

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

**Original Application No. 572 of 2025**

(Under Sections 14 & 15 of the National Green Tribunal Act, 2010)

**In The Matter Of**

Dr. Amit Kumar

.... Applicant

Versus

Union of India & ors.

.... Respondents

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**THROUGH COUNSEL**

New Delhi  
Date: 20.05.2026

(PURVI MATHUR/ KUSHAGRA SHARMA/ ABHIMANYU SINGH  
SRISHTI GUPTA/BHANU PRATAP SINGH)

**KP ASSOCIATES**

ADVOCATES & CONSULTANTS

C-9(LGF), Defence Colony, New Delhi – 110024.  
office@kpandassociates.in; www.kpandassociates.in

+91 9784339173 | +91 9760066964

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**Original Application No. 572 of 2025**

(Under Sections 14 & 15 of the National Green Tribunal Act, 2010)

**In the matter of:**

Dr. Amit Kumar

.... Applicant

Versus

Union of India & Ors.

.... Respondents

**REPLY ON BEHALF OF RESPONDENT NO. 26 TO THE  
ORIGINAL APPLICATION NO. 572 OF 2025 UNDER  
SECTIONS 14 AND 15 OF THE NATIONAL GREEN TRIBUNAL  
ACT, 2010**

**MOST RESPECTFULLY SHOWETH:**

1. That the present Original Application (hereinafter referred to as the 'OA') has been filed under Section 14 and 15 of the National Green Tribunal Act, 2010 (hereinafter referred to as 'the Act') seeking relief and compensation for environmental damage and

public health hazard in the Aravalli region of District Nuh, Haryana.

2. That the present reply is being filed through Mr. P.K. Rastogi, who is the Director of Respondent No. 26 i.e., M/s Gracure Pharamceuticals Pvt. Ltd. (hereinafter referred to as the 'Answering Respondent') and has been duly authorized by virtue of Resolution passed by Board of Directors dated May 16, 2026 to institute proceedings, to represent the Answering Opposite Party, to sign and verify documents on its behalf, to swear affidavit, and to do all such other things as may be necessary for the successful pursuit of this matter. A true copy of the Resolution passed by Board of Directors dated May 16, 2026 is attached herewith and marked as **ANNEXURE R/1**.
3. At the outset, all allegations, contentions, and submissions made by the Applicant in the OA under reply are expressly and categorically denied for being frivolous, fallacious, mala fide, and designed to taint the reputation of the Answering Respondents and to misled this Hon'ble Tribunal. Nothing contained in the present reply shall be deemed to be an admission

of any statement made in the Application under reply merely for want of traversal. The specific no-denials of any of the averments, submissions or contentions made in the Application should not be considered as an admission of the same.

4. The Application is an abuse of the process of this Hon'ble Tribunal and is filed with ulterior motives to generate publicity and to tarnish the reputation and goodwill of the Answering Respondent. The Applicant has approached this Hon'ble Tribunal.
  
5. That the Answering Respondent is a pharmaceutical manufacturing company duly established and operating from its unit situated at RIICO Industrial Area, Bhiwadi, Rajasthan. The Answering Respondent is operating under valid consent and authorisations issued by the competent Pollution Control Authority and is subject to continuous regulatory oversight. From time to time, show-cause notices, if any, issued by statutory authorities have been duly responded to and addressed in accordance with law, and no adverse finding or final determination of violation has ever been recorded against the Answering Respondent. The Answering Respondent has

maintained strict compliance with applicable environmental laws and has never been found guilty of unauthorised waste handling or disposal.

6. That the Answering Respondent is a duly established industrial unit operating with all requisite statutory approvals from the competent Pollution Control Authority. The Answering Respondent has been granted valid Consent to Establish under Sections 25 and 26 of the Water (Prevention and Control of Pollution) Act, 1974 and under Section 21(4) of the Air (Prevention and Control of Pollution) Act, 1981. The said Consent to Establish is valid for the period from 10.11.2023 to 31.10.2028 or till the commencement of production/commissioning of the project, whichever is earlier. The unit has been set up strictly in terms of the said approvals and in compliance with the conditions prescribed therein. A copy of the Consent to Establish is attached herewith and marked as **Annexure R/2.**
7. It is submitted that the Answering Respondent also holds a valid Consent to Operate (CTO) issued by the competent Pollution Control Authority, permitting it to carry out its operations in

accordance with applicable environmental norms. The grant of Consent to Operate reflects continued regulatory oversight and satisfaction of the authorities regarding compliance with prescribed standards relating to emissions, effluents and waste handling. At all material times, the Answering Respondent has operated within the framework of these consents, and no adverse order or finding has been passed holding the unit to be in violation of its statutory obligations. A copy of the valid Consent to Operate is annexed herewith and marked as **Annexure R/3**.

8. That the Answering Respondent has been regularly complying with its statutory obligations under environmental laws, including submission of Environmental Statement Report (Form-V) to the concerned Pollution Control Authority. In this regard, the Answering Respondent has submitted its Environmental Statement Report for the financial year 2024–2025, detailing water consumption, air emissions, hazardous waste generation and disposal practices, as required under the applicable regulatory framework. The said statement also records that hazardous waste generated at the unit is disposed of only through authorised facilities, and that pollution control measures, including operation of Effluent Treatment Plant (ETP) and Air

Pollution Control Measures (APCM), are in place and functioning. The consistent filing of such statutory returns and disclosures reflects ongoing regulatory compliance, monitoring and transparency on the part of the Answering Respondent, and further demonstrates that its operations are being carried out in accordance with environmental norms. A copy of the Environmental Statement Report is annexed herewith and marked as **Annexure R/4**.

