

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL****PRINCIPAL BENCH, NEW DELHI****Original Application No. 780 of 2024****IN THE MATTER OF:**

PARMJEET SINGH

...APPLICANT

VERSUS

UNION OF INDIA AND OTHERS

...RESPONDENTS

**INDEX**

| <b>S.No.</b> | <b>Particulars</b>  | <b>Page No.</b> |
|--------------|---|-----------------|
| 1.           | Rejoinder on behalf of the Applicant to the reply filed by the Respondent No. 10 along with an Affidavit. | 1-29            |

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**REJOINDER AFFIDAVIT ON BEHALF OF THE APPLICANT IN  
RESPONSE TO THE REPLY FILED BY RESPONDENT NO. 10**

**MOST RESPECTFULLY SHOWETH:**

I, Paramjeet Singh, son of Sh. Omkar Singh, aged about 42 years resident of Fatehpur Tanda, Fatehpur Danda, Dehradun, Uttarakhand – 248140 do

hereby solemnly affirms and declares:

1. That I am the applicant in the present Original Application and as such well conversed with the facts and circumstances of the present case.

2. That the present rejoinder is being filed on behalf of Parmjeet Singh ("Applicant"), in response to the Reply filed by ("Respondent 3") and ("Respondent 10") to the present Original Application.

*SR*

3. That at the very outset, the Applicant denies each averment stated in the Respondent's Reply except for those that are a matter of record and/or explicitly admitted herein. It is clarified that there shall be no admission on the part of the Applicant for want of specific denial and/or traverse.
4. It is submitted that the detailed submissions made by the Applicant in the Original Application may be read as part and parcel of the present Rejoinder and the same is not being reiterated herein for the sake of brevity.
5. That the Applicant submits this Rejoinder in response to the reply filed by Respondent No. 3 and Respondent No. 10, firmly disputing the contentions raised therein. It is respectfully submitted that the replies are characterised by selective disclosure, internal contradictions and misapplication of law. The Respondents have sought to rely upon subsequent administrative circulars and reclassification exercises while conveniently overlooking binding statutory notifications, the express conditions of the Environmental Clearance, and the clear and concise findings of the Wildlife Institute of India. Far from curing the illegality, the Replies only highlight the evasive conduct of the



Respondents and underscore the fundamental irregularities vitiating the grant of Environmental Clearance and Consent to Establish.

## PRELIMINARY SUBMISSIONS AND OBJECTIONS

### A. Issue Regarding Grant of Permission within Doon Valley without Carrying Capacity Study

- i. It is respectfully submitted that the permission for establishing the Stone Crusher Plant within Doon Valley has been granted in blatant disregard of the requirement of assessing the carrying capacity of the Valley. The Doon Valley has long been recognised as an ecologically rich zone where indiscriminate industrial activity poses grave risks to the fragile environment. The Hon'ble Supreme Court, in *Rural Litigation and Entitlement Kendra, Dehradun and Others vs. State of U.P. & Others* [(1985) 2 SCC 431], categorically banned quarrying activities within the Valley. This emphasizes the need for ecological balance and environmental protection over short-term economic considerations. Despite this binding precedent, the State Respondents and their authorities proceeded to grant



Environmental Clearance without any scientific appraisal of the carrying capacity of the Valley.

- ii. That in particular, the aspect of air carrying capacity and ambient air quality was completely overlooked while granting EC to the Project Proponent. Given that stone crushers are categorized as highly polluting industries with significant dust and particulate emissions, the absence of an air quality and carrying capacity assessment renders the clearance arbitrary and unsustainable in law. The failure to undertake such a study amounts to ignoring the precautionary principle and the requirement of sustainable development, both of which have been judicially recognized as integral parts of environmental governance in India.

