

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 458 OF 2025**

IN THE MATTER OF:

BALRAJ

....APPLICANT

VERSUS

STATE OF UTTAR PRADESH & ORS

....RESPONDENTS

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1.	Reply on behalf of Respondent No. 11/Talib Metal Works to the Response dated 04.01.2026 filed on behalf of Respondent No. 3/UPPCB, with Affidavit	

FILED BY:

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**REPLY ON BEHALF OF RESPONDENT NO. 11/TALIB
METAL WORKS TO THE RESPONSE DATED 04.01.2026,
FILED ON BEHALF OF RESPONDENT NO. 3**

MOST RESPECTFULLY SHOWETH:

1. That the present Reply to the Response dated 04.01.2026, filed on behalf of Respondent No. 3, is being filed on behalf of Respondent No. 11/Talib Metal Works, through its Sole Proprietor Mr. Muzaffar Ali, who is the duly authorized signatory of Respondent No. 11 and is competent to swear the Affidavit on its behalf.
2. That the present Original Application arises from a letter petition received by this Hon'ble Tribunal, alleging certain polluting activities being undertaken by some factories which recycle old batteries, including the unit of the Answering Respondent. During the hearing of the letter petition on 14.10.2025, this Hon'ble Tribunal noted that the letter petition alleges that the concerned factories are emitting toxic gases and discharging poisonous liquid

(waste), leading to serious diseases being caused to the villagers in the nearby areas. Taking note of the same, this Hon'ble Tribunal, vide its order dated 14.10.2025, sought a response from the arrayed respondents, including the Answering Respondent, and constituted a Joint Committee, comprising of representatives of the Central Pollution Control Board [CPCB], the Uttar Pradesh Pollution Control Board [UPPCB] and the District Magistrate, Muzaffarnagar, directing them to undertake visits to the site, look into the grievances raised in the letter petition, verify the factual position and submit a report to this Hon'ble Tribunal. The said report, in the form of a response filed on behalf of Respondent No. 3/UPPCB, came to be filed on 04.01.2026.

3. That in compliance of order dated 14.10.2025 passed by this Hon'ble Tribunal, the Joint Committee, comprising of Sub-Divisional Magistrate, Muzaffarnagar, Scientist-E, CPCB, Project Office, Agra and Regional Officer, UPPCB, Muzaffarnagar, undertook site visits of the concerned industries, including the unit of the Answering Respondent, on 12.12.2025.
4. That a perusal of the Inspection Report of the Joint Committee, which has been annexed along with the response filed by the UPPCB and has been downloaded by the Answering Respondent from the official website of this Hon'ble Tribunal, clearly reveals that at the time of

inspection, the unit of the Answering Respondent was found operational with all statutory permissions and regulatory licences and was found to be fully complying with the environmental norms. It was specifically observed by the Joint Committee that pollution controlling devices, like cyclone dust collector, bag filter and wet scrubbers are installed at the unit of the Answering Respondent and all parameters in the stack monitoring and analysis report were also found to be within the prescribed limits [Annexure R-3/20]. It was also observed that no industrial effluent is being discharged from the unit of the Answering Respondent.

5. That by way of the present Reply, the Answering Respondent seeks to endeavour to demonstrate to this Hon'ble Tribunal as to how the Answering Respondent is operating fully in compliance of all the environmental norms, after having obtained all the requisite permissions, consents and clearances from the concerned regulatory agencies.
6. That it is submitted that the Answering Respondent prides itself on practicing the highest standards of professional and business ethics in pursuing its commercial interests. It is earnestly submitted that the Answering Respondent is not indulging in any pollution of any kind and has always offered full co-operation to the statutory authorities and has

been extremely vigilant in ensuring that all environmental and statutory norms and regulations are complied with. The company has got all the statutory clearances from the regulatory authorities and considers compliance of the same as part of responsibly conducting its mercantile interests with the highest standards of probity and ethics. The industrial unit of the Answering Respondent has employed all the necessary safeguards in the form of installing modern machinery and adopting environment friendly means to ensure that no pollution of any kind is caused by the industry.

7. That the unit of the Answering Respondent is situated over a very small area and falls under the category of a MSME unit. The Answering Respondent believes in pursuing its commercial interests in a responsible manner and is willing to participate in any process that is undertaken for the safeguarding, protection, preservation and improvement of the surrounding environment in the industrial area, where the unit of the Answering Respondent is situated.
8. That the Answering Respondent has been operating at all times with a valid consent and authorization from the UPPCB under the provisions of the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981 and the Hazardous Waste Rules. The current consolidated consent and authorization,

granted by the UPPCB to the Answering Respondent under the above named statutes, is valid till 31.12.2028 and has been annexed along with the Response filed by Respondent No. 3 as Annexure R-3/19.