9. In order to ensure lawful handling and disposal of non-hazardous waste scrap generated at its premises, the Answering Respondent entered into an Agreement for Lifting of Scrap dated 04.03.2024 with M/s Nagina Traders (i.e., Respondent No. 23), a proprietorship firm, the proprietor whereof is Mr. Salman Khan. The said agreement was executed in the ordinary course of business and clearly delineates the responsibilities of the parties. That pursuant to the said agreement, Respondent No. 23 was entrusted with the responsibility of lifting, collecting and transporting scrap from the premises of the Answering Respondent. The Answering Respondent does not undertake any direct disposal activity and does not engage in transportation of scrap beyond lawful handover at its premises. A copy of the

Agreement dated 04.03.2024 is annexed herewith and marked as **Annexure R/5**.

10. In furtherance of the aforesaid agreement, Respondent No. 23 furnished a written undertaking dated 01.04.2024, wherein it unequivocally undertook that M/s Nagina Traders shall be solely responsible for lifting, collecting and transporting the scrap from the premises of the Answering Respondent and that the scrap shall be disposed of only at authorised dumping/recycling yards in accordance with environmental laws. It was specifically acknowledged in the undertaking that the Answering Respondent shall have no role whatsoever in the transportation route, destination or method of disposal after the scrap is handed over. The undertaking further records that the responsibility of lawful disposal rests entirely upon the scrap contractor. It is further submitted that the Answering Respondent had entered into the aforesaid Agreement with M/s Nagina Traders after verifying the fact that the scrap dealer had a valid certificates of Consent to Operate and Consent to Establish from the DPCC. A copy of the undertaking dated 01.04.2024, Consent to Operate Order dated 15.01.2024, Consent to Establish Order dated 09.01.2024, and

GST Registration Certificate are annexed herewith and marked as **Annexure R/6 (colly.)**

11. It is respectfully submitted that, in furtherance of ensuring lawful, safe, and environmentally compliant handling and disposal of scrap generated at its premises, the Answering Respondent has entered into agreements with various authorised scrap collectors and recyclers, specifically tailored to different categories of waste, as part of its comprehensive due diligence and compliance measures in strict compliance with the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
  
12. It is further submitted that the Answering Respondent, as part of its regular compliance practice, also undertakes review and assessment of scrap collectors and recyclers engaged for disposal of different categories of waste. Such exercise is carried out periodically to ensure that the entities engaged for lifting and recycling activities are operating through authorised channels. These measures form part of the internal compliance framework followed by the Answering Respondent in relation to waste handling and disposal.

13. It is submitted that the scrap generated at the unit was non-hazardous and not disposed of directly by the Answering Respondent. The material was sold and handed over to third-party scrap dealers against proper sale invoices maintained in the ordinary course of business. The movement of scrap from the premises of the Answering Respondent was also accompanied by gate passes and delivery challans generated at the time of dispatch.
14. At the outset, it is submitted that the Original Application does not disclose any cause of action against Respondent No. 26. It is well settled by a consistent line of decisions of this Hon'ble Tribunal that proceedings under Sections 14 and 15 of the National Green Tribunal Act, 2010 can be maintained only where the Applicant establishes a clear, direct and demonstrable nexus between the alleged environmental damage and the person sought to be proceeded against. In the present case, the Application is conspicuously silent on any specific act, omission or statutory violation attributable to Respondent No. 26. There is no inspection report, no determination by any Pollution Control Board, no sampling analysis, and no material evidence linking

Respondent No. 26 to the alleged dumping or burning of scrap. The Hon'ble Tribunal has repeatedly held that mere suspicion, association, or naming of an entity without foundational material does not satisfy the threshold for invoking jurisdiction under the NGT Act. On this ground alone, the Application is liable to be dismissed qua Respondent No. 26.

15. The Applicant has failed to plead or establish any violation by Respondent No. 26 of the Environment (Protection) Act, 1986, the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, or any directions issued thereunder. It is settled law that environmental liability before this Hon'ble Tribunal must be anchored in a demonstrable breach of a statutory duty or regulatory condition. The Application does not allege non-compliance with consent conditions, authorisations, or waste handling obligations on the part of Respondent No. 26. The Hon'ble Tribunal has consistently held that, in the absence of a specific statutory infraction, the extraordinary jurisdiction under Sections 14 and 15 cannot be invoked on conjectures or presumptions. The proceedings, therefore, suffer from a fundamental legal infirmity.

16. It is submitted that the Answering Respondent has, in the ordinary course of its operations, been regularly furnishing statutory environmental disclosures before the concerned authorities in terms of the applicable environmental framework. In this regard, the Answering Respondent submitted its Environmental Statement Report (Form-V) for the financial year 2024–2025 before the Rajasthan State Pollution Control Board, Bhiwadi, in compliance with Rule 14 of the Environment (Protection) Rules, 1986. The said statement contains detailed disclosures pertaining to the nature of manufacturing activities carried out at the unit, water consumption, emissions, hazardous waste generation and disposal mechanisms adopted by the unit. The filing of such Environmental Statement Reports forms part of the continuous compliance and monitoring mechanism under environmental laws and reflects that the operations of the Answering Respondent remain under regular regulatory supervision.
17. It is further submitted that the Environmental Statement Report specifically records that the Answering Respondent is operating pollution control systems including an Effluent Treatment Plant (ETP) for treatment of process water and adequate Air Pollution

Control Measures (APCM) for controlling emissions. The report further records that hazardous waste generated at the unit, including ETP sludge and date-expired products, is disposed of only through authorised facilities, namely Ramky Enviro Engineering Ltd., Udaipur, in accordance with the applicable Hazardous Waste Management Rules. The report also records that regular water and air testing is being conducted by the unit and that plantation and other environmental protection measures are being undertaken on a continuous basis. These contemporaneous statutory disclosures clearly demonstrate that the Answering Respondent has established and maintained a structured compliance mechanism and has consistently undertaken disposal of waste only through authorised channels.

