

**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 OTHERS

...RESPONDENTS

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**RESPONDENT NO.8 THROUGH: -**

**[A. RADHAKRISHNAN]**

Advocate for Respondent No.8

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**[SUJEET RANJAN]**

Advocate for Respondent No.8

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D/846/2024

Chamber No.504, Block-D, Administrative Building Complex,  
Supreme Court of India, New Delhi -110 001

PLACE: **NEW DELHI**DATED: **22.05.2025**

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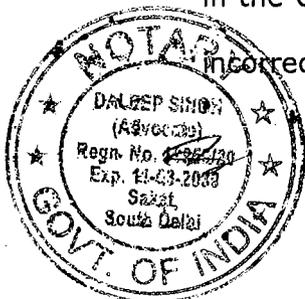
UNION OF INDIA AND OTHERS

...RESPONDENTS

**REPLY AFFIDAVIT ON BEHALF OF RESPONDENT NOS. 8 THROUGH ITS  
AUTHORIZED SIGNATORY**

I, Mr. Amiruddin, S/o Ismail, Age about 50 Years, R/o House Number 38, Karim Nagar, Ansar Block, Hapur Road, Meerut City, Meerut, Uttar Pradesh – 250002 do hereby solemnly affirm and say as under: -

1. That I am the Director of the Answering Respondent No.8, **MORE BRIGHT E-WASTE RECYCLER PRIVATE LIMITED** (CIN: U74999UP2019PTC121639) is a private company incorporated on 24.09.2019 and having its registered address at H.No.38, Gali No.4, Hapur Road, Karim Nagar, Meerut, Uttar Pradesh - 250002 and say that I am well conversant with the facts of the matter and hence competent to swear this Affidavit on behalf of the Answering Respondent.
2. That the Answering Respondent denies each and every averment made in the Original Application filed before this Hon'ble Tribunal as false and incorrect except those that are specifically admitted hereinunder.



**PRELIMINARY SUBMISSIONS**

3. That the present Original Application has been filed with misjoinder of parties, the Answering Respondents being wrongly added in the array of parties. It is pertinent to note that the Respondent No.8 is a private Private Limited (CIN: U74999UP2019PTC121639) incorporated on 24.09.2019. It is classified as Non-government company and is registered at Registrar of Companies, Kanpur.
  
4. That the Order I Rule 10 (2) of the Code of Civil Procedure explicitly provides that the Court may at any stage of the proceedings *strike out* the name of any person / party either upon or without the application of either party, and on such terms as may appear to the Court to be just, and accordingly order that the name of the party in question is improperly joined. It is submitted that in view of the fact that the same Answering Respondent has been added as two distinguished Respondents in present Original Application i.e., as Respondent No.9 and Respondent No.11, the name of the Answering Respondent must be struck off from either of the places. The relevant portion of Order I Rule 10 (2) is provided below:

*"(2) Court may strike out or add parties.—The Court may at any stage of the proceedings, either upon or without the application of either party, and on such terms as may appear to the Court to be just, order that the name of any party improperly joined, whether as plaintiff or defendant, be struck out, and*



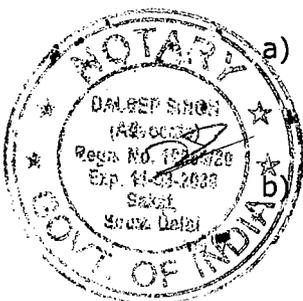
*that the name of any person who ought to have been joined, whether as plaintiff or defendant, or whose presence before the Court may be necessary in order to enable the Court effectually and completely to adjudicate upon and settle all the questions involved in the suit, be added."*

Further, the reliefs sought through the present Original Application involves policy decisions and actions by the authorities concerned wherein the Answering Respondent has no role to play. Therefore, the presence of the Answering Respondent is not necessary in the array of parties in order to enable this Hon'ble Tribunal to effectually and completely adjudicate upon and settle all the questions involved in the present matter.

5. That the present matter has been filed by the Applicant seeking a direction for not registering any e-waste recycling facility without physical verification of pollution control measures and other requirements and for the immediate cancellation of such earlier registered facilities which are operating in violation of the environment along with imposing penalty against them in the form of environment compensation which may be utilized for the restoration of the area. In the nutshell, the matter revolves around two aspects

a) Policy decision on registration procedure

b) Implementation of the existing environmental laws



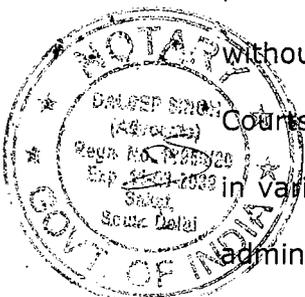
Therefore, it is beyond the comprehension of the Answering Respondent as to how does the presence of the Answering Respondent in the array of parties is necessary for the effective adjudication of the present matter, unless the Applicant in the Original Application specifically wants to put the spotlight over the Answering Respondent with vexatious motives.

6. That the Hon'ble Supreme Court of India in the matter of *Ashwini Kumar Upadhyay v. Union of India*, (2023) 14 SCC 611 held that,

*"10. This Court has generally stayed its hand when confronted with issues relating to policy or fiscal matters concerning the State, as the same falls outside the ambit of the Court's jurisdiction....."*

Similarly, this Hon'ble Tribunal should also stay its hand having confronted with the issues relating to policy with respect to the procedural aspects of Registration.

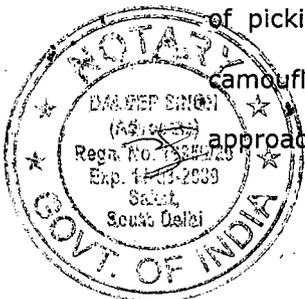
7. That it is pertinent to note that Original Applicant has not come before this Hon'ble Tribunal with clean hands and the same is only an abuse of process of law and the Original Application must be dismissed *in limine* without delving into the merits of the case. In catena of judgments, the Courts have consistently held that the clean hands doctrine is applicable in various contexts, including environmental law, contract disputes, and administrative actions. In the case of ***Ramjas Foundation and another***



**vs. Union of India and others**, (2010) 14 SCC 38, Hon'ble the Apex Court has univocally held that,

*"21. The principle that a person who does not come to the court with clean hands is not entitled to be heard on the merits of his grievance and, in any case, such person is not entitled to any relief is applicable not only to the petitions filed under Articles 32, 226 and 136 of the Constitution but also to the cases instituted in others courts and judicial forums. The object underlying the principle is that every court is not only entitled but is duty bound to protect itself from unscrupulous litigants who do not have any respect for truth and who try to pollute the stream of justice by resorting to falsehood or by making misstatement or by suppressing facts which have a bearing on adjudication of the issue(s) arising in the case."*

Similarly, in the present matter, the Original Application has been filed with frivolous and vexatious motives of harassing the Answering Respondent in a case which revolves arounds the question policy decision and law implementation. Had the Original Applicant approached this Hon'ble Tribunal with clean hands, only the state would have been a party. Alternatively, along with the state all the registered as well unregistered recyclers would have been the parties to the matter. The act of picking and choosing the Answering Respondent as a party, that too, twice, camouflaged with a few other recyclers, confirms that the Original Applicant has not approached this Hon'ble Tribunal with clean hands.



