

**BEFORE THE NATIONAL GREEN TRIBUNAL  
SITTING AT NEW DELHI  
O.A. NO. 712 OF 2023**

Farman Qurashi

..... APPLICANT

**VERSUS**

MOEF&CC and Others

..... RESPONDENTS

**PAPER BOOK**

**REPLY ON BEHALF OF APPLICANT**

(FOR INDEX KINDLY SEE INSIDE)

**PALLAVI PRATAP**

Advocate for the Applicant

ENROL NO. UP/1246/2010

A-90, LGF South Ex-II, New Delhi

Mob: 9999990078

Email: [pallavipratap@hotmail.com](mailto:pallavipratap@hotmail.com)

**BEFORE THE NATIONAL GREEN TRIBUNAL  
SITTING AT NEW DELHI  
O.A. NO. 712 OF 2023**

Farman Qurashi

..... APPLICANT

**VERSUS**

MOEF&amp;CC and Others

..... RESPONDENTS

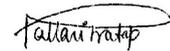
**INDEX**

<b><u>Sl.No.</u></b>	<b><u>Particulars</u></b>	<b><u>Pages</u></b>
<b><u>COMPILATION-I</u></b>		
1.	Reply to the Affidavit filed on behalf of UPPCB i.e. respondent no. 4 on record alongwith affidavit.	<b>1-8</b>
<b><u>COMPILATION-II</u></b>		
2.	<b><u>Annexure No. RA-1</u></b> True copy of the order dated 22.11.2024	<b>9-10</b>
3.	<b><u>Annexure No. RA-2</u></b> True copy of the order dated 02.07.2025	<b>11-12</b>
4.	<b><u>Annexure No. RA-3</u></b> True copy of the representation dated 22.09.2025 along with postal receipts	<b>13-19</b>
5.	<b><u>Annexure No. RA-4</u></b> True copy of the photographs.	<b>20-25</b>
6.	<b><u>Annexure No. RA-5</u></b> Pendrive containing the videos of the discharge.	<b>26</b>

Place: New Delhi  
Dated: 04.10.2025

Through

APPLICANT


**PALLAVI PRATAP**

Advocate for the Applicant  
ENROL NO. UP/1246/2010  
A-90, LGF South Ex-II, New Delhi  
Mob: 9999990078  
Email: [pallavipratap@hotmail.com](mailto:pallavipratap@hotmail.com)

**BEFORE THE NATIONAL GREEN TRIBUNAL  
SITTING AT NEW DELHI**

**O.A. NO. 712 OF 2023**

Farman Qurashi

..... APPLICANT

**VERSUS**

MOEF&CC and Others

..... RESPONDENTS

**NDOH: 06.10.2025**

**REPLY TO THE AFFIDAVIT FILED BY RESPONDENT NO. 4**  
**ON BEHALF OF THE APPLICANT**

**MOST RESPECTFULLY SHOWETH:**

The applicant above named most respectfully showeth as under:-

1. That the applicant has filed the instant Original Applicant in respect to slaughtering operations of the M/s Meem Agro Foods Pvt. Ltd. without complying with the norms of effluent disposal and proper solid waste management.
2. That this Hon'ble Tribunal vide its order dated 22.11.2024 directed the UPPCB i.e. respondent no. 4 to file the report disclosing the progress of the action against respondent no. 10. True copy of the order dated 22.11.2024 is filed herewith as **Annexure No. RA-1.**

3. That the applicant has filed an I.A. No. 56/2025 dated 20.01.2025 for taking on record the Joint Inspection Report dated 28.11.2024 which was allowed vide order dated 02.07.2025. True copy of the order dated 02.07.2025 is filed herewith as **Annexure No. RA-2**.
4. That it is submitted that the applicant in its I.A. No. 56/2025 has brought on record the Joint Inspection Report dated 28.11.2024 and the Letter dated 06.12.2024 issued by the Commissioner, Saharanpur Division.
5. That a perusal of the Joint Inspection Report dated 28.11.2024 shows that the inspection team found several violations and further recommended to close the slaughter house under Section 33A of The Water (Prevention and Control of Pollution) Act, 1974.
6. That thereafter in pursuance of the Joint Inspection Report dated 28.11.2024, the Commissioner, Saharanpur Division vide its Letter dated 06.12.2024 direction the District Magistrate, Shamli to take appropriate action in terms of the Joint Inspection Report dated 28.11.2024.