18. The aforesaid documents and disclosures assume significance in the facts of the present case, as they demonstrate that Respondent No. 26 has at all times maintained a regulated and documented system for waste handling and disposal. The record does not indicate any instance where the Answering Respondent was found disposing waste through unauthorised means or at unauthorised locations. On the contrary, the material on record reflects continued compliance with environmental norms and

regular engagement with statutory authorities. In these circumstances, the allegations sought to be raised against Respondent No. 26 in the present proceedings are unsupported by the regulatory record and contrary to the contemporaneous compliance documents maintained by the unit.

19. That the scrap generated at the premises of the Answering Respondent is in the nature of non-hazardous industrial scrap arising from routine manufacturing and packaging activities. The said scrap does not constitute hazardous waste requiring specialised handling or on-site disposal by the Answering Respondent. The hazardous waste generated, if any, during the manufacturing process is separately identified, stored and disposed of strictly in accordance with the applicable provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 through authorised agencies and treatment facilities. The records maintained and statutory disclosures submitted by the Answering Respondent clearly distinguish between hazardous waste and ordinary industrial scrap. Accordingly, the scrap handed over to Respondent No. 23 under the scrap lifting arrangement was non-

hazardous in nature and was entrusted for lawful transportation and disposal in the ordinary course of business.

20. The Applicant seeks to fasten liability upon Respondent No. 26 for acts allegedly committed by independent third parties over whom Respondent No. 26 exercises no control or supervision after lawful handover of scrap. The Hon'ble Tribunal has repeatedly held that vicarious liability in environmental matters is not automatic and cannot be imposed in the absence of control, connivance, negligence, or failure to discharge a statutory obligation. Where a generator has exercised due diligence, entered into written agreements, and obtained undertakings for lawful disposal, liability cannot be extended merely because the waste originated from its premises. Any contrary approach would render lawful outsourcing arrangements commercially and legally unworkable and would be contrary to the scheme of the Hazardous and Other Wastes Rules, 2016.
21. It is further submitted that the scrap generated at the premises of the Answering Respondent is in the nature of non-hazardous industrial scrap arising from routine manufacturing and packaging activities. The said scrap does not constitute hazardous

waste requiring specialised handling or on-site disposal by the Answering Respondent. The hazardous waste generated, if any, during the manufacturing process is separately identified, stored and disposed of strictly in accordance with the applicable provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 through authorised agencies and treatment facilities. The records maintained and statutory disclosures submitted by the Answering Respondent clearly distinguish between hazardous waste and ordinary industrial scrap. Accordingly, the scrap handed over to Respondent No. 23 under the scrap lifting arrangement was non-hazardous in nature and was entrusted for lawful transportation and disposal in the ordinary course of business.

22. It is a settled principle recognised by this Hon'ble Tribunal that environmental adjudication, though preventive and remedial, must nevertheless be based on a complete chain of causation. In the present case, the Application does not establish the source of the alleged waste, the mode of transportation, the identity of the transporter, or the point at which the alleged illegality occurred. The pleadings stop short of attributing any direct role to Respondent No. 26 and instead proceed on broad generalisations.

The Hon'ble Tribunal has consistently deprecated such omnibus pleadings and has held that parties cannot be kept embroiled in proceedings in the absence of prima facie material establishing involvement. It is further submitted that the manufacturing activities carried out by the Answering Respondent are governed by documented process descriptions, material handling protocols and Material Safety Data Sheets (MSDS) maintained in the ordinary course of business.

23. That the Answering Respondent is a compliant industrial unit operating under regulatory oversight and has consistently cooperated with all statutory authorities. The Hon'ble Tribunal has held that compliant entities should not be subjected to coercive proceedings merely on the basis of allegations arising from third-party misconduct, particularly where no adverse finding has been recorded by a competent authority. Continuation of proceedings against Respondent No. 26, despite the absence of material incriminating evidence, would amount to an abuse of the process of this Hon'ble Tribunal.
24. That the Answering Respondent is a duly established and compliant industrial unit operating under valid statutory consents

and continuous regulatory oversight. The record would show that the Answering Respondent has maintained requisite environmental approvals, submitted periodic statutory disclosures, responded to notices issued by authorities from time to time and followed a documented process for handling and disposal of scrap through third-party contractors. The material placed on record, including agreements, undertakings, and compliance records, demonstrates that the Answering Respondent had put in place reasonable checks and procedures in relation to waste handling. Despite this, the present proceedings seek to proceed against Respondent No. 26 without any specific finding of statutory violation, illegal disposal activity or direct involvement attributable to it. In the absence of any such material, continuation of proceedings against the Answering Respondent would result in a compliant industrial unit being subjected to unnecessary litigation for acts allegedly committed by independent third parties beyond its control.