**8. BRIEF FACTS:**

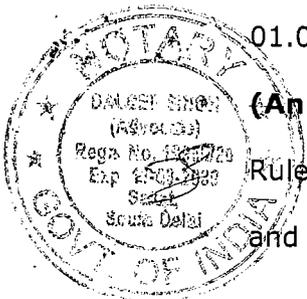
8.1. That the Answering Respondent was registered as a Private Limited Company under the Companies Act. That the Answering Respondent has been operating its business after obtaining the authorizations, approvals and consent from the State Pollution Control Board from time to time.

8.2 That it is pertinent to note that Answering Respondent was issued "Consent to Establish (CTE) under the provisions of Water (Prevention and control of pollution) Act, 1974 as amended and Air (Prevention and control of Pollution) Act, 1981" on **01.03.2024** for Collection, Dismantling, Segregation and Recycling of E-Waste to the capacity of 270 Metric Tonnes per year at its business unit located at Plot No. C78 Phase III Upside, M.G. Road, Hapur by Uttar Pradesh Pollution Control Board, Lucknow. A true and correct copy of the Consent to Establish (CTE) dated **01.03.2024** is annexed hereto and marked as **Annexure R-1 (Pg. 14 to 18)**

8.3. That it is pertinent to note that the Answering Respondent was provided with an Authorisation issued under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 by the Uttar Pradesh Pollution Control Board, Lucknow for the period 22.03.2024 to 31.12.2028 for its business unit located at "Plot No. C78 Phase III Upside, M.G. Road, Hapur (U.P)" address. A true and correct copy of the Authorisation is annexed hereto and marked as **Annexure R-2 (Pg. 19-25)**

9. That it is worth noting that the Original Applicant himself has annexed the copy of E-Waste (Management) Rules, 2022 which came into effect on

01.04.2023 in supersession of E-Waste (Management) Rules, 2016 (**Annexure-A/1**) but has failed to understand its meaning. The mentioned Rules provide for the comprehensive guidelines of not only classification and procedural aspects of registration but also for the complete management



of E-Waste in line with the statutory mandates enshrined under the Environment (Protection) Act, 1986 r/w the Environment (Protection) Rules, 1986. Similarly, SOP's (Standard Operating Procedures) for E-Waste

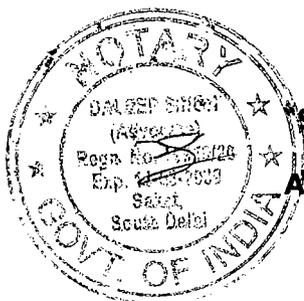
Recycler has been issued by the Central Pollution Control Board in July

2023 under the aforesaid E-Waste (Management) Rules, 2022 with respect to the 'Information Required for Registration of E-Waste Recycler on the Portal' which has also been annexed by the Original Applicant himself as **(Annexure-A/2)**. Both the aforesaid rules provide for the Verification and Audit by the Central Pollution Control Board by itself or through designated agency.

10. That Rule 24 of the E-Waste (Management) Rules, 2022 clearly provides that,

**"24. Verification and Audit - The Central Pollution Control Board by itself or through a designated agency shall verify compliance of these rules by producers, manufacturer, refurbisher, dismantlers, and recyclers through random inspection and periodic audit, as deemed appropriate so as to take action against violations of the provisions of these rules as per rule 22"**

Similarly, the Rule 9 of SOPs for E-Waste Recycler provides that,



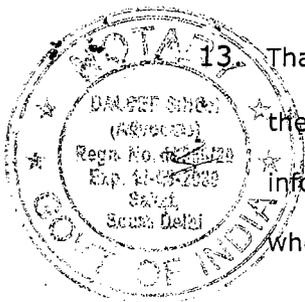
**9.0 Verification and Audit**

*The Central Pollution Control Board by itself or through SPCBs or through a designated agency shall verify compliance of, manufacturer through inspection and periodic audit, as deemed appropriate and the actions against violations shall be in accordance with the rule 24 of the E-Waste (Management) Rules,*

202

2."

11. It is pertinent to note that such random inspections and periodic audits as stipulated hereinabove have also taken place at the business premises of the Answering Respondent and the Answering Respondent fared well in all such inspections and audits which is reflected through the business continuity of Answering Respondent and the renewal of the permits and licenses issued to the Answering Respondent.
12. That the Answering Respondent has been granted all the necessary permissions, authorizations, consents and approvals for running the recycling facilities at its business premises as contemplated under the law and taking to account all the factors that are required to be considered before such a grant. It is pertinent to note that the Answering Respondent is a law-abiding corporate body carrying out its without damaging the environment and following all the prescribed norms. It is worth noting that, till date, the Answering Respondent has not violated any form of law. Consequently, so far, no form of penal action has ever been initiated against the Answering Respondent either by the Central Pollution Control Board or State Pollution Control Board.



13. That under the provisions of Section 5 of the Environment Protection Act, 1986, the State and Central Pollution Control Board are empowered to identify informal / illegal e-waste recyclers / refurbishers including clusters / areas where such illegal recyclers/refurbishers are operating and to close down such

informal recycling /refurbishing units immediately and for transformation of such informal/ illegal recyclers / refurbishers into formal recyclers / refurbishers. In the present case the Answering Respondent has been carrying out its business with all the requisite permissions and in accordance with the law as a formal recycler. The intention of the law itself is to handhold the and train the recyclers in a transformative manner rather than handling the situation in the manner 'License Raj' regime.

14. It is pertinent to note that the List of Documents required to be uploaded for the Registration as per the aforementioned SOP's (Standard Operating Procedures) for E-Waste Recycler issued by the Central Pollution Control Board under the E-Waste (Management) Rules, 2022 with respect to the 'Information Required for Registration of E-Waste Recycler' goes to confirm the contentions of the Answering Respondent which are as follows:

**"3.0 Digital Checklist for evaluation of application  
for recyclers**

XXXXXXXXXX

*3. List of the Documents to be uploaded*

- i. Copy of CTE and CTO*
- ii. Copy of Authorization*
- iii. Geo coordinates*
- iv. PAN*
- v. GST*
- vi. Aadhar*
- vi. Video of the recycling facility"*



It is pertinent to note that CTE (Consent to Establish), (Consent to Operation) and are the Authorization is issued by the State Pollution Control Board only after the

due physical verification and checks. Coupled with those requirements even the video of the recycling facility is uploaded as provided hereinabove. Therefore, all the requirements are already met with. It is submitted that the objective of the registration at the portal is to ensure that all the requisite approvals and consents are acquired by the recyclers in the process of registration as envisaged under the provisions of Section 5 of the Environment Protection Act, 1986 which is transformative in nature not otherwise.

15. The mentioned procedure of e-registration has been armored with the provisions of Rule 4 (5) and Rule 22 of E-Waste (Management) Rules, 2022 which provides for the penal action for the violators including revocation of their registration. The Rule 4 (5) of E-Waste (Management) Rules, 2022 is provided as under:

"4.

