

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,**  
**PRINCIPAL BENCH, NEW DELHI**  
**ORIGINAL APPLICATION NO. 616 OF 2019**

*In the Matter of:*

APPLICANT(S): Ramdev Bhai Samatbhai Sanjva

//Versus//

RESPONDENT(S): State of Gujarat & Ors.

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Date: 07/04/2025

COUNSEL FOR THE APPLICANT

Place: Bhopal

  
**(Dharamvir Sharma, Adv.)**

J-04, Fortune Glory, Ext-II, Bawadiya  
Kalan, Rohit Nagar,  
Bhopal (M.P.) – 462039;

Email: [dharam.advocate33@gmail.com](mailto:dharam.advocate33@gmail.com) Ph: 9200700009

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,**  
**PRINCIPAL BENCH, NEW DELHI**  
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*In the Matter of:*

APPLICANT(S): Ramdev Bhai Samat bhai Sanjva

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RESPONDENT(S): State of Gujarat & Ors.

**REJOINDER / OBJECTION TO THE COMPLIANCE**  
**REPORT OF THE JOINT COMMITTEE REPORT FILED**  
**ON DATED 23.11.2020**

MOST RESPECTFULLY SHOWETH,

1. That, the above O.A. has been remanded back by the Hon'ble Supreme Court and this Hon'ble Tribunal was pleased to pass the order dated 29.01.2025 whereof it was directed as follows:

*“Respondents No. 1, 2, 3 and 5 submits that reply/report on behalf of Respondent No. 2, GPCB will be filed within one week. She submits that at this stage the reply on behalf of the State of Gujarat or its authorities is not required. It will be open to the Applicant to file rejoinder/objection to the report of the Joint Committee within eight weeks.”*

2. That, the Joint Committee after submitting its report has further filed the Compliance Report address to the worthy Registrar, Hon'ble NGT, Principal Bench, New Delhi on 23.11.2020. For which, the Applicant

submits rejoinder/objection which are as follows.

3. That, admittedly Respondent No. 7 Jetpur Dyeing and Printing Units in Jetpur Taluka are discharging pollutants having hazardous chemicals into River Bhadar. The position has not changed substantially even till date because, there is still lots of discharge of waste water into the water body river Bhadar. This act of discharging polluted water from textile industry of colour chemicals by the respondent has been brought to the notice by the applicant vide its representation dated 27.12.2024, 03.2,2025, 28.04,2025, is annexed with this Rejoinder as **ANNEXURE A -9**. It is also prayed in these complaints that the officials of GPCB who are committing corruption and trying to protect the big pollution mafias be investigated and take action against those responsible for spreading pollution.
4. That, the applicant has also taken the photographs with latitude and longitude with time and date which demonstrate the present position where it can be seen from the recent photographs attached with this rejoinder. Hence, there needs immediate and further remedial action as well as order from this Hon'ble Tribunal to take stringent and appropriate action / orders in this regard. Copy of recent photographs are annexed with this rejoinder as **ANNEXURE A -10**
5. That, it has also been seen in the concluding part in Para 3.0 of the Compliance Report submitted by the Respondent Gujarat Pollution Control Board (in short, GPCB).
  - (a) Jetpur Dying and Printing Association (JDPA) Respondent No.

7 has constructed 03 collection sumps outside the river bed for collection of waste water from member textile units through tankers. It is respectfully submitted that textile units have started discharging the effluent mostly through tankers to these newly constructed collection sumps. However, the sewage from the Jetpur Area and primary treatment effluent from textile units located in the residential area of Jetpur is still discharged in open C-Channel and gets collected at the collection sumps located in the bed of River Bhadar. Therefore, the collection sumps and receiving wells in the bed of Rivers are not dismantled.

- (b) Even the analysis results of samples collected from outlet of 03 CETPs and STP during the period from 01.01.2020 to 31.08.2020 shows that the concentration of monitored parameters were found not meeting the CETP outlet norms prescribed in CCA by GPCB with reference to one or other parameters.

This situation itself shows the worst position at present of the area near bed of River Bhadar, which needs immediate intervention and direction by this Hon'ble Tribunal. To stop the discharge and dismantle the collection sumps received in wells of river Bhadar. It is humbly submitted that the photographs annexed along with this rejoinder as **ANNEXURE A-10** itself speaks the latest position of the area for which this case has been filed.