25. It is respectfully submitted that the Answering Respondent has, at all material times, maintained a comprehensive and documented internal compliance framework for waste management through its Standard Operating Procedure bearing SOP No. ES/013/03

titled "Waste Control and Management", implemented under the supervision of its Environment Health & Safety (EHS) Department. The said SOP governs segregation, collection, storage, handling and disposal of all categories of waste generated at the manufacturing facility. The SOP specifically mandates that "residue waste shall be collected in a closed polythene lined container labeled as 'Rejects for Disposal'" and that "at the end of each shift, transfer the residual rejects to EHS department for disposal at TSDF Site." The SOP further provides that "disposal activity shall be documented and shall be done in presence of QA and EHS and that disposal records are required to be maintained and attached with batch documentation for traceability and regulatory verification. The SOP also prescribes destruction protocols including puncturing, crushing, cutting and de-shaping of discarded material to prevent any possibility of reuse or misuse. Clause 5.7 thereof further records that "Solid or semi-solid or liquid waste shall be handed over to EHS" and that entries of all such waste are mandatorily maintained in prescribed records. The existence and implementation of such a detailed compliance mechanism unequivocally demonstrates that the Answering Respondent operates through a structured and

environmentally compliant waste management system and has exercised all reasonable due diligence expected under the applicable environmental framework. In these circumstances, the continuation of proceedings against the Answering Respondent, despite the absence of any finding of statutory violation or illegal disposal attributable to it, amounts to subjecting a compliant industrial unit to unwarranted proceedings solely on the basis of generalized allegations. A copy of the Waste Management SOP / Policy is Annexed herewith as **Annexure R/7**.

26. Without prejudice, it is submitted that even assuming (without admitting) that any illegal dumping or burning has occurred, the statutory framework under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 envisages liability upon the person actually engaged in transportation, handling or disposal of waste in an unauthorised manner. The Application, therefore, misdirects itself in seeking reliefs against Respondent No. 26 instead of pursuing remedies against the actual wrongdoers, if any.
27. From the facts borne out on record, it is evident that the statutory chain of responsibility does not extend to Respondent No. 26

beyond lawful handover of scrap. The Answering Respondent entered into a written agreement with Respondent No. 23, M/s Nagina Traders, a proprietorship firm, for lifting and transportation of scrap from its premises. In furtherance thereof, Respondent No. 23 furnished a written undertaking dated 01.04.2024, expressly acknowledging sole responsibility for lifting, collecting, transporting and disposing of scrap only at authorised dumping or recycling facilities. The undertaking unequivocally records that Respondent No. 26 has no role in the transportation route, destination or method of disposal after scrap is handed over. It is further undisputed that Respondent No. 23, acting independently and without the control or supervision of Respondent No. 26. These facts clearly demonstrate that the Answering Respondent exercised due diligence contemplated under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, and that any alleged illegality, if at all, occurred at a stage where Respondent No. 26 had neither custody nor control, breaking the chain of causation.

28. The regulatory record further militates against any inference of liability on Respondent No. 26. Notices issued by the Rajasthan State Pollution Control Board dated 25.07.2025 was duly

responded to, including a detailed reply dated 06.08.2025 submitted to RSPCB. At no stage has any Pollution Control Board recorded a finding that Respondent No. 26 violated the Environment (Protection) Act, 1986 or the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. There is no closure order, no environmental compensation assessment, and no determination of non-compliance against the Answering Respondent. In proceedings under the NGT Act, the absence of a statutory finding of violation is a material consideration, particularly when the Applicant seeks to fasten liability solely on the basis of inference rather than regulatory determination. A copy of show cause notice issued by RSPCB dated 25.07.2025 along with the reply dated 06.08.2025 is annexed herewith as **Annexure R/8 (colly.)**

29. It is respectfully submits that Answering Respondent, in strict adherence to all applicable environmental laws, rules, and regulations including the Environment (Protection) Act, 1986 and the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, it has executed multiple agreements with authorised contractors possessing valid Consent to Operate (CTO) and Consent to Establish (CTE) for the specific

purpose of handling, transporting, and disposing of various categories of waste generated at its premises. These agreements are deliberately structured to ensure that all waste such as solid, plastic, hazardous or otherwise is managed through legally sanctioned channels, thereby fulfilling the Answering Respondent's statutory duty of due diligence and authorised handover of scrap. By engaging only those contractors who have requisite statutory clearances and expertise for handling and disposal, the Answering Respondent has discharged its obligation fully under environmental laws, and as such, cannot be held liable for any alleged irregularities, non-compliance, or unlawful disposal acts committed by these independent contractors beyond the point of authorised handover. This approach of segregating disposal responsibilities through specific agreements for different types of waste underscores the Answering Respondent's bona fide commitment to environmentally responsible practices and eliminates any basis for imputing vicarious or direct liability upon it for subsequent handling or disposal.

30. It is respectfully submitted that Answering Respondent strictly adheres to all applicable safety and environmental protocols as prescribed in the Material Safety Data Sheets (MSDS) relating to

the substances and waste generated from its manufacturing processes. The Answering Respondent has incorporated these protocols in its Standard Operating Procedures (SOPs), and these practices are rigorously followed at all operational stages and has ensured that all hazardous waste generated at its premises is handled in strict conformity with the instructions and precautions detailed in the MSDS, including but not limited to safe containment, use of personal protective equipment, emergency measures, and environmentally sound disposal, through authorised contractors. It is submitted that Answering Respondent has exercised due diligence and meets all statutory obligations under the Environment (Protection) Act, 1986 and the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

31. It is a settled principle of environmental jurisprudence that liability, even under a strict liability regime, must follow statutory breach and factual control. The role of a waste generator under the 2016 Rules is confined to authorised handover and maintenance of due diligence; it does not extend to policing independent contractors *ad infinitum*. To accept the Applicant's contention would be to impose an unworkable and legally

impermissible burden upon compliant industrial units, effectively rendering outsourcing arrangements meaningless. The Hon'ble Principal Bench has consistently held that vicarious liability cannot be imposed in the absence of control, connivance or failure of statutory duty. In the present case, not only is there an absence of control post-handover, but there is positive evidence of compliance through agreements, undertakings and regulatory cooperation.

