

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

O.A NO. 546 OF 2025

IN THE MATTER OF:

AMIT KUMAR

....APPLICANT

VERSUS

UNION OF INDIA & ORS.

....RESPONDENTS

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*Filed by:*



Amit Kumar  
(Applicant in person)  
Place: New Delhi  
Dated: 02.02.2026

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RESPONDENT NO. 9 (IRRIGATION AND WATER RESOURCES  
DEPARTMENT, GOVERNMENT OF UTTAR PRADESH)**

**MOST RESPECTFULLY SHOWETH:**

1. That the reply filed by the R-9 Irrigation and Water Resources Department, Government of Uttar Pradesh is a superficial document that fails to address the core issue of the Katha River being a primary recharge zone for the local groundwater table. The Department has failed to place on record any study or technical material regarding the declining water levels in the Saharanpur and Shamli districts due to the systematic destruction and encroachment of the Katha Riverbed.
2. It is submitted that the Irrigation and Water Resources Department, Government of Uttar Pradesh has turned a blind eye to the potential leaching of pollutants into the groundwater and the impact of the Katha River damage on the Irrigation of the nearby villages farms. While the Applicant has placed on record evidence of untreated sewage and municipal waste dumping in the riverbed, the Respondent Department has failed to conduct even a single piezometric study or groundwater quality test along the course of the river to assess the extent of heavy metal or fecal contamination.

3. The Respondent No. 9 reply is a product of a mere office-level formality where no actual site visit was conducted. The R-9 has failed to identify and map the "Floodplain Zones" and "Recharge Areas" of the Katha River, which are vital for groundwater sustainability. By allowing concrete encroachments (as identified by the Applicant via coordinates) to persist, the R-9 has allowed the permanent blocking of natural recharge channel
4. That the R-9 is in violation of its and the Ganga Order 2016. Under Order 3(1)(b) of the Ganga Order, the "Basin" includes the soil and water resources on a catchment basis; however, the R-9 has failed to protect the groundwater resources associated with this tributary of the Yamuna.
5. The Respondent No. 9 has badly failed to place on record the floodplain zone and the village-wise "Ground Water Stress" data for the Saharanpur and Shamli districts. This concealment is a deliberate attempt to hide the worsening state of the aquifer caused by the administration's refusal to recognize the Katha as a river and protect its ecological flow.

**Prayer**

6. In light of the above submissions, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:
  - a. Reject the hollow and substanceless reply of the Irrigation and Water Resources Department, Government of Uttar Pradesh;
  - b. Direct the R-9 to **demarcate and submit a detailed report on the floodplain zone** and water quality along the 123 km course of the Katha River in both districts
  - c. Direct the R-9 to identify and notify the "Critical Recharge Zones" of the Katha Riverbed and ensure their immediate protection from concrete encroachments

- d. Pass any other order(s) as this Hon'ble Tribunal may deem fit and proper in the interest of environmental justice.

VERIFICATION

Verified at New Delhi on this 2nd day of February 2026 that the contents of the above submission, are correct and true to the best of our knowledge, belief, and official records. No part of it is false, and nothing material has been concealed therein.

*Filed by:*



Amit Kumar  
(Applicant in person)  
Place: New Delhi  
Dated: 02.02.2026