**Registration**

(1) XXXXX

.....

(5) *Where any registered entity furnishes false information or willfully conceals information for getting registration or return or report or information required to be provided or furnished under these rules or in case of any irregularity, the registration of such entity may be revoked by the Central Pollution Control Board for a period up to three-years after giving an opportunity to be heard and in addition, environmental compensation charges may also be levied as per rule 22 in such cases"*



Similarly, The Rule 22 (5) of E-Waste (Management) Rules, 2022 states that:

**"22. Environmental****Compensation –**

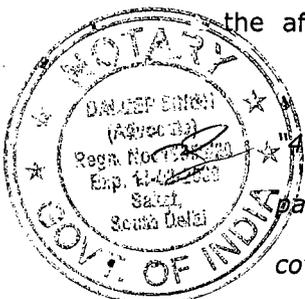
(1) XXXXXX

.....

(5) *False information resulting in over generation of extended producer responsibility certificates by recycler shall result in revocation of registration and imposition of environmental compensation which shall not be returnable and repeat offence, violation of these rules for three times or more shall also result in permanent revocation of registration over and above the environmental compensation charges."*

Mere registration at the portal, that too after requisite authorizations, permissions and consents from the State Pollution Control Board does not provide a free hand to the recyclers. But, are continuously monitored under various provisions of the E-Waste (Management) Rules, 2022 and other applicable laws including the Environment Protection Act, 1986 r/w its Rules. Therefore, the averments of the Original Applicant are farfetched and misleading and filed the present matter with vexatious motives targeting the Answering Respondent with ill will.

16. That it is further submitted that the "Authorisation issued under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016" provides for the "Specific Conditions of Authorization". The para 4 of the aforesaid condition states that,



*"It is brought to your notice that as per the order dated 14.11.2003 passed by the Hon'ble Supreme Court in W.P. (c) 657 of 1995, no industry covered under Hazardous Waste (Management and Handling) Rules, 1989*

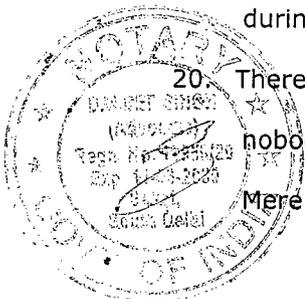
*(as amended) shall be allowed to operate without valid authorisation. It is also provided in the same order that industries which are not complying with the conditions shall not be allowed to operate. Hence in case you fail to apply for authorisation before its expiry or fails to comply with conditions of the earlier authorisation issued to you, closure order shall be issued against your industry without any further notice."*

17. Further, under the provisions of Section 18 (1) (b) of the Water (Prevention and Control of Pollution) Act 1974 and Air (Prevention and Control of Pollution) Act 1981, the State Pollution Control Board as well as the Central Pollution Control Board carry out inspections of business units of the Answering Respondent with respect to its E-Waste recycling activities and in view of the total compliance of prevalent laws on the part of the Answering Respondent, no penal action has ever been taken so far against.

18. The Answering Respondent even complied with EPR Portal requirements which includes fulfilling the EPR Targets (Recycling Targets) by purchasing online EPR certificates in terms of end products of recycling only from registered recyclers through the EPR Portal. It is noteworthy that the mentioned portal has a dashboard wherein information related to number of registered entities, EPR obligations of producers and recyclers, quantity of available EPR certificates, quantity of EPR certificates transferred are available for the general public.

19. Further, it is relevant to mention that to establish and run an industrial unit, the concerned unit has to comply with the directions of CAQM (Commissioner for Air Quality Management) from time to time. On a periodical and surprise visit by the CAQM, if any unit is found to be violating any of the norms, the CAQM has the authority and powers to pass an order effecting the closure of such a unit. Even during such inspections, the Answering Respondent has been found to be compliant.

20. Therefore, it evident that running a recycling industry is not an easy task and nobody can escape the regulatory norms without being put to the strict rigors of law. Mere registration on the portal does not provide a blanket approval providing a



freeway to violate laws. In fact, in the process of getting registered over the E-waste registration portal the entities handling the E-Waste get acquainted with the requirements as per the law which is the real objective of the said portal. Therefore, the present Original Application is devoid of any merit and liable to be dismissed *in limine* with exemplary cost.

21. That for the reasons mentioned hereinabove may this Hon'ble Tribunal be gracious to pass a suitable Order dismissing the present Original Application with exemplary cost. Alternatively, may this Hon'ble Tribunal strike of the Answering Respondent(s) from the array of parties, the presence of Answering Respondent(s) in the present matter being misjoinder of parties.

*Ameechi*

DEPONENT

**VERIFICATION**

Verified at New Delhi on this 22 MAY 2025 day of May, 2025 that the contents of the aforesaid affidavit in paras 1 to 21 are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.

I Identify The Deponent Who has Signed/Put T.I. In my Presence



**ATTESTED**

DALEEP SINGH ADVOCATE  
NOTARY DELHI-R-19959  
GOVERNMENT OF INDIA  
SUPREME COURT OF INDIA  
COMPOUND NEW DELHI  
REGISTER Pg./Sl. No. 1037/15

*Ameechi*

DEPONENT

**ATTESTED**

**NOTARY PUBLIC**

22 MAY 2025

A25 Annexure - R-1

14



**UTTAR PRADESH POLLUTION CONTROL BOARD**  
**Building. No TC-12V Vibhuti Khand, Gomti Nagar, Lucknow-226010**

Phone:0522-2720828,2720831, Fax:0522-2720764, Email: info@uppcb.com, Website: www.uppcb.com

**Validity Period :01/03/2024 To 28/02/2029**

**Ref No. - 202299/UPPCB/Circle1(UPPCBHO)/CTE/HAPUR/2024**

**Dated:- 01/03/2024**

To ,

Shri AMIRUDDIN MALIK  
M/s MS MORE BRIGHT E WASTE RECYCLER PVT LTD  
C-78, MG ROAD(IIDC), HAPUR,HAPUR,  
HAPUR

**Sub : Consent to Establish for New Unit/Expansion/Diversification under the provisions of Water (Prevention and control of pollution) Act, 1974 as amended and Air (Prevention and control of Pollution) Act, 1981 as amended.**

Please refer to your Application Form No.- 24721354 dated - 05/02/2024. After examining the application with respect to pollution angle, Consent to Establish (CTE) is granted subject to the compliance of following conditions :

1. Consent to Establish is being issued for following specific details :

A- Site along with geo-coordinates :

B- Main Raw Material :

Main Raw Material Details		
Name of Raw Material	Raw Material Unit Name	Raw Material Quantity
E-waste recycling	Metric Tonnes/Month	280

C- Product with capacity :

Product Detail	
Name of Product	Product Quantity
Collection, Segregation and Recycling of E-Waste (MT/Month)	270

D- By-Product if any with capacity :

By Product Detail			
Name of By Product	Unit Name	Licence Product Capacity	Install Product Capacity
collection segregation and recycling of ewaste	Metric Tonnes/Year	4320	4320