32. It is a settled principle of environmental jurisprudence that liability under environmental law must be based on clear evidence establishing that the concerned industry is responsible for the alleged pollution. The Hon'ble Supreme Court in *Indian Council for Enviro-Legal Action v. Union of India* (1996) 3 SCC 212 and *Sterlite Industries (India) Ltd. v. Union of India* (2013) 4 SCC 575 has held that environmental liability and compensation can only be imposed where the polluter is clearly identified and a nexus between the activity of the industry and the environmental damage is established.
33. The Respondent No. 26 maintains proper, accurate, and complete records of waste generation, storage, handling, transportation,

and disposal in strict compliance with the provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and other applicable environmental regulations. The Answering Respondent regularly submits the prescribed periodic returns and supporting documentation to the competent regulatory authorities in accordance with statutory requirements. Further, Answering Respondent also maintains detailed records of scrap disposal and conducts periodic audits of the scrap yards and waste handlers engaged for disposal of scrap materials, in order to ensure that such waste is handled and disposed of in compliance with the applicable environmental laws and regulatory standards.

34. That viewed cumulatively, the factual record, statutory framework and conduct of Respondent No. 26 lead to only one conclusion, that no liability civil, environmental or otherwise can be fastened upon the Answering Respondent. The allegations in the Original Application do not travel beyond general assertions, the statutory authorities have recorded no adverse findings, and the entire chain of alleged illegality, if any, lies downstream with independent third parties. Continuation of proceedings against Respondent No. 26 in such circumstances would neither advance

environmental protection nor serve the ends of justice and would instead amount to penalising a compliant entity for acts beyond its control.

35. It is submitted that in the fact and circumstances as submitted by the Answering Respondents, the instant application ought not be entertained by this Hon'ble Tribunal and the same is liable to be dismissed in limine with exemplary costs on the Applicant.

36. The Answering Respondent craves leave of this Hon'ble Tribunal to add further facts and submissions, if required, at a later stage and using the hearing on the instant Application. Further, the Answering Respondent craves leave of this Hon'ble Tribunal to file any additional documents as it deems fit in the interest of justice to assist this Hon'ble Tribunal in the effective adjudication of the instant Application.

**PARA-WISE REPLY**

37. That the contents of paragraph 1 of the Application are partly admitted to the limited extent that the present Application has been filed under Sections 14 and 15 of the National Green Tribunal Act, 2010. However, the allegations regarding

environmental damage and public health hazards attributable to the Answering Respondent are vehemently denied for being baseless, unsubstantiated and devoid of any material evidence.

38. That the contents of paragraph 2 are partly admitted to the extent that the Application purports to invoke jurisdiction of this Hon'ble Tribunal. However, it is denied that any cause of action arises against the Answering Respondent, and the alleged violations are specifically denied for lack of any direct nexus or material evidence.
39. That the contents of paragraph 3 are matters of record to the extent they describe the Applicant. The Answering Respondent has no knowledge of the credentials claimed and hence the same are neither admitted nor denied.
40. That the contents of paragraph 4 are partly admitted to the extent that Respondent Nos. 1-13 are statutory authorities. However, the allegations of failure and inaction are denied, and in any case, no liability can be fastened upon the Answering Respondent on this basis.

41. That the contents of paragraph 5 are denied insofar as they attempt to generalize alleged unlawful activities. The Answering Respondent is not concerned with the activities of Respondent Nos. 14-25 and hence no inference can be drawn against it.
42. That the contents of paragraph 6 are vehemently denied. It is specifically denied that the Answering Respondent is a source of any waste being illegally transported or burnt. The said allegation is unsupported by any inspection report or adjudicatory finding, and is based on mere conjecture and assumption. The contents of preceding paragraphs of Reply maybe read and treated as part and parcel of the present paragraph and the contents thereof are not being repeated herein for the sake of brevity.
43. That the contents of paragraph 7 are matters of record to the extent they refer to an order of this Hon'ble Tribunal and the contents of paragraph 8 are vehemently denied. It is specifically denied that any failure on part of authorities gives rise to liability of the Answering Respondent, in absence of any direct role or violation attributable to it.
44. That the contents of paragraphs 9 and 10 are partly admitted to the limited extent that they describe the geographical location and

general background of the area in question, which are matters of record. However, all allegations regarding the existence or operation of unauthorized units and alleged illegal burning activities are categorically denied insofar as they seek to implicate the Answering Respondent. It is submitted that the Answering Respondent has no involvement whatsoever in any such activities, and the said averments have no nexus or bearing upon the Answering Respondent.

45. That the contents of paragraph 11 are vehemently denied. It is specifically denied that the Answering Respondent supplies, transports or facilitates the movement of any waste to the alleged site. The allegations are vague, unsubstantiated and not supported by any evidence. The contents of preceding paragraphs of Reply maybe read and treated as part and parcel of the present paragraph and the contents thereof are not being repeated herein for the sake of brevity.
46. That the contents of paragraph 12 are matters relating to third parties and are not within the knowledge of the Answering Respondent, hence denied for want of knowledge.

