

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

Original Application No. 1258 of 2024

Action Group Against Plastic Pollution and another.

..... Applicants

Vs.

State of Punjab & others

..... Respondents

**REJOINDER TO THE REPLY FILED BY RESPONDENT NO. 7 (MC
JALANDHAR)**

I. PRELIMINARY OBJECTIONS

1. That the reply filed by respondent no.7 is factually incorrect, misleading and devoid of merit designed only to mislead this Hon'ble Tribunal. The respondent no.7 has failed to provide data for years prior to 2024, proving that enforcement is an afterthought triggered only by the filing of the present petition.
2. That as a local body, respondent No. 7 is a trustee of the environment. By allowing the unchecked manufacture and sale of Single Use Plastic (SUP), it has committed a "breach of trust" as defined in *M.C. Mehta v. Kamal Nath (1997 1 SCC 388)*.
3. That the alleged challans mentioned are selective and a mere cosmetic exercise manipulated to mislead this Hon'ble Tribunal. Targeting small vendors without complete particulars/addresses while shielding large manufacturers and

wholesalers is a colourable exercise of power and a violation of the Polluter Pays Principle.

4. That the data provided by the respondent Corporation in para 6 (154 challans in the year 2024) serves as a statistical admission of failure rather than compliance. For a metropolitan city like Jalandhar with a population exceeding 12 Lakhs and 85 administrative wards, the issuance of 0.4 challans per day indicates a complete collapse of the enforcement mechanism. This Hon'ble Tribunal may note that this figure represents a token enforcement rate of 0.005 challans per ward per year, which holds no deterrent value against the rampant commercial usage of banned plastic.
5. That the answering respondent has made a glaring admission in Para 28 of their reply, stating that they have 'educated the people... for the use of non-woven carry bags as they are not single-use.' This submission is scientifically flawed and legally impermissible. Non-woven bags are manufactured using Polypropylene (PP), a petrochemical-based plastic which is non-biodegradable. The promotion of these bags under the guise of 'eco-friendly alternatives' violates the spirit of the Plastic Waste Management (Amendment) Rules, 2021. By officially promoting a plastic variant that mimics cloth but disintegrates into micro-plastics, respondent no. 7 is engaging in state-sponsored environmental misinformation.
6. That perusal of Annexure R-1 (List of Challans) reveals that punitive action is restricted solely to street vendors, small karyana store owners, and vegetable sellers. The respondent has failed to place on record a single instance of seizure or punitive action against major stockists, wholesalers, or distributors who act as the primary source of Single-Use Plastic in Jalandhar. This 'pick-and-choose' policy violates the 'Polluter Pays Principle' by penalizing the lowest rung of the economic ladder while granting immunity to the supply chain heads. In fact, SUP

is in use rampantly in city of Jalandhar despite alleged enforcement claims by the respondent as clear from the latest geo tagged photos annexed along with the rejoinder as annexures P-10 to P-15.

7. That the seizure of 500kg of SUP and a truckload of thermocol as mentioned by the respondent no. 7 in its reply acts as *res ipsa loquitur* evidence that banned items are easily available in Jalandhar and there is gross dereliction of statutory duty by respondent no. 7 in implementing the ban.

II. PARA-WISE REPLY

1. That para 1 to 3 of the reply are matters of record.
2. That para 4 of the reply is wrong, vague, baseless and hence stoutly denied. The claim of no violation is false. The Respondent is in direct violation of Rule 6 of the Plastic Waste Management (PWM) Rules, 2016.
3. That para 5 and 6 of the reply are wrong, vague, baseless and hence stoutly denied. 154 challans in a city of 12 lakhs is a badge of failure. These are cosmetic actions issued on a single day against anonymous street vendors.
4. That para 7 of the reply is wrong, vague, baseless and hence stoutly denied. Organizing a Sodal Mela once a year is tokenism. Shockingly in one of the photographs annexed by respondent no. 7 with its reply, single use plastic packaging being used in so called awareness drive is visible, showing the amount of awareness officials of respondent no.7 has regarding single use plastic. It is asserted that awareness without enforcement is a hollow gesture that mocks the PWM (Amendment) Rules, 2021.