6. That, the contamination of water quality in few stretches of river and

even the samples collected from all natural drains shows contamination of industrial effluent/sewage which require proper channelling away from the River Bhadar and natural drains in the said locality of Jetpur. This is directly affecting the lives of aquatic and terrestrial beings. The effluent discharge by the Respondent No 7. Textile Units into the water body and C-Channels is a great concern which needs to be rectified and a fresh inspection report should be ordered for analysing water quality samples from this area. Since, the analysis result of inspected units shows that they are not meeting the CEPT Inlet Norms with reference to one or other parameters. It should also be called for ascertaining that permission has obtained by the industrial units abstracting ground water from the CGWA or not. Since, the compliance report has already submitted that industrial units are still in process of obtaining permission in its conclusion 3.0, at page 12.

7. That, as per Recommendation Para 4.0 of the compliance report, the Jetpur-Navagadh Nagarpalika had not completed construction work of 23.5 MLD STP so that discharge of sewage area can be treated and sewage in the C-channel should be stopped completely. It is also to be ascertained by calling for the latest report by directing the Respondent No. 2 /GPCB.
8. That, strict action is needed to be taken against the industrial units and Respondent No.7/JDPA for illegal discharge and polluting the natural drains, river stretches of River Bhadar.

It is therefore respectfully prayed that this Hon'ble Tribunal may kindly be pleased to take the above objections on record and order a

fresh inspection of the area for ascertaining the discharge of effluents in River Bhadar, in the interest of justice of environment.

Date: 07/04/2025

COUNSEL FOR THE APPLICANT

Place: Bhopal



**(Dharamvir Sharma, Adv.)**

J-04, Fortune Glory, Ext-II, Bawadiya

Kalan, Rohit Nagar,

Bhopal (M.P.) – 462039;

Email: [dharam.advocate33@gmail.com](mailto:dharam.advocate33@gmail.com) Ph: 9200700009

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APPLICANT(S) : Ramdevbhai Samatbhai Sanjva

//Versus//

RESPONDENT(S) : State of Gujarat & Ors.

**AFFIDAVIT**

I, Ramdevbhai S Sanjva S/o Shri Samatbhai Sanjva, Age Adult R/o Opp. Bhadar River Bank, Jetpur Distt. Rajkot Gujrat, at present Bhopal do hereby solemnly affirm on oath and state as under:-

1. That, deponent is well acquainted with the facts of the present case and the contents of the rejoinder /application are drafted under instructions.
2. That, the contents from paragraph 1 to of the rejoinder and the prayer clause of the same are true. I have read and understood the same which is true and nothing material has been concealed.
3. That, this affidavit is being executed in support of the present rejoinder application.



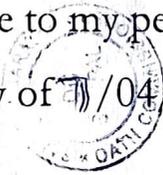
*S. Ramdev*  
DEPONENT

**VERIFICATION**

श्री. Ramdevbhai Sanjva.....  
आत्मज श्री. *S. Ramdev*.....  
निवास *Bhopal*.....  
ने आज दिनांक 07/04/2025 को मेरे सामने श्री. *S. Ramdev* को शपथ आयुक्त के सामने पेश किया

I, the above deponent do hereby verify that the contents of this affidavit from paragraphs 1 to 8 are true to my personal knowledge and belief.

Signed and verified on this day of 07/04/2025



*S. Ramdev*  
DEPONENT

शपथ आयुक्त, मोफत

*Amy*  
**IDENTIFIED BY ME**

To

- (1) Chairman Central Pollution Control Board ✓  
New Delhi
- (2) Chairman Gujarat Pollution Control Board  
Gandhinagar

complain by : Ramdev s.sanjva  
resi : opp.bhadar river bank  
jetpur dist :Rajkot  
mo.9726509391

Subject: Action against those who are spreading water pollution in Bhadar and Uben rivers and to stop the spread of pollution in both rivers

Therefore, it is my respectful request to inform you that the Bhadar River passing through Jetpur in Rajkot district of Gujarat state and the Uben River passing through Bawa Piplia in your jurisdiction are being polluted by large scale units associated with the saree industry in this area, which is seriously harmful to the environment, health of the general public and agriculture.