47. That the contents of paragraph 13 pertain to actions of statutory authorities and other entities and are not attributable to the Answering Respondent, hence denied insofar as any adverse inference is sought to be drawn.
48. That the contents of paragraph 14 are denied insofar as they seek to implicate the Answering Respondent. The Answering Respondent has no connection with the alleged incident or findings, and any such linkage is specifically denied. Mere reference or inclusion of the name of the Answering Respondent in any communication, without any adjudication or finding, cannot form the basis of liability under environmental jurisprudence.
49. That the contents of paragraph 15 are matters of record regarding prior proceedings hence, no reply is warranted by the Answering Respondent to the present paragraph.
50. That the contents of paragraphs 16 to 20 are matter pertain to representations submitted by the Applicant, inter-departmental communications, and internal correspondences between statutory authorities, which are neither in the knowledge of nor attributable to the Answering Respondent, hence denied for want of

knowledge. It is submitted that the Answering Respondent has no role whatsoever in such communications, and mere reference to its name, if any, in official correspondence does not establish any involvement, liability or violation.

51. That the contents of paragraph 21 are partly admitted to the limited extent that a show cause notice was issued to the Answering Respondent. However, it is denied that the same constitutes any proof of violation. It is submitted that the Answering Respondent has duly responded to the said notice in accordance with law, and no adverse finding has been recorded against it.
52. That the contents of paragraph 22 are denied insofar as any inference is sought against the Answering Respondent. The alleged incident has no nexus with the Answering Respondent.
53. That the contents of paragraph 23 are general allegations and are denied in toto. The Answering Respondent has not contributed in any manner to the alleged environmental damage.

54. That the contents of paragraph 24 are vehemently denied. The impleadment of the Answering Respondent is arbitrary, without basis and liable to be struck down.
55. That the contents of paragraph 25 are denied in totality. It is specifically denied that the Answering Respondent has violated any provision of the Environment (Protection) Act, 1986, the Air (Prevention and Control of Pollution) Act, 1981, the Water (Prevention and Control of Pollution) Act, 1974, or any rules framed thereunder. It is submitted that the Answering Respondent has, at all material times, operated in strict compliance with applicable environmental laws, statutory consents and regulatory requirements, and no violation has ever been established by any competent authority.
56. That the contents of paragraph 26 relate to authorities and are not attributable to the Answering Respondent, hence denied for want of knowledge.
57. That the contents of paragraph 27 are denied. It is specifically denied that any act or omission of the Answering Respondent has resulted in violation of the fundamental rights of any person, including the right to life under Article 21 of the Constitution of

India. The allegations are vague, unsubstantiated and devoid of any causal link between the Answering Respondent and the alleged harm, and are therefore liable to be rejected.

58. That the contents of paragraph 28 are vehemently denied. It is submitted that no act of the Answering Respondent has caused or contributed to any environmental degradation, damage to ecological systems, or impact on biodiversity in the Aravalli region.
59. That the contents of paragraph 29 are denied in toto. It is specifically denied that the Answering Respondent is involved in any inter-state transportation, dumping or disposal of waste in violation of environmental laws. The Answering Respondent does not undertake any such activity, and any allegation to the contrary is baseless, unsupported by evidence, and liable to be dismissed.
60. That the contents of paragraph 30 are denied insofar as they seek to sustain the present Application against the Answering Respondent. It is submitted that no cause of action, whether continuing or otherwise, exists against the Answering Respondent. The Application is founded on vague and

generalized allegations without any specific instance, date or material linking the Answering Respondent to the alleged acts, and is therefore liable to be dismissed on the ground of absence of cause of action.

**PRAYER**

In light of the facts and circumstances stated hereinabove, it is most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to:


- a) Dismiss the present Original Application qua Respondent No. 26 as being devoid of merit, misconceived, and unsupported by any material evidence establishing any violation or liability on the part of Respondent No. 26, and or;
- b) Discharge and/or delete Respondent No. 26 from the array of parties in the present Original Application, and or;

- c) Pass any other or further order(s) as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the present case, in the interest of justice.

**THROUGH COUNSEL**

New Delhi

Date: 18.05.2026

  
(PURVI MATHUR/ KUSHAGRA SHARMA/ ABHIMANYU SINGH  
SRISHTI GUPTA/BHANU PRATAP SINGH)

**KP ASSOCIATES**

ADVOCATES & CONSULTANTS

C-9(LGF), Defence Colony, New Delhi – 110024.

office@kpandassociates.in; www.kpandassociates.in

+91 9784339173 | +91 9760066964

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

**Original Application No. 572 of 2025**

(Under Sections 14 & 15 of the National Green Tribunal  
Act, 2010)

**In The Matter Of**

Dr. Amit Kumar

.... Applicant

Versus

Union of India & Ors.

.... Respondents

**AFFIDAVIT**

I, Pradeep Kumar Rastogi, the Director and Authorised Signatory of the Answering Respondent No. 26 in the present application, and having my office at 251-254, IInd Floor, DLF Tower, 15 Shivaji Marg, New Delhi, Delhi, India - 110015, do hereby solemnly affirm and declare as under:



1. That I am the Director and Authorised Representative of the Answering Respondent No. 26 company in the above captioned matter and am conversant with the facts and circumstances of the

present case as such and am competent and authorised to sign and swear this affidavit.

2. That I have gone through the Reply to the present application and state that the contents thereof are true and correct to the best of my knowledge and belief.

