

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

APPEAL NO. 22 OF 2015

IN THE MATTER OF:

KRISHAN LAL GERA

... APPELLANT

VERSUS

STATE OF HARYANA & ORS.

...RESPONDENTS

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NEW DELHI

DATED: 25.09.2024

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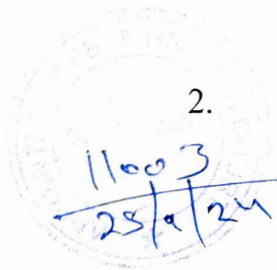
STATE OF HARYANA & ORS.

...RESPONDENTS

**RESPONSE ON BEHALF OF THE RESPONDENT NOS. 9 AND
10 TO THE BRIEF NOTE FILED BY THE LEARNED AMICUS
CURIAE**

I, Dr. Navneet Singh Chhabra S/o Mr. Ranjit Singh aged about 56 years, working for gain as Unit Head- Medical Director at QRG Medicare Limited, do hereby solemnly affirm and state as under:

1. That I am the authorized signatory of the Respondent Nos.9 and 10 in the above-mentioned matter and I am well aware of the facts and circumstances of the case. I am therefore competent and authorized to affirm the present response on behalf of the Respondent Nos.9 and 10.
2. That I have read and understood the contents of the brief note filed by the Learned Amicus Curiae and I am therefore competent to reply to the same.
3. It is submitted that vide order dated 9th July 2024, this Hon'ble Tribunal had directed the Learned Amicus Curiae to give a brief note indicating the issues which are to be examined after the order passed by the Hon'ble Supreme Court, that would facilitate the hearing.



4. It is submitted that the Hon'ble Supreme Court had vide order dated 1 May 2023 remanded the matter back to this Hon'ble Tribunal to decide the issue as to whether the environment clearance granted can be used having regard to an inspection report dated 1 February 2018.
5. The Respondent Nos. 9 and 10 have filed an application to place on record additional documents and facts that have transpired after passing of the earlier judgment dated 25 August 2015 of this Hon'ble Tribunal which was set aside by the Hon'ble Supreme court. It had also placed on record its compliance with the certain findings in the report dated 1 February 2018 which had to be adjudicated by this Hon'ble Court. It is submitted that the Learned Amicus Curiae has not raised any issues or found any deficiencies with respect to the said compliances . Further, no issue has been raised to the responses filed by the answering Respondents in the earlier affidavits and submissions made in the aforesaid application.
6. The Learned Amicus Curiae has however raised an issue that the report of SEIAA, Haryana dated 27 December 2023 pointed some deficiencies in implementing conditions of EC. It is submitted that in the said report the SEIAA has observed that the housekeeping of the hospital needs improvement. There was no deficiency found in the compliance of conditions of EC. In fact the SEIAA in the report concludes that all the conditions stipulated in the EC have been complied with.

So far as the housekeeping of the hospital is concerned, it is submitted that Respondent No.10 Hospital has introduced initiatives in 2023 and 2024 to improve housekeeping, details of which are annexed hereto and marked as ANNEXURE – A.



7. It has also been stated by the Learned Amicus Curiae that the report does not cover all the conditions as laid down in the EC. It is submitted that SEIAA has relied upon the six monthly compliance reports submitted by Respondent No.10 Hospital along with CTO and authorisations and test reports of Moef & CC approved laboratories [Page 1223-1269] in which it was shown that all the conditions of EC have been complied with. The last six monthly compliance report was submitted for the period January 2023 to June 2023. It is submitted that the Learned Amicus Curiae has also not found any issues with respect to six monthly compliance report which has been found to be in order by the SEIAA an expert body.

8. In light of the same, it is submitted that it appears that in fact there is no issue remaining for consideration even as per the Learned Amicus Curiae and in view of the same it is humbly submitted that the aforementioned appeal which has been pending for the last 10 years may be disposed off. The Respondent No.10 Hospital is subject to regular monitoring. It has complied with all the conditions of EC and has not been found to be in violation of any of the environmental norms. Moreover the issues originally raised in the Appeal do not survive as on date.



[Signature]
DEPONENT

VERIFICATION

I, the deponent above named do hereby verify that the contents of foregoing affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed there from.

Verified at Faridabad on this the 24th day of September, 2024.

[Faint background text from a stamp: Certified that the above deponent on oath affirmed before me on the 25/09/2024 by Manoj Singh identified by Self. It is personally known to me the contents of the above were explained to the Deponent.]
[Signature]
SUMIT KALSHIK Adv.
 OATH COMMISSIONER, FARIDABAD

[Signature]
DEPONENT

**CERTIFIED TRUE COPY OF THE CIRCULAR RESOLUTION PASSED BY THE
BOARD OF DIRECTORS OF QRG MEDICARE LIMITED ON 26TH JUNE, 2024**

**CHANGE IN AUTHORIZATION TO REPRESENT BEFORE VARIOUS
COURTS/FORUMS/TRIBUNALS/AUTHORITIES IN LEGAL MATTERS**

“RESOLVED THAT in supersession to all the earlier Resolutions passed at the Meeting of the Board of Directors of the Company, the following officials be and are hereby severally authorized, in the manner prescribed herein below, to deal with litigations matters filed before various consumer forums, courts, tribunals, authorities, Police authorities, Judicial Bodies, Quasi-Judicial Bodies and allied bodies, against or by the Company –