5. That para 8 and 9 of the reply are wrong, vague, baseless and hence stoutly denied. Occasional cleanliness drives do not constitute the enforcement complete ban mandated by the PWM (Amendment) Rules, 2021.
6. That para 10 of the reply is wrong, vague, baseless and hence stoutly denied. Large seizures of single use plastic by respondent no. 7 during one of the occasional raids influenced by filing of this petition prove that the supply chain is thriving unchecked and manufacturing is occurring with the implicit consent of the authorities including respondent no. 7.
7. That para 11 of the reply is wrong, vague, baseless and hence stoutly denied. Alleged 30 motivators for 85 wards and for a city with population of 12 lakh people is a skeletal and non-serious arrangement designed to fail and moreover, respondent has provided no data on daily activity, inspections, or results by these alleged volunteers/motivators.
8. That para 12 to 15 of the reply are wrong, vague, baseless and hence stoutly denied. The claim of segregated waste collection is physically contradicted by the plastic-clogged drains of Jalandhar city.
9. That para 16 of the reply is wrong, vague, baseless and hence stoutly denied. The claim of following directions is explicitly refuted by the PPCB's own finding of the Respondent's lackadaisical approach (Annexure R-6/C of PPCB reply).
10. That para 17 to 27 of the reply are wrong, vague, baseless and hence stoutly denied. The alleged punitive and remedial measures claimed by respondent no. 7 have yielded zero reduction in plastic litter and enforcement of ban on single use plastic.

11. That para 28 of the reply is wrong, vague, baseless and hence stoutly denied. Promoting "non-woven bags" is illegal as most non-woven bags are Polypropylene (PP)—a form of plastic and Studies (including in Environmental Science & Technology) show that non-woven plastics shed micro-plastics quickly due to their loose structure. Calling these eco-friendly is incorrect. This approach of respondent shows their incompetence in understanding the law.
12. That para 29 to 37 of the reply are wrong, vague, baseless and hence stoutly denied. The respondent has failed to prove improvement in any water body or dumpsite.
13. That grounds A to H in the reply are wrong, vague, baseless and hence stoutly denied. The respondent's acts are a complete failure of the statutory mandate.
14. It is therefore, prayed that the original application may kindly be allowed and respondent no.7 be directed to pay Environmental Compensation for the damage caused and initiate disciplinary action against erring Health Officers/Commissioner for gross negligence.

Dated: 15/01/2026


Signature of Applicant

(Action Group Against Plastic Pollution Through its
president Dr. Pallavi Khanna)


Through Counsel

VERIFICATION-

I, Pallavi Khanna, the applicant no.2 herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Dated: 15/01/2026


Applicant

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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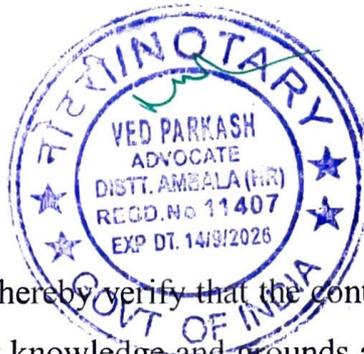
Affidavit of Dr. Pallavi Khanna, President, Action Group Against Plastic Pollution aged years r/o #667 Urban Estate Phase 1, Jalandhar.

I, the above-mentioned deponent do hereby solemnly affirm and declare as under:

1. That the deponent is Applicant no. 2 and has filed the present Original Application before this Hon'ble Tribunal against the non-implementation of the ban on manufacture, distribution, sale and usage of Single Use Plastic in city of Jalandhar.
2. That the contents of Para 1 to 14 of the rejoinder are true to the best knowledge of the deponent.

Place: Jalandhar

Date: 15/01/2026



Pallavi Khanna

Deponent

The deponent herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Pallavi Khanna

Deponent

FESTEL
NOTARY PUBLIC
AMBALA CITY (Haryana)

2 FEB 2026

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

Original Application No. 1258 of 2024

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..... Applicants

Vs.