3. I state that the Annexures to the Reply are true copies of their respective originals.



  
DEPONENT 

### VERIFICATION


I, the above-named Deponent, do hereby verify that the contents of Para 1 to 3 of the aforesaid Affidavit are true and correct to the best of my knowledge and record, no part of it is false and nothing material has been concealed therefrom.

20 MAY 2026

I Identify the deponent who has Signed / put    In my presence

Solemnly affirmed on this, the \_\_\_th day of May, 2026 at \_\_\_\_\_.

Solemnly affirmed before me  
Readover & Explained to the Deponent  
who has signed before me.

  
KRISHNA KUMAR MISHRA  
NOTARY PUBLIC (DELHI)  
GOVT. OF INDIA

20 MAY 2026

  
DEPONENT 

**GRACURE PHARMACEUTICALS LTD.**

Regd. Office : 251-254, 2nd Floor, DLF Tower,  
Block-IV, 15, Shivaji Marg, New Delhi-110015 (INDIA)  
Phones : +91-11-47770900  
E-mail : info@gracure.com  
URL : www.gracure.com  
CIN : U24232DL1992PLC049002

**CERTIFIED TRUE COPY OF RESOLUTION PASSED AT MEETING OF THE BOARD OF DIRECTORS OF GRACURE PHARMACEUTICALS LIMITED HELD ON SATURDAY 16<sup>TH</sup> MAY 2026 AT 251-254, IIND FLOOR, DLF TOWER, 15 SHIVAJI MARG, NEW DELHI-110015**

RESOLVED THAT Mr. P.K. Rastogi, Director, be and is hereby authorised, for and on behalf of the Company, to represent the Company in the matter titled "Dr. Amit Kumar vs. Union of India & Ors.", Original Application No. 572 of 2025, pending before the Hon'ble National Green Tribunal, and to take all necessary steps in connection therewith, including signing, verifying and filing pleadings, applications, replies, affidavits, vakalatnama(s), authorisations, undertakings, statements and other documents, as may be required before the Hon'ble Tribunal and/or any other authority/forum in relation to the said matter.

RESOLVED FURTHER THAT the aforesaid Authorised Representative be and is hereby authorized to appoint advocates, solicitors and legal counsel on behalf of the Company, issue necessary instructions to them, and do all such acts, deeds and things as may be necessary or incidental for effectively prosecuting and/or defending the aforesaid matter on behalf of the Company.

CERTIFIED TO BE TRUE

For Gracure Pharmaceuticals Limited

Amreshwar Sahai Bhargava  
Managing Director  
Din No 00004468



Manufacturing Unit I : E-1105, RIICO Industrial Area, Phase-III, Bhiwadi, Alwar – 301019, Rajasthan, (INDIA)  
Ph : +91-01493-221316,87

Manufacturing Unit-2 : A-1118(F), RIICO Industrial Area, Phase-III, Bhiwadi, Alwar – 301019, Rajasthan, (INDIA)  
Ph : +91-01493-294387



Regional Office Bhiwadi  
Rajasthan State Pollution Control Board  
G.O-I, Phase-2, RIICO Industrial Area, Bhiwadi

Phone: 01493-221435



Registered

File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1755-175

Order No: 2023-2024/Bhiwadi/9338

Dispatch Date: Mar 21 2024 1:57PM

Unit Id : 1318

M/s Gracure Pharmaceuticals Ltd.

E-1105, RIICO Industrial Area , Bhiwadi Tehsil:Tijara

District:Alwar

Sub: **Consent to Establish** under Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section 21(4) of Air (Prevention & Control of Pollution) Act, 1981.

Ref: Your application(s) for Consent to Establish dated 10/11/2023 and subsequent correspondence.

Sir,

**Consent to Establish** under the provisions of Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 (hereinafter to be referred as the Water Act) and under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981, (hereinafter to be referred as the Air Act) as amended to date and rules & the orders issued thereunder, is hereby granted for your **Gracure Pharmaceuticals Ltd. plant** situated / proposed at **E-1105, RIICO Industrial Area, Bhiwadi RIICO INDUSTRIAL AREA , Bhiwadi Tehsil:Tijara District:KHAIRTHAL-TIJARA**, Rajasthan under the provisions of the said Act(s). This consent is granted on the basis of examination of the information furnished by you in consent application(s) and the documents submitted therewith, subject to the following conditions:-

- 1 That this Consent to Establish is valid for a period from **10/11/2023** to **31/10/2028** or **date of commencement of production / commissioning of the project or activities whichever is earlier.**
- 2 That this Consent is granted for manufacturing / producing following products / by products or carrying out the following activities or operation/processes or providing following services with capacities given below:



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**Rajasthan State Pollution Control Board**  
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**Phone: 01493-221435**

**Registered**

**File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1755-175**

**Order No : 2023-2024/Bhiwadi/9338**

**Dispatch Date: Mar 21 2024 1:57PM**

**Unit Id : 1318**

Particular	Type	Quantity / Capacity
Change of fuel in Boiler (400 Kg/Hr) PNG	Activity	400.00 KG/HOUR
Change of fuel in Boiler (850 Kg/Hr) PNG	Activity	850.00 KG/HOUR
D.G. Set 250 KVA Convert into dual fuel	Activity	250.00 KVA
ETP 30 KLD	Service	30.00 KLD
STP 25 KLD	Service	25.00 KLD
Two D.G. Set 500 KVA Convert into dual fuel	Activity	500.00 KVA EACH