It is worth mentioning here that despite several written complaints by us and numerous other complainants regarding the water pollution of these two rivers to the relevant departments, on this very date, the polluted water in these two rivers is being discharged on a permanent basis, which is proving to be a man-made environmental disaster for the environment of this area, the health of the people and the agricultural land. Therefore, we, the complainants, humbly request you to take strict action against the white terrorist pollution mafia who are releasing this polluted water into the river and to control the water pollution in both rivers and prevent serious damage to the environment and public health. We expect appropriate action as per the complaint....

yours

Date 27/12/2024

*S. Ramdev*  
27-12-2024

Copy send to

- (1) Ministry of Forest and Environment Central Government New Delhi
- (2) Ministry of Forest and Environment state Government Gujarat
- (3) Chief minister's office gujrat state

RG398617521IN IVR:8271398617521  
RL JETPUR SO <360370>  
Counter No:1,27/12/2024,12:29  
To:CHIEF MINIS O.GANDHI NAGR  
PIN:382010, Gandhinagar Gujarat HO  
From:RAMDEV S SA.OPP BHADAR RIVER  
Wt:20gms Ack Fee:3.00,REG=17.0  
Amt:29.50,Tax:4.50,Amt.Paid:30.00(Cash)  
<Track on www.indiapost.gov.in>

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RL JETPUR SO <360370>  
Counter No:1,27/12/2024,12:29  
To:MINIS OF FORE,NEW DELHI  
PIN:110003, Lodi Road HO  
From:RAMDEV S SA.OPP BHADAR RIVER  
Wt:20gms Ack Fee:3.00,REG=17.0  
Amt:29.50,Tax:4.50,Amt.Paid:30.00(Cash)  
<Track on www.indiapost.gov.in>

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RL JETPUR SO <360370>  
Counter No:1,27/12/2024,12:30  
To:MINI OF FORE,GANDHI NAGR  
PIN:382010, Gandhinagar Gujarat HO  
From:RAMDEV S SANJVA,JETPUR  
Wt:20gms Ack Fee:3.00,REG=17.0  
Amt:29.50,Tax:4.50,Amt.Paid:30.00(Cash)  
<Track on www.indiapost.gov.in>

RG398617362IN IVR:8271398617362  
RL JETPUR SO <360370>  
Counter No:1,27/12/2024,12:29  
To:CHAIRMAN ,GPCB  
PIN:382010, Gandhinagar Gujarat HO  
From:RAMDEV S SA.OPP BHADAR RIVER  
Wt:20gms Ack Fee:3.00,REG=17.0  
Amt:29.50,Tax:4.50,Amt.Paid:30.00(Cash)  
<Track on www.indiapost.gov.in>  
<Dial 18002666868> <Wear Masks. Stay Safe>

RG398617431IN IVR:8271398617431  
RL JETPUR SO <360370>  
Counter No:1,27/12/2024,12:29  
To:CHAIRMAN,CENT POLLU CONTROL  
PIN:110032, Shadara SO  
From:RAMDEV S SA.OPP BHADAR RIVER  
Wt:20gms Ack Fee:3.00,REG=17.0  
Amt:29.50,Tax:4.50,Amt.Paid:30.00(Cash)  
<Track on www.indiapost.gov.in>  
<Dial 18002666868> <Wear Masks. Stay Safe>

TO  
Hon'ble  
Prime Minister sir  
Government of India

Complainant: Ramdev, s sanjva  
resi: opp bhadar river bank  
jetpur dist rajkot  
mo.9726509391

Matter : Action should be taken against those who are causing water pollution in Bhadar and Uben rivers, to bring pollution control in both rivers, and to investigate the scam of crores of rupees committed under the pretext of water pollution control.....

