by Respondent No. 8, namely Sh. Jatinder Dhingra. Such reckless impleadment reflects non-application of mind and casts serious doubt upon the bona fides of the allegations levelled in the present Original Application.

5. That the answering respondents are Government Contractors engaged in execution of various infrastructure and road construction projects. At present, the answering respondents are executing National Highway Projects awarded by Government agencies. The said projects are projects of national importance intended to improve transportation infrastructure, economic growth, public connectivity and national development.
6. That it is submitted that for participation in Government tenders relating to road construction and National Highway projects, availability of a Hot Mix Plant is an essential eligibility requirement. The establishment of the Hot Mix Plant is therefore directly connected with execution of public infrastructure projects. The answering respondents have established the Hot Mix Plant strictly in accordance with law after obtaining all requisite permissions and approvals from competent authorities.
7. The answering respondent has established the project only after obtaining all requisite permissions and approvals from the competent authorities. The Department of Town and Country Planning, Punjab specifically declared the proposed activity permissible at the site in question. Thereafter, the Punjab Pollution Control Board processed the application in accordance with law and granted Consent to Establish after verification of all relevant parameters and compliance requirements.
8. That the Department of Town and Country Planning, Punjab vide communication dated 14.08.2025 declared that the proposed activity of Hot Mix Plant was permissible at the proposed site. The said communication is already part of record as Annexure R-4/A with comprehensive report filed before this Hon'ble Tribunal by the Respondent no. 4 along with its reply.



9. That thereafter the Punjab Pollution Control Board sought verification regarding compliance of siting criteria from the Tehsildar, Phillaur vide letter dated 03.09.2025. The Tehsildar, Phillaur after physical verification submitted report dated 05.09.2025 certifying that the proposed site satisfied the prescribed siting requirements and that there existed no prohibited establishment within the prescribed distances. Copies thereof are already part of record as Annexure R-4/B, Annexure R-4/C and Annexure R-4/D respectively with comprehensive report filed before this Hon'ble Tribunal by the Respondent no. 4 along with its reply.
10. That only after obtaining the aforesaid reports from competent statutory authorities, Consent to Establish dated 26.09.2025 was granted by Punjab Pollution Control Board. A copy thereof is already part of record as Annexure R-4/E with comprehensive report filed before this Hon'ble Tribunal by the Respondent no. 4.
11. That the aforesaid facts completely demolish the allegations made by the Applicant regarding violation of siting criteria.
12. That the present Original Application is founded primarily upon assumptions, private reports and apprehensions raised by the applicant. It is settled law that environmental adjudication must be founded upon cogent scientific evidence and not upon speculative allegations. The applicant has failed to demonstrate any substantial environmental injury, ecological degradation or violation of any environmental norm attributable to the answering respondent.
13. That the applicant has deliberately suppressed material facts and has not approached this Hon'ble Tribunal with clean hands. The applicant has failed to disclose that prior to grant of Consent to Establish, the site was duly examined by the competent authorities including the Department of Town and Country Planning, Punjab, the Revenue



Authorities and the Punjab Pollution Control Board. The applicant has selectively referred to certain facts while suppressing the official reports and permissions granted by the competent authorities.

14. That the allegations regarding violation of siting criteria are wholly false, incorrect and contrary to the official record. Before grant of Consent to Establish, the Punjab Pollution Control Board sought verification from the Tehsildar, Phillaur regarding distances from village phirni, residential areas, educational institutions, religious places, wildlife sanctuary, protected monuments, hospitals, courts and other sensitive locations. Upon verification, the competent Revenue Authority certified compliance with the applicable siting norms and only thereafter Consent to Establish was granted. The official records therefore completely demolish the allegations raised in the Original Application.
15. That the applicant has attempted to rely upon a private inspection report allegedly prepared by an Assistant Professor of a private institution. Such report neither possesses any statutory sanctity nor can it override the findings recorded by the competent governmental authorities. The said report was neither prepared pursuant to any statutory mandate nor by any authority empowered under environmental laws. Consequently, the same cannot form the basis for any adverse action against the answering respondent.
16. That the allegations concerning veterinary facilities, dispensaries, playgrounds, dairy farms and other locations are legally untenable and beyond the scope of the applicable siting criteria. The relevant notifications governing establishment of hot mix plants do not prescribe any prohibition or minimum distance in respect of several locations referred to by the applicant. Therefore, the reliance placed upon such allegations is wholly misplaced.



17. That the applicant has failed to appreciate the distinction between a hospital and a dispensary. Mere existence of an outdoor dispensary or veterinary facility does not constitute a violation of the prescribed siting criteria. The competent authorities have already examined these aspects and found no violation warranting denial of permission.
18. That it is further submitted that the allegations regarding proximity to villages are based upon an erroneous interpretation of the applicable notifications. The notifications distinguish between habitation and city/town boundaries and prescribe separate standards for each. The applicant has intentionally mixed these concepts to create an impression of non-compliance where none exists.
19. That the Punjab Pollution Control Board, being the statutory regulator entrusted with implementation of environmental laws in the State, has independently examined the matter and submitted a comprehensive report before this Hon'ble Tribunal. The said report categorically records that Consent to Establish was granted after due verification and that during subsequent inspection the unit was found complying with the prescribed code of practice applicable to hot mix plants.
20. That the allegations of the applicant regarding excessive air pollution, emission of black smoke and resultant environmental degradation stand conclusively falsified by the official stack emission monitoring conducted by the Punjab Pollution Control Board. Pursuant to the inspection conducted on 20.04.2026 as stated in Annexure R-4/I appended to the reply filed by PPCB, the competent officers of the Punjab Pollution Control Board collected stack emission samples from the Air Pollution Control Device (APCD) attached to the Hot Mix Plant of the answering respondent. The said samples were analysed by the Zonal Laboratory, Jalandhar

and the analysis report was duly communicated by the Environmental Engineer, Punjab Pollution Control Board, Regional Office, Kapurthala vide letter dated 17.06.2026. The laboratory report demonstrates that the particulate matter emissions from the Hot Mix Plant were found to be within the prescribed permissible standards applicable to Hot Mix Plants. The said report completely negates the allegation that the answering respondent is causing air pollution or operating in a manner prejudicial to the environment. The findings recorded by the statutory environmental regulator, based upon scientific sampling and laboratory analysis, deserve greater evidentiary value than the unsubstantiated allegations and privately procured reports relied upon by the applicant. Consequently, the very foundation of the present Original Application alleging environmental pollution stands demolished and no cause survives for grant of any relief against the answering respondent. A copy of the analysis report communicated by the Environmental Engineer, Punjab Pollution Control Board, Regional Office, Kapurthala vide letter dated 17.06.2026 is appended hereto as **Annexure R7/2.**

21. That it is pertinent to mention that no commercial production has commenced by the answering respondents. Whatever activity was noticed at the site was only a trial run and commissioning exercise undertaken after installation of machinery for calibration, mechanical testing and verification of operational efficiency of the equipment.
22. That the answering Respondents respectfully submit that after obtaining Consent to Establish (CTE), they have diligently complied with all statutory requirements, environmental safeguards, technical specifications and conditions prescribed by the Punjab Pollution Control Board for grant of Consent to Operate (CTO). The



answering Respondents installed all requisite pollution control devices, implemented the prescribed code of practice and completed all compliances required under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981. The answering Respondents thereafter applied for grant of Consent to Operate on 26.02.2026 and deposited the entire requisite statutory fee as demanded by the Punjab Pollution Control Board. The answering Respondents deposited the prescribed consent fee for a sum of Rs.42,000/- each towards CTO for Air and Water pollution through NEFT transactions dated 26.02.2026, copies whereof are annexed herewith as **Annexure R-7/3 collectively**. Thus, no deficiency whatsoever remains on the part of the answering Respondents for consideration and grant of Consent to Operate.