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..... Respondents

REJOINDER TO THE REPLY FILED BY RESPONDENT NO. 6 (PPCB)**I. PRELIMINARY OBJECTIONS**

1. That under section 5 of the Environment (Protection) Act, 1986, the PPCB has the power to shut down industrial units violating any environmental law and regulation. The respondent no. 6 has failed to exercise these powers against a single major plastic manufacturer, distributor and seller in Jalandhar.
2. That respondent no. 6 has reduced a serious environmental crisis to a paper trail of letters and notices from 2022 to 2024, with no ground-level impact clear from easy availability of single use plastic in the markets.
3. That respondent no. 6's own record of the meeting dated 31.01.2025, detailing the lackadaisical approach of MC officials, is a judicial admission of the failure of the state machinery and punitive action needs to be taken by this Hon'ble Tribunal against respondent no.7.

4. That the applicant places heavy reliance on the respondent board's own internal communication, annexed as Annexure R-6/C to their reply. In this document, the PPCB has explicitly characterized the approach of the Municipal Corporation Jalandhar (Respondent No. 7) as 'lackadaisical'. This constitutes a formal indictment of the implementing agency by the statutory regulator. It is submitted that when the State Pollution Control Board itself certifies that the Local Body is negligent and 'lackadaisical,' the averments made by the applicant regarding the failure of the authorities stand admitted by the respondents themselves.
5. The respondent board has attempted to dilute the gravity of the situation in Jalandhar by presenting consolidated state-wide figures (e.g., 14,009 inspections across Punjab). The reply conspicuously lacks granular, ward-wise data for Jalandhar district specifically. This data fog is an attempt to mask the specific lack of enforcement in the subject city. The respondent has failed to explain why, despite supposedly closing manufacturing units, the market is still flooded with banned items, indicating a failure to check interstate smuggling and illegal warehousing. Latest geo tagged pictures annexed as P-10 to P-15 depict the ground reality of alleged enforcement by the respondent.

II. PARA-WISE REPLY

1. That para 1 and 2 of the reply are matters of record.
2. That para 3 of the reply is wrong, vague, baseless and hence stoutly denied. Alleged implementation is only in files and not in true letter and spirit.
3. That para 4 to 9 of the reply are wrong, vague, baseless and hence stoutly denied. Alleged closing of only 30 units in the entire state of Punjab is a statistical insignificance that emboldens violators. It is also submitted that respondent has not shared any list of the alleged units closed down and what punitive action has been taken by them against the violators who were running these units.

4. That para 10 to 21 of the reply are wrong, vague, baseless and hence stoutly denied. The enumeration of letters proves the Applicant's point: the ban is restricted to correspondence.
5. That para 22 to 29 of the reply are wrong, vague, baseless and hence stoutly denied. Awareness is a secondary tool; the primary duty is the seizure and prosecution of manufacturers, which is conspicuously missing from the reply of respondent no. 6.
6. That para 30 to 31 of the reply are wrong, vague, baseless and hence stoutly denied. The claim of monitoring is hollow as the PPCB has failed to register even one criminal complaint against large-scale violators in Jalandhar.
7. That para 32 of the reply is admitted only to the extent that it proves the lackadaisical approach and non-compliance of the authorities. Rest of the para is wrong, vague, baseless and hence stoutly denied.
8. That para 33 to 35 of the reply are wrong, vague, baseless and hence stoutly denied. Directing the respondent no. 7 MC Jalandhar to submit a report after many years of the ban is an admission of ineffective monitoring.
9. It is therefore, prayed that the original application may kindly be allowed and this Hon'ble tribunal may issue a direction for setting up high-level independent committee to monitor the ban and impose heavy penalties on the State of Punjab for administrative failure, further respondent no.7 be directed to pay Environmental Compensation for the damage caused and initiate disciplinary action against erring officials for gross negligence, direct the respondents to publish a monthly status report on the district website detailing the specific quantities of plastic seized and fines collected, to ensure public accountability, in addition direct the PPCB to exercise its powers under Section 5 of the Environment (Protection) Act, 1986 to close down the specific commercial

establishments identified as habitual offenders, rather than merely issuing notices.

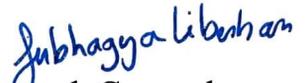
Dated: 15/01/2026



Signature of Applicant

(Action Group Against Plastic Pollution

Through its president Dr. Pallavi Khanna)



Through Counsel

VERIFICATION-

I, Pallavi Khanna, the applicant no.2 herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Dated: 15/01/2026

Place: Jalandhar



Applicant

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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..... Respondents

Affidavit of Dr. Pallavi Khanna, President, Action Group Against Plastic Pollution aged 57 years r/o #667 Urban Estate Phase 1, Jalandhar.