**B. Regarding Material Omissions and Contradictions in District Magistrate's Letter dated 26.09.2023 / VIOLATION OF SITING CRITERIA**



- i. That in the District Magistrate's Inspection Report dated 26.09.2023, at paragraph 10, the location of the project has been described at Serial No. 2(kha) of the tabulated details, it has been categorically recorded that the distance of the project site from the perennial river (i.e., River Song in the present case) is "more than 500 metres."
- ii. That this statement is factually incorrect and misleading. An earlier Inspection Report dated 13.03.2023 expressly records that Khasra No. 242, which is immediately adjacent to the project site, is registered as *Jalmagan Bhumi* (
- iii. Furthermore, the Sub-Divisional Magistrate, Doiwala, in a subsequent letter dated 14.05.2025, has unambiguously confirmed that Khasra No. 242 is a river khasra and that the distance of the "duck" (pit) of the stone crusher from this river khasra is only about 70 metres.

**True copy of the SDM letter dated 14.05.2025 is annexed and marked herewith as Annexure A1/2**



- iv. It is thus evident that while official records clearly establish the proximity of the project site to river khasra land at barely 70 metres, the State Authorities has willfully, intentionally and with a malafide intention in its report dated 26.09.2023 has conveniently omitted this crucial fact and, instead, wrongly declared the distance from the Song River to be “more than 500 metres.”
- v. That the said misrepresentation is neither inadvertent nor immaterial; rather, it amounts to a deliberate and mala fide attempt to circumvent the siting criteria prescribed under State law and to create a false factual basis for the subsequent grant of permissions.
- vi. That this distortion is further relied by the findings of the Wildlife Institute of India (WII) in its Report dated 07.08.2024, which categorically concludes that the proposed Stone Crusher is partly sited on the active floodplain of River Song and that such siting reduces the functional width and ecological integrity of the wildlife corridor.



**C. ISSUE REGARDING NO OBJECTION FROM STATE OF UP**

- i. That it is respectfully submitted that the Inspection Report dated 13.03.2023 (*Annexure A1/3*) expressly records that Khasra No. 239, forming part of the project site, is recorded in the ownership of the State of Uttar Pradesh. The report further notes that, since the said khasra is vested in the State of Uttar Pradesh, it was imperative for the Project Proponent to obtain a No Objection Certificate (NOC) from the Irrigation Department of the State of Uttar Pradesh prior to establishment of the proposed Stone Crusher Plant.
- ii. That despite this categorical requirement, neither the Project Proponent nor the State authorities have produced or relied upon any such NOC from the competent Irrigation Department of Uttar Pradesh. The omission of this mandatory clearance vitiates the entire process, since the project site involves inter-state land and riparian interests, where no authority within Uttarakhand could have validly proceeded in the absence of the consent of the State of Uttar Pradesh.
- iii. That the failure to obtain this mandatory inter-state NOC amounts to a substantive illegality and renders the Environmental Clearance and subsequent permissions unsustainable in the eyes of law. It



also demonstrates a clear violation of the precautionary principle, as the authorities failed to resolve jurisdictional doubts and inter-state ownership issues before granting permission for a highly polluting industry within a sensitive riverine landscape.

**D. ISSUE REGARDING ECO-SENSITIVE ZONE, WILDLIFE CLEARANCE, AND MANDATORY EC CONDITIONS**

- i. That it is respectfully submitted that the District Forest Officer (DFO), Rajaji Tiger Reserve, by letter dated 12.08.2024, categorically recorded that the Eco-Sensitive Zone (ESZ) of the Rajaji Tiger Reserve has not yet been formally notified. The said letter further clarifies, with reference to the Office Memorandum of MoEF&CC, Government of India, that in all such cases where the ESZ has not been notified, and where a project or activity is located within 10 kilometers of a National Park or Sanctuary, the prior approval of the Standing Committee of the National Board for Wildlife (NBWL/SCNBWL) is mandatory before the establishment of such a project.
- ii. That this requirement also stands judicially reinforced by the binding directions of the Hon'ble Supreme Court, inter alia, in *Goa Foundation v. Union of India* (Order dated 04.12.2006), wherein the Court



categorically directed that in the absence of a notified ESZ, a default buffer of 10 kilometers around National Parks and Wildlife Sanctuaries shall operate as ESZ, and all restrictions applicable therein shall mandatorily apply.

