

N.D.H.:23.10.2024

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

ORIGINAL APPLICATION NO 8 71 2024

**IN THE MATTER OF :**

SUMIT SAINI

...APPLICANT

VERSUS

AGGARWAL PLYWOOD INDUSTRIES  
INDEX

..RESPONDENT

LUXMI TIMBW

S.NO.	PARTICULARS	PAGE NO.
1.	REPLY BY THE RESPONDENT AGAINST THE DETAILED REPORT FILED BY THE HARYANA STATE POLLUTION CONTROL BOARD WITH AFFIDAVIT	1 - 4
2.	<u>ANNEXURE R-1</u> A TRUE COPY OF APPLICATION FOR RENEWAL OF THE NOC DATED NIL	5- 8

**Place:** New Delhi**Date:** 21.10.2024

FILED BY:

**(GAURAV AGARWAL)**  
Advocate for Respondent No.1GRV LEGAL  
Advocates and Legal Consultants  
O-703, Aditya Mega City,  
VaibhavKhand, Indirapuram,  
Ghaziabad, U.P. NCR- 201014  
Mob.: 8802911392  
Email. : [gaurav@grvlegal.in](mailto:gaurav@grvlegal.in)

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

ORIGINAL APPLICATION NO. 871 OF 2024

**IN THE MATTER OF :**

SUMIT SAINI .....APPLICANT  
VERSUS  
AGGARWAL PLYWOOD INDUSTRIES ..RESPONDENT

**REPLY/OBJECTION ON BEHALF OF THE 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 established in the year 2011 and has been engaged in the plywood industry and is amongst those 28 industries which were named in the order.
3. 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. 40 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.
4. 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 <sup>2</sup> saleable product, separate/individual record is not kept of its disposal to the locals.

5. That in the report, the HSPCB alleges, with respect to the management and disposal of fly ash generated, that fly ash is being collected in bags but no record of ash generation and disposal is provided by the unit. Further, the representative of the unit has submitted that the fly ash is being used by locals and farmers or filling and levelling purposes. Upon this it is pertinent to mention that no fly ash is being generated and it is only wood ash that is being generated. Also, the said ash is being given to contractors who further utilize it for filling of construction sites.
6. That with respect to the nature and adequacy of plantation carried out it is submitted that the Respondents have planted abundant trees/plants in the premises. The HSPCB is not correct in submitting in the report that adequate plantation is not done
7. That it is further submitted that there are rain water harvesting systems installed in the said unit and are in regular use during rain. The report of the HSPCB has also stated that there is a rain water harvesting system.
8. That so far as the NOC from the State Ground Water Authority is concerned, the Respondents have the NOC


and the renewal of the same was applied for.<sup>3</sup>

However, the said application is pending disposal and there is no objection/defect notified in the said application. A true copy of application for renewal of NOC dated NIL is **ANNEXURE R- 1**

9. That it may be pertinent to mention that the Respondent is a manufacturing unit engaged in the present industry since past more than 13 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.

Vishal Singhla  
Partner, Aggarwal Plywood Industries  
Respondent

Through

  
(GAURAV AGARWAL)  
Advocate for Respondent No.1  
GRV LEGAL  
Advocates and Legal Consultants  
O-703, Aditya Mega City,  
VaibhavKhand, Indirapuram,  
Ghaziabad, U.P. NCR- 201014  
Mob.: 8802911392  
Email. : [gaurav@grvlegal.in](mailto:gaurav@grvlegal.in)

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

ORIGINAL APPLICATION NO. 871 OF 2024

**IN THE MATTER OF :**

SUMIT SAINI

.....APPLICANT

VERSUS

AGGARWAL PLYWOOD INDUSTRIES ..... RESPONDENT

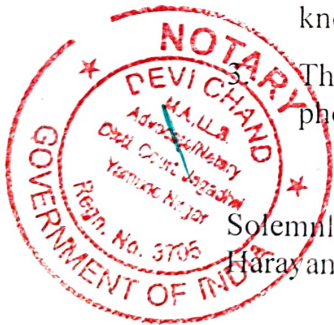
**AFFIDAVIT**

I, VISHAL SINGLA aged about 35 years, S/o Raj Kumar, R/o House NO 1059, Sector-17, Near Jindal Hospital, HUDA, Jagadhri, District Yamunanagar, Haryana 135003, 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 9 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.

That the Annexures R-1 to the reply are true copy of the photographs.

