

N.D.H.:23.10.2024

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 856 OF 2024**

IN THE MATTER OF:

SUMIT SAINI

..... APPLICANT

VERSUS

HAPLOOS PLYBOARDS PVT. LTD.

... RESPONDENT

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Place: New Delhi**Date:** 17.08.2024

FILED BY:


(GAURAV AGARWAL)

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BEFORE THE NATIONAL GREEN TRIBUNAL
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ORIGINAL APPLICATION NO. 856 OF 2024

IN THE MATTER OF :

SUMIT SAINIAPPLICANT
VERSUS

HAPLOOS PLYWOOD PVT. LTD.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 Private Limited Company established in the year 2002 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. 50 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 saleable product, separate/individual record is not kept of it's 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. Upon this it is pertinent to mention that no fly ash is being generated and it is only wood ash that is being generated.
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 A copy of set of photographs from the unit dated NIL is **ANNEXURE R-1**.
7. That regarding the NOC from the State Ground Water Authority, the Respondents had a valid NOC upto 20.01.2024 and before the expiry of the same the Respondent has already applied for its renewal however, the same is pending disposal at the end of the Haryana Ground Water Department but no objection/defect is notified in the said application till date.
8. 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 stated that there is 1 rain water harvesting system. A true copy of photographs of Rain water harvesting systems in the unit dated NIL is ANNEXURE R-2.

9. That may be pertinent to mention that Respondent is a manufacturing unit engaged in the present industry since past more than 22 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.

Ashok Kumar Sarawagi
Authorised Signatory
Haploos Plywood Pvt. Ltd
Respondent

Through


(GAURAV AGARWAL)
Advocate for Respondent No.1

GRV LEGAL
Advocates and Legal Consultants
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AFFIDAVIT

I, ASHOK KUMAR SARAWAGI, aged about 62 years, S/o Baijnath Sawawagi, R/o House No. 2126, Ward No. 21, Sector 17 HUDA, Jagadhri, District Yamunanagar, Haryana 135001, do hereby state on solemn affirmation as under:


1. That the deponent is the Authorised Signatory 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 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.
3. That the Annexures R-1 and R-2 to the reply are true copy of the photographs.

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

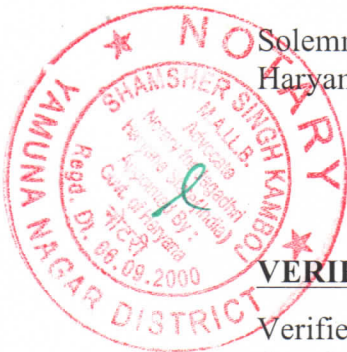

DEPONENT

VERIFICATION

Verified at Yamunanagar, Haryana 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.

.....ATTESTEL

SHAMSHER SINGH KAMBOJ
M.A.LL.B
Advocate
15/10/24
NOTARY JAGADHRI
YAMUNA NAGAR


DEPONENT



ANNEXURE R-1



ANNEXURE R-2