

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

IN

ORIGINAL APPLICATION No. 985/2019

WITH

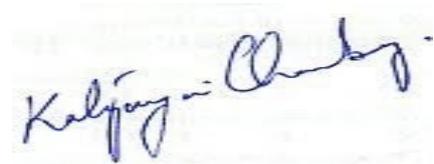
ORIGINAL APPLICATION No. 986/2019

IN THE MATTER OF:

**In Re : Water Pollution by Tanneries at Jajmau, Kanpur, Uttar Pradesh With In Re :
Water Pollution at Rania, Kanpur Dehat & Rakhi Mandi, Kanpur Nagar, Uttar Pradesh**

SUBMISSION

Dated: 02/ 07/2025



Through

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(Amicus Curiae)

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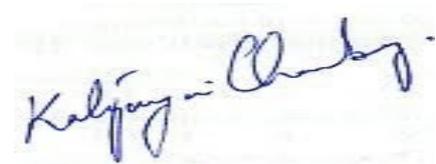
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1.	Submission by Amicus Curae wrt Health survey and related infrastructure	

Dated: 02.07.2025



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SUBMISSIONS

OBSERVATIONS FROM THE AFFIDAVIT BY SPECIAL SECRETARY, MEDICAL HEALTH AND FAMILY WELFARE

1. Point 2 (Health survey)

Kanpur Nagar:

8 affected areas- Panki industrial area, Rakhi mandi, Jajmau industrial area, Rooma TSDF, Nauraiya khera, Tejab mill campus, Anwar ganj and Gola ghat.

Total people screened	6757
Blood samples collected (<i>potentially affected persons</i>)	391
Persons with Cr (out of 60 received reports)	40
Persons with mercury	0
Pending report	331

Kanpur Dehat:

(Palanpurva, Chauhanpurva, Yadavpurva, Khanchandpur)

Total people screened	1911
Blood samples collected (<i>potentially affected persons</i>)	132
Persons with Cr	132
Persons with mercury	0

Fatehpur:

(Gadhrauli, Ashapur, Baniakhera, Abhaypur)

Total people screened	479
Blood samples collected (<i>potentially affected persons</i>)	49
Persons with Cr	47
Persons with mercury	3

Timeline to complete survey- within **3 months**

2. Point 3 (augmentation and strengthening of health- infrastructure)
 - i. Diagnostic center is at RML Lucknow
 - ii. Timeline to develop medical units in affected areas is **3 months**

3. Point 14 (health insurance and multi- specialty medical aid)
 - i. Ayushman bharat Pradhan mantri jan arogya yojana and Mukhyamantri JA Yojana- "**eligible**" residents receive free medical treatment upto 5 lakhs.
 - ii. Heavy metal treatment is available at- GSVM medical college/ JK Cancer hosp Kanpur nagar; Autonomous State medical college in Kanpur dehat; Dist hosp and Amar shaheed JSATDS medical college Fatehabad.

OBSERVATION FROM COMPLIANCE REPORT ON BEHLAF OF DM FATEHPUR

1. Point 2- Blood sampling & survey
(Pg. 4237)

All patients (10+15+14+9) tested have been found positive of Chromium and 2 with mercury, 2 with fluoride.

Even with blood sampling reports indicating severe heavy metal contamination of residents, the following submission was made in the Affidavit-

"13. That no patient displaying special or unusual symptoms has been discovered at any Saturday camp, all attendees suffer only from common, minor ailments; photographs of the camps and mobile laboratory are filed as Annexure 06."

Pg 4283- provides "List of person tested for mercury & chromium" dated 12.06.2025.