7. That it is pertinent to mention here that the Joint Inspection Team which carried out the above mention inspection also comprised of officials from Uttar Pradesh Pollution Control Board apart from other departments.
8. That now the respondent no. 4 by means of its affidavit dated 30.06.2025 has disclosed that another inspection was carried out on 28.12.2024 and the report dated 28.12.2024 (*Annexure No. 3 of the Affidavit on UPPCB*) stating that the respondent no. 10 is complaint on 28.12.2024.
9. That further a perusal of the inspection report dated 28.12.2024 shows that it is a one page report without any photographs to show case whether any inspection was carried out at the site of the respondent no. 10.
10. That it is further submitted that the Joint Inspection Report dated 28.11.2024 was a detailed 8 page report with all the photographs of the inspection and the inspection team comprised of 8 members including the officials of respondent no. 4 i.e. UPPCB, whereas the new inspection report dated 28.12.2024 is a single page

report which says that the respondent no. 10 is compliant without any evidence in support of the same.

11. That it is pertinent to mention here that once in the Joint Inspection Report dated 28.11.2024 it was found that the respondent no. 10 was found of several violations and the inspection team had recommended closure, then why another inspection was carried out by UPPCB.
12. That it appears that the respondent no. 4 wanted to grant time to the respondent no. 10 to show it compliant on record and to save it from closure.
13. That it is further submitted that the respondent no. 4 has only imposed environmental compensation of Rs. 19,50,000/- (Rupees Nineteen Lacs and Fifty Thousand) and has closed the matter.
14. That it is pertinent to mention here that till today the respondent no. 10 is violating the environmental norms and the applicant has informed the respondents of the same by providing evidence in the form of photographs and videos. True copy of the representation dated 22.09.2025 along with postal receipts is filed herewith as **Annexure No. RA-3.**

15. That it is submitted that the respondent no. 10 to this date has been flouting effluent disposal norms as prescribed by the UPPCB i.e. respondent no. 4. True copy of the photographs is filed herewith as **Annexure No. RA-4.**
16. That the respondent no. 10 has been discharging the blood of the animals directly into the sewage after slaughtering. Pendrive containing the videos of the discharge is filed herewith as **Annexure No. RA-5.**
17. That at this juncture it is submitted that the action of UPPCB i.e. respondent no. 4 by allowing the respondent no. 10 to operate after deposition of environmental compensation is just like granting permission to violate the norms by charging a fee for the same which defeats the purpose of environmental norms and regulations.
18. That view of these glaring facts, it is the respectful submission of the applicant, that the Consent to Operate dated 28.01.2020 granted to respondent no. 10 be cancelled.
19. For the foregoing reasons, the prayers/reliefs prayed by the applicant deserve to be granted. It is the respectful

submission of the applicant that the present application filed before this Hon'ble tribunal deserves to be allowed.

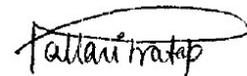
(A) Pass any such other order or orders as this Hon'ble Tribunal may deem fit in the facts and circumstances of the case.