23. That it is pertinent to mention that even the Punjab Pollution Control Board in its report dated 24.04.2026 (already on record as Annexure R-4/J) filed before this Hon'ble Tribunal specifically recorded that the application for Consent to Operate submitted by the answering Respondents was under consideration of the Board and further recorded that during inspection conducted on 20.04.2026 the unit was found complying with the code of practice prescribed under Notification No. G.S.R. 376(E) dated 18.05.2023 issued by the Ministry of Environment, Forest and Climate Change, Government of India. The Board further reported that stack emission samples were collected and the unit was found complying with the prescribed environmental safeguards. Thus, the statutory regulator itself found the answering Respondents to be compliant with the applicable environmental requirements.
24. That a bare reading of the order dated 29.04.2026 passed by this Hon'ble Tribunal would show that no finding whatsoever has been



recorded against the answering Respondents regarding violation of the siting criteria or environmental norms. Rather, this Hon'ble Tribunal took note of the report submitted by the Punjab Pollution Control Board wherein it was specifically recorded that the Consent to Establish had been granted after verification of the siting criteria by the Department of Town and Country Planning, Punjab and the Tehsildar, Phillaur and that the unit was found complying with the prescribed code of practice. This Hon'ble Tribunal was pleased to grant opportunity to the answering Respondents to file objections to the report of the Punjab Pollution Control Board and their detailed response to the Original Application. The interim restraint imposed by this Hon'ble Tribunal was only a precautionary arrangement during pendency of the proceedings and was not based upon any final adjudication or finding of environmental violation against the answering Respondents.

25. That owing to the pendency of the instant matter before this Hon'ble Tribunal and the retrained Order passed on 29.04.2026 the authorities at the helm of the affairs at PPCB are showing reluctance in granting CTO to the Hot Mix Plant despite of the fact that all the prescribed norms are being duly met. Respondent No.7 and 8 owing to the inaction of the authorities at the helm of the affairs at PPCB as to withholding the CTO are suffering multifarious losses in this regard. Even the Respondent No.7 who has been carrying out the work of road constructions under the contracts awarded by the State Government and the NHAI is facing difficulties in carrying out the work in the absence of the Hot Mix Plant and is forced to arrange the material from far off/distant places. Construction of road network is of national importance leading to prosperity of the national as whole, which owing to trivial issues should not be disturbed/stalled. Copies

of the allotment letters awarded by the government instrumentalities to Respondent No.7 are appended hereto as **Annexure R7/4**.

26. That the answering respondents submit that owing to the pendency of the present Original Application and the uncertainty created thereby, the business activities of the answering respondents have been seriously and adversely affected, causing substantial financial loss, reputational damage and jeopardising their contractual obligations towards various Government agencies. It is respectfully submitted that despite having complied with all the statutory requirements for grant of Consent to Operate and having deposited the requisite statutory fee with the Punjab Pollution Control Board, the issuance of the Consent to Operate has remained pending on account of the pendency of the present proceedings before this Hon'ble Tribunal. As a direct consequence thereof, the answering respondents have been unable to effectively execute various public infrastructure projects entrusted to them. In fact, the National Highways Authority of India (NHAI), Project Implementation Unit, Jalandhar, vide communication bearing No. PIU/PD/JAL/2026/Phagwara-Jalandhar/Dhingra/1519 dated 25.06.2026, has issued a Final Notice to Respondent No. 7, M/s Dhingra Brothers (India), alleging non-commencement of overlay work under the Operation and Maintenance Contract of the Six Lane Phagwara-Jalandhar Section of NH-44 and calling upon the answering respondents to commence the work within three days, failing which the work shall be executed at the respondents' risk and cost with consequential recovery of expenditure and initiation of proceedings for debarment/blacklisting under the contract. The answering respondents respectfully submit that the delay in commencement of the said work is directly attributable to the pendency of the present litigation and the consequential withholding

of statutory permissions by the concerned authorities, and not on account of any default on the part of the answering respondents. The answering respondents are thus suffering grave and irreparable prejudice despite having complied with all legal and statutory requirements. A true copy of the communication dated 25.06.2026 issued by the National Highways Authority of India is annexed herewith as **Annexure R-7/5**.

27. That the answering Respondents respectfully submit that despite completion of all statutory compliances, installation of pollution control measures, deposit of requisite fee and filing of the application for Consent to Operate, the said application could not attain finality owing to the pendency of the present proceedings before this Hon'ble Tribunal and the interim directions operating in the matter. The answering Respondents therefore cannot be faulted for non-issuance of the Consent to Operate when all necessary compliances stood completed and the matter remained pending consideration before the competent authority during the pendency of the present litigation. The answering Respondents have at all times acted bonafide, transparently and in accordance with law and remain willing to comply with any further condition that may be imposed by the competent authorities.
28. That the applicant has not challenged the validity of the Consent to Establish granted by the competent authority through any appropriate proceedings. In the absence of any challenge to the statutory permissions and in the absence of proof of fraud, misrepresentation or suppression at the time of obtaining such permissions, the applicant cannot seek indirect nullification of the approvals through the present proceedings.
29. That the present Original Application appears to be motivated by local objections and private grievances rather than any genuine



environmental concern. The pleadings do not disclose any substantial question relating to the environment arising out of implementation of any enactment specified in Schedule I of the National Green Tribunal Act, 2010.

30. That no cause of action has accrued against the answering respondent. The application is devoid of material particulars, unsupported by scientific evidence and does not disclose any continuing environmental damage. As such, the present proceedings constitute an abuse of the process of law and deserve dismissal with exemplary costs.
31. That without prejudice to the aforesaid submissions, it is submitted that the answering respondent is committed to complying with all environmental safeguards, conditions imposed by the regulatory authorities and all applicable statutory requirements. The answering respondent shall continue to abide by any further directions issued by the competent authorities from time to time.
32. That in view of the foregoing facts and circumstances, the allegations levelled in the Original Application are false, baseless, unsupported by statutory record and liable to be rejected. The Original Application deserves dismissal with costs.

PARAWISE REPLY

1. That the contents of para 1 needs no reply to the extent they relate to description of parties.
2. That the contents of para 2 needs no reply to the extent they relate to description of parties.
3. That the contents of para 3 is a matter of record to the extent that the present Original Application has been filed under the provisions of the National Green Tribunal Act, 2010. However, the answering Respondents deny all allegations, averments, implications and reliefs sought therein which are contrary to the true facts and record. It is submitted that the present application is based upon conjectures, presumptions and unsubstantiated apprehensions without any credible scientific evidence demonstrating violation of



environmental laws by the answering Respondents. The Applicant although has no locus to file the instant application, however, without prejudice even otherwise has failed to establish any actual environmental damage, pollution or violation of statutory norms warranting intervention by this Hon'ble Tribunal. The remaining contents of this paragraph, being legal submissions, require no reply.

4. That the contents of Para No. 4 are denied being false, misleading and incorrect. It is specifically denied that the answering Respondents have made any illegal installation or are carrying out any activity posing threat to public health, environment or livelihood of the villagers. It is further denied that the present project is being established in violation of any environmental law, rule, notification or guideline.

It is submitted that before establishment of the Hot Mix Plant, the answering Respondents obtained all requisite permissions and approvals from the competent authorities. The Punjab Pollution Control Board granted Consent to Establish (CTE) dated 26.09.2025 after due verification and satisfaction regarding compliance of the applicable siting criteria and environmental requirements. The said Consent to Establish remains valid and subsisting. It is further submitted that the Department of Town and Country Planning, Punjab found the activity permissible at the proposed site and the Tehsildar, Phillaur, after verification of the site and revenue record, confirmed compliance with the prescribed siting criteria. The allegations regarding illegal installation are therefore wholly baseless and contrary to the official records of the competent authorities. The Applicant's claim of representing the entire village is specifically denied for want of knowledge and proof. The remaining averments



are self-serving statements regarding the Applicant's personal credentials and require no reply.

5. That the contents of Para No. 5 are vehemently denied as false, frivolous, misconceived and contrary to the record. It is specifically denied that the answering Respondents are setting up the Hot Mix Plant in a hasty, sketchy or illegal manner or without following due procedure established by law.