The information provided in the table maybe be summarized as:

Number of patients/ persons	39
Age category	21 yrs – 70 yrs
Gender	Female- 30 Male- 9
Area of blood sampling	Godhrauli (13 patients)

	Ashapur (7 patients) Baniyakheda (12 patients) Abhaypur (7 patients)
Number of patients with Cr	39
Number of patients with Mercury	26
Number of patients with both Cr and mercury	26
Treatment provided (Medical college/ Health camp)	Multivitamins, Pan D, Liver enzymes

Observations Based on the information provided so far:

- **Limited Scope of Testing:** Apart from blood sampling, only LFT/KFT tests were undertaken, which is certainly inadequate, especially in case of heavy metal contamination where even neurological impact is high.
- **Gender Disparity:** The data shows a disproportionately higher number of females (77%) among the affected population (Fatehpur)
- **Inadequate demographic Coverage:** Blood sampling was confined to just select “*potentially affected persons*” and not for the entire affected area.
- **Minimal Medical Intervention:** The treatment provided was generic and symptomatic, lacking any targeted chelation or detoxification therapy.
- **Lack of Infrastructure:** There is no mention of mobile health units, diagnostic labs, multi- specialty hospitals, expert epidemiologist or outreach mechanisms being deployed in the contaminated areas.
- **Absence of Welfare Schemes:** There are no insurance schemes or financial relief measures (specifically designed for residents of these polluted zones) in place for the affected individuals, exacerbating their vulnerability.

It is further observed that:

- No systematic health survey has been undertaken in any of the affected areas.
- Diagnostic and testing facilities specific to heavy metal contamination have not been established in any of the three concerned districts.
- No insurance or compensatory mechanism has been introduced for individuals suffering from Chromium and Mercury-related health complications.

In light of these inadequacies, it is imperative that the Hon'ble Tribunal formulates a time-bound and comprehensive redressal mechanism to ensure proper diagnosis, treatment, and long-term care of the affected population. Any delay in addressing these urgent medical needs may lead to further irreversible health consequences and possible fatalities.

RECOMMENDATIONS FOR HEALTH SURVEY, DIAGNOSIS AND TREATMENT

1. Comprehensive Epidemiological survey- trained public health team has to be deployed for detailed survey in all contaminated areas across three districts. A team of Experts having experience in heavy metal and other chemical (Chromium, mercury, fluoride, arsenic, formaldehyde, hydrogen sulfide, benzene, toluene etc) diagnosis and detoxification may be engaged:
 - a) Dr. Rajnarayan Tiwari, Director & Scientist G, ICMR- National Institute for Research in Environmental Health, Bhopal. (director.nireh@icmr.gov.in)
 - b) Dr. T K Joshi (Retd. HOD Epidemiology, RML Hospital, Delhi), 9810639658, kantjoshi@gmail.com
 - c) All India Institute of Medical Science, Ansari Road, New Delhi, Senior Doctors from the Departments of Neurology, Nephrology, Oncology and

Gastroenterologists. Email: director@aiims.gov.in CSIR- IITR Lucknow, Vishvigyan Bhawan, 31 Mahatma Gandhi Marg, Kaiser Bagh, UP- 226001

- d) Chief Secretary, 101, B-Block, Lok Bhawan, U.P., Civil Secretariat, Vidhan Sabha Marg, Lucknow, UP – 226001, E-mail: csup@nic.in
- e) Member Secretary, Department of Health, Govt of UP, psecup.health@gmail.com
- f) Dr. Ram Manohar Lohia Institute of Medical Sciences, Vibhuti khand, Gomtinagar, Lucknow- 226010

The Expert Committee may provide consultation for:

- i. Suggest clinical design and executing protocol (SoP) for conducting diagnosis and treatment of persons contaminated with heavy metals and other chemicals.
 - ii. Lay down evidence- based protocol for treatment and medication.
 - iii. Provide timelines for execution of the diagnosis and treatment protocol.
 - iv. Evaluate precision of the results reported by the State.
 - v. Create a schedule for monthly testing for all exposed individuals to track long term health impact.
 - vi. Design long term rehabilitation program including nutritional aid, mental health etc of the affected individuals.
 - vii. Help set up Heavy Metal Diagnostic labs in each affected district, equipped with testing for blood and urine samples.
2. Mapping and registration- Geotagging of households with confirmed (and suspected) exposure to chromium, mercury and fluoride must be done.
 3. Inclusion of vulnerable groups- special focus on health screening/ testing of pregnant women, children and senior citizens.