Dated: 04.10.2025

APPLICANT

New Delhi

Through



**PALLAVI PRATAP**

Advocate for the Applicant

ENROL NO. UP/1246/2010

A-90, LGF South Ex-II, New Delhi

Mob: 9999990078

Email: [pallavipratap@hotmail.com](mailto:pallavipratap@hotmail.com)

BEFORE THE NATIONAL GREEN TRIBUNAL  
SITTING AT NEW DELHI

O.A. NO. 712 OF 2023

Farman Qurashi

..... APPLICANT

VERSUS

MOEF&CC and Others

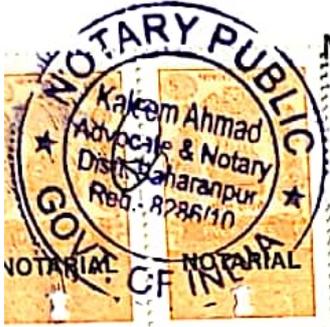
..... RESPONDENTS

AFFIDAVIT

I, Farman Qurashi, aged about 37 years, Son of Inam Qurashi, Resident of Village Chausana, Chausana Jaddid, Shamli, Uttar Pradesh – 247778, presently at Saharanpur, do hereby solemnly affirm and declare as under:-

1. That I am the Applicant as such I am conversant with the facts of the case and thus competent to affirm this affidavit.
2. That I have read the contents of the accompanying Reply/ application including facts in brief, grounds etc. from pages 1 to 19 and have understood the same.

FARMAN



- 3. That the facts stated therein are true and correct to the best of my knowledge and belief and nothing material has been suppressed.
- 4. That I have instructed by Advocate and the Application has been prepared by my Advocate on my instructions as stated above.
- 5. That the Annexures filed herewith are true and correct copies/ English translations of their respective originals.



Verified at Saharanpur on      day of October 2025

*FARMAN*  
DEPONENT

**VERIFICATION**

I above named deponent do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed there from.

Verified at Saharanpur on      day of October 2025

*9763365*

**IDENTIFIED BY**  
*[Signature]*

*FARMAN*  
DEPONENT

*[Signature]*



Item No. 11

Court No. 1

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**Original Application No. 712/2023  
(I.A. Nos. 839/2023, 838/2023 & 202/2024)

Farman Qurashi

Applicant

Versus

Ministry of Environment, Forest and  
Climate Change & Ors.

Respondent(s)

Date of hearing: 22.11.2024

**CORAM: HON'BLE MR. JUSTICE PRAKASH SHRIVASTAVA, CHAIRPERSON  
HON'BLE MR. JUSTICE ARUN KUMAR TYAGI, JUDICIAL MEMBER  
HON'BLE DR. A. SENTHIL VEL, EXPERT MEMBER**

Applicant: Mr. Tanay Tewari &amp; Mr. Robin Singh, Advs.

Respondent: Mr. Raj Kumar, Adv. for CPCB (Through VC)  
Mr. Pradeep Misra & Mr. Daleep Dhyani, Advs. for UPPCB (Through VC)  
Mr. Ravinder Singh, Adv. for MoEF & CC (Through VC)  
Mr. F.A. Ayyubi, Ms. Akanksha Rai & Ms. Gurneet Kaur, Advs. for R - 10**ORDER**

1. The Tribunal in the earlier proceedings had granted repeated opportunities and by the previous order dated 12.08.2024, last opportunity of a further four weeks was granted to Respondent No. 10 to file the reply.

2. Learned counsel for Respondent No. 10 submits that the reply has been filed on behalf of Respondent No. 10 yesterday at 7.30 pm. Since the reply has been filed belatedly, therefore, it has not come on record. Even otherwise, in terms of the last opportunity and during the previous working day of the Tribunal, no reply was filed. Hence, we take on record the reply of Respondent No. 10, subject to deposit of cost of Rs. 10,000/- with the Registrar General of the Tribunal within one week.

3. Learned Counsel for the Applicant has also informed that a show cause notice dated 27.08.2024 has been issued by the UPPCB to Respondent No. 10 and action has been initiated against him. Hence, the UPPCB is directed to file the report disclosing the progress of the action initiated against Respondent No. 10.