2. Water Requirement (in KLD) and its Source :

Source of Water Details		
Source Type	Name of Source	Quantity (KL/D)
Ground Water (within premises)		1.0

3. Quantity of effluent (In KLD) :

**PRADEEP  
SHARMA**

Digitally signed by  
**PRADEEP SHARMA**  
Date: 2024.03.01  
19:02:25 +05'30'

Effluent Details	
Source Consumption	Quantity (KL/D)
Domestic	1.0
Industrial	0.0

4. Fuel used in the equipment/machinery Name and Quantity (per day) :

Fuel Consumption Details		
Fuel	Consumption(tpd/kld)	Use
Others	10	10
Others	60	60

5. For any change in above mentioned parameters, it will be mandatory to obtain Consent to Establish again. No further expansion or modification in the plant shall be carried out without prior approval of U.P. Pollution Control Board.
- For any change in above mentioned parameters, it will be mandatory to obtain Consent to Establish again. No further expansion or modification in the plant shall be carried out without prior approval of U.P. Pollution Control Board.
2. You are directed to furnish the progress of Establishment of plant and machinery, green belt, Effluent Treatment Plant and Air pollution control devices, by 10th day of completion of subsequent quarter in the Board.
3. Copy of the work order/purchase order, regarding instruction and supply of proposed Effluent Treatment Plant/Sewerage Treatment Plant /Air Pollution control System shall be submitted by the industry till 28/02/2029 to the Board.
4. Industry will not start its operation, unless CTO is obtained under water (Prevention and control of Pollution) Act, 1974 and Air (Prevention and control of Pollution) Act, 1981 from the Board.
5. It is mandatory to submit Air and Water consent Application, complete in all respect, four months before start of operation, to the U.P. Pollution Control Board.
6. Legal action under water (Prevention and control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981 may be initiated against the industry With out any prior information, in case of non compliance of above conditions.

**Specific Conditions:**

**PRADEEP  
SHARMA**

Digitally signed by  
PRADEEP SHARMA  
Date: 2024.03.01 19:02:43  
+05'30'

1. This Consent is valid for the Establishment of unit only. The industry can only manufacture products, at the rate of production as mentioned in consent order. In case of any change in capacity, the project will have to intimate the Board. For any enhancement of the above, fresh Consent to Establish has to be obtained from U.P. State Pollution Control Board.
2. The Industry shall comply with various Waste Management Rules as notified by MoEF&CC i.e. Plastic Waste Management Rules, 2016, The Hazardous and Other Wastes (Management and Transboundary) Rules, 2016, E-waste (Management) Rules, 2016, The Batteries (Management and Handling) Rules, 2001 as amended.
3. Minimum 40% of the land on which industry is to be established will be covered by the plantation of tall trees of suitable species as per the guidelines set up by the Board vide its Office Order no.H-16405/220/2018/02 dt. 16/02/2018. The copy of this guideline is available at URL [http://www.uppcb.com/pdf/Green-Belt-Guidle\\_160218.pdf](http://www.uppcb.com/pdf/Green-Belt-Guidle_160218.pdf).
4. Under the Noise Pollution (Regulation and Control) Rule 2000, the industry shall take adequate measures for control of noise from its own sources within the premises so as to maintain ambient air quality standards in respect of noise to less than 75 dB(A) during day time and 70 dB(A)
5. The Industry shall ensure the time bound compliance of Guidelines on Implementation of E-Waste (Management) Rules, 2016 formulated by CPCB and is available in the CPCB web site and will submit the monthly progress report to the SPCB and CPCB. The industry shall abide by directions given by Hon'ble Supreme Court, High Court, National Green Tribunals, Central Pollution Control Board and Uttar Pradesh Pollution Control Board for protection and safeguard of environment from time to time.
6. The Industry shall ensure the time bound compliance of stringent norms as published by the UPPCB vide office memorandum no.H48273/C-1/NGT-83/2020, dt. 27-02-2020 (available at URL [uppcb.com/pdf/uppcb\\_28022020.pdf](http://uppcb.com/pdf/uppcb_28022020.pdf)) in compliance of The Hon'ble NGT order dt. 14.11.2019 in O.A. No. 1038/2018.
7. The industry shall provide adequate arrangement for fighting the accidental leakages/dischARGE of any air pollutant/gas/liquid from the vessel, machinery etc. which are likely to cause fire hazard including environmental pollution.
8. The industry shall adhere to general standards terms and conditions of Water/Air Acts and compliance of Environment standards as per Environment (protection) Act 1986.
9. In case of violation of above-mentioned conditions or any public complaint the consent shall be withdrawn in accordance with law. The low sulfur diesel will be used as fuel in the D.G set.
10. The Industry shall submit first compliance report with respect to conditions imposed within 30 days of issue of this permission.
11. The Industry shall install 01 No. Pit Furnace with Hood, Wet Scrubber, ID Fan and 30 meter stack from ground level. The industry shall ensure the installation and operation of APCS to achieve the norms as notified in the E.P. Rules 1986 as amended.
12. The Industry shall comply direction issued by Hon'ble NGT/High Court/Supreme Court/CPCB/UPPCB time to time.
13. Unit shall comply Solid Waste Rule, 2016 as amended.
14. Unit shall install APCS and ETP as proposal submitted by unit.
15. The Industry shall submit Environmental Statement in prescribed format as per rule no.14 as per E.P Rules 1986.
16. The use of Pet coke and Furnace oil as a fuel is restricted in compliance of the Hon'ble Supreme court order. The industry shall only use PNG as fuel once PNG pipeline is available in that industrial area.
17. MSW waste should be suitable segregated. A separate and isolated MSW collection center should be provided.
18. Unit shall establish Miyawaki forest as per the GO no. 1011/81-7-2021-09(writ)/2016 dated 13.10.2021 of Deptt. of Environment, forest and climate change and BG of Rs. 50,000/- be deposited within a month time along with the proposal for proposed plantation.
19. Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 65 and other direction issued time to time regarding use of cleaner fuel.
20. Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 75 regarding GRAP.
21. Unit shall operate and maintain/upgrade the air pollution control device in such manner that emission should be as per norms prescribed by CAQM.
22. Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 76 and 77 regarding regulation of DG sets.
23. A Bank Guarantee of Rs. 50,000/- (Rs. Fifty Thousand Only) shall be submitted within 15 days including the above conditions which will be valid for two years otherwise this consent to establish shall be deemed to be withdrawn.

Please note that consent to Establish will be revoked, in case of, non compliance of any of the above mentioned conditions. Board reserves its right for amendment or cancellation of any of the conditions specified above. Industry is directed to submit its first compliance report regarding above mentioned specific and general conditions till 01/04/2024 in this office. Ensure to submit the regular compliance report otherwise this Consent to Establish will be revoked.

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Dated:- 01/03/2024

Copy To -

Regional Officer, U.P. Pollution Control Board, Ghaziabad.