- iii. That in the present case, the project site admittedly falls well within 10 kilometers of the Rajaji Tiger Reserve. Accordingly, the Project Proponent was legally obliged to obtain the prior approval of the NBWL/SCNBWL before establishment and operation of the proposed Stone Crusher Plant. The failure to obtain such approval strikes at the root of the project's legality.
- iv. That this requirement is not merely external; it is also embedded in the Environmental Clearance (EC) dated 01.02.2024 itself. Condition 78 thereof explicitly provides that: *"During operation phase, the Environmental Clearance is subject to obtaining clearance under the Wildlife (Protection) Act, 1972 from the competent authority as may be applicable to this project."* This binding stipulation makes wildlife clearance a condition precedent to lawful operation. In the absence of such clearance, the EC lose all efficacy.
- v. That in fact, even the DFO's letter dated 12.08.2024 at para 5 explicitly acknowledges that, in view of the above directions, operation of the



stone crusher without NBWL/SCNBWL approval would be contrary to law. The absence of NBWL/SCNBWL approval therefore makes the permissions unsustainable in law.

- vi. It is therefore submitted that the omission of NBWL/SCNBWL approval is not a mere procedural lapse but a fatal defect which vitiates the very grant of Environmental Clearance and renders the project legally untenable.

**E. Location of Project Site within the Notified Shivalik Elephant Reserve and Findings of the Wildlife Institute of India (WII) on Floodplain Siting and Corridor Disruption**

- i. It is respectfully submitted that the project site at Village Fatehpur Tanda, Tehsil Doiwala, District Dehradun falls within the Dehradun Forest Division, which forms part of the Shivalik Elephant Reserve. The Shivalik Elephant Reserve was formally notified on 29.10.2002 by the Uttarakhand Forest Department vide Notification No. 177/1(2)/FD/2002-19(9)/2002, in pursuance of the guidelines of the Project Elephant Division, MoEF&CC. The notified Reserve spans an area of 5,405 sq. km and



includes, inter alia, the Rajaji and Corbett National Parks, as well as the Dehradun, Haridwar, Kalsi, Narendranagar, Lansdowne and other forest divisions.

- ii. That under *Project Elephant* (a centrally sponsored scheme initiated in 1992), Elephant Reserves have been conceived as management units for conserving elephants, their habitats and corridors, while also mitigating human-elephant conflict in shared landscapes. The official Elephant Atlas prepared by the Project Elephant Division of MoEF&CC and the Wildlife Institute of India confirms the inclusion of Dehradun Forest Division within the Shivalik Elephant Reserve.
- iii. That the strategic importance of the Shivalik Elephant Reserve is underscored by the fact that it supports a significant elephant population and contains recognized elephant corridors that facilitate movement between Rajaji National Park, Corbett National Park, and adjoining forest landscapes. The presence of crop-raiding compensation records in the area further demonstrates active elephant use of the landscape surrounding the project site.



- iv. That it is important to highlight that pursuant to the direction of this Hon'ble Tribunal dated 12.07.2024, the Wildlife Institute of India (WII), Dehradun, through its Director, constituted an expert team comprising senior scientists and elephant specialists to independently assess the implications of the proposed 100 TPH Stone Crusher Plant and 500 KVA DG set by Respondent No. 10.
- v. That the WII team, after collating forest department data and conducting field observations, categorically recorded that the Song River and its floodplain are intensively used by elephants and other wildlife. Two identified elephant corridors, namely the Lal Thappar (Kansrao–Barkot) corridor and the Teen Pani corridor, facilitate connectivity between the Badkot Range of the Dehradun Forest Division and the Kansrao and Motichur Ranges of Rajaji National Park. In order to use either of these corridors, elephants must cross the Song River, making the river and its floodplain a crucial linkage.
- vi. That the WII report further notes that elephants, being highly mobile, are not limited to designated corridors but also frequently use the entire riverfront, including floodplain areas and dry



riverbeds, which provide dense riparian cover of *Dalbergia sissoo* and associated vegetation.

