

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

ORIGINAL APPLICATION NO. 850/2024

IN THE MATTER OF :

SUMIT SAINI

.....APPLICANT

VERSUS

JAMUNA WOOD TECH INDUSTRIES

.....RESPONDENT

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Place: New Delhi

Date: 21.10.2024

FILED BY:


(GAURAV AGARWAL)
Advocate for Respondent No.1

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REPLY/OBJECTION BY RESPONDENT AGAINST THE
DETAILED REPORT FILED BY THE HARYANA STATE
POLLUTION CONTROL BOARD

1. That by an order of this Tribunal dated 18.04.2024, HSPCB was directed to conduct an inspection and verify the factual compliance status qua all relevant aspects and to inform the Hon'ble Tribunal with the specific queries put to the HSPCB.
2. That the Respondent is a Partnership Firm established in 2003 and has been engaged in the plywood industry and is amongst those 28 industries which were named in the order.
3. That it is submitted that the Respondent uses wood waste as its fuel and not coal or any other substance. The quantity of the wood waste used daily is around 4.5 tons or 4500 kgs. However, the report of the HSPCB incorrectly states that the Respondent is utilizing 10 tons or 10000 kgs of wood waste which is incorrect and false.

4. That it is incorrectly stated in the report of HSPCB that Respondent is generating fly ash. As the fuel used is wood waste hence it generates only wood ash which is approx. 15 Kg depending upon the type of wood waste. The wood ash generated in the process is taken away by the local and farmers for filling and levelling purpose. Hence, the wood ash is disposed accordingly.
5. That the wood ash generated is not used by the Respondent, hence the same is stored in gunning bags. The said bags are thereafter, taken away by locals and farmers after due verification by the Respondents. However, as the same is not a saleable product, separate/individual record is not kept of it's disposal to the locals.
6. That it is further submitted that there is proper rain water harvesting system installed in the said unit and are in regular use during rain. The report of the HSPCB has incorrectly stated that there no rain water harvesting system.
7. That it may be pertinent to mention that the Respondent is a manufacturing unit engaged in the present industry since past more than 21 years. The Respondent has always complied and followed each and every rule and law scrupulously. However, the Respondents states that in the event any further direction, if any is passed by this Tribunal, Respondent shall be obliged to follow the same as well. It is lastly submitted that considering the fact of compliance by the Respondent and the fact that Respondent is a source of livelihood to huge section of society

who are directly and indirectly engaged with the Respondent, this Tribunal may be pleased to dismiss the O.A with heavy cost to the Applicant.

Sanjay Kumar
Partner, Jamuna Wood Tech Industries
Respondent

Through



(GAURAV AGARWAL)
Advocate for Respondent No.1
GRV LEGAL
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AFFIDAVIT

I, SANJAY KUMAR, aged about 58years, S/o Sri Ramesh Kumar, R/o House 2443, Bubka Road, Raduar (rural) (45), District Yamunanagar, Haryana 135133, do hereby state on solemn affirmation as under:

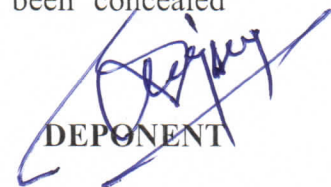
1. That the deponent is the Partner of the Respondent in the present Original Application as such I am well conversant with the facts and circumstances of the present case and hence, competent to swear this affidavit.
2. That I have gone through the accompanying Reply from para 1 to 7 and say that the contents thereof are true and correct to the best of my knowledge and belief and I believe the same to be true.

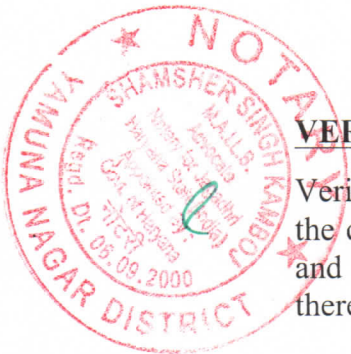
Solemnly affirmed on this 15th day of Oct, 2024 at Yamunanagar, Harayana.


DEPONENT

VERIFICATION

Verified at Yamunanagar, Harayana on this 15th day of Oct, 2024 that the contents of my above affidavit are true and correct to my knowledge and no part of it is false and nothing material has been concealed therefrom.


DEPONENT



Shamsheer Singh Kamboj
.....ATTESTED
SHAMSHER SINGH KAMBOJ
M.A.L.L.B.
15/10/24
Advocate
NOTARY JAGADHRI
YAMUNA NAGAR