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**मिशन LIFE - पर्यावरण के लिए जीवन शैली**  
(Lifestyle For Environment)  
जनसहभागिता का सन्देश



- स्वच्छता - देशभर में अपने परिवेश की स्वच्छता हेतु अपना सक्रिय योगदान सुनिश्चित करें
- संकल्प लें - एकल उपयोग प्लास्टिक उत्पाद जैसे कप, तश्तरी, चम्मच, स्ट्रॉ, ईयरबड्स आदि का उपयोग न हो एवं पर्यावरण अनुकूल विकल्पों जैसे कागज/पत्तों में बने दोने या कटलरी को प्राथमिकता दी जाय |
- एकल उपयोग प्लास्टिक उत्पाद के प्रयोग को रोकने एवं प्लास्टिक बैग के बजाय कपड़े के थैले का उपयोग करने मात्र में 375 मिलियन टन ठोस (प्लास्टिक) कचरे का उत्सर्जन बचाया जा सकता है
- चक्रीय अर्थव्यवस्था (सर्कुलर इकोनॉमी) का समुचित कार्यान्वयन वर्ष 2030 तक लगभग 14 लाख करोड़ रुपये की अतिरिक्त वचत उत्पन्न कर सकता है | वेस्ट/अपशिष्ट फेंकने के पूर्व सोचें, ये किमी का संसाधन तो नहीं ...?
- अनुपयोगी इलेक्ट्रिक / इलेक्ट्रॉनिक उत्पाद को कचरे में फेंकने से रकें | इसके उपयुक्त निस्तारण हेतु इसे प्राधिकृत ई - वेस्ट गीमाइकलर को दें | प्राधिकृत ई-गीमाइकलिंग इकाई में अनुपयोगी इलेक्ट्रिक / इलेक्ट्रॉनिक उत्पाद को देने मात्र में 0.75 मिलियन टन तक ई-कचरे का पुनर्चक्रण किया जा सकता है एवं ई-कचरे के विषम पर्यावरणीय दुष्प्रभाव से बचा जा सकता है
- बाहर जाने समय - सोचें कि क्या आपको वास्तव में परिवहन की आवश्यकता है - वह भी क्या व्यक्तिगत रूप में ? छोटी दूरी के लिए पैदल चलना पसंद करें, अथवा सम्भव हो तो कार पूल के रूप में संसाधन को साझा करें अथवा मार्बजनिक परिवहन पर विचार करें
- घरेलू स्तर पर कम से कम ठोस अपशिष्ट का उत्सर्जन करें और उनका श्रेणीकरण करें
- उपयोगी शेष खाद्य सामग्री आपके स्वयं प्रयास अथवा निकटस्थ सक्रिय स्वयं सेवी संस्थाओं की सहायता से समाज के वंचित वर्ग तक पहुंचाई जा सकती है | वहीं अनुपयोगी भोजन/खाद्य सामग्री को कंपोस्ट (वर्मी कंपोस्ट) करने से 15 अग्र टन भोजन को नष्ट होने से बचाया जा सकता है
- ध्यान रखें - उपयुक्त नल और शावर के उपयोग से पानी की खपत को 30 - 40% तक कम किया जा सकता है। एवं उपयोग में न होने पर नलों को बंद रखने मात्र में 9 ट्रिलियन लीटर पानी बचाया जा सकता है
- ट्रेफिक लाइट/रेलवे क्रॉसिंग पर कार/स्कूटर के इंजन बंद करने मात्र में 22.5 ट्रिलियन kWh तक ऊर्जा की बचत हो सकती है
- परम्परागत बल्ब के स्थान पर CFL का उपयोग बिजली की खपत में प्रभावी कमी लाते हैं | उपयोग में न होने पर बिजली उपकरणों को बंद करें | स्टार गेटेड विद्युत उपकरणों के उपयोग को प्राथमिकता दें

हमारे द्वारा अपनी जीवन शैली की प्राथमिकताओं का उचित और पर्यावरण अनुकूल पुनर्निर्धारण समाज और पर्यावरण के प्रति हमारा दायित्व है।

*True Copy*



Annexure R-2

19

**Uttar Pradesh Pollution Control Board**

Building, No TC-12V Vibhuti Khand, Gomti Nagar, Lucknow-226010

Phone:0522-2720828,2720831, Fax:0522-2720764, Email: info@uppcb.in, Website: www.uppcb.com

205030/UPPCB/Circle1(UPPCBHO)/CTO/both/HAPUR/2024

Date: 22/03/2024

To,

M/s

MS MORE BRIGHT E WASTE RECYCLER PVT LTD

C-78, MG ROAD(IIDC), HAPUR,HAPUR,

Application Id-  
25243788

Consolidated Consent to Operate and Authorisation hereinafter referred to as the CCA (Consolidated Consent & authorization) (Fresh) under Section-25 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention & Control of Pollution) Act, 1981 and Authorization under Rule-6(2) of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 notified under Environment (Protection) Act, 1986 as applicable (to be referred hereinafter as Water Act, Air Act and HW Rules respectively).

CCA is hereby granted to MS MORE BRIGHT E WASTE RECYCLER PVT LTD located at C-78, MG ROAD(IIDC), HAPUR,HAPUR,. subject to the provisions of the Water Act, Air Act and Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the orders that may be made further and subject to following terms and conditions :-

1. This CCA MS MORE BRIGHT E WASTE RECYCLER PVT LTD granted for the period from 09/03/2024 to 31/12/2028 and valid for manufacturing of following products.

S No	Product	Quantity	Unit
1	Collection, Dismantling and Recycling of E Waste	270	Metric Tonnes/Month

2. Conditions under Water(Prevention and Control of Pollution) Act -1974 as amended :-

(i) The daily quantity of effluent discharge (KLD) :-

Kind of Effluent	Quantity(KLD)	Treatment facility	Discharge point
Domestic	0.8 KLD	Septic Tank	

(ii) Trade Effluent Treatment and Disposal :-The applicant shall operate Effluent Treatment Plant consisting of primary/secondary and tertiary treatment as is required with reference to influent quantity and quality.

In case of stoppage of functioning of ETP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

(iii) The treated effluent shall be recycled to the maximum extent and should be reused within the premises for gardening etc. Quality of the treated effluent shall meet to the following general and specific standards as prescribed under Environment (Protection) Rules, 1986 and applicable to the unit from time-to-time :-

**Industrial Effluent Quality Standard**

S.No.	Parameter	Standard
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(iv) Sewage Treatment and Disposal :- The applicant shall provide comprehensive STP as is required with reference to influent quantity and quality. In case of stoppage of functioning of STP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

(v) The treated sewage shall be reused in gardening as far as possible. The STP shall be maintained continuously so as to achieve the quality of the treated sewage to the following standards.

S No.	Parameters	Standards
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### 3. Conditions under Air (Prevention and Control of Pollution) Act -1981 as amended :-

i) The applicant shall use following fuel and install a comprehensive control system consisting of control equipment as required with reference to generation of emissions and operate and maintain the same continuously so as to achieve the level of pollutants to the following standards.