- vii. Based on Forest Department data (2015–2020), the WII report confirms widespread human-elephant conflict in the immediate vicinity of the project site. Villages and beats such as Fatehpur, Banwaha, Majri, Ghamandpur, Jakhan, Lachhiwala South, Sainkot, and others have recorded recurring crop depredation and property damage incidents. Between 2000–2018 alone, 36 human casualties (15 deaths and 21 injuries) attributable to elephants were officially recorded in the Badkot and Lachhiwala ranges
- viii. Table 1 of the WII report details year-wise instances of crop loss and property damage in beats surrounding the proposed project site, with figures running into dozens of incidents every year. This official data corroborates with the Forest Department compensation records, conclusively showing that the project area is a human–elephant conflict hotspot.
- ix. That it is also important to mention that during the WII's site visit on 07.08.2024, elephant dung was recorded at the edge of Kansrao Reserved Forest at a distance of only about 380 metres

from the proposed stone crusher site. This constitutes incontrovertible field evidence of elephant presence and movement in the immediate vicinity of the project site.

- x. That the WII also observed that the Song River and its active floodplain serve as critical habitats for several wild animals, including elephants, leopards, and tigers. These habitats double as dispersal routes and movement corridors for large mammals, the functionality of which would be irreparably impaired by the establishment of the proposed plant.
- xi. That most significantly, the WII report concludes that the proposed stone crusher plant is partly sited on the active floodplain of the Song River. Along with other existing anthropogenic pressures such as active riverbed material mining, the siting of this plant would effectively narrow the functional width of the wildlife corridor and reduce its ecological functionality. The report relies on official floodplain mapping (Geological Survey of India's Bhukosh portal) to reach this conclusion.



**D. Documented Human–Elephant Conflict in Fatehpur Tanda**

- i. That the official records of the Uttarakhand Forest Department (letter dated 23.05.2024 from the Range Officer, Lachhiwala Range, Dehradun Forest Division) demonstrate that the area of Fatehpur Tanda, where the project site is located, has been a consistent hotspot of human–elephant conflict.
- ii. That between the years 2016–17 and 2024–25, multiple villagers of Fatehpur Tanda and adjoining areas were granted compensation for crop damage caused by wild elephants. The compensation amounts, which reach up to ₹11, 250 in the year 2024–25, evidence not only the regularity of elephant movement through the landscape but also the severity of damages suffered by local communities.
- iii. That the same communication identifies specific compartments where elephant depredation is recurring, with conflict zones documented as close as 1.20 km to 3 km from habitation. This makes it evident that the project site lies in the middle of an active elephant-use zone.
- iv. That these official records are contrary to the Respondents' averments that the project area is ecologically benign or



disconnected from wildlife habitats. On the contrary, they reinforce the conclusion that the establishment of a stone crusher plant in such a location will aggravate human–elephant conflict, compromise elephant corridors, and expose local villagers to greater risks.

- v. That ignoring these recorded instances of conflict amounts to deliberate non-application of mind and violates the precautionary principle, since the authorities were already in possession of official data showing the ecological sensitivity of the project site.
6. Thus, the authoritative field assessment of the WII demolishes the Respondents' claim that the project is innocuous. On the contrary, it establishes that the project:
- a. That it is located in an ecologically sensitive floodplain;
  - b. That it lies within a notified Elephant Reserve (Shivalik Elephant Reserve, 2002);
  - c. That it is in the heart of an active elephant movement zone with recurring conflict; and
  - d. That it will permanently impair functional wildlife corridors between Rajaji National Park and adjoining forest divisions.



