

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 572 OF 2025

IN THE MATTER OF:

DR. AMIT KUMAR

...APPLICANT

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

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Respondent No. 11 and 12

(Rajasthan State Pollution Control Board)

Through its Counsel 

(Nishant Awana/ Rebecca Mishra)

For NMA Law Chambers

Advocates for the Respondent No. 11 and 12

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Place: New Delhi

Date: 12.02.2026

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**REPLY ON BEHALF OF RESPONDENT NO. 11 and 12 i.e.,
RAJASTHAN STATE POLLUTION CONTROL BOARD**

MOST RESPECTFULLY SHOWETH:

1. The present Reply is being filed on behalf of Respondent No. 11 and 12 i.e., Rajasthan State Pollution Control Board (“RSPCB/answering Respondent”), in compliance of the Order dated 19.11.2025 passed by this Hon’ble Tribunal in the present Original Application (“**subject OA**”).
2. It is stated that the subject OA has been instituted by the Applicant alleging illegal dumping of hazardous and industrial waste in the forest areas and hills of villages Khori Kalan and Khori Khurd, District Nuh, Haryana, purportedly originating from industrial units located in the RIICO Industrial Area, Bhiwadi, Rajasthan.
3. In the abovesaid respect, it is stated that the answering Respondent has conducted the necessary due diligence by inspecting the identified units and subsequently issuing Show Cause Notices (“SCN”) to the units at which the violation of norms was observed.
4. It is stated that after issuance of Show Cause Notices to these two units, verification of the replies submitted by the units was

conducted by the Regional Office, Bhiwadi of the answering Respondent. Thereafter, a final show cause notice has been issued to both the units in February, 2026 on account of violations and non-adherence to norms observed in the waste management disposal in these units.

5. It is stated that the industries operating in the RIICO Industrial Area, Bhiwadi are directed to manage and dispose of hazardous waste strictly in accordance with the conditions prescribed in the authorization issued to them.
6. Further, RIICO has provided a designated dumping ground for the disposal of non-hazardous industrial waste generated by the industries situated in the RIICO Industrial Area Bhiwadi.
7. It is further stated that after disposal of the Original Application No. 277 of 2024 vide this Hon'ble Tribunal's order dated 30.05.2025, the answering Respondent has not received any further request for information or assistance from the HSPCB.
8. Pertinently, the State of Rajasthan has been facing issues relating to illicit transboundary movement of waste from the State of Haryana into the State of Rajasthan, and the Regional Office of the answering Respondent has informed the HSPCB about the illicit disposal of waste within the territory of the State of Rajasthan, by industries located in the State of Haryana. A copy of the Letter dated 17.07.2025 is annexed herewith and marked as Annexure R-11/1.
9. On 25.04.2025, the answering Respondent inspected Village Udhanwas (Rajasthan) - Nurpur (Haryana) border, the answering Respondent identified 8-10 illegal crucibles operating within the Rajasthan territory, which were also reportedly processing waste sourced from Manesar and Gurugram. The answering Respondent therefore has requested

the District Administration to dismantle these illegal units, and the illegal crucibles established were dismantled.

10. On 24.06.2025 as a result of a similar inspection at the Village-Gujariyawas, where large quantities of plastic scrap (purportedly from a Rewari-based unit) and two illegal crucibles (bhattis) were found. The answering Respondent therefore has requested the District Administration to dismantle these illegal units.
11. The answering Respondent continues to maintain a strict vigil in the RIICO Industrial Area, Bhiwadi, to ensure that all industries manage hazardous waste strictly according to the conditions of their statutory Authorizations.
12. In view of the measures detailed hereinabove, it is most respectfully submitted that the answering Respondent and its officials have been duly discharging their duties and are committed to ensuring strict compliance with the directions of this Hon'ble Tribunal, including the effective monitoring of industrial units within the RIICO Industrial Area, Bhiwadi, to prevent the illegal disposal of waste.
13. The answering Respondent remains dedicated to maintain interstate coordination with the HSPCB to curb the transboundary movement of unauthorized waste, taking stringent enforcement actions against violators.
14. The answering Respondent most humbly reserves its rights to file an additional Affidavit/Report as and when deemed necessary.
15. It is submitted that the answering Respondent is still in the process of evaluating the compliance of the identified units and monitoring the border areas, and therefore craves leave of this Hon'ble Tribunal to place on record any such supplementary

information that may be essential for the effective adjudication of the present matter.

16. The above□quoted information has been provided by the answering Respondent bonafideon the basis of records, without prejudice to its rights and contentions in law and on facts.

Respondent No. 11 and 12

(Rajasthan State Pollution Control Board)

अमित जुधास
क्षेत्रीय अधिकारी
रा०प्र०नि०मं०, मिवाडी

Through its Counsel

(Nishant Awana/ Rebecca Mishra)

For NMA Law Chambers

Advocates for the Respondent No. 11 and 12

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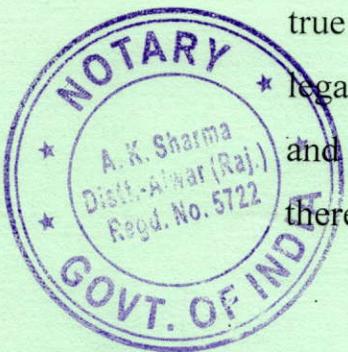
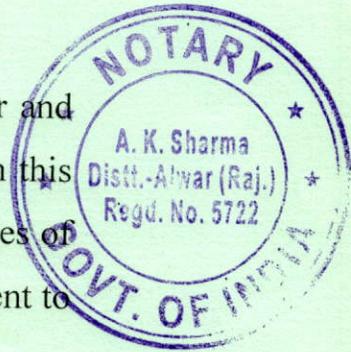
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AFFIDAVIT

I, Amit Juyal, S/o Shri Chandra Shekhar Juyal aged about 52 years, working as Regional Officer with the Respondent No. 11 and 12- Rajasthan State Pollution Control Board, having its office at Jaipur, presently at Bhiwadi, do hereby solemnly affirm and declare as under:

1. That I am the Officer in Charge for the above noted matter and have been duly authorized by Respondent No. 11 and 12 in this regard. I am well conversant with the facts and circumstances of the case on the basis of official records, and, hence, competent to affirm this affidavit.
2. That the contents of the accompanying Reply have been drafted by my counsel under my instructions. Facts stated therein are true to my knowledge on the basis of official records and the legal submissions made therein are based on the advice received and believed to be correct. Nothing material has been concealed therefrom.



VERIFICATION:

I, the abovenamed deponent, do hereby verify that the contents of the above affidavit are true and correct to my knowledge and belief and as per the official records available. I say that no part of it is false and nothing material has been concealed therefrom.

Verified at Bhiwadion this 12th day of February, 2026.

ATTESTED
SIG./THUMB IMP. AS PER
IDENTIFIED BY

NOTARY, ALWAR (RAJ.)
LIC. EXP. 2028

12 FEB 2026

DEPONENT
अमित जुयाल
क्षेत्रीय अधिकारी
रा०प्र०नि०मं०, भिवाडी

DEPONENT
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IDENTIFIED BY