It is submitted that the answering Respondents are reputed Government Contractors engaged in execution of road infrastructure and National Highway projects. The Hot Mix Plant has been established only after obtaining necessary approvals from the competent authorities and after complying with the statutory requirements prescribed under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981 and the Environment (Protection) Act, 1986. The allegation that the establishment of the plant is in violation of the guidelines issued by the Central Pollution Control Board is specifically denied. On the contrary, the Punjab Pollution Control Board, after examining the proposal and obtaining verification from the competent Revenue Authorities, granted Consent to Establish vide order dated 26.09.2025. The said approval itself establishes that the proposed site satisfies the applicable siting criteria and environmental requirements. It is further submitted that the Tehsildar, Phillaur, vide report dated 05.09.2025, certified that there is no Municipal Corporation limit, City, Lal Lakir, National Highway, Educational Institution, Religious Place, Wildlife Sanctuary, Zoo or other prohibited establishment within the prescribed distances from the site. The said official verification report completely demolishes the allegations made in the present paragraph. The averments regarding

population, demographics, senior citizens and children are irrelevant and are denied to the extent the same are sought to be used to create an unfounded apprehension of environmental harm. No scientific study, environmental impact assessment, air quality analysis, stack emission report or expert opinion from any statutory authority has been produced by the Applicant to establish any actual or potential environmental damage.

6. That the contents of Para No. 6 are denied being false, misconceived, speculative and unsupported by any scientific material. It is denied that the proposed Hot Mix Plant would cause severe difficulties, damage to roads, traffic congestion, health hazards or pollution as alleged. The averments are based merely upon apprehensions and assumptions and not upon any expert study, environmental assessment, scientific report or findings of any competent statutory authority.

It is submitted that the answering Respondents have established the project only after obtaining statutory approvals from the competent authorities. The Punjab Pollution Control Board, after examining the proposal and after verification of the prescribed siting criteria, granted Consent to Establish dated 26.09.2025 under the provisions of the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981. It is further submitted that the allegations regarding toxic emissions and health hazards are wholly conjectural and unsupported by any scientific evidence. No air quality monitoring report, emission analysis report, health impact assessment or expert opinion from any statutory authority has been placed on record by the Applicant. The remaining contents of the paragraph are denied and the Applicant is put to strict proof thereof.



7. The contents of Para No. 7 are denied being false, misleading and contrary to the official record. It is denied that the operation of the Hot Mix Plant would release poisonous gases causing injury to students, residents or any other person as alleged. It is further denied that the project poses any threat to public health, environment or safety.

It is submitted that the alleged resolution passed by the Gram Panchayat does not have any statutory force nor can it override the permissions and approvals granted by the competent authorities under the environmental laws. Environmental compliance is governed by the provisions of the Environment (Protection) Act, 1986, the Water Act, 1974 and the Air Act, 1981 and is to be determined by the statutory authorities constituted thereunder and not by resolutions passed by local bodies. It is further submitted that before grant of Consent to Establish, the site was independently verified by the Tehsildar, Phillaur at the instance of the Punjab Pollution Control Board. The Tehsildar specifically certified that there was no prohibited establishment i.e. educational institution, religious place etc. within the prescribed distances from the site. Thereafter, Punjab Pollution Control Board granted Consent to Establish after being fully satisfied regarding compliance of the applicable siting criteria. The allegations regarding damage to roads, accidents, environmental degradation and public health concerns are speculative and based upon mere apprehensions. No material has been produced to substantiate the same. The answering Respondents submit that movement of vehicles associated with lawful industrial and infrastructure activities is regulated by the concerned authorities and cannot be a ground to prohibit a project which has otherwise received statutory approvals. The map annexed by the Applicant is



denied to the extent it is inconsistent with the official records and verification reports relied upon by the competent authorities while granting statutory approvals.

8. The contents of Para No. 8 are denied being false, incorrect and legally unsustainable. It is denied that the resolutions allegedly passed by neighbouring Gram Panchayats establish any environmental violation or furnish any valid ground for restraining the establishment of the Hot Mix Plant.

It is submitted that the alleged resolutions are based entirely upon assumptions, fears and unverified apprehensions regarding future emissions and environmental impact. The same do not constitute expert evidence and cannot substitute the statutory scrutiny undertaken by the competent authorities. Mere opposition by neighbouring villages cannot render a lawful project illegal nor can it nullify permissions granted after due verification by the competent authorities. It is further respectfully submitted that the Punjab Pollution Control Board, being the statutory regulator entrusted with implementation of environmental laws, has already examined the project and granted Consent to Establish after obtaining verification from the competent Revenue Authorities. Furthermore, the subsequent inspection conducted by the officials of Punjab Pollution Control Board found the unit complying with the Code of Practice prescribed under Notification dated 18.05.2023 issued by the Ministry of Environment, Forest and Climate Change. The present proceedings appear to be based upon perceived apprehensions rather than any established environmental violation.

9. That the contents of Para No. 9 are denied being false, misleading, speculative and devoid of any legal basis. The allegations regarding dangerous effects on health and environment are based solely on

apprehensions and assumptions without any scientific study, environmental assessment, emission monitoring report or expert opinion from any statutory authority. The answering Respondents reiterate that the project has been established after obtaining Consent to Establish from Punjab Pollution Control Board and after verification of the prescribed siting criteria by the competent authorities.

10. That the contents of Para No. 10 are denied being false, misleading, speculative and devoid of any legal basis. It is submitted that representations allegedly submitted by certain Sarpanches or Gram Panchayats do not create any legal embargo against establishment of a project otherwise permissible under law. The answering Respondents were under no legal obligation to discontinue a project merely because objections were raised by certain individuals or local bodies. The establishment of a Hot Mix Plant is regulated by the provisions of the Water Act, 1974, Air Act, 1981 and Environment (Protection) Act, 1986 and not by resolutions or representations of private individuals. The competent statutory authorities, after due consideration of all relevant factors, found the site suitable and granted Consent to Establish. Therefore, the contents of this paragraph are denied.

11. That the contents of Para No. 11 are denied being incorrect and misconceived. The answering Respondents specifically deny that the project would result in any adverse environmental consequences or public health hazards. It is further submitted that there exists no statutory requirement under any provision of the Environment (Protection) Act, 1986, Air Act, 1981 or Water Act, 1974 requiring procurement of No Objection Certificates from neighbouring Gram Panchayats before establishment of a Hot Mix Plant. Consequently,



the allegation regarding non-obtaining of NOCs from surrounding villages is wholly irrelevant and legally untenable.

12. The contents of Para No. 12 of the Application are denied for the want of knowledge. Even otherwise, mere filing of a complaint does not establish violation of environmental norms. The answering Respondents deny all allegations contained in the said complaint. It is pertinent to mention that despite receipt of such complaints, the Punjab Pollution Control Board, after due verification and examination of the matter, found the proposed site suitable and subsequently granted Consent to Establish dated 26.09.2025 in favour of the answering Respondents. The contents contrary thereto are denied.

13. That the contents of Para No. 13, to the extent they refer to the communication dated 03.09.2025 (Annexure P-11 at page no 68-69 of paper-book of present OA) issued by the Assistant Environmental Engineer, are matters of record. However, the interpretation sought to be placed thereon by the Applicant is incorrect and denied.

It is most respectfully submitted that the said communication itself supports the case of the answering Respondents. The competent officer specifically recorded that the machinery was merely under installation and no production activity had commenced. The communication further acknowledges that the answering Respondents had applied for Consent to Establish and that the Department of Town and Country Planning and Tehsildar, Phillaur had certified compliance with the applicable siting criteria. The allegations questioning the inspection process are baseless, speculative and unsupported by any evidence. The Applicant cannot discredit official acts performed by public authorities merely on conjectures and assumptions.