9. That the hazardous waste produced at the unit of the Answering Respondent is disposed of through the Treatment, Storage and Disposal Facility of M/s Sheetala Waste Management Project. An agreement for the said purpose has been entered into between the Answering Respondent and M/s Sheetala Waste Management Project, a copy of which has been provided to the UPPCB.
10. That the fly ash, produced at the industrial unit of the Answering Respondent as a result of the manufacturing process, is collected through the cyclone and bag filter and then converted into lead ingots through the furnace, whereafter the leftover is disposed along with the hazardous waste.
11. That the UPPCB, on 09.12.2025, has directed the unit of the Answering Respondent to install the Online Continuous Emission Monitoring System [OCEMS] on the stack. In compliance of the said direction, the Answering Respondent has recently placed the order for the associated equipment and the OCEMS shall be installed at the unit of the Answering Respondent shortly after receipt from the supplier. It is submitted that there was some delay in

placing the purchase order due to a financial crunch being faced by the Answering Respondent.

12. That it is respectfully submitted that compliance of all conditions, related to the various consents and permissions granted to the unit of the Answering Respondent, is ensured by the Answering Respondent with great diligence and all documentation related to the same are submitted with the UPPCB.
13. That it is manifestly clear from the above submissions that the industrial unit of the Answering Respondent is fully compliant and has all the requisite permissions and clearances, which are required for its operations. The Answering Respondent is also a stakeholder in the preservation of environment and adopts all measures so as to ensure that no pollution is caused due to its operation.
14. That in such circumstances, it is respectfully prayed that the present Original Application may kindly be disposed of, qua the Answering Respondent.

FILED BY:

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Dated: 19.02.2026

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Account Reference	: NEWIMPACC (SV)/ up14843304/ KHATAULI/ UP-MJF
Unique Doc. Reference	: SUBIN-UPUP1484330422685317502430Y
Purchased by	: MUZAFFAR ALI SO MAUD ALI
Description of Document	: Article 4 Affidavit
Property Description	: Not Applicable
Consideration Price (Rs.)	:
First Party	: MUZAFFAR ALI SO MAUD ALI
Second Party	: Not Applicable
Stamp Duty Paid By	: MUZAFFAR ALI SO MAUD ALI
Stamp Duty Amount(Rs.)	: 10 (Ten only)



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Deponent

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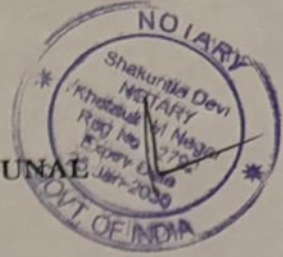
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[Signature]

Sworn before me at.....
 the deponent... Muzaffar Ali So
 (are identified by Shri.....
 I have satisfied..... examining the
Maud Ali
 deponent who understands the contents of
Murad Ali Babul
 the affidavit which has been read out and
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AFFIDAVIT

I, Muzaffar Ali, S/o Mr. Maud Ali, aged 56 years, R/o Dayal Puram, Maszid Vali Gali, Khatauli, Muzaffarnagar, Uttar Pradesh-251201, do hereby solemnly affirm and declare as under:-

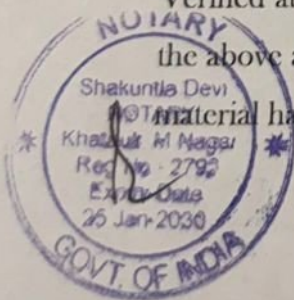
1. That I am the Sole Proprietor at Talib Metal Works and am fully conversant with the facts of the present case. I am fully competent to affirm this Affidavit.
2. That the contents of the accompanying Reply have been read over and explained to me in vernacular and I have understood the contents of the same. The Reply has been drafted under my instructions and I state that the contents of the same are true and correct to the best of my knowledge derived from the records maintained during the course of usual business by Talib Metal Works.
3. That the Annexures annexed to the present Reply are true and correct copies of their respective originals.

DEPONENT

शुभम मरुती

VERIFICATION

Verified at Muzaffarnagar on this day of February, 2026 that the contents of the above affidavit are true to my knowledge, no part of it is false, and nothing material has been concealed therefrom.



DEPONENT

शुभम मरुती