I, the above-mentioned deponent do hereby solemnly affirm and declare as under:

1. That the deponent is Applicant no. 2 and has filed the present Original Application before this Hon'ble Tribunal against the non-implementation of the ban on manufacture, distribution, sale and usage of Single Use Plastic in city of Jalandhar.
2. That the contents of Para 1 to 9 of the rejoinder are true to the best knowledge of the deponent.

Place: 15/01/2026

Date: Jalandhar



Pallavi Khanna

Deponent

The deponent herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Pallavi Khanna

Deponent

2 FEB 2026

ATTESTED
NOTARY PUBLIC
HARYANA

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

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JOINT REJOINDER TO THE REPLIES FILED BY RESPONDENTS**NO. 1, 2, 3, & 5**

1. That the reply filed by respondent no. 1, 2, 3 and 5 are itself misconceived as merely adopting the PPCB's reply, these respondents have shown a total lack of independent stand qua implementation of ban of single use plastic items and despite of PPCB (respondent no.6) pulling up MC Jalandhar (respondent no. 7) for their abysmal approach with regard to implementing environmental rules and regulations in city of Jalandhar, respondent no. 1, 2, 3 and 5 have taken no further action against them. Blind adopting of reply filed by respondent no. 6, goes to show that respondent no. 1, 2, 3 and 5 have no independent findings and have not made any ounce of effort in implementing the ban on single use plastic.
2. That the Deputy Commissioner, Jalandhar (Respondent No. 3), is the ex-officio Chairman of the District Environment Committee (DEC), which is the nodal body responsible for monitoring environmental compliance under the District Environment Plan. However, the affidavit filed by respondent No. 3 reflects a complete absence of effective district-level monitoring. No material has been

placed on record to show that any DEC meetings were convened or that any action was taken to address poor enforcement of the ban on single-use plastic. The Deputy Commissioner has merely forwarded the report of the Punjab Pollution Control Board and has requested this Hon'ble Tribunal to treat the same as his reply, without any independent application of mind. The affidavit does not disclose any supervisory steps such as holding review meetings, issuing directions to the police or GST departments to curb inter-district movement of banned plastic, or independently verifying the claims made by the Municipal Corporation (respondent no.7). The failure of all respondents to place any independent data on record clearly demonstrates that the monitoring mechanism at the district level is ineffective and largely defunct in the state of Punjab.

3. That the proliferation of micro-plastics in Jalandhar's groundwater, caused by the State's inaction, is a direct violation of the citizens' right to life enshrined under Article 21 of the Constitution of India.
4. That it is pertinent to note the proactive steps being taken in other states. For instance, Andhra Pradesh government has banned single-use plastics in its state secretariat as a precursor to a state-wide ban by 2026. Similarly, Karnataka has enforced strict bans in temples, and the Kashi Viswanathan Temple has declared its premises a plastic-free zone. In contrast, the respondents in Punjab seem content with status quo and has no environmental action plan.
5. That the state of Punjab has failed to ensure that the 3-tier monitoring system operates effectively and the alleged State Environmental Plan remains a theoretical document with no ground presence in Jalandhar.

6. That the respondent's reliance on PPCB's reply proves they have no independent action plan to save Jalandhar from the plastic menace. Respondent no. 1, 3 and 5 have reproduced the entire law pertaining to single use plastic but have no efforts to show the steps taken by them for implementation of the same law.
7. It is therefore, prayed that the original application may kindly be allowed and this Hon'ble tribunal may issue a direction for setting up high-level independent committee to monitor the ban and impose heavy penalties on the State of Punjab for administrative failure, further respondent no.7 be directed to pay Environmental Compensation for the damage caused and initiate disciplinary action against erring officials for gross negligence, direct the respondents to publish a monthly status report on the district website detailing the specific quantities of plastic seized and fines collected, to ensure public accountability, in addition direct the PPCB to exercise its powers under Section 5 of the Environment (Protection) Act, 1986 to close down the specific commercial establishments identified as habitual offenders, rather than merely issuing notices.