14. That the contents of Para No. 14 are emphatically denied. It is specifically denied that the proposed Hot Mix Plant is surrounded by schools, residential clusters, sports academies, stadiums or other infrastructure within prohibited distances as alleged. The Tehsildar, Phillaur, after verification of the site and revenue record, specifically certified that there existed no Educational Institution, Religious Place, Protected Monument, Temple, Gurudwara, Court, Tourist Place, Wildlife Sanctuary or other prohibited establishment within the prescribed distances. The Punjab Pollution Control Board relied upon the said verification while granting Consent to Establish. The allegations regarding emission of toxic fumes, dust and hazardous gases are speculative and unsupported by any scientific material. No environmental impact study, air quality monitoring report, stack emission analysis or expert report has been produced by the Applicant. The allegation regarding non-obtaining of NOC from Gram Panchayats is denied as no such requirement exists under the applicable environmental laws.
15. That the contents of Para No. 15 are denied. It is submitted that representations addressed to Punjab Pollution Control Board or Deputy Commissioner merely reflect the concerns of certain individuals and do not establish any environmental violation by the answering Respondents. The competent statutory authorities considered all relevant material and thereafter granted Consent to Establish after satisfying themselves regarding compliance with the prescribed siting criteria and environmental safeguards. Therefore, the contents of the paragraph are denied.
16. That the contents of Para No. 16 are denied. It is specifically denied that the health of students or sports persons would be adversely affected as alleged. The assertions are based solely upon

apprehensions and not on any scientific evidence. The answering Respondents submit that the applicable environmental laws prescribe specific siting criteria, emission standards and pollution control measures. The project has been approved by the competent authorities after verification of compliance with the said norms. Consequently, generalized fears regarding future health effects cannot constitute a valid ground for denying a lawful project. It is further submitted that a playground or sports facility is not included within the prohibited siting criteria prescribed under the relevant notifications governing Hot Mix Plants.

17. That the contents of Para No. 17 are denied. The allegations regarding likely health effects upon children are hypothetical, speculative and unsupported by any scientific or medical evidence. The Applicant has failed to place on record any study, report or expert opinion establishing any causal connection between the proposed project and the alleged health risks. The answering Respondents reiterate that the project has been established after obtaining statutory approvals and shall operate strictly in accordance with the conditions imposed by the competent authorities.

18. That the contents of Para No. 18 are denied. The allegations regarding pollution of canal water are wholly imaginary, conjectural and unsupported by any technical or scientific material. The Applicant has not produced any hydrological study, water quality assessment, expert report or scientific evidence demonstrating any possibility of contamination of canal water. It is submitted that the Hot Mix Plant does not discharge any untreated effluent into the canal and adequate environmental safeguards are being maintained in accordance with the conditions prescribed by Punjab Pollution Control Board. The allegation that permission from the Department



of Water Resources was required is denied for want of legal basis, and the Applicant is put to strict proof thereof.

19. The contents of Para No. 19 are denied. It is submitted that the proposed construction of sports infrastructure or stadiums does not render the establishment of the Hot Mix Plant unlawful. The allegations regarding emission of toxic and hazardous gases affecting sports activities are based solely upon assumptions and are unsupported by any scientific evidence. It is further submitted that neither the proposed stadium nor playgrounds fall within the prohibited categories prescribed under the applicable siting criteria governing Hot Mix Plants. The competent authorities, after due verification of the site, found the location compliant with the prescribed norms and accordingly granted Consent to Establish. The contents of this paragraph are therefore denied and the Applicant is put to strict proof of each and every allegation contained therein.
20. That the contents of Para No. 20 are denied to the extent the same are sought to be applied to the answering Respondents. While the paragraph contains general information regarding Hot Mix Plants, the Applicant has failed to produce any material demonstrating that the answering Respondents have violated any environmental norm or caused any pollution. Mere reference to general industrial processes cannot establish environmental harm in the facts of the present case. The allegations regarding impact upon 25 villages, dispensaries and vaccination centres are speculative, hypothetical and unsupported by any scientific study or official report. The answering Respondents reiterate that the project has been established after obtaining statutory approvals and after compliance with applicable siting criteria.
21. That the contents of Para No. 21 are denied. The allegations regarding respiratory issues, cancer, neurological damage,

contamination of air, water and soil are based upon generalized assumptions and literature references and not upon any site-specific study relating to the answering Respondents' project. No medical study, epidemiological survey, environmental impact assessment, ambient air quality monitoring report or emission analysis has been produced to substantiate the allegations. The answering Respondents further submit that no commercial operation had commenced when the application was filed and therefore the allegations are entirely speculative.

22. That the contents of Para No. 22 are denied. It is submitted that the Applicant is selectively relying upon general scientific literature relating to occupational exposure in industrial settings. Such generalized references cannot substitute actual evidence demonstrating violation by the answering Respondents. The answering Respondents are under obligation to comply with all pollution control measures prescribed by PPCB and shall operate only in accordance with statutory conditions.
23. That the contents of Para No. 23 are denied. The allegations regarding adverse health consequences upon children, elderly persons, pregnant women and other vulnerable groups are wholly conjectural and unsupported by any scientific material pertaining to the present project. The Applicant has failed to establish any actual exposure or exceedance of prescribed standards.
24. That the contents of Para No. 24 are denied. The judgment in M.C. Mehta and other cited cases are distinguishable on facts and have no application to the present matter. The cases relied upon by the Applicant concerned industries found violating environmental norms or operating in contravention of statutory requirements. In the



present case, the answering Respondents have obtained Consent to Establish after due verification by competent authorities.

25. That the contents of Para No. 25 are denied. The Applicant has deliberately failed to disclose that the principles laid down in the judgments relied upon apply only where there is proven violation of environmental standards or demonstrated excess emissions. No such finding exists against the answering Respondents. Therefore, the reliance placed upon the said judgment is wholly misconceived.
26. That the contents of Para No. 26 are denied. The Orders passed by this Hon'ble Tribunal referred to by the Applicant relate to entirely different factual situations where units were found operating without statutory consents or in violation of environmental norms. The answering Respondents are not similarly situated and therefore the said orders are inapplicable.
27. That the contents of Para No. 27 are denied. The Applicant has failed to establish any factual similarity between the present project and the cases cited. No finding exists in the present matter regarding harmful emissions, excess pollution or violation of statutory conditions.
28. That the contents of Para No. 28 are matter of general record. However, it is submitted that the answering Respondents have undertaken to comply with all pollution control measures and environmental safeguards prescribed by the competent authorities. The allegations regarding non-compliance are denied. Infact the hot mix plant duly fulfil all the conditions and prescribed norms.
29. That the contents of Para No. 29 are denied. The Applicant has not produced any empirical monitoring study relating to the answering Respondents' unit. General observations concerning hot mix plants cannot be treated as proof of pollution by the answering Respondents.

30. That the contents of Para No. 30 are denied. The principles of precautionary principle and sustainable development cannot be invoked on the basis of mere apprehensions. There must exist credible scientific evidence indicating probable environmental harm. In the present case, no such evidence exists. Rather, the competent authorities have verified the site and granted Consent to Establish after satisfying themselves regarding compliance with applicable norms.
31. That the contents of Para No. 31 are denied. It is specifically denied that the alleged institutions and establishments are situated within prohibited distances. The Tehsildar, Phillaur, upon verification, certified compliance with the prescribed siting criteria. The PPCB also considered the said verification before granting Consent to Establish. Therefore, the allegations are contrary to the official record.
32. That the contents of Para No. 32 are denied. Mere opposition by local bodies cannot override statutory approvals granted by competent authorities. Environmental compliance is determined in accordance with law and not by majority opinion. The resolutions relied upon by the Applicant have no statutory force and cannot invalidate permissions lawfully granted by regulatory authorities.
33. That the contents of Para No. 33 are denied. It is submitted that the applicable siting criteria have already been verified by the competent authorities and found to be satisfied. The Applicant has failed to establish any violation of the applicable notification or guidelines.
34. That the contents of Para No. 34 are denied. No monitoring data showing exceedance of environmental standards has been placed on record. The allegations are based upon hypothetical situations and assumptions and therefore deserve rejection.

35. The contents of Para No. 35 are denied. The judgments and orders referred to are distinguishable on facts and have no application to the present case. The answering Respondents are set up the said plant strictly in accordance with statutory permissions and therefore no question of relocation, closure or suspension arises.
36. That the contents of Para No. 36 are denied. It is submitted that the answering Respondents have obtained Consent to Establish from Punjab Pollution Control Board. The allegation that the project is operating without requisite approvals is false and contrary to record.
37. That the contents of Para No. 37 are denied. The Applicant has failed to establish that emissions from the answering Respondents' project have caused any deterioration of air quality or adverse health effects. No scientific material has been produced in support of the allegation.
38. That the contents of Para No. 38 are denied. The allegations regarding residential areas and dense populations are contrary to the official verification reports relied upon by Punjab Pollution Control Board. The judgments referred to by the Applicant are distinguishable and have no application to the present case.
39. That the contents of Para No. 39 are denied. The allegations regarding lack of pollution control measures are false. The answering Respondents have installed and shall maintain all pollution control devices as required by the competent authorities. No violation has been established against the answering Respondents.
40. That the contents of Para No. 40 are denied. The alleged report of Guru Nanak Dev Engineering College is neither a statutory report nor prepared by any authority empowered under environmental laws to determine compliance with environmental norms. The said report cannot override the findings of Punjab Pollution Control Board, Tehsildar, Phillaur and other statutory authorities. The photographs

annexed therewith are denied and the Applicant is put to strict proof of their authenticity, date, source and correctness.