Severally from Category ‘A’

Category ‘A’

1. Dr Raajiv Singhal
2. Mr. Anjaneyulu Ganji
3. Mr Madhukiran Sistla
4. Dr Navneet Chhabra
5. Ms Prachi Singh
6. Mr Deepak Daima

RESOLVED FURTHER THAT abovementioned authorised signatories of the Company, in the manner specified above, are hereby authorized to prepare, authenticate, execute, sign, file, certify and submit various complaints, petitions, written statements, application, affidavit, undertakings, written arguments, appeal documents, vakalatnama and other records and documents to deal with the litigation matters filed before various consumer forums, courts, tribunals, authorities and allied bodies, against or by the Company and also authorized to do all such other acts, deeds, things, including engagement of legal counsel, or any other matters as they may consider necessary, expedient in connection with the same.

RESOLVED FURTHER THAT any Director of the Company be and is hereby authorized severally to delegate all or any of the aforesaid powers entrusted in favour of any other person by executing either a letter of authority or power of attorney as they may consider necessary and expedient to give effect to the above Resolution.

RESOLVED FURTHER THAT any director of the Company/Company Secretary be and is hereby authorized to do all such acts, deeds and things as may be necessary to give effect to the foregoing Resolution including issuing certified true copies of the resolution.”



QRG Medicare Private Limited (formerly known as QRG Medicare Limited)

Registered Address: Plot No 67/1, Off Science City Road, Sola, Ahmedabad, Gujarat 380060

Correspondence Address: Marengo Asia Hospitals, Plot No. 1, HUDA Staff Colony, Sector 16, Faridabad, Haryana 121002

☎ 1800 309 9999 ■ helpdesk@marengoasia.com CIN No. U74999GJ2010PTC133972

For
QRG MEDICARE LIMITED



Vacha Shah
Company Secretary
M No – A42366



VIVEKANANDA ASHRAMA

Regd. Under Haryana Registration & Regulation Of Societies Act. 2012 (Haryana Act No. 1 Of 2012)

PLOT NO 1, SECTOR - 16 FARIDABAD (HARYANA)

Ref. No

Date

TO WHOM SOEVER IT MAY CONCERN

Pursuant to the approval of Governing Body in its meeting held on 14-6-2024 of The Vivekananda Ashrama, Dr Navneet Singh Chhabra is be and hereby authorised to appear, sign, verify, declare, affirm, make, present, submit and file all necessary notices, plaints, petitions, written statements, affidavits, undertakings, vakalatnamas, declarations, Appeals, Revisions, applications, statements, complaints, papers and documents and all proceedings and matters in connection with any suit(s) or proceeding(s) filed by or against The Vivenkanda Ashrama ("Society") before any court of law or any tribunal or any quasi-judicial or statutory or administrative authority and nominate, appoint and engage advocates, solicitors, counsel or other professionals and retainers; and to do all such acts, things, deeds as may be necessary or proper to carry out the purpose mentioned hereinbefore.

For The Vivekananda Ashrama

Dr Raajiv Singhal
Gen. Secretary
24-9-2024



In the year 2023, the hospital, QRG Medicare Limited introduced Service Buddy initiative for the patients, wherein the patient/attendant could scan a QR code fixed in the IPD ward/ Room and order a service related to housekeeping, maintenance, etc.

Therefore, on the onset of 2024, the hospital, QRG Medicare Limited have introduced yet another initiative. On a regular basis there are 25 different services provided by the housekeeping team and 7 different services by GDA team throughout the day.

Keeping this in mind the housekeeping and GDA team has been divided into 2 parts:

- One that does regular services and will be deployed for the same as per frequency of that area – hourly/ 2 hourly/ four hourly/ once a day/ weekly/ monthly.
- Other part comprises of a pool of GDAs and housekeepers who will be posted on SOS duty and can be called by using the QR code fixed from the individual areas where these codes are fixed.

The following QR code is for the use of all internal stakeholders – Nurses, Doctors, medical/ non-medical Administrators. These have been fixed in offices, OPDs and all Nursing stations.

Marengo Asia Hospitals
HUMANE BY PRACTICE

Activate SOS for Housekeeping & GDA Services

Scan the QR code for on call services in case of absolute emergency

202 L/O/HD Chamber

Housekeeping
सफाई सेवामें /
घोटी

GDA
Housekeeping & GDA
मरिजों के अलावा
अन्य जगहों पर

Who can activate the QR code
Nurses | Doctors | Admins/Incharge Team/Outcharge | Coordinator | GDA

Marengo Asia Hospitals
HUMANE BY PRACTICE

**Seamless In-Room Services,
One Scan Away!**

क्यूआर कोड स्कैन करें
और हमारी इन-रूम सेवाओं का निरंतर लाभ उठाएं

CATH LAB/NURSING STATION

Any
Maintenance
Support
कमरे के अंदर
रखरखाव की
जगह जगहों पर

Housekeeping
Services/GDA
सफाई सेवामें /
घोटी

IT Support
आईटी सहायता

Marengo Asia Hospitals, committed to providing you
with the best patient care

हमारे अतिरिक्त होस्पिटल्स आपकी सर्वोत्तम देखभाल प्रदान करने के लिए प्रतिबद्ध हैं

Delhi | Lucknow | Jaipur | Ahmedabad | Bhubaneswar | Ranchi | Patna | Faridkot | Gurgaon