7. That in light of these scientific findings, it is submitted that the grant of EC and CTE to the Project Proponent amounts to permitting a high-pollution industry on a floodplain and within a notified elephant reserve, in violation of both statutory mandates and precautionary jurisprudence.

**PARAWISE REPLY TO THE SHORT REPLY ON BEHALF OF THE  
RESPONDENT NO. 10**

- i. That the contents of para 1 of the short reply filed by the answering Respondent No. 10 are denied to the extent they suggest that the present Original Application is confined only to the quashing of the Environmental Clearance (EC) dated 01.02.2024 and Consent to Establish (CTE) dated 18.01.2024. The answering Respondent seeks to portray the present Original Application as a challenge limited only to the Environmental Clearance dated 01.02.2024 and the Consent to Establish dated 18.01.2024, whereas the substantive grievance raised by the Applicant is the impermissible siting and proposed operation of a highly polluting stone crusher unit within the notified Shivalik Elephant Reserve, partly on the active



floodplain of the Song River, and in the midst of a documented human–elephant conflict zone. The relief of quashing EC/CTE is merely consequential to the primary relief of restraining an activity which poses continuing and irreversible ecological harm.

- ii. That the contents of para 2 are wrong, misconceived, and denied. The attempt of the answering Respondent to portray the present OA as barred by limitation and non-maintainable under Sections 14 and 15 of the NGT Act, 2010 is wholly untenable. The grievance raised is a continuing cause of action, as the project proponent seeks to site and operate a stone crusher unit on the active floodplain of the Song River and within the notified Shivalik Elephant Reserve, thereby creating an ongoing and recurring threat to wildlife corridors, riverine ecology, and public safety through aggravated human–elephant conflict. The Wildlife Institute of India's report, commissioned pursuant to this Hon'ble Tribunal's order, conclusively records the ecological sensitivity of the project site and the persistent conflict incidents in its immediate vicinity. Such findings make it evident that the illegality is not a one-time past occurrence but a continuing violation of statutory mandates, environmental safeguards, and precautionary principles. The

Hon'ble Tribunal's jurisdiction under Section 14 squarely extends to addressing such substantial environmental questions irrespective of artificial limitation pleas. Accordingly, the plea of non-maintainability is a smokescreen intended to distract from the material illegality of the project and deserves outright rejection.

- iii. That the contents of para 3 are denied as misleading and factually incorrect. The Applicant has never advanced a simplistic or isolated contention, as the Respondent portrays, but has raised a composite grievance backed by statutory notifications, binding judicial precedents, and scientific findings. It is a matter of record that the project site lies within the 10 km zone of Rajaji Tiger Reserve, and since no Eco-Sensitive Zone (ESZ) notification has been finalized, the settled law as per the Hon'ble Supreme Court's directions in *Goa Foundation* (2006) mandates that the entire 10 km radius be treated as ESZ, thereby requiring prior clearance from the Standing Committee of the NBWL before any such activity could commence. This is not an optional requirement but a statutory condition reinforced in Para 78 of the EC itself, which makes operation subject to clearance under the Wildlife (Protection) Act, 1972. Equally, the Doon Valley Notification of 1989 continues to govern the ecological



safeguards in the area and prohibits industrial activity in ecologically fragile zones unless specific conditions are fulfilled, which the Respondent has failed to demonstrate. The attempt to downplay the applicability of these instruments by invoking the reclassification of stone crushers from “red” to “orange” category by the Uttarakhand Pollution Control Board is wholly misconceived, as such administrative categorization cannot override central statutory notifications, judicial pronouncements, or binding EC conditions. The Respondent’s evasive narration only underscores the illegality of the project siting and operation.