Infact, even samples from the Hot Mix Plant were obtained and analysed by the Zonal Laboratory, Jalandhar and the analysis report was duly communicated by the Environmental Engineer, Punjab Pollution Control Board, Regional Office, Kapurthala vide letter dated 17.06.2026. The laboratory report demonstrates that the particulate matter emissions from the Hot Mix Plant were found to be within the prescribed permissible standards applicable to Hot Mix Plants. The said report completely negates the allegation that the answering respondent is causing air pollution or operating in a manner prejudicial to the environment.

41. That the contents of Para No. 41 are matter of record to the extent that the Hon'ble Punjab and Haryana High Court relegated the Applicant to avail the remedy before this Hon'ble Tribunal. However, the said order does not amount to a finding on merits nor does it establish any environmental violation by the answering Respondents. Any contrary interpretation is denied.

42. That the contents of Para No. 42 are emphatically denied being false, fabricated, exaggerated and unsupported by any scientific evidence. It is specifically denied that the plant is emitting dense black smoke continuously or causing severe air pollution as alleged. It is further denied that any respiratory illness, skin disorder, eye disease, agricultural loss, soil degradation, livestock damage or ecological imbalance has occurred on account of the answering Respondents. The Applicant has not placed on record any ambient air quality monitoring report, stack emission report, medical record, laboratory analysis, agricultural study or scientific assessment supporting the allegations. The allegations are therefore based purely

upon conjectures and apprehensions. The answering Respondents reiterate that the Punjab Pollution Control Board, during inspection, found compliance with the prescribed Code of Practice and no violation has been established against the answering Respondents. Furthermore, whatever activity observed at the site was only in the nature of trial run and commissioning after installation of machinery and not commercial production. To the contrary, samples from the hot mix plant were obtained and analysed by the Zonal Laboratory, Jalandhar and the analysis report was duly communicated by the Environmental Engineer, Punjab Pollution Control Board, Regional Office, Kapurthala vide letter dated 17.06.2026. The laboratory report demonstrates that the particulate matter emissions from the Hot Mix Plant were found to be within the prescribed permissible standards applicable to Hot Mix Plants. The said report completely negates the allegation that the answering respondent is causing air pollution or operating in a manner prejudicial to the environment.

43. That the contents of Para No. 43, including all the grounds mentioned therein under Grounds No. I to XXII, are denied being false, misconceived, legally untenable and contrary to the record. It is specifically denied that the answering Respondents have established the Hot Mix Plant in violation of any statutory provision, environmental norm, CPCB guideline, MoEF&CC notification, siting criteria or provisions of the Air (Prevention and Control of Pollution) Act, 1981, Water (Prevention and Control of Pollution) Act, 1974, Environment (Protection) Act, 1986 or any other applicable law. It is submitted that the answering Respondents obtained Consent to Establish (CTE) from the Punjab Pollution Control Board valid from 26.09.2025 to 25.09.2026 after due scrutiny and verification by the competent authorities and after

satisfaction of all prescribed requirements. The allegations regarding absence of approvals, violation of siting norms, threat to public health, contamination of air, water or soil, illegality of land use, failure of authorities to discharge their duties, applicability of precautionary principle, public trust doctrine, constitutional violations, damage to agriculture, livestock, schools, colleges, hospitals, playgrounds, stadiums or nearby villages are denied for want of proof. The Applicant has not placed on record any scientific study, ambient air quality monitoring report, stack emission report, laboratory analysis, environmental assessment report or any other admissible evidence demonstrating any actual environmental damage attributable to the answering Respondents. The alleged photographs, private reports, representations, resolutions and newspaper reports relied upon by the Applicant neither constitute proof of environmental violation nor can they override the findings and permissions granted by the statutory authorities. It is further submitted that whatever activity was observed at the site was only in the nature of installation, commissioning and trial run/testing of machinery and not commercial operation. The judgments and legal principles relied upon by the Applicant pertain to cases involving proven violations and are wholly distinguishable from the facts of the present case. Accordingly, all the grounds raised by the Applicant deserve to be rejected.

44. The contents of Para No. 44 are denied to the extent the same allege any continuing illegality on the part of the answering Respondents. It is submitted that the present Original Application is liable to be dismissed as the Applicant has failed to establish any subsisting cause of action or any actual environmental damage attributable to the answering Respondents. The averments made in the paragraph

are incorrect and denied. The question of limitation is a matter for consideration by this Hon'ble Tribunal in accordance with law.

45. That the contents of Para No. 45 are denied being wrong and incorrect. It is submitted that the Applicant has not approached this Hon'ble Tribunal with clean hands and has suppressed material facts including the grant of Consent to Establish by the Punjab Pollution Control Board and the findings of the competent authorities regarding compliance with the applicable siting criteria. The present Original Application is thus liable to be dismissed with costs.
46. The contents of Para No. 46 are denied for the want of knowledge. It is submitted that the Applicant has deliberately suppressed material facts and has not approached this Hon'ble Tribunal with clean hands. The Applicant has failed to disclose the grant of Consent to Establish (CTE) by the Punjab Pollution Control Board, the findings of the competent authorities regarding compliance with the applicable siting criteria, and other material facts relevant for adjudication of the present matter. It is further submitted that merely because no similar petition is stated to have been filed earlier does not confer any right upon the Applicant to seek relief on the basis of unsubstantiated allegations, conjectures and apprehensions. The present Original Application is devoid of merit, unsupported by any credible scientific evidence and is liable to be dismissed with costs.

REPLY TO PRAYER

That the contents of the Prayer Clause are denied being false, misconceived, speculative and contrary to the facts and record of the case. The Applicant is not entitled to any of the reliefs prayed for. It is submitted that the answering Respondents have established the project strictly in accordance with law and after obtaining the requisite Consent to Establish (CTE) from the Punjab Pollution Control Board vide Consent valid from



26.09.2025 to 25.09.2026. The Applicant has failed to place on record any credible scientific evidence, ambient air quality monitoring report, stack emission report, laboratory analysis, environmental assessment report or any other admissible material establishing any violation of environmental norms by the answering Respondents. The allegations regarding air pollution, water pollution, soil contamination, public health hazards, ecological damage, violation of siting criteria and environmental degradation are based merely upon apprehensions, assumptions none of which constitute legally admissible evidence of any environmental violation. The statutory authorities, including the Punjab Pollution Control Board, after conducting inspections and verification of the site, have found the project compliant with the applicable requirements and accordingly granted the requisite Consent to Establish.

It is further submitted that the answering Respondents are government contractors engaged in execution of public infrastructure projects, including National Highway works of national importance. Establishment of the Hot Mix Plant is an essential requirement for execution of such public projects.

The answering Respondents have made substantial investments in establishing the plant after obtaining the necessary permissions and are committed to complying with all environmental safeguards and conditions imposed by the competent authorities.

The relief seeking restraint, prohibition, closure, cancellation or revocation of permissions is wholly unwarranted in the absence of any finding of violation by the competent statutory authorities.

Similarly, no ground exists for appointment of any Local Commissioner, independent Environmental Impact Assessment or any further inquiry at the instance of the Applicant, particularly when the matter has already been examined by the Punjab Pollution Control Board and other competent authorities.

The answering Respondents further submit that no irreparable injury shall be caused to the Applicant, whereas grant of the reliefs sought would cause grave prejudice, financial loss and disruption of ongoing public infrastructure projects being executed by the answering Respondents.



Accordingly, the present Original Application being devoid of merit deserves to be dismissed with exemplary costs and all the prayers made therein deserve to be rejected.