4. The Applicant will have an opportunity to file rejoinder within two weeks thereafter if he so desires.

5. List on 17.03.2025.

Prakash Shrivastava, CP

Arun Kumar Tyagi, JM

Dr. A. Senthil Vel, EM

November 22, 2024  
Original Application No. 712/2023  
(I.A. Nos. 839/2023, 838/2023 & 202/2024)  
dv..

**ANNEXURE RA-2**

Item No. 14

Court No. 1

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 712/2023  
(IA Nos. 839/2023, 838/2023, 202/2024 & 56/2025)

Farman Qurashi

Applicant

Versus

Ministry of Environment, Forest &  
Climate Change & Ors.

Respondent(s)

Date of hearing: 02.07.2025

**CORAM: HON'BLE MR. JUSTICE PRAKASH SHRIVASTAVA, CHAIRPERSON  
HON'BLE MR. JUSTICE SUDHIR AGARWAL, JUDICIAL MEMBER  
HON'BLE DR. A. SENTHIL VEL, EXPERT MEMBER**

Applicant: Mr. Tanay Tewari, Ms. Pushpila Bisht & Ms. Pallavi Pratap, Advs. for Applicant

Respondents: Mr. Raj Kumar, Adv. for CPCB  
Mr. Pradeep Misra & Mr. Daleep Dhyani, Advs. for UPPCB (Through VC)

**ORDER**

1. I. A. No. 56/2025 has been filed by the applicant seeking permission to place on record joint inspection report dated 28.11.2024. IA is not opposed by any of the parties. On due consideration IA is allowed.
2. Learned Counsel for the applicant submits that Uttar Pradesh Pollution Control Board (UPPCB) has filed the affidavit dated 30.06.2025 enclosing therewith two fresh reports. He seeks time to file response to the said affidavit.
3. As of last opportunity, all the parties are granted three weeks' time to file their replies/objections etc.
4. List for hearing on 06.10.2025.

Prakash Shrivastava, CP

Sudhir Agarwal, JM

Dr. A. Senthil Vel, EM

July 02, 2025  
Original Application No. 712/2023  
JG.

1. The Chairman,  
Uttar Pradesh Pollution Control Board,  
Lucknow.
2. The Divisional Commissioner,  
Saharanpur Division,  
Saharanpur
3. Member Secretary,  
Uttar Pradesh Pollution Control Board  
Lucknow
4. Regional Officer Muzaffarnagar  
Pollution Control Board  
Uttar Pradesh

**Subject: Regarding violations made by the slaughter house operated by M/s Meem Agro Foods Pvt. Ltd., functioning on 993 to 1005, Kandhla Road, Kairana, Shamli District, U.P. - 247774.**

1. That the applicant is a resident of District Shamli, Uttar Pradesh and in the instant complaint is in respect to slaughtering operations of the M/s Meem Agro Foods Pvt. Ltd. without complying with the norms of effluent disposal and proper solid waste management.
2. That the abattoir is in contravention of the statutory requirements prescribed under the Environment (Protection) Act, 1986 and the rules framed thereunder in general.
3. That the improper and illegal disposal of effluents, including both Type I waste (which constitutes of vegetable matter such as rumen, stomach and intestine waste contents, drug, agriculture residues, etc.) and Type II waste (Comprising of Animal matter

such as inedible offals, tissues, meat trimmings, waste and condemned meat, bones, etc.) is causing enormous environmental degradation.

4. That the slaughter house operations undertaken by M/s Meem Agro Foods Pvt. Ltd. functioning on 993-1005, Kandhla Road, Kairana, Shamli, U.P. which is situated near the residential area, has been flouting the effluent disposal norms as prescribed by the UPPCB and has turned to be a loci of foul smell and improper solid waste disposal in the surrounding area.
5. That it is pertinent to mention here that earlier also a joint inspection was carried out and by means of report dated 28.11.2024, violations were found and the Commissioner, Saharanpur Division by its Letter dated 06.12.2024 directed District Magistrate, Shamli to issue closer order of the slaughter house. *Copy of the Letter dated 06.12.2024 is attached herewith.*
6. That it is pertinent to mention here that M/s Meem Agro Foods Pvt. Ltd. to this date has been flouting the effluent disposal norms as prescribed by the UPPCB. *Copy of the photographs is attached herewith.*
7. That the blood of the animals after the slaughtering has been done is being disposed directly into the sewage. *Pendrive containing the video of the disposal is attached herewith.*

8. That despite passing of the order by the Commissioner no action has yet been taken against the abattoir i.e. M/s Meem Agro Foods Pvt. Ltd. and it has been functioning regardless of the violation of the environmental norms.

