



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

**IA NO 536/2024  
IN  
Appeal NO. 40 OF 2024**

IN THE MATTER OF:

PUNJAB DYERS ASSOCIATION,  
TAJPUR ROAD  
LUDHIANA

...APPELLANT

VERSUS

PUNJAB POLLUTION CONTROL BOARD ...RESPONDENT

**REPLY OF APPELLANT IN APPEAL NO. 40/2024 TO  
APPLICATION FOR IMPLEADMENT BY APPLICANT IN IA  
536/2024**

**MOST RESPECTFULLY SHOWETH:**

1. That the Applicant, in IA no 536/2024 has filed application for impleadment as Respondent in Appeal no 40/2024 filed by the answering Appellant before this Hon'ble Tribunal.
2. That the Appellant has filed an Appeal no 40/2024 under sec 16 c of NGT Act 2010 against direction dated 25/26.9.2024 issued by Respondent Punjab Pollution Control Board u/s 33 A of Water (Prevention & Control of Pollution) Act 1974 as amended from time to time, to –
  - (i) meet prescribed discharge standards and to comply with disposal conditions mentioned in the Environmental Clearance granted by MoEFCC dated 3.5.2013.
  - (ii) immediately stop the discharge of effluent from 50 mld capacity CETP in to Buddha Nala or any other surface water body.
3. That upon hearing the Appeal and connected IAs on 4.11.2024, the Hon'ble Tribunal was pleased to direct applicant to supply copy of IA no 536/2024 to the counsel of answering Appellant

within 3 days and further directed that " It will be open to the Appellant to file reply to the I.As within three weeks".

4. That in compliance of the order of Hon'ble Tribunal dated 4.11.2024 Appellant in Appeal no 40/2024 submits short reply to IA no 536/2024 as under

5. PRELIMINARY OBJECTION

- (i) That the Applicant in IA has no locus to seek impeadment as Respondent in the statutory appeal filed by the answering appellant in the Appeal no 40/2024, filed against directions under sec 33 A of Water Act 1974 by Respondent Punjab Pollution Control Board.
- (ii) That the applicant in the IA are ordinary private residents of Ludhiana city who are neither necessary nor proforma party in the Statuary Appeal filed by the Appellant.
- (iii) That no legal right of the applicants in the IA is affected by the Appeal filed by Appellant before this Hon'ble Tribunal.
- (iv) That there is no claim by the applicants in the IA that they are users of the waters in Buddha Nala in any manner. Further. there is nothing in the IA to show that they are authorised to represent the interests of the persons using waters from Buddha Nala for drinking or irrigation or any other purpose.
- (v) That the applicants in the IA have no special knowledge that merits their assistance to this Hon'ble Tribunal in deciding on merit the appeal filed by the Appellant before this Hon'ble Tribunal.

- (vi) That the appellants have not availed legal remedy available to them under sec 49 (b) of the Water Act 1974 to address their grievance if any.
- (vii) That the applicants are not even a registered body / NGO with aim and objective to serve the interests of environment.
- (viii) That the applicants in the IA have not come before the Hon'ble Tribunal with clean hands. They have failed to disclose the source from which they have got possession of documents annexed in the IA.
6. That the answering appellant in the Appeal may kindly be permitted to filed detailed reply to the IA on merit in case, it is found necessary or so directed by this Hon'ble Tribunal.
7. That in view of the above short submissions/ reply , this Hon'ble Tribunal may kindly be pleased to dismiss the IA no 536/2024 with heavy cost upon the applicants in the IA.



**APPELLANT**

**NEW DELHI**  
**DATED: 28 .11.2024.**

**FILED BY:**



**(I K Kapila)**  
**Advocate**

**D 082, D LF Capital Greens, New Delhi**  
**[kapilaik@yahoo.co.in](mailto:kapilaik@yahoo.co.in), 9582063272**

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**AFFIDAVIT**

I, Vivek Kumar Jindal, a Director of Punjab Dyers Association, Tajpur Road, Ludhiana at present at New Delhi, do hereby solemnly affirm and declare as under: -

1. That I am presently a director of Punjab Dyers Association, a Company registered under company Act and duly authorized by the Company to file this affidavit.
2. That I am fully conversant with case as derived from office record and competent to swear to this affidavit.
3. That I have read the accompanying IA and have understood the contents thereof. **The facts stated there in are true and correct to the best of my knowledge and nothing has been concealed there from.**
4. That the Annexure is true copy of its original.

*Vivek Kumar Jindal*

**DEPONENT**

**VERIFICATION:**

28 NOV 2024

Verified at New Delhi on this day of Nov 2024, I the above named deponent, do hereby verify that the contents of the above affidavit are true and correct. No part of it is false and nothing material has been concealed there from.



ATTESTED  
*Parvesh Kr. Tyagi*  
NOTARY PUBLIC, DELHI

*Vivek Kumar Jindal*

**DEPONENT**

28 NOV 2024