- iv. That the bald and sweeping allegations made by the Respondent in para 4 are denied in toto. The present Original Application is neither a misadventure nor a product of vendetta but is a bona fide environmental cause brought before this Hon’ble Tribunal under Sections 14 and 15 of the NGT Act, 2010. The grievance is rooted in statutory notifications, binding directions of the Hon’ble Supreme Court, and independent scientific assessments, including the report of the Wildlife Institute of India, which categorically demonstrates that the project is sited on the active floodplain of River Song within the notified Shivalik Elephant Reserve and an area of recurring



human–elephant conflict. These are substantive environmental issues of public importance that cannot be dismissed with generic denials. The attempt to label the OA as “misconceived” is nothing but a diversionary tactic to avoid scrutiny of clear violations of the Doon Valley Notification, EIA Notification, 2006, and the Wildlife (Protection) Act, 1972.

- v. That the submissions of Respondent No. 10 in para 5 are wholly misleading and legally untenable. It is incorrect to suggest that the absence of a notification under Section 26A(1)(b) of the Wildlife (Protection) Act, 1972 obviates the need for clearance from the NBWL. The law on this issue is settled in *Goa Foundation v. Union of India* (2006) and subsequent orders, the Hon’ble Supreme Court has categorically directed that in respect of National Parks and Sanctuaries where the Eco-Sensitive Zone has not been notified, a default buffer of 10 km shall be treated as ESZ, and projects within that zone shall mandatorily require clearance from NBWL/CNBWL. The DFO’s letter dated 12.08.2024 itself records that the ESZ for Rajaji Tiger Reserve has not yet been notified, and in such cases NBWL clearance is a precondition before commencement of any project. In addition, Condition No. 78 of the Environmental



Clearance dated 01.02.2024 expressly mandates wildlife clearance as may be applicable, thereby binding the Project Proponent to obtain the same. The Respondent cannot approbate and reprobate by simultaneously relying on the EC and ignoring its explicit conditions. The attempt to deny NBWL applicability is therefore contrary to binding judicial precedent, statutory notifications, and the Respondent's own clearance conditions.

- vi. That the assertion made in para 6 are denied. The stone crushing units do not require an Environmental Clearance (EC) is factually and legally untenable. The reliance on the Office Memorandum dated 22.09.2008 is wholly misplaced, as that OM pertained only to "crushing and screening of ore" within mining leases and not to standalone stone crusher plants located outside mines and directly operating on riverbeds/floodplains. Respondent No. 10 has itself applied for and obtained an EC dated 01.02.2024, thereby accepting its requirement. Having sought and relied upon the EC, the Respondent cannot now disown the requirement to evade compliance with binding conditions, particularly the condition which mandates wildlife clearance.



- vii. That the averments contained in para 7 are wholly misconceived and are denied. The reliance placed upon the classification of stone crushers as "Orange Category" industries is an attempt to underplay the inherent pollution load of such units. It is respectfully submitted that categorization under the CPCB framework does not dilute or override statutory mandates under the Environment (Protection) Act, 1986, the Doon Valley Notification, 1989, or the EIA Notification, 2006. In fact, the EIA Notification, 2006 read with the subsequent MoEF&CC Notification dated 13.12.2007 expressly required all Orange Category units not covered in the Schedule to still be considered by the SEIAA before grant of consent, thereby recognizing the potential environmental impacts of such projects. More importantly, the Doon Valley Notification imposes independent restrictions on siting of polluting industries, which applies with full force to the present project situated within the notified Doon Valley. The Respondent's reliance on the Rural Litigation & Entitlement Kendra judgment is also misplaced: the Supreme Court prohibited unsustainable mining but did not hold stone crushers to be immune from environmental regulation; rather, such activities continue to be regulated under subsequent statutory



notifications and by judicial directions mandating precautionary safeguards in fragile riverine and wildlife habitats. The attempt to project stone crushing as "nil to negligible" in terms of emissions is contrary to both statutory classification and scientific record; the Wildlife Institute of India's 2024 report confirms severe adverse impacts on the Song River floodplain and elephant corridors. Thus, the plea of permissibility on the basis of Orange Category classification is untenable, and the Respondent cannot take refuge under regulatory nomenclature to justify establishment of a polluting unit in a legally protected and ecologically sensitive zone.