#### Air Pollution Source Details

S No.	Air Pollution Source	Type of fuel	Stack no	Control Device	Height of Stack
1	01 No. Pit Furnace	PNG/LPG	1	Oxides of Nitrogen	30 meter from ground level

#### Emission Quality Standards

S No.	Stack no	Parameters	Standards
1	1	Oxides of Nitrogen	As per notified under EP Act, 1986

In case of stoppage of functioning of air pollution control equipment, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately

(ii) The unit will not use any type of restricted fuel.

iii) Noise from the D.G. Set and other source(s) should be controlled by providing an acoustic enclosure as is required for meeting the ambient noise standards for night and day time as prescribed for respective areas/zones (Industrial, Commercial, Residential, Silence) which are as follows :-

Day time : from 6.00 a.m. to 10.00 p.m., Night time: from 10.00 p.m. to 6.00 a.m.

Standards for Noise level in db(A) Leq	Industrial Area		Commercial Area		Residential Area		Silence Zone	
	Day Time	Night Time	Day Time	Night Time	Day Time	Night Time	Day Time	Night Time
	75	70	65	55	55	45	50	40

### 4. Conditions under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 :-

The Factory Manager of M/s MS MORE BRIGHT E WASTE RECYCLER PVT LTD. is hereby granted an authorization to operate a facility for collection and storage of Hazardous wastes. The authorization is granted to operate a facility for generation, collection and storage of hazardous wastes within factory premises for following category of wastes:-

S.No.	Category of Hazardous Waste as per the Schedules I, II and III of these rules	Authorised mode of disposal or recycling or utilisation or co-processing, etc.	Quantity(ton/annum)
1	Schedule I, Cat 37.1 Sludge from wet scrubbers	Through TSDF	12 Ton/Annum

The authorization shall be in force and shall be valid upto 31/12/2028. The authorization is subject to the conditions stated below and such conditions as may be specified in the rules for the time being in force under Environment (Protection) Act, 1986.

**Terms and conditions of Hazardous Waste authorization :-**

- (i) The authorization shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
- (ii) The authorization and its renewal shall be produced for inspection at the request of an officer authorized by the SPCB.
- (iii) The person authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous wastes without obtaining prior permission of the SPCB.
- (iv) Any unauthorized changes in personnel, equipment as working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.
- (v) It is the duty of the authorized person to take prior permission of the SPCB to close down the facility.
- (vi) An application for the renewal of an authorization shall be made as laid down under these rules.
- (vii) The unit shall comply with any other conditions specified in the guidelines issued by the MoEF or CPCB/SPCB from time to time.
- (viii) The authorization is valid for temporary storage of Hazardous Waste within premises only.
- (ix) The authorized agency shall ensure that on-line data with regard to quantity and nature of hazardous chemicals being used in the plant as well as air emission and waste generated within premises is displayed on Display Board of size 6x4 feet outside the main factory gate within premises
- (x) It is duty of the authorized person to take prior permission of this Board to close and cleanup the facility for treatment, storage and disposal of hazardous waste.
- (xi) The applicant shall maintain record of hazardous waste in Form-3 and shall submit annual return in Form-4 on or before the 30th day of June following to the financial year to which that return relates.
- (xii) In no case any hazardous waste shall be disposed off on land, in any drain, or into any water stream. All spillage must also be safely collected and stored.
- (xiii) Before the hazardous waste is stored or dumped in the facility, applicant must conduct a detailed physical and chemical analysis of hazardous waste sample and report to the Board.
- (xiv) Dried hazardous sludge from the process in the plant shall be stored in double lined HDPE pit constructed with R.C.C. or such material which does not react with the waste contained in it.
- (xv) The storage area should be fenced properly and Sign/Notice Board indicating 'Danger' and 'Hazardous' shall be displayed at appropriate position both in Hindi and English.
- (xvi) The industry shall store non-ferrous metal waste, used oil/spent oil waste in sealed drums placed on impervious floor under covered shed. Hazardous waste if required shall be sold only to Registered Recyclers/Re-processors.
- (xvii) In case of any transportation of hazardous waste, the details in Form-10 of the Hazardous and Other Wastes Rules, 2016 shall be submitted to the Board.

**5. Essential documents to be submitted by the Industry/Unit as Applicable:-**

- (i) Annual return in Form-4 and Waste Disposal Manifest in Form-10 under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and Third Party Audit Report.

- (ii) Environment Statement in Form-V of Environment (Protection) Rules, 1986.
- (iii) Quarterly compliance report of the CCA, photograph of ETP/APCs/Waste Storage Area.
6. Competent Authority reserves the right to change/modify/add any time any condition of this CCA.
7. Unit has to comply with the following specific & general conditions. Non compliance of any provision of this CCA and provisions of the Water Act, Air Act and Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 will result in legal action under the aforesaid Acts and Rules.
8. In compliance to the G.O 1011/81-7-2021-09 (Writ)/2016 dated.13.10.2021 issued by Department of Environment, Forest and Climate Change, Uttar Pradesh. You are directed to develop Miyawaki Forest as per the SOP available at URL:-<http://www.upccp.in/TrainingSession.aspx> for ensuring timely compliance of this direction, you are hereby directed to submit a bank guarantee with minimum validity of one year of the amount equivalent to the sum of initial consent fees (Air and Water) or Rs. 50,000/- (Rs. Fifty Thousand Only) whichever is more, within 30 days from the date of issuance of this certificate. In case of non-compliance of this direction, your consent will be revoked by the Board.
9. If the unit uses the ground water and requires the permission from SGWA/CGWA for water abstraction then the industry will have to obtain No objection certificate for abstraction of ground water. It will be the responsibility of the industry to comply with the various conditions of the NOC obtained from the competent authority and submit to the Board, within 3 months time failing which CTO will be revoked.

**General Conditions:-**

1. The applicant shall get analysed the samples of effluent/emission/hazardous wastes at least once in a three month from the laboratory recognized by the MoEF and shall report to the UPPCB.
2. The applicant shall however, not without the prior consent of the Board bring into use any new or altered outlet for the discharge of effluent or gases emission or sewage waste from the unit.
3. Treated Industrial waste water and domestic waste water shall be disposed jointly at one disposal point. The applicant shall provide discharge measurement equipment at final disposal point.
4. The applicant shall strictly comply with conditions of this CCA and submit compliance report of stipulated conditions within 30 days of receipt of this CCA. If at any point of time, it is found that the industry is not complying with stipulated conditions or any further direction/instruction issued by the Board, legal action shall be initiated against the applicant.
5. The applicant shall maintain good house keeping. All valves/pipes/sewer/drains etc. must be leak-proof.
6. The industry shall provide uninterrupted entry to the STP/ETP inlet and outlet points, Air Pollution Control equipment and stack for smooth sampling/monitoring of efficiency of pollution control systems.
7. The industry shall provide Inspection Book at the time of inspection to the Board's officials.
8. Whenever due to any accident or other unforeseen act or event, such emission occurs or is apprehended to occur in excess of standards laid down, such information shall be reported to the Board's offices and all other concerned offices. In case of failure of pollution control equipment, the production process connected to it shall be stopped with immediate effect.
9. The industry shall operate in a manner so that all emissions be emitted through designated chimney/stack only.
10. In case of any damage to the agriculture productivity, human habitation etc. by the operation of industry, it shall be imperative to stop production in the industry with immediate effect and such information shall be reported to Board's offices. The industry shall be liable to pay compensation also in such cases as decided by the Competent Authority.
11. The applicant shall apply before the 60 days of expiry of CCA or any change in production types/production capacity/manufacturing process/capacity enhancement etc. or any change in effluent discharge point or emission point
12. The Board reserves the right to revoke/add/modify any stipulated condition issued along with CCA, as may be necessary.