9. That it is requested that in compliance of the Letter dated 06.12.2024 action be taken against the abattoir i.e. M/s Meem Agro Foods Pvt. Ltd. for violation of environmental norms.

Wherefore, in view of the above mentioned, it is most respectfully requested to stop the operations of M/s Meem Agro Foods Pvt. Ltd. for violation of environmental norms in pursuance of the Letter dated 06.12.2024 and strict punitive action be taken against M/s Meem Agro Foods Pvt.

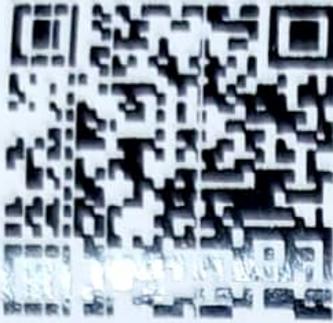
Place:

Date: 22/09/2025

Applicant

FARMAN

Farman Qurashi, Son of Inam  
Qurashi, Resident of House No. 318,  
Village Chausana, Chausana Jaddid,  
Shamli, Uttar Pradesh - 247778



Registered Letter



RY007410265IN

Dely Office & Pincode: Lucknow GPO(226001)

Booking Office: MPCM Saharanpur RMS (247001)

Counter No. 1, 23/09/2025 16:21:20

GST No. 09AAAGO0048P1ZZ B kg Ref ID: 3126003623092594414

Weight(gms): 55.00 L: B: H: (Vol. Weight: 0.00)

Amount Paid: 38.00 (Base Tariff: 32) Tax: 6.00 (CGST: 3.00 SGST: 3.00)

Mode of Payment: Cash

Sender	Receiver
FARIMAN QURESHI	THE CHAIRMAN
Mobile No. 3218662317	Mobile No. 1234567890
SHAMLI	UP POLLUTION CONTROL BO
SHAMLI-247778	LUCKNOW-226001

Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868

In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>

Go Green!!! Opt for eReceipts, ePOD

This is system generated document, no manual signature required

23-09-2025 16:23:40



Registered Letter



RY007410376IN

Daily Office & Pincode: Muzaffarnagar HC (251001)

Booking Office: MPCM Saharanpur RMS (247001)

Counter No. 1, 23/09/2025 16:22:25

GST No. 09AAAGO0048P1ZZ BkgRefID: 3126003623092594414

Weight(gms): 55.00 L: B: H: (Vol. Weight: 0.00)

Amount Paid: 38.00 (Base Tariff: 32) Tax: 6.00 (CGST: 3.00 SGST: 3.00)

Mode of Payment: Cash

Sender	Receiver
FARMAN QURESHI	REGIONAL OFFICER
Mobile No. 3218862317	Mobile No. 1234567890
SHAMLI	MUZAFFARNAGAR POLLUTION
SHAMLI-247778	MUZAFFARNAGAR-251001

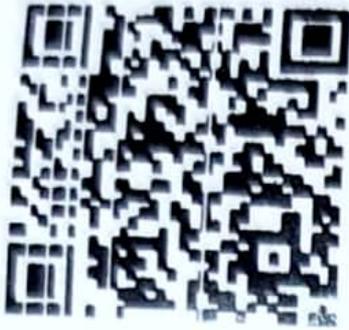
Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868