It is to be informed that a large amount of polluted water containing color chemicals is being discharged into the Bhadar and Uben rivers of Rajkot district of Gujarat state. I have made several written complaints regarding this matter to the Pollution Control Board, Gujarat, related departments as well as your office. However, in the current situation, pollution continues to spread in the Bhadar and Uben rivers. Which makes it clear that the officials from the regional office of the Gujarat Pollution Control Board to Gandhinagar are committing corruption in this matter and whenever action is taken regarding pollution control in this matter, these officials are trying to protect the big pollution mafias who spread pollution by only reporting, taking samples and issuing notices. Also, in this matter, a large-scale scam has been committed by the pollution mafia in the maintenance amount of crores of rupees collected from the member units under the pretext of stopping pollution in these two rivers, as well as in the subsidies given by the Gujarat government from time to time.

It is worth mentioning here that these pollution mafias are causing massive damage to the health of the people and the environment by spreading pollution in both the rivers. Therefore, I humbly request you to investigate this matter and take appropriate action against those responsible for spreading pollution and defrauding crores of rupees, and to bring the pollution in both rivers under true control.

Date 03/02/2025

yours

*S. Ramdev*  
03/02/2025

Copy send to

(1) Central Bureau of Investigation New Delhi

Regarding the investigation into the scam being perpetrated under the pretext of pollution control

(2) Anti Corruption Bureau Gujarat State

For investigation and action against officials having links with pollution mafia

(3) Representatives from all news media

RECEIVED IN THE DEPARTMENT OF ENVIRONMENT AND FORESTRY  
GANDHINAGAR, GUJARAT  
DATE: 03/02/2025, 11:08  
OFFICE OF THE SECRETARY  
GANDHINAGAR, GUJARAT

RECEIVED IN THE DEPARTMENT OF ENVIRONMENT AND FORESTRY  
RAJ. JETPUR SO (36070)  
Counter No: 1.03/02/2025.11:08  
To: CENTRAL BUREAU OF INVESTIGATION  
PIN: 110005, Lodh Road W-2  
Framing Road, Sakinaka, Sakinaka  
Dist: Rajkot, Gujarat, India

RECEIVED IN THE DEPARTMENT OF ENVIRONMENT AND FORESTRY  
RAJ. JETPUR SO (36070)  
Counter No: 1.03/02/2025.11:08  
To: ANTI CORRUPTION BUREAU  
GUJARAT STATE, MUMBAI ROAD, RAJ. JETPUR  
PIN: 360001, Sakinaka, Sakinaka  
Dist: Rajkot, Gujarat, India

श्री मान  
माननीय प्रधानमंत्री श्री  
भारत सरकार

शिकायतकर्ता: रामदेव एस सांजवा  
पता: शिव पान के पास, भादर नदी के तट पर  
जैतपुर जिला राजकोट  
Mo 9726509391

विषय: भादर नदी और उबेन नदी में प्रदूषण फैलाने वाले प्रदूषण माफियाओं के साथ-साथ इन प्रदूषण माफियाओं को उनकी आपराधिक गतिविधियों में सहायता करने वाले संबंधित अधिकारियों के खिलाफ कार्रवाई करना तथा दोनों नदियों में प्रदूषण को नियंत्रित करने के लिए कार्रवाई करने के विषय में

अतः हम आपको सूचित करना चाहते हैं कि स्थानीय साड़ी छपाई उद्योग से जुड़े सामान्य अपशिष्ट उपचार संयंत्र cetsp stop द्वारा राजकोट जिले में जैतपुर भादर और उबेन नदियों में प्रदूषित पानी छोड़ा जा रहा है, जिसके संबंध में स्थानीय स्तर से लेकर गुजरात प्रदूषण नियंत्रण बोर्ड और सभी संबंधित विभागों में कई शिकायतकर्ताओं ने लिखित शिकायतें दर्ज कराई हैं।

हालांकि, भादर और उबेन नदियों में प्रदूषित पानी का निर्वहन जारी है, जो कि गुजरात प्रदूषण नियंत्रण बोर्ड के क्षेत्रीय कार्यालय जैतपुर से लेकर गांधीनगर मुख्यालय तक के अधिकारियों की इन प्रदूषण माफियाओं के साथ मिलीभगत के कारण है, साथ ही अधिकारी स्वयं भी भ्रष्ट हैं और इन नदियों को प्रदूषित करने वाले प्रदूषण माफियाओं के कृत्यों पर पर्दा डाल रहे हैं।