**Specific Conditions:-**

- 1- This consent is only valid for the discharge of the domestic effluent and water will not be used in any industrial process and discharge of industrial effluent is not permitted under any circumstances.
- 2- In the industry, flow meter to be installed in all water abstraction points and usage of fresh water to be minimized. Unit must strictly maintain zero liquid discharge of effluent outside premises into drain/river/water body and on land.
- 3- The industry will have to ensure permission from the CGWA/UPGWD for ground water extraction and it will be the responsibility of the industry to comply with the various conditions of the permission taken.
- 4- The industry shall submit the point wise compliance report of the conditions imposed in the CTO issued to the unit for the year 2028 and the audited balance sheet for the current year within two months otherwise this CTO may be revoked.
- 5- If the CPCB or UPPCB issues the Closure order against the industry this consent order stands automatically suspended for that period.
- 6- The industry shall submit Environmental Statement in prescribed form V as per rule no.14 of E.P Rules 1986.
- 7- This consent is valid only for products and quantity mentioned above. Industry shall obtain prior approval before making any modification in product/process/fuel/Plant machinery failing which consent would be deemed void.
- 8- The industry shall abide by orders / directions issued by Hon'ble Supreme Court Hon'ble High Court, Hon'ble National Green Tribunal, Central Pollution Control Board and U.P Pollution Control Board for protection and safe guard of environment from time to time.
- 9- The industry shall comply with various provisions of Air (Prevention and Control of Pollution) Act 1981 as amended, Water (Prevention and Control of Pollution) Act 1974 as amended and all other applicable rules notified under E.P. Act 1986 and the various orders issued by the MOEF&CC, CPCB and SPCB in time to time .
- 10- Industry shall comply with various Waste Management Rules as notified by MoEF&CC i.e. Plastic Waste Management Rules, 2016, Hazardous and Other Wastes (Management and Transboundary movement) Rules, 2016, E-waste (Management) Rules, 2016, and Battery (Management and handling) Rules 2001.
- 11- MSW waste should be suitable segregated. A separate and isolated MSW collection center should be provided.
- 12- Industry shall comply Solid waste rule 2016 as amended.
- 13- Industry shall submit monitoring reports of all stacks and ambient air quality from a certified /approved laboratory under E.P. Act 1986.
- 14- The unit shall submit the details of fees deposited during last three years within a month.
- 15- The unit shall obtain prior consents in the event of any addition of new emission generation sources such as- Boiler/ Furnace/ Heaters/ D.G. Sets or alteration of existing emission sources in accordance with section-21/22 of air Act 1981 (as amended respectively).
- 16- The use of Pet coke and Furnace oil as a fuel is restricted in compliance of the Hon'ble Supreme court order.
- 17- The Industry will use minimum 20% Bio Briquette as fuel in the Boiler depending upon its availability.
- 18- Unit shall establish Miyawaki forest as per the GO no. 1011/81-7-2021-09(rit)/2016 dated 13.10.2021 of Deptt. of Environment, forest and climate change and BG of Rs. 50,000/- be deposited within a months time along with the proposal for proposed plantation.
- 19- Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 53 and 62 and other direction issued time to time regarding use of cleaner fuel.

- 20- Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 55 regarding DG sets.
- 21- Unit shall operate and maintain/upgrade the air pollution control device in such manner that emission should be as per norms prescribed by CAQM.
- 22- For operation of DG sets during GRAP period unit shall comply with CAQM direction no. 55 and 68.
- 23- Unit shall submit latest stack monitoring report from NABL approved laboratory within one month.
- 24- In any circumstances production capacity will not be enhanced without prior permission (CTE) from State Pollution Control Board.
- 25- Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 73.
- 26- DG Set will be allowed in a hybrid/dual fuel mode (with 70% gas-based fuels and 30% Diesel) or with Retrofitted Emission Controlled Devices (RECD) as per direction No. 76 issued by CAQM.
- 27- Minimum 33% of the land on which unit is established will be covered by the plantation of tall trees of suitable species as per the guidelines set up by the Board vide its Office Order no.H- 16405/220/2018/02 dt. 16/02/2018. The copy of this guideline is available at URL [http://www.uppcb.com/pdf/Green-Belt-Guidle\\_160218.pdf](http://www.uppcb.com/pdf/Green-Belt-Guidle_160218.pdf).

Copy to:

Regional Officer, U.P. Pollution Control Board Ghaziabad.

Vivek Roy  
Digitally signed C.E.O.  
by Vivek Roy  
Date: 2024.04.12 C-1  
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**मिशन LiFE - पर्यावरण के लिए जीवन शैली**  
(Lifestyle For Environment)  
**जनसहभागिता का सन्देश**



- स्वच्छता - देशसेवा में अपने परिवेश की स्वच्छता हेतु अपना सक्रिय योगदान सुनिश्चित करें
- संकल्प लें - एकल उपयोग प्लास्टिक उत्पाद जैसे कप, तश्तरी, चम्मच, स्ट्रॉ, ईयरबड्स आदि का उपयोग न हो एवं पर्यावरण अनुकूल विकल्पों जैसे कागज/पत्तों में बने दोने या कटलरी को प्राथमिकता दी जाय |
- एकल उपयोग प्लास्टिक उत्पाद के प्रयोग को रोकने एवं प्लास्टिक बैग के बजाय कपड़े के थैले का उपयोग करने मात्र से 375 मिलियन टन ठोस (प्लास्टिक) कचरे का उत्सर्जन बचाया जा सकता है
- चक्रीय अर्थव्यवस्था (सर्कुलर इकोनॉमी) का समुचित कार्यान्वयन वर्ष 2030 तक लगभग 14 लाख करोड़ रुपये की अतिरिक्त वचत उत्पन्न कर सकता है | वेस्ट/अपशिष्ट फेंकने के पूर्व सोचें, ये किन्मी का संसाधन तो नहीं ...?
- अनुपयोगी इलेक्ट्रिक / इलेक्ट्रॉनिक उत्पाद को कचरे में फेंकने में रुकें | इसके उपयुक्त निस्तारण हेतु इसे प्राधिकृत ई - वेस्ट रीमाइकलर को दें | प्राधिकृत ई-रीमाइकिंग डिकार्ड में अनुपयोगी इलेक्ट्रिक / इलेक्ट्रॉनिक उत्पाद को देने मात्र से 0.75 मिलियन टन तक ई-कचरे का पुनर्चक्रण किया जा सकता है एवं ई-कचरे के विषम पर्यावरणीय दुष्प्रभाव से बचा जा सकता है
- बाहर जाने समय - सोचें कि क्या आपको वास्तव में परिवहन की आवश्यकता है - वह भी क्या व्यक्तिगत रूप से ? छोटी दूरी के लिए पैदल चलना पसंद करें, अथवा सम्भव हो तो कार पूल के रूप में संसाधन को साझा करें अथवा सार्वजनिक परिवहन पर विचार करें
- घरेलू स्तर पर कम से कम ठोस अपशिष्ट का उत्सर्जन करें और इनका प्रथाक्रीकरण करें
- उपयोगी शेष खाद्य सामग्री आपके स्वयं प्रयास अथवा निकटस्थ सक्रिय स्वयं सेवी संस्थाओं की सहायता से समाज के वंचित वर्ग तक पहुंचाई जा सकती है | वहीं अनुपयोगी भोजन /खाद्य सामग्री को कंपोस्ट (वर्मी कम्पोस्ट) करने से 15 अग्र टन भोजन को नष्ट होने से बचाया जा सकता है
- ध्यान रखें - उपयुक्त नल और शावर के उपयोग से पानी की खपत को 30 - 40% तक कम किया जा सकता है। एवं उपयोग में न होने पर नलों को बंद रखने मात्र से 9 ट्रिलियन लीटर पानी बचाया जा सकता है
- ट्रेफिक लाइट/रेलवे क्रॉसिंग पर कार/स्कूटर के इंजन बंद करने मात्र से 22.5 ट्रिलियन kWh तक ऊर्जा की बचत हो सकती है
- परम्परागत बल्ब के स्थान पर CFL का उपयोग विजली की खपत में प्रभावी कमी लाते हैं | उपयोग में न होने पर विजली उपकरणों को बंद करें | स्टां गेटेड विद्युत उपकरणों के उपयोग को प्राथमिकता दें