PRAYER

It is therefore respectfully prayed that this Hon'ble Tribunal may graciously be pleased to dismiss the present Original Application as being devoid of merit and hold that the answering respondents have established the project after obtaining Consent to Establish and after compliance of applicable environmental norms and further direct the PPCB to give the Consent to Operate as the law or pass such other order(s) as this Hon'ble Tribunal may deem fit and proper in the interest of justice.

Place: PANCHKULA

Date: 26.06.2026

ANSWERING RESPONDENT NO. 7 & 8

Through

ADITYA GROVER, ARJUN GROVER, POOJA R. SHARMA, SATINDER P. SINGH
P-754/2005 P-2186/2014 P-457/2018 P-3043/2011

Mob.-93562-66033, Email- adityagrover2008@gmail.com
ADVOCATES

Counsel for Answering Respondents no. 7 & 8



(M/S Dhingra Brothers)
Respondent No. 7

(Jatinder Dhingra)
(Respondent No. 8)

VERIFICATION

I, Jatinder Dhingra, S/o Sh. Kawal Kishore Dhingra, Resident of Village Dhadda, P.O. Model Town, Hoshiarpur Road, District Jalandhar, Punjab-144003, Sole Proprietor of M/s Dhingra Brothers (India), verified that the contents of the above petition are true and correct to my knowledge and belief, no part thereof is false and nothing material has been concealed therefrom.

Place: PANCHKULA

Date: 26.06.2026

ANSWERING RESPONDENT NO. 7 & 8



(M/S Dhingra Brothers)

(Jatinder Dhingra)
Respondent No. 8

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 91 OF 2026

GRAM PANCHAYAT, VILLAGE TEHANG

....APPLICANT

VERSUS

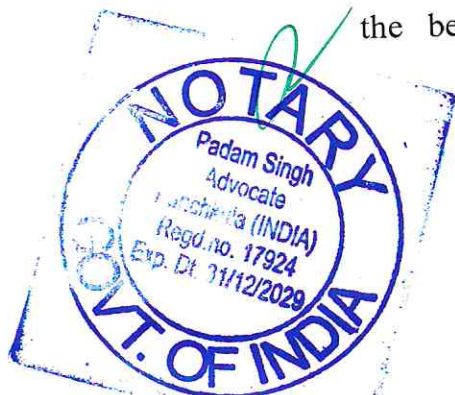
UNION OF INDIA & ORS.

....RESPONDENTS

AFFIDAVIT OF Jatinder Dhingra, aged about 45 years, S/o Sh. Kawal Kishore Dhingra, Resident of Village Dhadda, P.O. Model Town, Hoshiarpur Road, District Jalandhar, Punjab-144003, Sole Proprietor of M/s Dhingra Brothers (India).

I, the above named deponent do hereby solemnly affirm and declare as under:-

1. That the deponent is Respondent No. 8 in the accompanying Original Application and is the sole proprietor of Respondent No. 7, namely M/s Dhingra Brothers (India). Being fully conversant with the facts and circumstances of the present case, the deponent is duly competent and authorised to swear the present affidavit.
2. That the accompanying reply on behalf of Respondent Nos. 7 and 8 has been drafted under the instructions of the deponent. The deponent has read and understood the contents thereof and the same are true and correct to the best of the deponent's knowledge and belief.
3. That the contents of the accompanying reply are true and correct to the best of the deponent's knowledge, based on the records



maintained by the answering respondents and nothing material has been concealed therefrom.

4. That the documents annexed with the accompanying reply are true copies of their respective originals and form part of the official and business records of the answering respondents.

DATE: 26.06.2026

PLACE: Panchkula


DEPONENT

VERIFICATION

Verify that the contents above affidavit are true and correct to the best of my knowledge and belief, derived from the records of the answering respondents. Nothing material has been concealed therefrom and no part thereof is false.

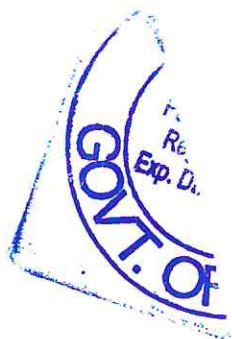
Verified at Panchkula, Haryana, on this 26th day of June, 2026


DEPONENT

26 JUN 2026

ATTESTED

PADAM SINGH
NOTARY PUBLIC,
PANCHKULA





Government of India

Form GST REG-06

[See Rule 10(1)]

Registration Certificate

Registration Number : 03AGRPD1639H1ZK

35

1.	Legal Name	JATINDER DHINGRA		
2.	Trade Name, if any	DHINGRA BROTHERS (INDIA)		
3.	Additional trade names, if any			
4.	Constitution of Business	Proprietorship		
5.	Address of Principal Place of Business	Building No./Flat No.: Hazara Post Office Road/Street: OLD HOSIARPUR ROAD Locality/Sub Locality: VILLEG DHADDA City/Town/Village: Jalandhar District: Jalandhar State: Punjab PIN Code: 144009		
6.	Date of Liability	01/07/2017		
7.	Date of Validity	From	01/07/2017	To Not Applicable
8.	Type of Registration	Regular		
9.	Particulars of Approving	Punjab Goods and Services Tax Act, 2017		
Signature Signature Not Verified Digitally signed by DS GOODS AND SERVICES TAX NETWORK 15 Date: 2024.11.21 16:15:51 IST				
Name		Ashok Kumar Bali		
Designation		Excise And Taxation Officer-cum- State Tax Officer		
Jurisdictional Office		Jalandhar 1 - Ward No.6		
Date of issue of Certificate		21/11/2024		
Note: The registration certificate is required to be prominently displayed at all places of Business/Office(s) in the State.				

This is a system generated digitally signed Registration Certificate issued based on the approval of application granted on 21/11/2024 by the jurisdictional authority.

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Goods and Services Tax Identification Number: 03AGRPD1639H1ZK

Details of Additional Place of Business(s)

Legal Name JATINDER DHINGRA
Trade Name, if any DHINGRA BROTHERS (INDIA)
Additional trade names, if any

Total Number of Additional Places of Business(s) in the State 2

- 1 VILLEG DHADDA, 0, KAWAL KISHORE, VILLEG DHADDA, HOSIARPUR ROAD, JALANDHAR, Jalandhar, Punjab, 144005
- 2 VILLEG ATTI, VILLEG ATTI, PHILLAUR, Phillaur, Jalandhar, Punjab, 144410

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Goods and Services Tax Identification Number: 03AGRPD1639H1ZK

Legal Name JATINDER DHINGRA
Trade Name, if any DHINGRA BROTHERS (INDIA)
Additional trade names, if any

Details of Proprietor

1



Name JATINDER DHINGRA
Designation/Status PROP.
Resident of State Punjab

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PUNJAB POLLUTION CONTROL BOARD

ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ

Regional Office, Kapurthala

2nd Floor, Midland Finance Centre, Opp. King's Hotel, Near Bus Stand, Jalandhar
Visit us at www.ppcb.gov.in Tel No. 0181-2991937 e-mail: - pcb2jalandhar@gmail.com

No. 1027

Dated: - 17/06/2026

To

M/s Dhingra Brothers (India) Bitumen Plant,
Village Teheng,
Tehsil Phillaur and District Jalandhar.

Subject:- Regarding copy of air emission sampling report.

It is submitted that the air emission sample was collected on 20.04.2026. A copy of the test report of the same is attached herewith.

DA/Test Report

Environmental Engineer,
Regional Office, Kapurthala

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ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਰੋਕਥਾਮ ਬੋਰਡ

ਜੇਨਲ ਪ੍ਰਜੇਗਸਾਲਾ, ਫੋਕਲ ਪੁਆਇੰਟ, ਪੀ:ਐਸ:ਆਈ:ਈ:ਸੀ ਵਾਟਰ ਟੈਕ, ਜਲੰਧਰ

ਫੋਨ ਨੰਬਰ : 0181- 2600301

www.ppcb.gov.in

ਈ ਮੇਲ : zolabjalandhar@gmail.com

AIR/WATER SAMPLE ANALYSIS REPORT

1.	Laboratory Sample No	Lab/Air / 08 /2026
2.	Name of industry	M/s Dhingra Brother (India) Bitumen Plant, Village Tehing, Phillaur, Jalandhar.
3.	Name of Sample Collecting Officer	Er. Rajinder Singh (AEE) S. Gauravjeet Singh (SA)
4.	Type of Sample	Stack Monitoring
5.	Date of Sample Collection	20.04.2026
6.	Date of Sample Receipt in Lab	21.04.2026
7.	Point of sample collection	From port hole on stack APCD

RESULTS

Sr. No	PARAMETERS	RESULT
1.	Particulate Matter (mg/Nm ³) Hot Mix Plant C Batch Type)	110

Note-The analysis results may be correlated with the industry-specific standards, general standards, or the standards made more stringent by the PPCB/ MoEF as the case may be, to determine whether the industry is conforming or not conforming to the prescribed standards."