Dated: 15/01/2026

Pallavi Khanna

Signature of Applicant

(Action Group Against Plastic Pollution

Through its president Dr. Pallavi Khanna)

Subhagya Lishan
Through Counsel

VERIFICATION-

I, Pallavi Khanna, the applicant no.2 herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Dated: 15/01/2026

Place: Jalandhar

Pallavi Khanna
Applicant

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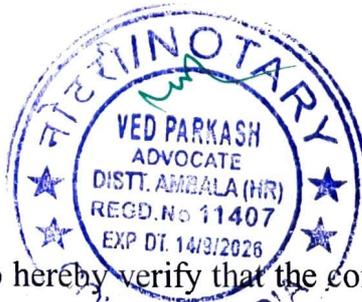
Affidavit of Dr. Pallavi Khanna, President, Action Group Against Plastic Pollution aged 57 years r/o #667 Urban Estate Phase 1, Jalandhar.

I, the above-mentioned deponent do hereby solemnly affirm and declare as under:

1. That the deponent is Applicant no. 2 and has filed the present Original Application before this Hon'ble Tribunal against the non-implementation of the ban on manufacture, distribution, sale and usage of Single Use Plastic in city of Jalandhar.
2. That the contents of Para 1 to 9 of the rejoinder are true to the best knowledge of the deponent.

Place: 15/01/2026

Date: Jalandhar



Pallavi Khanna

Deponent

The deponent herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Pallavi Khanna

Deponent

2 FEB 2026

ATTESTED
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HARYANA

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**REJOINDER ON BEHALF OF THE APPLICANTS TO THE REPLY
FILED BY RESPONDENT NO. 4 (CENTRAL POLLUTION CONTROL
BOARD)**

MOST RESPECTFULLY SHOWETH:

PRELIMINARY OBJECTIONS:

1. That the reply filed by the Central Pollution Control Board (hereinafter "CPCB") is a classic example of bureaucratic evasion. The CPCB has attempted to reduce its role to that of a mere post-office i.e. issuing directions and forwarding complaints, while completely washing its hands of the ground-level enforcement failures. Under the Environment (Protection) Act, 1986, and the Plastic Waste Management Rules, 2016, the CPCB is the apex regulatory body. It cannot claim "no comments" on rampant violations in

Jalandhar simply by shifting the burden to State authorities (respondent no. 3, 6 & 7), especially when those authorities have demonstrably failed to act.

2. That the reply filed by the Central Pollution Control Board (CPCB) constitutes a clear abdication of its statutory duties under the Environment (Protection) Act, 1986. The Respondent has attempted to reduce its role to that of a mere 'post-office'—issuing paper directions while washing its hands of the ground-level collapse of enforcement.
3. That the respondent relies heavily on a list of directions, guidelines, and Action Plans (Annexures I to IV) to prove its diligence. However, the very existence of the present petition, highlighting the rampant availability of Single Use Plastic (SUP) in Jalandhar is evidence that these paper directions have failed. Issuing a direction under Section 5 of the EPA is meaningless if the CPCB does not exercise its power to penalize the State Boards and Municipal Corporations for non-compliance. The reply lists directions but fails to place on record a single instance where it took punitive action against the Punjab Pollution Control Board (PPCB) or Jalandhar Municipal Corporation for failing to implement said directions.
4. That the respondent boasts of a Comprehensive Action Plan (Annexure-II) aimed at supply and demand-side interventions. Yet, in the reply it is admitted that the enforcement is largely delegated. The CPCB's defence that it has developed portals and conducted workshops is irrelevant to the core grievance: that banned plastic is physically present and being sold openly in Jalandhar. Digital portals do not clean up physical pollution.

