

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

ORIGINAL APPLICATION NO. 88 OF 2025

IN THE MATTER OF:

Devidas Khatri

...Applicant

Versus

Union of India and Ors.

...Respondents

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Anob

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Place: Delhi

Date : 11.04.2026

Devidas Khatri

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**REJOINDER ON BEHALF OF THE APPLICANT IN RESPONSE TO THE
REPLY AFFIDAVIT FILED BY RESPONDENT NO. 13**

MOST RESPECTFULLY SHOWETH:

1. That the contents of para 1 of the reply need no rejoinder.
2. That the contents of para 2 are not admitted in the manner stated by the respondent. The provisions of the E-waste (Management) Rules, 2022 and SOP's (Standard Operating Procedures) for E-waste Recycler are not implemented and complied in letter and spirit.
3. That the contents of para 3 of the reply need no rejoinder.
4. That the contents of para 4 of reply need no rejoinder.
5. That the contents of para 5 of reply need no rejoinder.
6. That the contents of para 6 to 8 of the reply are replied in terms that the respondent has claimed about the physical verification of the business unit carried out by the authorities but they have failed to place on record any details, documents or inspection reports to substantiate such claims. The Rule 5 (iii) of SOPs for E-Waste Recycler, clearly provides that,

"5.0 Target Time and Modality of Granting Registration

XXXXXXX

iii. CPCB shall conduct verification of the recycling facility within three months of granting the registration on the portal either through physical or video conferencing mode. The physical verification will be for confirming the information provided by the applicant recyclers."

Devidas Khatri

Thus, it is evident that, after the grant of registration by the CPCB, it is mandatory to conduct verification within a period of three months, either through physical inspection or video conferencing, to ensure that the information provided by the recycler is correct. However, the respondent has failed to place on record any information with respect to the such verification. This clearly indicates that, no such verification was conducted after the grant of registration to the Respondent, as no specific details, records, or verification report have been provided. It is further submitted that no verification was ever conducted by the CPCB within the stipulated period of three months from the date of online registration, which is a mandatory prerequisite for the grant of registration to recyclers. It is further submitted that the absence of any verification records or report clearly indicates that the provisions of E-waste (Management) Rules, 2022 and SOP's (Standard Operating Procedures) for E-waste Recycler have not been implemented or complied with in letter and spirit.

7. That the contents of para 9 and 10 need no rejoinder.
8. That the contents of para 11 is replied in terms that the respondent is necessary party to the present matter as the CPCB has failed to physically verify the business unit, which is a prerequisite condition to grant registration and also respondent have only claimed that such verification were carried out but failed to place on record any specific details, documents, or inspection report etc.

Devdas Khatia

Humble Applicant

Through Counsel

Anoop

(Anoop Agarwal, Advocate)

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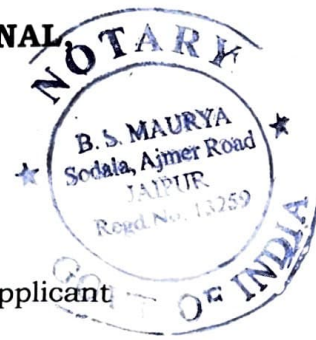
Devidas Khatri

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...Respondents



AFFIDAVIT

I, Devidas Khatri S/o Shri Nand Kishore Khatri, aged about 50 years, R/o 239, Laxmi Nagar, Behind Mangori Walon Ki Bagichi, Brahmपुरi, Jaipur, do, hereby take oath and state as under:-

1. That I am Applicant and well conversant with the facts of the case and thus competent to depose this affidavit.
2. That the accompanying rejoinder has been drafted by mem counsel under my instructions and the same are based on the records and has been read over by me and I have understood the same.
3. That all the contents of rejoinder are true and correct to my personal knowledge.

Devidas Khatri

Deponent

Verification

I, the above-named deponent, do hereby solemnly affirm that the contents of para no. 1 to 3 of the above affidavit are true to my personal knowledge. Nothing has been concealed in it. No part of it is false. So help me God.

Devidas Khatri

Deponent

ATTESTED
D. S. Maurya
D. S. MAURYA
Notary (Govt. Of India)
Sodala, Ajmer Road, Jaipur
11 APR 2026