Analyzed by: -

Asstt. Scientific Officer
Zonal Lab, Jalandhar

Endst.No. 750-51

Dated: 28/4/26

A copy of the above is forwarded to the following for information & necessary action along with data sheet to:-

1. The Senior Environmental Engineer, Punjab Pollution Control Board, Zonal office, Jalandhar.
2. The Environmental Engineer, Regional Office, ~~Rapurthal~~ along with extra copy of analysis report and data sheet for further transmission to the industry as per rules

Asstt Scientific Officer
Zonal Lab, JalandharT.C
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DHINGRA BROTHERS IND
PLOT NO 19 KAPURTHALA ROAD
VARIANA INDUSTRIAL AREA
JALANDHAR
JALANDHAR, Pin : 000000

PAYMENT ADVICE

Transaction Date	:	26/02/2026
Remitter Name	:	DHINGRA BROTHERS IND
Remitter's Account No	:	50200055998830
Beneficiary Code	:	
Beneficiary Name	:	PUNJAB POLLUTION COLLECTION ACC
Beneficiary's Account No	:	2918000100261206
Transaction Remarks	:	NEFT - PUNB0291800 - C15493260226103747 - - 2918000100261206 - PUNJAB POLLUTION COLLECTION ACC
Reference No	:	1487971258
Payment Product	:	NEFT
UTR / RRN No	:	HDFCH00825153208
Amount	:	42000.00
Amount in Words	:	Forty Two Thousand Rupees

Dear Sir / Madam,

We have initiated your payment for the amount of 42000.00 for the services rendered, vide NEFT, for below mentioned details

Payment Details 1

Payment Details 2

Payment Details 3

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DHINGRA BROTHERS IND
PLOT NO 19 KAPURTHALA ROAD
VARIANA INDUSTRIAL AREA
JALANDHAR
JALANDHAR, Pin : 000000

PAYMENT ADVICE

Transaction Date	:	26/02/2026
Remitter Name	:	DHINGRA BROTHERS IND
Remitter's Account No	:	50200055998830
Beneficiary Code	:	
Beneficiary Name	:	PUNJAB POLLUTION CONTROL BOARD NEFT-RTGS A-C
Beneficiary's Account No	:	2918000100261206
Transaction Remarks	:	NEFT - PUNB0291800 - C85324260226102002 - - 2918000100261206 - PUNJAB POLLUTION CONTROL BOARD NEFT-RTGS A-C
Reference No	:	1487932383
Payment Product	:	NEFT
UTR / RRN No	:	HDFCH00825127901
Amount	:	42000.00
Amount in Words	:	Forty Two Thousand Rupees

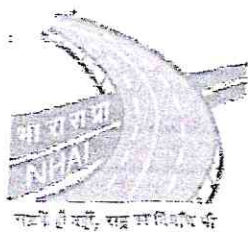
Dear Sir / Madam,

We have initiated your payment for the amount of 42000.00 for the services rendered, vide NEFT, for below mentioned details

Payment Details 1 :
Payment Details 2 :
Payment Details 3 :

T.C
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This is computer generated advice. Does not require any signature.



भारतीय राष्ट्रीय राजमार्ग प्राधिकरण

(सड़क परिवहन और राजमार्ग मंत्रालय, भारत सरकार)

National Highways Authority of India

(Ministry of Road Transport and Highways, Government of India)

परियोजना कार्यालय इकाई - लुधियाना/Project Implementation Unit-Ludhiana

प्लॉट- 74500, बाधोवाल बार्डर, राव जैनपुर, लुधियाना-142027 (पंजाब)

At Km. 74500 on Ludhiana Bypass, Village- Jainpur, Ludhiana- 142027 (Punjab)

दूरभाष/Phone: 0161-6727698, ईमेल/ E-mail: Nhaipluludhiana@gmail.com & Ludhiana@nhai.org



1200/2/BC-OVERLAY/2026/NHAI/PIU-LDH/ 22502

02.02.2026

To,

M/s Dhingra Brothers (India)
PO-Hazara, Old Hoshiarpur Road,
Village-Dhadda, Jalandhar, Punjab-144025

Sub: Six laning of Panipat-Jalandhar section of NH-1 from Km. 96.000 to Km. 387.100 in the State of Haryana and Punjab to be executed as BOT (Toll) on DBFO Pattern under NHDP Phase-V: Balance BC Overlay Works between km. 96.000 and km. 387.100 (Balance stretches in Haryana and Punjab sections)- Variation Proposal- Reg.

Ref:

- i) NHAI HQ letter no. NHAI/PIU/LDH/DBI/Variation/e-303298 dated 27.01.2026.
- ii) Authority Engineer letter no. MSV-MIC/AE/O&M/NH-44/3443 dated 29.12.2025.
- iii) Contractor letter no. DBI/25-26/0430 dated 27.12.2025.

Sir,

1. With reference to the subject cited proposal, it is to inform that NHAI HQ vide letter dated 27.01.2026 (Ref. i) has conveyed approval for the variation proposal in the subject project amounting to ₹32,98,50,851/- (after applying tender discount of 35.62% and excluding GST), which is 216.98% variation from contract price of Rs. 15,20,19,689/- (excluding GST).
2. In this regard, NHAI HQ has further intimated that the proposal was placed before the Executive Committee in its 700th meeting held on 23.01.2026 (Agenda Item No. 700.12). The Executive Committee accorded approval to the proposal, subject to submission of Performance Bank Guarantee (PBG) for the variation amount, by applying the same percentage as stipulated for the original contract amount.
3. Accordingly, you are requested to submit the requisite Performance Bank Guarantee for the approved variation amount, calculated by applying the same percentage as applicable for the original contract.
4. It may also be noted that, keeping in view the existing condition of the pavement, the works of DBM and BC shall be commenced immediately and completed before the onset of the monsoon.
5. This is issued for your information and necessary action, please.

Yours Sincerely,

Encl: As above.

Priyanka Meena
02/02/26.
(Priyanka Meena)
Project Director

Copy to:

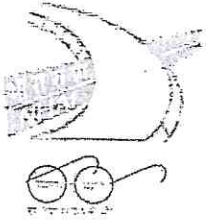
M/s MSV International INC in JV with M/s Bloom : For information & necessary action
Companies LLC in association with M/s please.
Mahamarg Infra Consultant Pvt. Ltd.

Head Office: G-5/6, Sector-10, Dwarka, New Delhi - 110075
प्रधान कार्यालय: जी-5 एवं 6, सेक्टर-10 द्वारका, नई दिल्ली-110075

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M/s Dhinagra Brothers. (India).				"Six laning of Panipat-Jalandhar section of NH-1 from Km. 96.000 to Km. 387.100 in the State of Haryana and Punjab to be executed as BOT (Toll) on DBFO Pattern under NHDP Phase-V: Balance BC Overlay Works between km. 96.000 and km. 387.100 (Balance stretches in Haryana and Punjab sections)."												
Estimated Cost	Discount In %	Contract Agreement Date	LOA Date	Appointed Dated	Contract Price	COS Approval Amount	Total Amount after COS	Construction Period	Scheduled Completion Date	Revised Scheduled Completion Date	Maintenance D/LP Period	Type of Contract	Physical Progress as on date(%)	Financial Progress as on date(%)	COS approved till date	EOT approved till date
23,61,28,750	35.62 %	08.10.2025	12.08.2025	11.11.2025	15,20,19,689	32,98,50,851	48,18,70,540	6 Months	10.05.2026		3 Years	BOQ	32.20	31.35	Authority letter no 1200/2/BC-OVERLAY/2026/NHAI/PIU-LDH/22502 dated 02.02.2026	Nil