Solemnly affirmed on this day of \_\_\_\_\_, 2024 at Yamunanagar, Harayana.



**For Aggarwal Plywood Industries**

*Vishal Singla*  
**Partner**

**DEPONENT**

**VERIFICATION**

Verified at Yamunanagar, Harayana on this day of \_\_\_\_\_, 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 therefrom.

**For Aggarwal Plywood Industries**

*Vishal Singla*  
**Partner**

**DEPONENT**

**ATTESTED**

**Devi Chand (M.A., LL.B.)**  
Advocate/Notary  
Distt. Courts Jagadhri (Y.N.R.)

*15/10/24*

**ANNEXURE R-1**

Government of Haryana  
Haryana Water Resources Authority  
Applications for Issue of Permission to Extract Ground Water

Application for Permission to Extract Ground Water for Industrial Use

Application No: HWRA/IND/N/2021/595 (Application Received Fee Paid)

I. General Information:

Application Type Category/ Type of Application:

(i) Name of Applicant:	VISHAL SINGLA
ID Proof Type	Aadhaar
ID Proof no	XXXXXXXX2242
Id Proof Document	Download
(ii) Designation of Applicant:	PARTNER
Authorization Letter in the name of VISHAL SINGLA (applicant)	Download
(iii) Name of Industry:	AGGARWAL PLYWOOD INDUSTRIES
(iv) Registration number of Industry:	UDYAM-HR-19-0002135
(v) Location Details of the Industrial Unit	
Industrial Unit Address	Aggarwal Plywood Industries, Village Kunjal, Damla, Yamuna Nagar, Haryana, 135003
State:	Haryana
District:	YAMUNANAGAR
Tehsil:	Jagadhri
Block:	JAGADHRI
Village/MC:	Yamunanagar (MC)
Region:	over-exploited
(vi) Correspondence Address	
Complete Postal Address	Aggarwal Plywood Industries, Village Kunjal, Damla, Yamuna Nagar, Haryana, 135003
Mobile Number:	9896045373
E-Mail of Industry:	aggarwalalu@gmail.com
(vii) Salient Features of the Industrial Activity:	
a. Type of Industry	Plywood and allied products
b. Industry fall under	Small
c. Is Water Intensive	No
d. Purpose of Abstraction	Other Use - INDUSTRIAL AND DOMESTIC USE
e. Groundwater utilization for	Existing Industry
f. Whether present industrial activity commenced after 23.12.2020	No
g. Whether there is expansion of this industry Unit after 23.12.2020 involving increase in water requirement	No
h. Consent to Operate	Download
	CTO/CTE Number : 313127021YAMCTO11992 169
	Issue Date : 04/06/2021

Vishal Singla  
Partner

- i. Validity Period of Consent to Operate 03/06/2021 31/03/2026
- j. Large industry/ MSME certificate/ proof Download
- k. Date of commencement 22/06/2012 77

l. Description MANUFACTURING OF PLYWOOD AND ALLIAD PRODUCTS and other timber products

(viii) Land use details of the existing/proposed Industrial unit premises

Ownership of the land(Enclose documents of ownership)	Download	
Latitude	Longitude	30.541488 77.112686
Location Map	Download	
Total Land area(in sq m)		9863.00
Rooftop area of buildings/sheds(in sq m)		3252.00
Road/paved area(in sq m)		0.00
Green belt area(in sq m)		0.00
Open Land (in sq m)		6611.00
Source of availability of surface water for Industrial use, if any	No	
Townships/villages within 2 km radius of the Industrial unit	Yes	KUNJAL

2) Detail of water requirement/ recycled water usage : (Please enclose flow chart of activities and requirement of water at each stage)

Flow Chart of activities and requirement of water	Download	
Water Balance Chart with water requirement at each Stage.	Download	
Upload Affidavit for Non/Partial supply of water from local government water supply agency ( in case of ground water requirement less than 10 KLD).	Download	
Upload NOC/Certificate for non/ partial supply of fresh water/ treated waste from the local government water supply agency.	Download	
Quality of groundwater	Fresh Water	
Name of NABL(Under Valid Certificate)	ASIA TEST LAB	
Upload test report of groundwater quality from NABL accredited lab	Download	
Whether there is expansion of existing industry involving increase in ground water abstraction after 23.12.2020	No	
(i) Total water required(in m3/day)	20.00	Download
a. Ground Water required(in m3/day)	20.00	
b. Recycled Water usage(In m3/day)	0.00	
c. Proposed/existing water supply from any agency(in m3/day)	0.00	

