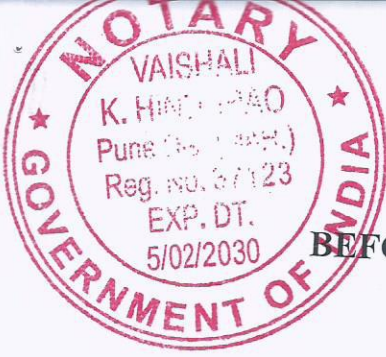




**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, AT PUNE**

Original Application 163/2025

Mr Nana Aburao Khaire

... Applicant

Versus

M/s Kirloskar Ferrous Industries Ltd & Ors

... Respondent

Rejoinder to the Reply of the M.P.C.B Dated 22.05.2026

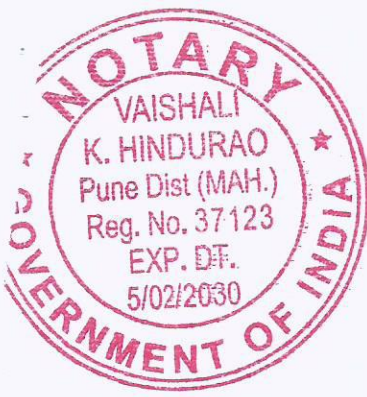
I, Mr Nana Aburao Khaire Aged adult occupation Farmer residing at Nazare KP Taluka Purndar, District Pune do hereby solemnly affirm and state as under:

1. At the outset the Applicant submits that the Respondent No 2 has not complied with the directions of this Hon'ble Tribunal dated 19.01.2026 as per which it was made very specific that the Respondent No 2 had to show as to what was the action



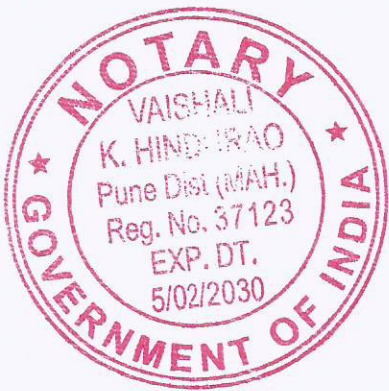
taken by the Respondent No 2 after the proposed directions dated 04.09.2025 was issued.

2. The Applicant submits that the Respondent No 2 has not dealt with any of the 10 points covered as per the proposed directions dated 04.09.2025. it is submitted that this seems to be a feeble attempt to cover up the Respondent No1's actions and it appears that the same is done with an intention to dilute the issues at hand. The proposed directions dated 04.09.2025 was issued by the Respondent no 2 after verifying the same as per site visit at loco and the nature of the observations are rather serious.
3. Thus the Applicant humbly requests this Hon'ble Tribunal to direct the Respondent No 2 to comply with the order of this Hon'ble Tribunal dated 19.01.2025 in it's letter and spirit whereby the Respondent No 2 shows action taken by it on each of the 10 points raised in the directions dated 04.09.2025. The table at page 200 to 201 of the Paper book only deals with compliances but does not deal with any action taken by the



Respondent No 2 to the lapses observed, thereby giving a clean chit to the Respondent No 1.

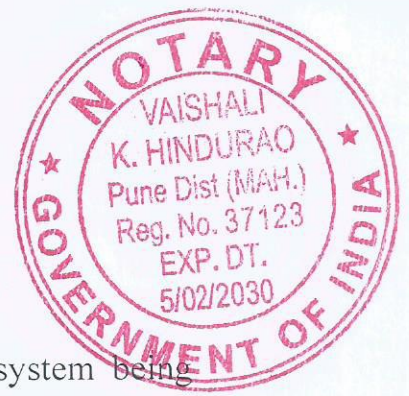
4. There is nothing mentioned in the said reply as to the Status of the E.C. for expansion and as to what action has been taken by the Respondent No 2 in that regard.
5. There is a mention about 5lakh MT of Legacy slag waste, which is admitted by the Respondent No1 of its own accord. The Respondent No 2 has failed to take any action on the Legacy slag and has mentioned only about the future compliance, thereby giving the Respondent No 1 a long rope and a clean chit.
6. Further the Respondent No 2 has failed to show any proof as to the scientific disposal of the slag which was observed at the site of the Respondent No 1 in Para 6 (VII) at Page 162 of their reply, the Respondent No 2 has taken the statement of the Respondent No 1 as the gospel truth and has made an



unverified statement regarding its alleged disposal. Further the said Paragraph mentions about disposal of sludge to the extent of 49233.42 MT since October 2025 to February 2026. There is no mention as to what was done regarding the disposal before October 2025. The Reply fails to mention the monthly generation of slag and as to how long did it take to generate the Slag of the said quantity and as to how many months/ years was the slag lying there at the premises. Thus a detailed reply be called for in that regard.

7. Thus this by itself amounts to admission of the slag and its non action for years which is being conveniently ignored by Respondent No 2.

8. As to Point No 5 of the Proposed directions fugitive emissions were noted due to incomplete secondary fume extraction system. The Respondent No 2 has again ignored the issue and has mentioned about future compliance and has taken no action against the Respondent No 1 for the violations by it.



9. As to point No 6 i.e the storm water drainage system being inadequately maintained, again the response deals with future compliance, but the same does not mention about any action being taken against the Respondent No 1 for the violation already done by them.

10. As to point No 7 of the Proposed Directions, there is non compliance of the same for which no action has been taken against the Respondent No 1 for the same, and the said violation still continues as the construction of the said road is still not complete.

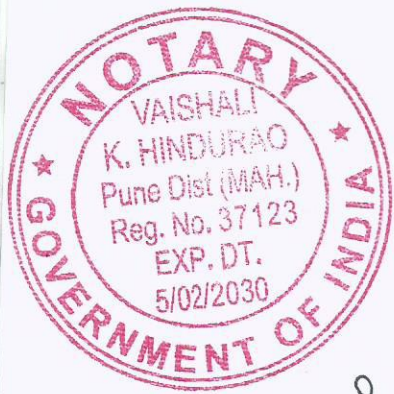
11. As to Point No 8 of the said proposed directions regarding the disposal of acid being done unscientifically, the same is only a proposed solution to which the Respondent No 2 seems to be happy with merely an assurance given in that regard, with no action being taken against the R-1 on the past and present violations.



12.As to Point no 9 of the said proposed directions for dust suppression measures generated from the slag there is noncompliance reported which is still persisting. The Respondent No 2 has not taken any action against the Respondent No 1 for the same. The R-2 has conveniently ignored the issue on this count too.

13.As to point no 10 again the same has not been complied with.

14.Thus from the above it is very clear that the Respondent no 2 M.P.C.B. has not taken any action against the Respondent No 1 and it seems that they are being given opportunity for improvement, but there is no action taken for violations still occurring nor there is any mention of any action for past violations. Thus the concerned officer deserves to be called to the open court and an explanation be called from him in that regard. The Respondent No 2 is more keen on having the present Original Application being disposed of than solving the



issues at hand and a fresh compliance Report be called for from
the Respondent No 2 M.P.C.B.

S. Shankar

Adv for the Applicant

11.31.2026

Applicant

Solemnly Affirmed on this 25th Day of June

At Pimpri, Pune.

NOTARIAL REGISTER

Sr. No. 12/2026

Date 25.06.2026

BEFORE ME

Hindurao
Dt. 25.06.2026
ADV. VAISHALI K. HINDURAO
NOTARY GOVT. OF INDIA
Tapkinnagar, Kalewadi, Pimpri, Pune-17