T.C
J.A



भारतीय राष्ट्रीय राजमार्ग प्राधिकरण
(सड़क परिवहन और राजमार्ग मंत्रालय)

National Highways Authority of India

(Ministry of Road Transport & Highways)

राष्ट्रीय राजमार्ग प्रकल्प (P.O.)/PROJECT IMPLEMENTATION UNIT (PIU) JALANDHAR

प.ओ. इलाहाबाद 2/ 31A, Kalia Colony, Back side Bal Hospital

फोन- 1440001 Jalandhar-144008 (PUNJAB)

फोन 0181-2603542

फोन 0181-2010627

E-mail: nhai@nhai.org.in

No.PIU/PD/JAL/2026/Phagwara-Jalandhar/Dhingra/ 1519

Date: 25.06.2026

To,

M/s Dhingra Brothers (India)
PO Hazara Old Hoshiarpur Road
Village Dhadda, Jalandhar-144025
Mob: 9888496660
E-mail:-jatindhingra98@gmail.com

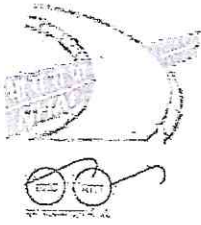
Sub: Operation & Maintenance and Incident Management of Six lane of Phagwara-Jalandhar Section of NH-1 (New NH-44) from Km.352 + 730 to Ch. 387+100 part of Panipat - Jalandhar section in the State of Punjab on item rate basis-Notice for non-commencement of Over-lay work. Reg

Ref: - 1.Authority-Engineer letter no.5072 dated 22.06.2026

With reference to the subject cited above, it is intimated that the overlay works under DLP of Ceigall India for the stretch between Km 352.730 and Km 387.100 were awarded to M/s Dhingra Brothers (India) on a risk and cost basis.

2. It is pertinent to mention that the approval of the Executive Committee for sanction of estimate for Improvement of Main Carriageway and Service Road with overlay of DBM/BC, PQC in water prone areas and other associated works, including maintenance and integrated incident management, on NH-44 (Phagwara-Jalandhar section) from Km 352.730 to Km 387.100 and the left some portions are falling for over-laying under M/s Dhingra Brothers (India) work scope.
3. However, despite repeated correspondence from the Authority Engineer and discussions held during previous Project Review Meetings, your firm has failed to commence the overlay works at site.
4. In this connection, the Authority Engineer has submitted to this office a proposal for execution of the balance overlay works at your Risk & Cost due to the non-commencement of the assigned works by your firm
5. In view of the above, you are hereby called upon to commence the overlay works from Km 352.730 to Km 387.100 under the jurisdiction of PIU Jalandhar within 03 (Three) days from the date of issuance of this letter. Failing which, this office shall be constrained to initiate appropriate action as proposed by the Authority Engineer, including execution of the balance works at your Risk & Cost, recovery of all consequential expenditures, and initiation of action for debarment/blacklisting and other measures as per the provisions of the Contract Agreement.
6. This may be treated as a Final Notice and Most Urgent.

T. C
A



भारतीय राष्ट्रीय राजमार्ग प्राधिकरण
(सड़क परिवहन और राजमार्ग मंत्रालय)

National Highways Authority of India

(Ministry of Road Transport & Highways)

प्रोजेक्ट इम्प्लीमेंटेशन यूनिट (पीयू)/PROJECT IMPLEMENTATION UNIT (PIU) JALANDHAR

पता: कल्ले कॉलोनी, 31A, Kalla Colony, Back side Bai Hospital

जलंधर-141008/Jalandhar-141008 (PUNJAB)

टेली. 0181-2330002

फैक्स 0181-2330007

E-mail: nhai@nhai.gov.in

7. This issued with approval of Project Director.

Dy. Manager (T)
For Project Director

Copy to:

1. Regional Officer, Chandigarh
2. RE, M/s MSV International Inc.

T.C
for
A

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

Original Application No. 91 of 2026

Gram Panchayat, Village Tehang

....Applicant

VERSUS

Union Of India & Ors.

....Respondents

KNOW ALL to whom these presents shall come that I/We, the undersigned appoint

ADITYA GROVER, ARJUN GROVER, POOJA R. SHARMA, SATINDER P. SINGH

P-754/2005

P-2186/2014

P-457/2018

P-3043/2011

Mob.-93562-66033, Email- adityagrover2008@gmail.com

Advocates

OFFICE: H. NO. 912, SECTOR-4, PANCHKULA (HARYANA)-134112.

To be the Advocate for the **RESPONDENT NO. 7 & 8** in the above mentioned case to do all the following acts, deeds and things or any them, that is to say :-

1. To act, appear and plead in the above mentioned case in this Court or any other Court in which the same may be tried or heard in the first instance or in Appeal or Letters Patent Appeal or Review or Revision or Execution or in any other stage of its progress until its final decision.
2. To present pleadings, Appeals, Letters Patent Appeals, Petition for Appeal, Cross-Objections or petitions for executions, review, revisions, withdrawal, compromise, to other petitions or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of the said case in all its stages.
3. To withdraw or compromise the said case or submit to arbitration, any differences or disputes, that shall arise touching or in any manner relating to the said case.
4. To receive moneys and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
5. To employ any other Legal Practitioner/Advocate authorizing him to exercise the powers and authorities hereby conferred on the Advocate whenever he may think fit to do so.

And I/We hereby agrees to rectify whatever the Advocate or his substitute shall do in these premises and in this connection.

And I/We hereby agrees not to hold the Advocate or his substitute responsible for the result of the said case in consequence of his absence from the Court when the said case is called up for hearing.

And I/We hereby agree that in the event of the whole or any 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 cause until the same is paid.

And I/We hereby agree that the Advocate will not be bound to appear for us if the case is transferred to any other Court or the Court sits at any place other then its normal place of setting.

IN WITNESS WHEREOF, I/WE hereunto set my/our hands to these presents, the contents of which have been explained to and understood be me/us.

This the 26th Day of June, 2026

Accepted

ADITYA GROVER, ARJUN GROVER, POOJA R. SHARMA, SATINDER P. SINGH
Advocates

(Signature of client)



(M/s Dhingra Brothers)
R-7

(Jatinder Dhingra)
R-8



भारत सरकार
Government of India



Aadhaar no. issued: 14/01/2013



Jatinder Dhingra
Date of Birth/DOB: 05/11/1981
Male/ MALE

7277

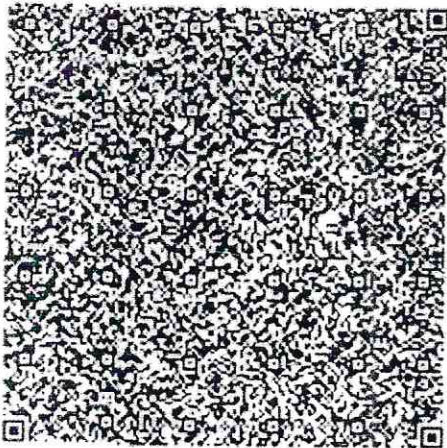
मेरा आधार, मेरी पहचान

[Handwritten signature]

1947 | help@uidai.gov.in | www.uidai.gov.in

VID : 9143 0149 9603 9845

7277



Details as on: 24/04/2024

Address:
S/O Kawal Kishore Dhingra, 473-R, Model
Town, Jalandhar - I, PO: Model Town
(Jalandhar), DIST: Jalandhar,
Punjab - 144003

भारतीय विहित पहचान प्राधिकरण
Unique Identification Authority of India



[Handwritten signature]



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ADITYA GROVER <adityagrover2008@gmail.com>

**ORIGINAL APPLICATION NO. 91 OF 2026 GRAM PANCHAYAT, VILLAGE TEHANG
VERSUS UNION OF INDIA & ORS**

1 message

ADITYA GROVER <adityagrover2008@gmail.com>

Tue, Jun 30, 2026 at 12:03 PM

To: Vibha Nagar <nagar.vibhanagar@gmail.com>

Cc: ADITYA GROVER <adityagrover2008@gmail.com>

Regards

O/o ADITYA GROVER, Advocate,
H.No. 912, Sector-4, Panchkula,
Mobile: +91-9356266033.



Reply to OA 91 NGT.pdf
10161K