PARA-WISE REJOINDER:

1. That the contents of para 1 and 2 are matters of record. However, the blanket denial of liability by the answering respondent is vehemently denied. The CPCB is a necessary party precisely because the local machinery has collapsed, requiring central intervention which has been conspicuously absent.
2. That the contents of para 3 regarding the applicant's grievance are reiterated. It is denied that the respondent has effectively discharged its duties. The prudent enforcement mentioned by the respondent is non-existent on the ground.
3. That the contents of para 4 and 5 are denied and contents of the original application are reiterated.
4. That the averments in para 6 are denied as being misleading and insufficient. The respondent claims to have a Comprehensive Action Plan, but fails to show specific results of this plan in Punjab. A plan without execution is a nullity. The respondent claims 21,912 inspections nationwide. This number is statistically insignificant for a country the size of India and proves the lack of serious enforcement. Furthermore, the respondent admits that 15,694 of these were joint inspections, indicating CPCB's lack of independent verification mechanisms. The respondent has failed to state how many of these inspections were conducted specifically in Jalandhar or against the erratic manufacturers in Punjab mentioned in the original applicant. The respondent has merely annexed copies of directions issued to various authorities. The applicant submits that issuance is not compliance. The CPCB has failed to place on record any Action Taken Report verifying whether the directions dated

11.11.2024 or 04.07.2024 were actually implemented by the Punjab authorities.

5. That the contents of para 7, 8 and 9 are denied. The attempts to evade specific responses by referring back to Paragraph 6 are denied. Regarding Para 9, the Status Report on Micro-plastics (Annexure-A) is a diversion. The original application complains of visible, macro-pollution by SUPs (bags, cutlery) which requires immediate enforcement, not long-term studies.
6. That the averments in para 10 are denied as being misleading and insufficient. The respondent's recitation of the Plastic Waste Management Rules, 2016 is admitted as a matter of law, but the interpretation that these rules absolve CPCB of liability is denied. While local bodies have duties, the CPCB has the overriding duty under Section 5 of the EPA to enforce the law when subordinate authorities fail. The CPCB cannot act as a bystander citing distinct responsibilities.
7. That the contents of para 11 and 12 are denied and contents of the original application are reiterated.
8. That the averments in para 13 to 15 are denied as being misleading and insufficient. The respondent's repeated use of the phrase "no comments are called for from this Answering Respondent" is legally untenable. When the applicant alleges that "waterways and lands are inundated with SUP" and "hundreds of plastic industries continue to manufacture SUP", the CPCB, as the premier environmental watchdog, is duty-bound to comment. Silence implies either ignorance or complicity. The CPCB acts as the nodal agency for pollution control; if the State respondents (Nos. 3, 6, 7) are failing, the CPCB is mandated to override them.

9. That the averments in para 16 are denied as being misleading and insufficient. The respondent's refusal to comment on the lack of implementation of its own directions under Section 5 EPA is shocking. If directions issued by CPCB to raw material manufacturers are not implemented, it is a failure of CPCB's own enforcement mechanism. The respondent cannot blame the state for the failure of central directions.
10. That the averments in para 17 to 21 are denied as being misleading and insufficient. The contents of the original application are reiterated. The respondent's strategy of passing the buck to the State Pollution Control Board (respondent No. 6) and Municipal Corporation (respondent No. 7) is objected to. The CPCB is responsible for the overall implementation of the rules across India.
11. That the averments in para 22 are denied as being insufficient. It is denied that the contents of Para 6 and 8 suffice as a reply. The CPCB has failed to address the specific allegation regarding the high contribution of SUP manufacturing to Greenhouse Gas emissions.
12. That the averments in para 23 to 32 are denied as being misleading and insufficient. The respondent continues to offer no comments on serious allegations regarding political interference, lack of vision, and failure of the municipal corporation. It is submitted that under the NGT Act, the CPCB acts as an expert body to assist the Tribunal. By refusing to comment on the environmental degradation in Jalandhar, the CPCB is failing in its duty to assist this Hon'ble Tribunal.