(ii) Breakup of Water Requirement and Usage:

Activity	Existing Requirement (m3/day)	Additional Proposed Requirement (m3/day)	Total Requirement (m3/day)	No. of Operational Days in a Year	Annual Requirement (m3/year)
a. Industrial Activity	15.00	0.00	15.00	365	5475.00

For Agarwal Plywood Industries

*(Handwritten signature)*

b. Residential / Domestic	5.00	0.00	5.00	365	1825.00
c. Greenbelt Development / Environment Maintenance	0.00	0.00	0.00	0	0.00
d. Other Use	0.00	0.00	0.00	0	0.00
e. Grand Total	20.00	0.00	20.00		7300.00

Source of recycled water

NONE

## (iii) Breakup of Recycled Water Usage:

	(m3/day)	(Days)	(m3/year)
(a) Total Waste Water Generated:	2.00	365	
(b) Quantity of Treated Water Available	0.00	0	
i). Reuse in Industrial Activity:	0.00	0	
ii). Reuse in Green Belt Development:	0.00	0	
iii). Any other use	0.00	0	0.00
(c) Total Treated Water Utilized:	0.00		
(d) Quantity and mode of disposal of unutilised effluent:	2.00 SENT TO SEPTIC TANK		

## 3. Details of existing and/ or proposed groundwater abstraction structures

## (a) Groundwater Abstraction Structure-Existing

SNo.	Type/ Year of construction	Depth (meter) / Diameter (mm)	Depth to water level (meters below ground level)	Discharge (m3 per hour)	Operational hours/ (day)/ days/year	Mode of lift	Horse Power of pump	Whether fitted with water meter or not	Whether permission/ registered with HRWA / if so Details of permission
1	bore well/ 2012	61.00/ 32.00	35.00	10.00	2.00/ 300	1	2.5	Yes	No/

Source of fresh water requirement being met uptill now

Affidavit duly attested by the Applicant regarding non-existence of tubewell

Likely date of operation of proposed tubewell

Quantum of ground water recharge(m3/year)

4315.00

Details of rainwater harvesting and artificial recharge measures for groundwater recharge in the premises. If the firm has proposed to take up rainwater harvesting and recharge outside the industrial unit premises, then provide NOC from the concern authority/agency where the harvesting measures are proposed, if already implemented, details may be furnished. (attach report on comprehensive & feasible Rainwater harvesting/recharge proposal).

Download

Whether the applicant has earlier applied for abstraction N of ground water to any other Government Agency.

Vishal Singh Partner

Vishal Singh  
Partner

**SELF-DECLARATION** stating that the applicant has not applied for abstraction of ground water to any other competent Authority/CGWA

Download

Water Efficient Technology will be adopted

Download

Consent of operate issued by HSPCB(CTO)

Download

Impact Assessment Report prepared by the accredited consultant : Submit IAR of existing / proposed groundwater withdrawal on the groundwater regime and socio-economic impacts report. Pro-forma for the report is given in Annexure IV of HWRA Guidelines dated 10.9.21. On top of the IAR, provide the Check List + Salient features of IAR, in the prescribed formats.

Certificate regarding non/ partial availability of fresh water/ treated waste water supply from the local government water supply agency

Download

Any Other Document/Information (Annual Maintenance Schedule)

Download

Any Other Document/Information

Any Other Document/Information

**Self Declaration:-**

- I hereby declare that all the documents prescribed in the application form have been uploaded and no blank / another / irrelevant documents have been uploaded against specified documents. I am also aware that any false/ wrong submission /uploading of document will lead to rejection of my application without any notice.
- I hereby certify that the contents of the above Application are true to the best of my knowledge and belief and that it conceals nothing and that no part of it is false. I understand that if any information furnished by me is found to be false, Haryana Ground Water Authority can take punitive action against me as per the extant rules. Further, I shall comply with all the terms and conditions of the permission/NOC to be granted by HWRA.

Date:

Place:

Shri Agarwal Plywood Industries

Vishal Singla  
Partner

Signature of Applicant with Office Seal

(VISHAL SINGLA)

(PARTNER)

**a) Information of payment for Application Fee**

Total Amount	Mode of Payment	Online	Reference No.	Transaction No.	Date	Amount	Status
			HRWA1009114517122046	WHDF0306355775	30/09/2021	25000	success

**b) Information of payment for Tarrif Fee**

Total Amount  
Mode of Payment