- viii. That the contents of para 8 are denied. The mere fact that Respondent No. 10 obtained an EC dated 01.02.2024 and a CTE dated 18.03.2024 does not cure the fundamental illegality of the siting of the unit itself. Both the WII field report and the official records of the Revenue and Forest Departments establish that the project is partly located on the active floodplain of the River Song and within the notified Shivalik Elephant Reserve, which is a critical wildlife habitat and human-animal conflict zone. It is settled law that clearances obtained in violation of statutory notifications, siting criteria, or judicially recognized environmental restrictions are void



ab initio and cannot sanctify an inherently impermissible activity. Hence, the so-called approvals relied upon by Respondent No. 10 stand vitiated in law.

- ix. That the averments of the answering Respondent in the present paragraph are wholly misconceived and untenable. The reliance on the Office Memorandum dated 02.12.2009 is not misplaced, for the said OM clarifies that projects situated in and around wildlife habitats, corridors, and eco-sensitive landscapes cannot be exempted from wildlife scrutiny. The Wildlife Institute of India's field report and official records conclusively demonstrate that the Respondent's project footprint falls partly on the active floodplain of River Song and squarely within the notified Shivalik Elephant Reserve, which is a wildlife habitat of national importance. The contention that no EC is required stands belied by the fact that the Respondent themselves applied for and obtained EC on 01.02.2024, thereby conceding to the applicability of the EIA Notification, 2006. Having sought and obtained EC, the Respondent cannot now turn around and deny its necessity. Equally, condition of the EC itself makes wildlife clearance mandatory. Hence, the attempt to trivialize the requirement of NBWL clearance as a

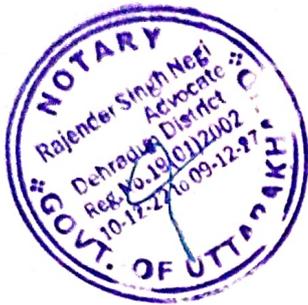


"figment of imagination" is a deliberate misrepresentation and contrary to binding statutory and judicial mandates.

- x. That the sweeping assertion of the Respondent in para 10 that the OA is "meritless and liable to be dismissed" is nothing but a bare denial unsupported by record. On the contrary, the Wildlife Institute of India's independent assessment, official records of recurring human-elephant conflict, the SDM's letter confirming the proximity of the unit to river khasra land, and the undisputed siting of the project partly on the active floodplain of River Song cumulatively establish imminent and continuing environmental harm. The project is not only located within the notified Shivalik Elephant Reserve but also directly impacts recognized elephant corridors connecting Rajaji National Park and adjoining forest divisions. The Respondent's own Environmental Clearance conditions mandate wildlife clearance and adherence to judicial directions, which remain unfulfilled. Thus, far from being meritless, the OA raises substantial questions of environment within the meaning of Sections 14 and 15 of the NGT Act, warranting urgent adjudication and protective directions.



xi. In view of the aforementioned facts, discrepancies, and procedural lapses, the Applicant respectfully submits that this Hon'ble Tribunal may be pleased to take the present rejoinder on record and grant the prayer(s) sought in the Original Application (O.A.). The Applicant further prays for such other orders as this Hon'ble Tribunal may deem just and proper in the facts and circumstances of the case.



DEPONENT

VERIFICATION

Verified at Uttarakhand on this <sup>3</sup> day of NOV, 2025 that the contents of the above affidavit are true and correct to the best of my knowledge and nothing material is concealed therein.

This affidavit is sworn before me by  
Shri.....<sup>5422/25</sup>.....  
who is identified by Shri.....  
at Dehradun on.....

DEPONENT

(Rajender Singh Negi)  
Advocate & Notary, Dehradun



*Handwritten signature*