- 13.** That the averments in para 33 are denied as being misleading and insufficient. The Respondent's reliance on 'Guidelines for Environmental Compensation' is hollow. In Point No. 10 of its own reply (based on the PPCB report), the CPCB admits that an Environmental Compensation of ₹2.7 Crore was imposed on Municipal Corporation Jalandhar but is 'yet to be submitted'. This is a judicial admission that the 'Polluter Pays Principle' has failed. The CPCB has failed to explain why it has not exercised its powers under Section 5 of the Environment (Protection) Act to recover this specific pending amount from the State authorities.
- 14.** That the averments in para 34 to 42 are denied as being misleading and insufficient. The denials are rejected. The Polluter Pays Principle cited by the Petitioner requires active enforcement, not just guidelines. The CPCB's denial of the severe environmental damage without conducting its own independent assessment is baseless.
- 15.** That the averments in para 43 are denied as being misleading and insufficient. The respondent alleges it has followed up with PPCB and annexed a report dated 28.01.2025 (Annexure-IV), however, CPCB has blindly relied on the report of the PPCB, which is a party accused of inaction in this very original application. Furthermore, CPCB did not conduct an independent verification of the alleged raids, enforcement drives, or regulatory actions claimed in the PPCB report. Submitting a report from the very authority accused of negligence violates the principles of natural justice and fair audit.
- 16.** It is therefore, prayed that in light of the evasive reply filed by respondent No. 4, which admits to issuing directions but fails to prove their execution, this Hon'ble Tribunal may be pleased to reject the reply filed by respondent No. 4 as vague and insufficient and further direct the CPCB to constitute an

independent team (excluding local officials) to inspect the manufacturing units and markets in Jalandhar and file an independent status report, direct the CPCB to explain why no coercive action under Section 5 of the EPA has been taken against the Punjab Pollution Control Board officers for their admitted failure to enforce the ban and pass any other order as deemed fit.



Dated: 15/01/2026

Signature of Applicant

(Action Group Against Plastic Pollution

Through its president Dr. Pallavi Khanna)



Through Counsel

VERIFICATION-

I, Pallavi Khanna, the applicant no.2 herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Dated: 15/01/2026

Place: Jalandhar



Applicant

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I, the above-mentioned deponent do hereby solemnly affirm and declare as under:

1. That the deponent is Applicant no. 2 and has filed the present Original Application before this Hon'ble Tribunal against the non-implementation of the ban on manufacture, distribution, sale and usage of Single Use Plastic in city of Jalandhar.
2. That the contents of Para 1 to 16 of the rejoinder are true to the best knowledge of the deponent.

Place: Jalandhar

Date: 15/01/2026



Pallavi Khanna
Deponent

The deponent herein, do hereby verify that the contents of the above paragraphs are true to the best of my knowledge and grounds are based on legal advice and that I have not suppressed any material fact.

Pallavi Khanna

Deponent



ATTESTED
w
NOTARY PUBLIC
AMBALA CITY (Harvard)