In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>

Go Green!!! Opt for eReceipts, ePOD

This is system generated document, no manual signature required

23-09-2025 16:23:56



Registered Letter



RY007410212IN

Delivery Office & Pincode: Lucknow GPO(226001)

Booking Office: MPCM Saharanpur RMS (247001)

Counter No. 1, 23/09/2025 16:20:29

GST No. 09AAAGO0048P1ZZ BkgRefID: 3126003623092594414

Weight(gms): 54.00 L: B: H: (Vol. Weight: 0.00)

Amount Paid: 38.00 (Base Tariff: 32) Tax: 6.00 (CGST: 3.00 SGST: 3.00 )

Mode of Payment: Cash

Sender	Receiver
FARMAN QURESHI	THE MEMBER SECRETARY
Mobile No. 3218862317	Mobile No. 1234567890
SHAMLI	UP POLLUTION CONTROL BO
SHAMLI-247778	LUCKNOW-226001

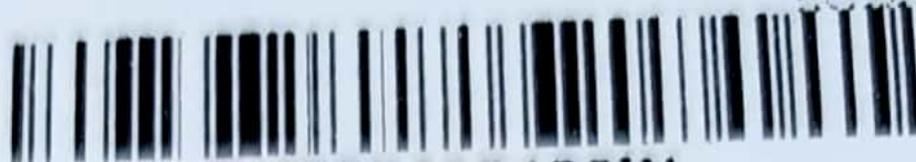
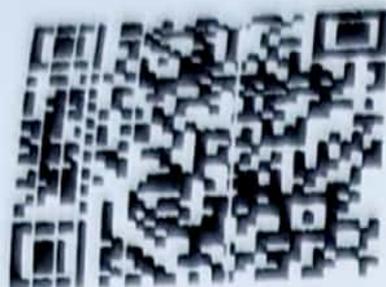
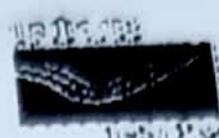
Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868

In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>

Go Green!!! Opt for eReceipts, ePOD

This is system generated document, no manual signature required

23-09-2025 16:23:28



RY007410402IN

Daly Office &amp; Pincode: Saharanpur HO(247001)

Booking Office: MPCM Saharanpur RMS (247001)

Counter No. 1, 23/09/2025 16:23:22

GST No. 09AAAGO0048P1ZZ BkgRefID: 3126003623092594414

Weight(gms): 53.00 L: B: H: (Vol. Weight: 0.00)

Amount Paid: 38.00 (Base Tariff: 32) Tax: 6.00 (CGST: 3.00 SGST: 3.00 )