हमारे द्वारा अपनी जीवन शैली की प्राथमिकताओं का उचित और पर्यावरण अनुकूल पुनर्निर्धारण समाज और पर्यावरण के प्रति हमारा दायित्व है।

*True Copy*

**VAKALATNAMA**  
**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 Others ...Respondents

KNOW ALL to whom these presents shall come that I, Amiruddin, the Director of Respondent No.8 - M/s More Bright E-Waste Recycler Private Limited herein, do hereby appoint:

**MR. A. RADHAKRISHNAN AND MR. SUJEET RANJAN, ADVOCATES,**

**504, Block-D, Addl. Building Complex, Supreme Court of India, New Delhi-110001**

(hereinafter, called the Advocates) to be my Advocates in the above noted case and authorize them:

To act, appear and plead in the above-noted case in this Court/Tribunal or in any other Court/Tribunal in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me.

To sign, file verify and present pleadings, appeals, cross objections or petitions for execution review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages.

To file and take back documents to admit and/or deny the documents of opposite party.

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take execution proceedings.

To deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.

To appoint and instruct any other Legal Practitioner, authorizing them to exercise the power and authority hereby conferred upon the Advocates whenever they may think it to do so and to sign the Power of Attorney on my behalf.

And I the undersigned do hereby agree to ratify and confirm all acts done by the Advocates or their substitute in the matter as my own acts, as if done by me to all intents and purposes.

And I undersigned do hereby agree not to hold the Advocates or their substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court/Tribunal shall be of the Advocates which they shall receive and retain themselves.

IN WITNESS WHEREOF I do hereunto set my hands to these presents the contents of which have been understood by me on this 05<sup>th</sup> day of May, 2025. **22 MAY 2025**

Accepted subject to the terms of fees.

For More Bright E-Waste Recycler Pvt. Ltd

*(A. Radhakrishnan)*  
**Mr. A. Radhakrishnan, Advocate**

*(S. Ranjan)*  
**Mr. Sujeet Ranjan, Advocate**

*(Amiruddin)*  
**Amiruddin**  
 (Client)

Director

aradhakr@gmail.com MS-626/1995  
 Ph: +91-9310925179

sujeetranjanadvocate@gmail.com  
 Ph: +91-9971695298

**504, Block-D, Addl. Building Complex, Supreme Court of India, New Delhi-110001**



**ATTESTED**

**NOTARY PUBLIC**

**22 MAY 2025**



# MORE BRIGHT

## E WASTE RECYCLER PVT. LTD.

27

Factory Add:- Plot No. C78 Phase III Upsidc, M.g. Road, Hapur (U.P.) 245101  
Office Add:- Plot No.12 Ismail Colony Near Jamia Residency Fatehullapur Road Bijli Bamba Bypass, Meerut - 250002

Ref No. ....

Date: 22.05.2025

**Board Resolution Authorizing Mr. Amiruddin to appear/represent the Company -  
M/s More Bright E-Waste Recycler Private Limited before any court of Law/ Tribunal**

This Board Resolution has been passed on 22.05.2025 by M/s More Bright E-Waste Recycler Private Limited at H.No.38, Gali No.4, Hapur Road, Karim Nagar, Meerut, Uttar Pradesh - 250002 authorizing Mr. Amiruddin, S/o Ismail, Age about 50 Years, R/o House Number 38, Karim Nagar, Ansar Block, Hapur Road, Meerut City, Meerut, Uttar Pradesh – 250002 to appear/represent on behalf M/s More Bright E-Waste Recycler Private Limited before any court of Law/ Tribunal.

For More Bright E-Waste Recycler Pvt. Ltd

(Director)  
Faisal Malik  
Faisal Malik Director

For More Bright E-Waste Recycler Pvt. Ltd

Amiruddin  
(Director)  
Director  
Amiruddin



SITUS JUSTITIA LAW ASSOCIATES &lt;situsjustitialawassociates@gmail.com&gt;

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**Advance Service : Reply Affidavit on behalf of Respondent No.8 : DEVIDAS KHATRI VS. UNION OF INDIA AND OTHERS : O.A. No. 88 of 2025 : NGT, Principal Bench at New Delhi**

1 message

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**SITUS JUSTITIA LAW ASSOCIATES** <situsjustitialawassociates@gmail.com>

Mon, May 26, 2025 at 8:45 PM

To: adv anoop agarwal &lt;adv.anoop10@gmail.com&gt;

Cc: sujeetranjanadvocate@gmail.com, Arunachalam Radhakrishnan &lt;aradhaki@gmail.com&gt;

Dear Sir/Madam,

Please find attached herewith the copy of Reply Affidavit being filed on behalf of the Respondent No.8 in the matter of **"DEVIDAS KHATRI VS. UNION OF INDIA AND OTHERS"** being O.A. No. 88 of 2025 before the National Green Tribunal, Principal Bench at New Delhi.

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*Regards,*

*Situs Justitia Law Associates  
Chamber No.504, Block - D, 5th Floor,  
Additional Building Complex,  
Supreme Court of India, New Delhi - 110 001  
email : [situsjustitialawassociates@gmail.com](mailto:situsjustitialawassociates@gmail.com)  
Ph: +91-93109 25179, +91-99716 95298*

**Reply Affidavit Respondent No.8.pdf**

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