

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

O. A. No. 701 OF 2022

IN THE MATTER OF:-

DINESH SINGLA & ORS. ...APPLICANTS

VERSUS

AJAY GOEL & ORS ...RESPONDENTS

**REPORT & SUBMISSIONS ON BEHALF OF THE
AMICUS CURIAE**

**New Delhi
Dated: 05.12.2023**

FILED BY



MANSI CHAHAL
ADVOCATE
CHAMBER NO -7, TRISHUL TOWER
KAUSHAMBI, GHAZIAGBAD, U.P
MOB: 8377863559
Email:-mansichahal104@gmail.com

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

O. A. No. 701 OF 2022

IN THE MATTER OF:-

DINESH SINGLA & ORS. ..APPLICANTS

VERSUS

AJAY GOEL & ORS ...RESPONDENTS

INDEX

| <u>S. No.</u> | <u>Particulars</u> | <u>Pages</u> |
|----------------------|---|---------------------|
| <u>1.</u> | REPORT & SUBMISSIONS ON BEHALF OF THE AMICUS CURIAE | <u>1-11</u> |

**New Delhi
Dated: 05.12.2023**

FILED BY



MANSI CHAHAL
ADVOCATE
CHAMBER NO -7, TRISHUL TOWER
KAUSHAMBI, GHAZIAGBAD, U.P
MOB: 8377863559
Email:-mansichahal104@gmail.com

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

O. A. No. 701 OF 2022

IN THE MATTER OF:-

DINESH SINGLA & ORS. ..APPLICANTS

VERSUS

AJAY GOEL& ORS ...RESPONDENTS

**REPORT & SUBMISSIONS ON BEHALF OF THE
AMICUS CURIAE**

1. That this Honourable Tribunal vide Order dated 29.08.2023, in the above-titled matter, was pleased to appoint the undersigned as Amicus Curiae for assisting this Honourable Tribunal on the issues and questions raised in the instant Application.
2. That I visited the factories namely K.K Spun Pipe Pvt Ltd, M/s K.K Concrete Products Pvt Ltd & M/s Everest Steel Fabricators on 03.11.2023 along with Ms. Akansha Tanwar, Regional Officer,

Ballabgarh Region, HSPCB & Mr. Ujjwal, AEE, Ballabgarh Region, HSPCB. The representative/ brother of the applicant namely Mr. Mukesh Singla along with 3-4 other local residents was also present at the site during the inspection. The amicus also had a telephonic conversation with the applicant i.e. Mr Dinesh Singla who told that his brother Mr. Mukesh Singla will be present on his behalf during the inspection.

3. BRIEF DETAILS OF THE SITE VISITS CONDUCTED ARE DETAILED AS UNDER:-

3.1. M/S K.K SPUN PIPE PVT LTD

The unit was engaged in manufacturing of cement/ Concrete Products. The unit is lying closed from about last 1 year and is not in operation anymore. The guard who was present at the site/ factory informed that the factory went bankrupt and is thus closed from about last one

year. On visit, No operation or manufacturing process was found in the factory.

3.2. M/S K.K CONCRETE PRODUCTS PVT LTD

- I. The unit was stated to be established in year 1971 and is engaged in manufacturing of cement/ Concrete Products like Block Tiles, cement blocks, cement pipes etc. The unit has obtained Consent to Operate under Air and Water Act from HSPCB valid from 08.09.2022- 31.12.2023, under Green category.

- II.** There is no source of any trade effluent in the factory. But the manufacturing process causes dust emissions in and around the premises. The vehicular movement i.e. trucks carrying raw materials are the major source of dust emissions. However, the unit has installed the water sprinklers to control the dust emissions.

- III. The housekeeping of the unit was found unsatisfactory. The cleanliness and proper management was also lacking in the premises. Tyres & Garbage was found lying in an unorganized manner.
- IV. The plantation and greenery was not maintained properly. Due to vehicular movement and dust emissions, the layers of dust were lying covering the leaves.
- V. That the unit was made operational to observe the noise levels. No adverse impact due to noise was observed in the surrounding area.
- VI. That the undersigned also had conversation with the local residents, who were residing nearby this unit. The residents submitted that the major problem faced by them is due to the dust emissions caused by the vehicular movements in

the unit. The residents denied with any problem of noise due to unit.

3.3. M/S EVEREST STEEL FABRICATORS

- I.** The unit namely M/s Everest Steel Fabricators is situated adjacent to M/s K K Concrete Products Pvt Ltd. and is engaged in engineering and fabrication work.
- II.** The unit is covered under White category as per HSPCB policy which includes engineering and fabrication work (dry process without any heat treatment/ metal surface finishing operations/ painting). But some painted materials, on which spray painting was done, were found on the spot.
- III.** There was no plantation in the unit.
- IV.** The housekeeping was found non- satisfactory. The unit was lacking cleanliness.

3.4. RUBBER UNITS AS STATED IN THE REPLY OF RESPONDENT NO. 5

The undersigned also visited the Shiv Colony, Gali No. 1 and No rubber factories or any other factory were found operating in that area.

3.5. SUGGESTIONS

In order to combat the pollution, following measures are suggested to be adopted by:-

1. The units shall be encouraged to install/ put "Vertical Gardens" (A garden in which the plants are supported to grow along vertical, especially fences or on walls, rather than along the ground) having living plants in them, and built-in irrigation system (*as shown in Picture 1*). The Vertical gardens or the Green walls will serve as the natural air purification system. These are energy cost effective as their plants reduce the overall temperatures of buildings when exposed to the sun. Moreover, the units will also be encouraged

to adopt the Principle of “Sustainable Development”. Also, vertical gardens will work as a mask to both air and noise pollution.

2. The greenery already existing in the unit should be maintained properly with adequate watering. (*as shown in Picture 2*)
3. Adequate number of trees shall be planted in the units along with the inside and outside boundary wall of the unit.
4. The scrap material & garbage must be properly managed by the unit, preferably by making a separate shed/ area for it and disposing it in a scientific manner.
5. The unit namely M/s KK Concrete Pvt Ltd should develop the *Kuccha* approach road into a *Pucca* metallic road in order to combat the dust emissions arising due to vehicular movement.

6. The Units shall undertake the CSR activity by contributing for Environmental protection & restoration and do the plantation activity on a Government land, which will significantly contribute in reducing the air pollution, improving the local ecosystem and overall biodiversity.
7. The vehicles like trucks carrying the raw material to the unit shall be properly covered so that the dust particle doesn't get released in the air.
8. The monitoring and inspections of the unit shall take place at regular intervals so as to keep a continuous vigilance on the units.
9. The said factual report is being submitted to this Honourable Tribunal.



Date:- 05.12.2023

MANSI CHAHAL
ADVOCATE

**PICTURE SHOWING WALL MOUNTED PLANTS/
VERTICAL GARDENS**