साथ ही, इस संबंध में, ये प्रदूषण माफिया वर्षों से सीईटीपी से जुड़ी सभी सदस्य इकाइयों से रखरखाव के नाम पर करोड़ों रुपये की वसूली कर रहे हैं। वर्ष 2025 में भादर और उबेन नदियों में फैल रहे जल प्रदूषण से स्पष्ट है कि रखरखाव के करोड़ों रुपए का भी बड़े पैमाने पर गबन किया गया है। भ्रष्ट अधिकारियों की मदद से छोटी व एकल साड़ी छपाई इकाइयों को बंद होने का डर दिखाकर डराया जा रहा है।

अतः मैं आपसे विनम्र निवेदन करता हूँ कि उपरोक्त शिकायत में उल्लिखित तीनों मुद्दों के संबंध में भ्रष्ट अधिकारियों, प्रदूषण माफियाओं और रखरखाव के करोड़ों रुपए का गबन करने वालों के खिलाफ सख्त कार्रवाई करें और दोनों नदियों में प्रदूषण को नियंत्रित करें।

तारीख: 28/04/2025

प्रतिलिपि भेजी गई

- 1 केंद्रीय अन्वेषण ब्यूरो मुख्यालय नई दिल्ली (घोटाले के संबंध में कार्रवाई करने के उद्देश्य से)
- 2 प्रवर्तन विभाग मुख्यालय नई दिल्ली प्रदूषण के नाम पर हो रहे करोड़ों रुपए के बेनामी लेन-देन की जांच के संबंध में
- 3 केंद्रीय सतर्कता आयोग मुख्यालय नई दिल्ली
- 4 सभी प्रेस प्रतिनिधि श्री.

REGISTRATION NO: 201296720021  
PL JETPUR SD 36070  
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PIN: 110014, NORTH WING BLDG  
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Amt: 24.50, PS: 5.00, Tax: 4.50, Net. Paid: 25.00 (Cash)  
Track on www.indiapost.gov.in



आपका

S. Ramdev  
28-04-2025

REGISTRATION NO: 201296720021  
PL JETPUR SD 36070  
Counter No: 1, 28/04/2025, 10:38  
To: PRIME MINISTER, SOUTH BLOCK  
PIN: 110011, North Block BLDG  
From: RAMDEV S SA, OFF BHADAR RIVER  
Weightage Ack Fees: 2.00, PED=17.0  
Amt: 24.50, PS: 5.00, Tax: 4.50, Net. Paid: 25.00 (Cash)  
Track on www.indiapost.gov.in



REGISTRATION NO: 201296720021  
PL JETPUR SD 36070  
Counter No: 1, 28/04/2025, 10:38  
To: DIRECTOR, PRIME MINISTER'S OFFICE  
PIN: 110011, North Block BLDG  
From: RAMDEV S SA, OFF BHADAR RIVER  
Weightage Ack Fees: 2.00, PED=17.0  
Amt: 24.50, PS: 5.00, Tax: 4.50, Net. Paid: 25.00 (Cash)  
Track on www.indiapost.gov.in



REGISTRATION NO: 201296720021  
PL JETPUR SD 36070  
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To: DIRECTOR, PRIME MINISTER'S OFFICE  
PIN: 110011, North Block BLDG  
From: RAMDEV S SA, OFF BHADAR RIVER  
Weightage Ack Fees: 2.00, PED=17.0  
Amt: 24.50, PS: 5.00, Tax: 4.50, Net. Paid: 25.00 (Cash)  
Track on www.indiapost.gov.in

① Pmo. Ru. 29672502/31r  
② P.D. Ru. 29672489631r  
③ CBJ - Ru. 29672490531r  
④ CAG - Ru. 29672491931r  
Resi Post Id



**Photos with GPS Locations of polluted nalas which drains in Bhadar River. Recent Pictures taken by the applicant on dated 15.04.2025**





**Photos with GPS Locations of polluted nalas which drains in Bhadar River. Recent Pictures taken by the applicant on dated 26.04.2025**





**Photos with GPS Locations of polluted nalas which drains in Bhadar River. Recent Pictures taken by the applicant on dated 26.04.2025**