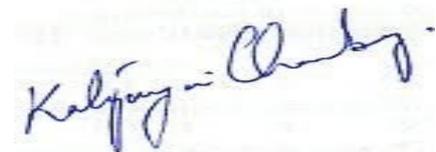
4. Deployment of mobile testing units- for remote villages to facilitate sample collection.
5. Referral hospitals- establish a clear chain of referral hospitals with toxicology departments offering advanced treatment.
6. Experts/ specialist doctors visit- monthly health camps must be attended by toxicologists, neurologists, nephrologists alongwith physicians and lab technicians.
7. Awareness Programs: Implement public awareness campaigns about symptoms, risks, and preventive measures regarding heavy metal toxicity.

The Amicus Curiae respectfully prays that, if this Hon'ble Tribunal finds it just and expedient, she may be permitted to conduct visits to hospitals and other public health institutions within the three affected districts, with necessary assistance and coordination to be provided by a representative of the Regional Office of the Central Pollution Control Board (CPCB).

That an urgent and kind intervention of this Hon'ble Tribunal is sought considering the facts and circumstances as stated hereinabove.

AND FOR THIS ACT OF KINDNESS, THE ADVOCATE AS IN DUTY BOUND SHALL EVER BE GRATEFUL.

Dated: 02/07/2025



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The State may also fill in the following table in the format requested:

S. No	Recommendations	Timeline (specify in DD/MM/YY)
1.	RO – NF Water Plants: Clean Water for All Domestic Purposes at centralised and de- centralised installed RO- NF systems (Identify the usage of wells/handpumps/ borewells/ water source for animals and agriculture)	
2.	Blood Sampling/ survey by Govt in the affected areas of Kanpur Nagar/ Dehat/ Fatehpur (Heavy Metal Analysis- Chromium, Mercury, Fluoride)	
3.	Improve Govt. Hospital's infrastructure to include multi-speciality diagnostic facilities	
4.	List of all Industries (Regardless of Category/ legal/ illegal/ in-house)- Kanpur Nagar, Kanpur Dehat, Fatehpur	
5.	Boundary Wall and Cover for Existing Cr Dump/ Plume (Fatehpur & Kanpur Dehat)	
6.	Soil, Sludge and Water Analysis of- Panki/ Shanigawa Landfill Site/ STP @ Pankha, Sajari	
7.	Operate Existing STP (Resolving Non- Compliance Within 2 Months)	
8.	Drain Action Plan- Untapped & Over Flowing tapped Drains (with name/ location of each sewage drain)	
9.	Permanent Monitoring Plan for Existing STP/ CETP/CCRU/ Landfills/ TSDFs	
10.	Construction and Installation of sewage system and STP in Kanpur dehat and Fatehpur	
11.	Removal of Chromium, Mercury and Ash from the affected area	
12.	Soil & Ground Water Remediation	

13.	River Rejuvenation Plan (Senger/Noon/ Pandu Rivers)- Including Flood Plain Zoning, Rain water harvesting, watershed development, encroachment removal, Eco- flow	
14.	Government <i>Multi-Speciality Medical Aid Facility</i> for victims of Heavy metal contamination (can be established in existing Govt Hospitals in all three districts)	
15.	Induction Of Workforce in CPCB/ PCB	
16.	Technical Infrastructure to State PCB/ SGWB	
17.	Continuous supply of Electricity for STP/CETP/ Hospitals	
18.	Bye- Laws for Preventing Environmental Pollution from Mercury (in lines of Minamata Convention)	
19.	Find out the source of Chromium, Mercury, Fluoride, and Iron in the eco-system.	
20.	Survey And Mapping of (new/old) Dump Sites (of chromium, mercury, ash) in Fatehpur and Kanpur Dehat, Kanpur Nagar	
21.	Survey and Mapping of Groundwater Contamination in Fatehpur and Kanpur Dehat, Kanpur Nagar	
22.	Survey of People/ Cattle/ Food Chain- To Check Degree of Contamination and create an effective Remediation Plan Against Bio- Accumulation of Heavy Metals.	