2 FEB 2020



 GPS Map Camera

Jalandhar, Punjab, India 

Phase 1, Urban Estate, Jalandhar, Punjab 144022,
India

Lat 31.288470, Long 75.596952

Saturday, 10/01/2026 07:20 PM GMT+05:30

Note : Captured by GPS Map Camera



GPS Map Camera

Jalandhar, Punjab, India 

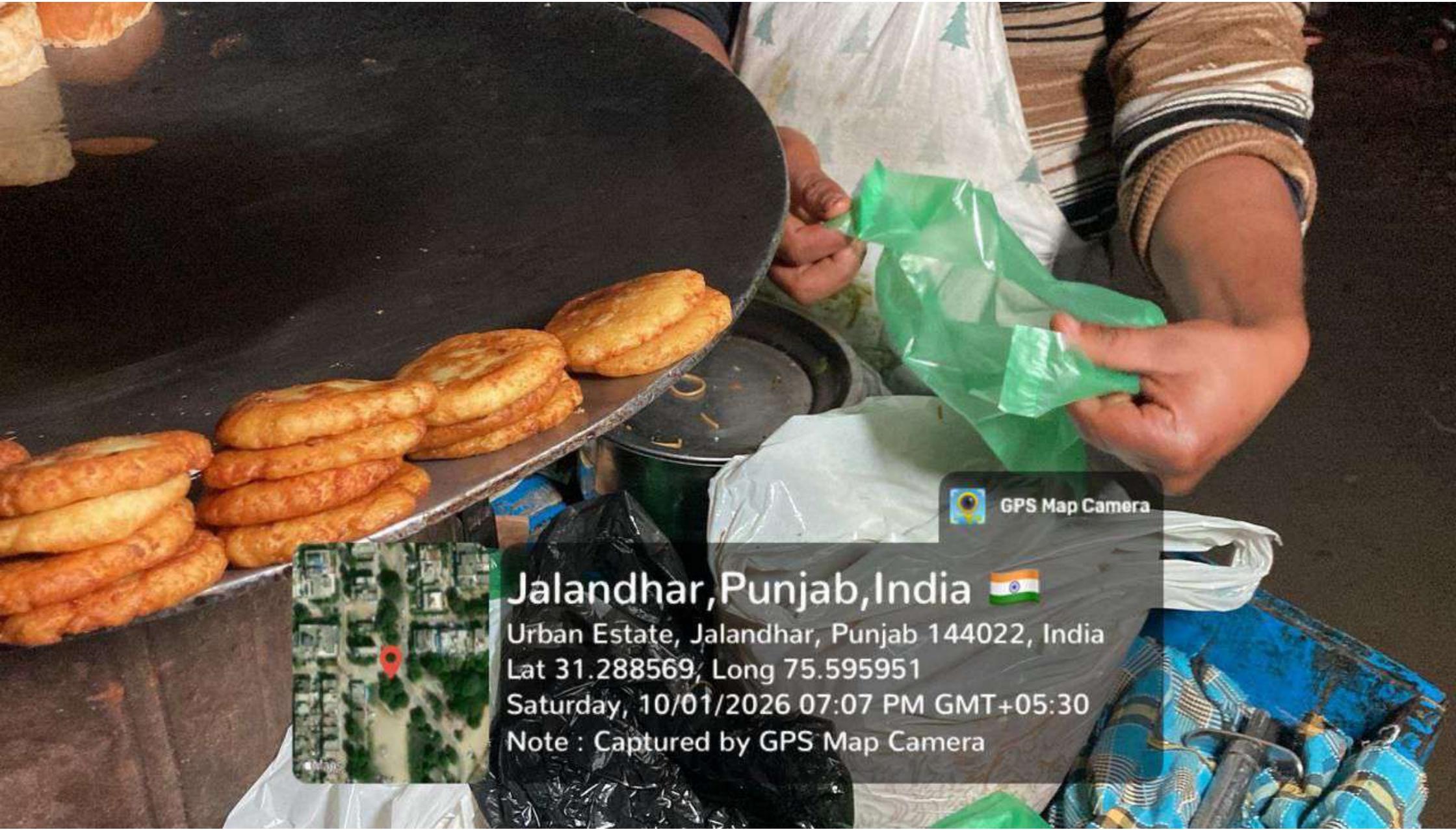
Phase 1, Urban Estate, Jalandhar, Punjab 144022, India

Lat 31.288518, Long 75.596959

Saturday, 10/01/2026 07:21 PM GMT+05:30

Note : Captured by GPS Map Camera





 GPS Map Camera

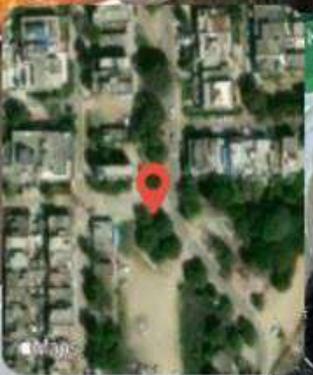
Jalandhar, Punjab, India 

Urban Estate, Jalandhar, Punjab 144022, India

Lat 31.288569, Long 75.595951

Saturday, 10/01/2026 07:07 PM GMT+05:30

Note : Captured by GPS Map Camera





 GPS Map Camera

Jalandhar, Punjab, India 

Phase 1, Urban Estate, Jalandhar, Punjab 144022,
India

Lat 31.288372, Long 75.596278

Saturday, 10/01/2026 07:07 PM GMT+05:30

Note : Captured by GPS Map Camera





GPS Map Camera

Jalandhar, Punjab, India New Model Town, New Model Town, Jalandhar,
Punjab 144003, India

Lat 31.309475, Long 75.578156

Wednesday, 31/12/2025 02:55 PM GMT+05:30

Note : Captured by GPS Map Camera





GPS Map Camera

Jalandhar, Punjab, India 

New Model Town, New Model Town, Jalandhar,
Punjab 144003, India

Lat 31.308905, Long 75.578103

Wednesday, 31/12/2025 02:16 PM GMT+05:30

Note : Captured by GPS Map Camera