Mode of Payment: Cash

Sender

Receiver

FARMAN QURESHI

Mobile No. 3218662317

SHAMLI

SHAMLI-247778

DIVISIONAL COMMISSIONER

Mobile No. 1234567890

SAHARANPUR DIVISION

SAHARANPUR-247001

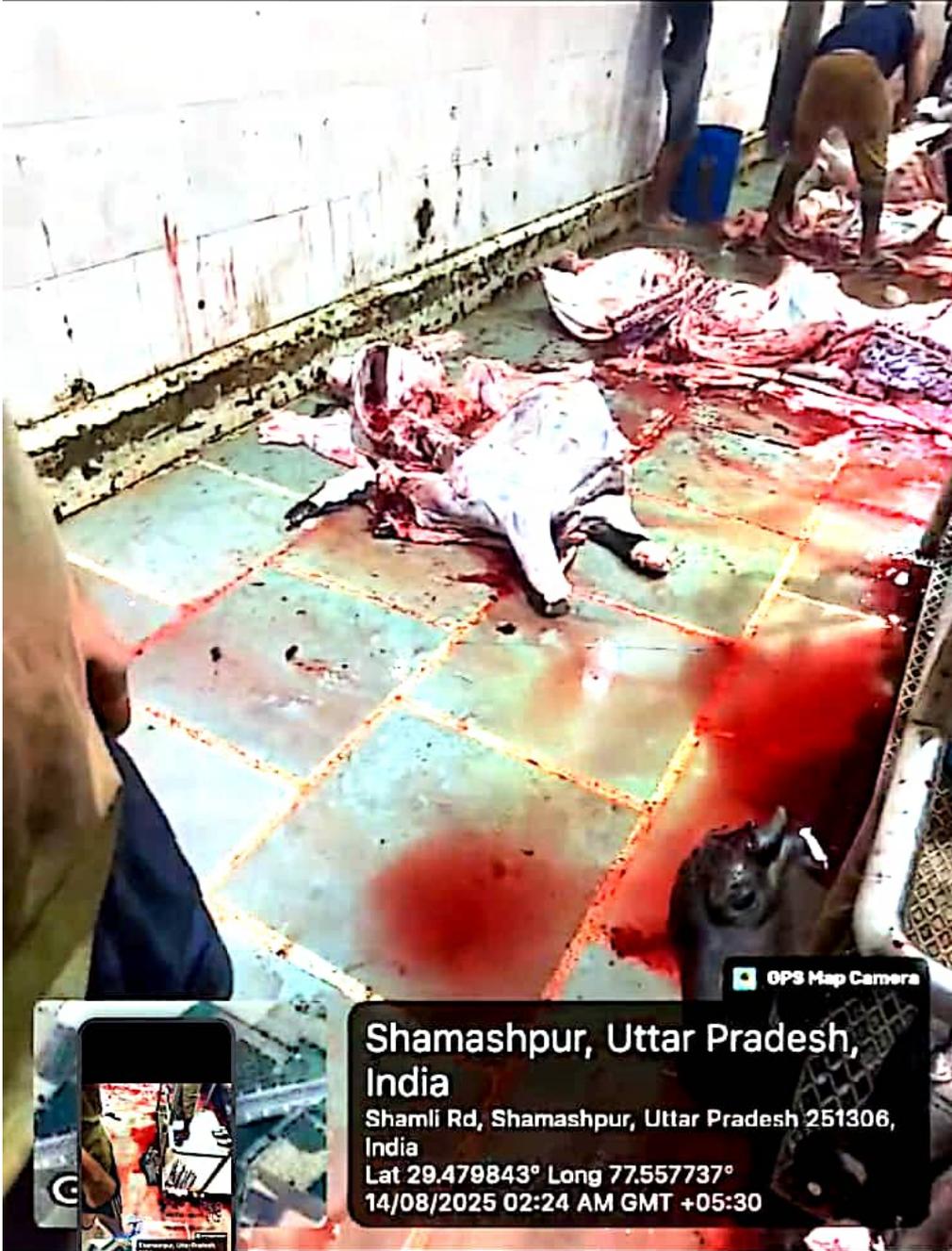
Track on [www.indiapost.gov.in](http://www.indiapost.gov.in) OR Dial 18002666868In case of any complaint, please visit <https://crm.indiapost.gov.in/customer>

Go Green! Opt for eReceipts, ePOD

This is system generated document, no manual signature required

23-09-2025 16:24:10





GPS Map Camera

Shamashpur, Uttar Pradesh,  
India

Shamli Rd, Shamashpur, Uttar Pradesh 251306,  
India

Lat 29.479843° Long 77.557737°

14/08/2025 02:24 AM GMT +05:30



1418

22



GPS Map Camera



**Shamashpur, Uttar Pradesh,  
India**

Shamli Rd, Shamashpur, Uttar Pradesh 251306,  
India

Lat 29.479843° Long 77.557737°

14/08/2025 02:24 AM GMT +05:30



GPS Map Camera

Shamashpur, Uttar Pradesh,  
India

Shamli Rd, Shamashpur, Uttar Pradesh 251306,  
India

Lat 29.479843° Long 77.557737°

14/08/2025 02:24 AM GMT +05:30



Google

1420

24



00:08 / 01:50





**Videos of the discharge of blood of Animals**