

BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

E.A NO. 08 OF 2025  
IN  
APPEAL NO. 16/2024

**IN THE MATTER OF:**

M/S SLAUGHTER HOUSE NAGAR NIGAM SAHARANPUR  
...APPELLANT

VERSUS

UTTAR PRADESH POLLUTION CONTROL BOARD  
...RESPONDENT

**REJOINDER ON BEHALF OF THE APPLICANT**  
**WITH AFFIDAVIT**

(FOR INDEX: - Kindly See Inside)

New Delhi  
Dated: 29.07.2025

FILED BY

*Shanig*

*Mansi*

**S.A ZAIDI & MANSI CHAHAL**  
ADVOCATE

CHAMBER NO- 7, TRISHUL TOWER  
KAUSHAMBHI, GHAZIABAD U.P

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**MOST RESPECTFULLY SHOWETH:**

1. That the above captioned execution application is pending for adjudication before this Honourable Tribunal and is coming up for hearing on 07.08.2025.
2. That the reply filed by the Respondent No. 1 i.e. UPPCB is misconceived, misleading, and a gross misrepresentation of the factual matrix and the binding directions of this Honourable Tribunal as

directed by the Honourable NGT vide order dated 02.09.2024 in Appeal No. 16/2024.

3. That the present Execution Application has been filed seeking compliance of the specific directions issued by this Honourable Tribunal wherein the applicant i.e. contractor of the slaughterhouse, being a lessee of Slaughter house Nagar Nigam Saharanpur, was directed to give an undertaking before the Member Secretary, UPPCB, and on such submission, the unit was allowed to operate at its present location till 01.02.2025 by the UPPCB, subject to compliance with environmental norms.

4. That it is a matter of record that this Honourable Tribunal in Para 20 of its order dated 02.09.2024 directed: "*...we dispose of the OA permitting the PP to give an undertaking before the Member Secretary, UPPCB to the effect that by 01.02.2025, either he will comply with the*

*specific condition... failing which it will close down the unit..."*

In pursuance of the said direction, the applicant i.e. the contractor of the Saharanpur slaughter house, who is operating the slaughter house submitted the required undertaking before the Member Secretary, UPPCB on 15.10.2024. The Honourable NGT direction was clear that the undertaking shall be submitted by the "PP" (Project Proponent). At no point in the order did this Honourable Tribunal specify that only Nagar Nigam Saharanpur could submit the undertaking.

5. That it is also pertinent to highlight here that the main Appeal i.e. Appeal No. 16/2024 was filed through the said contractor, who has been recognized as the functioning operator of the Saharanpur Nagar Nigam slaughterhouse. The UPPCB participated in all proceedings of the

matter and at no stage objected that the undertaking would be submitted by the Nagar Nigam and not the applicant i.e. the contractor.

6. That the conduct of the UPPCB stating that the undertaking must come from the Nagar Nigam, and not the contractor, is clearly an afterthought just to harass the applicant, for the reasons best known to them only.
7. That despite being fully aware that the contractor was acting as the PP and filing the appeal on behalf of Nagar Nigam, UPPCB raised no objection before this Honourable Tribunal during final arguments or at the time of pronouncement of order. It cannot now, in execution, state that the undertaking cannot be given by the applicant.
8. That moreover, the UPPCB never communicated this fact to the applicant that the undertaking

cannot be given by the applicant but only by the Nagar Nigam Saharanpur. The UPPCB just to deliberately delay the operation of the slaughter house is knowingly acting in such a way.

- 9.** That also instead, UPPCB has now states in its reply wherein it falsely claims that repeated reminders were sent to Saharanpur Nagar Nigam for submission of the undertaking, while willfully ignoring that the undertaking was already submitted by the contractor on 15.10.2024, which clearly amounts to non-compliance and wilful disobedience of the Hon'ble Tribunal's direction and renders the UPPCB liable for contempt of the court conduct.
- 10.** That it is submitted that due to UPPCB's failure to comply with the de-sealing direction of the Honourable NGT, the applicant was prevented from operating the unit, causing extreme financial losses.

**11.** That the present rejoinder is being made bonafide in the interest of justice.

New Delhi  
Dated: 29.07.2025

Applicant

Through

*Shanig*  
*Manshi*  
S.A. ZAIDI & MANSHI CHAHAL  
ADVOCATES

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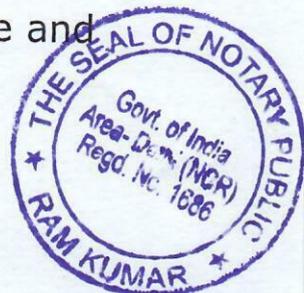
VERSUS

UTTAR PRADESH POLLUTION CONTROL BOARD  
..RESPONDENT

**AFFIDAVIT**

I Farman Ahmad, Contractor in M/s Slaughter House Nagar Nigam Saharanpur situated at Kamela Colony, District Saharanpur, Uttar Pradesh, presently at New Delhi do here by solemnly affirm and declare as under:

1. That I am the Appellant in the above noted case therefore I am fully conversant with the fact of the case I am competent to sign and swear this Affidavit.
2. That the accompanying Rejoinder has been drafted by my counsel and the same has been read over and explain to me and I say and declare that the same are true and correct.



3. That the Contents of accompanying Rejoinder be read as part and parcel of this affidavit as the same are not repeated herewith for the sake of brevity.

*Handwritten signature*

DEPONENT

**VERIFICATION**

Verified at Delhi on this **29 JUL 2025** day of **2025**, 2025 that the contents of my above Affidavit are true and correct to my knowledge and nothing material has been concealed there from.

*Handwritten signature*

DEPONENT

ATTESTED  
*Handwritten signature*  
NOTARY  
DELHI (INDIA)  
**29 JUL 2025**