- 3 That in case of any increase in capacity or addition / modification / alteration or change in product mix or process or raw material or fuel, the project proponent is required to obtain fresh consent to establish.
- 4 That the control equipment as proposed by the applicant shall be installed before trial operation is started for which prior consent to operate under the provision of the **Water Act and Air Act** shall be obtained. This consent to establish shall not be treated as consent to operate.
- 5 That the quantity of effluent generation and disposal along with mode of disposal for the treated effluent shall be as under:



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Unit Id : 1318

Type of effluent	Max. effluent generation (KLD)	Quantity of effluent to be recycled (KLD)	Quantity of treated effluent to be disposed (KLD) and mode of disposal
Domestic Sewage	16.400	NIL	16.400 STP and Gardening/Plantation
Trade Effluent	10.500	NIL	10.500 Recycle back into the process/ Discharge into RIICO drain Leading to CETP Bhiwadi

- 6 That this CTE (Exp.) is being issued to your project having investment in Land ,Building, Plant & Machinery etc.@ Rs. 2027.18 Lakhs. In case of any increase in capacity or addition/ modification/ alteration/ or change in product mix or process or raw material or fuel, the project proponent is required to obtain fresh consent to establish from the Board.
- 7 That this CTE (Exp.) is being issued to the unit in Orange Category as per the State Board's categorization dated 02/06/2020.
- 8 That the industry shall apply for either renewal of this consent or for consent to establish at least 60 days in advance prior to expiry date of this consent letter else additional fee shall have to be deposited in accordance with the Rajasthan Water & Air (Prevention & Control of Pollution) (Amendment) Rules 2016.
- 9 That any information submitted/mentioned in the consent application form/declaration/ affidavit/ supporting enclosures if found incorrect later on, shall make the industry liable for legal action under section 42 of the Water Act,1974 and section 38 of the Air Act,1981.
- 10 That total water consumption for the industry shall not exceed to 84 KLD ( 25 KLD for domestic use, 42 KLD industrial purpose/Boiler& 19 KLD for utilities & other use) and same shall be met from ground water (69 KLD), RIICO supply 15 KLD.
- 11 That the industry shall establish and maintain Effluent Treatment Plant (30 KLD ETP) of adequate capacity for treatment of entire trade effluent (20.5 KLD) up to prescribed norms.



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**File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1755-175**

**Order No: 2023-2024/Bhiwadi/9338**

**Dispatch Date: Mar 21 2024 1:57PM**

**Unit Id : 1318**

- 12 That treated trade effluent shall be reused/ recycled in process with in premises up to maximum possible extent and excess/surplus effluent (if any) may be discharged after proper treatment as per prescribed norms in to close conduit pipeline leading to CETP, Bhiwadi.
- 13 That entire domestic waste water (25 KLD) shall be treated/disposed through septic tank followed by soak pit.
- 14 That this consent is subject to any order or direction from Hon'ble Supreme Court/High Court/NGT or any other Court of the competent jurisdiction.
- 15 That this consent will not be used as an evidence for ascertain the land title and its use.
- 16 That this Consent does not absolve the project proponent from the other statutory obligations prescribed under any other law or any other instrument of force. The sole and complete responsibility, to comply with the conditions laid down in all other laws for the time being in force, rests with the industry/unit/project proponent.
- 17 That the industry shall not use petcoke/furnace oil in any process/service/utility in compliance to the order dated 17/11/2017 of Hon'ble Supreme Court, wherein ban has been imposed on the use of pet coke and furnace oil in the State of Rajasthan.
- 18 That the industry shall comply with the standards as prescribed vide MOEF notification no. GSR 826(E) dated 16th November 2009 with respect to National Ambient Air Quality.
- 19 That the domestic effluent generated from the industry shall be treated as IS: 2470 (Part-I & II) and the treated effluent shall be disposed through septic tank and soak pit.
- 20 That effective control measures shall be provided to control fugitive emissions during processing, transportation, packaging etc.
- 21 That this Consent is being issued on the basis of mechanism for environmental management of critically and severely polluted areas and consideration of activities/ projects in such areas in compliance to Hon'ble NGT order dated 23/08/2019 in matter of O.A. No.1038 CTO /2019 vide RSPCB, Head Office Jaipur Office Order No.F.14(99)Corres/Plg(VI)/2709-2716 dated 26/12/2019
- 22 An action plan with time lines for implementation of all the conditions shall be submitted to the Board with bank guarantee of 10 % of the cost of the additional pollution control equipment/arrangements required to be installed subjected to minimum bank guarantee of Rs. 50,000/-, within 30 days of issuance of consent.



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Unit Id : 1318

- 23 That the unit shall apply & obtain membership of local trust, if any constituted for operation & maintenance of common effluent treatment plant and submit a copy of membership document to this office within one month from the date of issuance of this consent letter.
- 24 That this Consent is liable to be revoked, if any complaint regarding Air, Water or Noise pollution is received and found correct after verification and in case Unit fails to comply with the Guideline & Specific Conditions laid down by the State Board.
- 25 That this consent is subjected to the compliance of decision of Hon'ble Supreme Court in the matter of Gujrat chamber of commerce & industry vs. CPCB & ANR.
- 26 That the industry shall comply all the applicable directions issued by CAQM-NCR (Commission for Air quality management) from time to time.
- 27 The this Consent is not valid for operation D.G sets which are non-compliant with direction no 76 issued by the CAQM-NCR vide letter no F. No. A- 110018/01/2021 -CAQM/15322-15331 dated 29.09.2023
- 28 That CETP treated effluent equivalent to the quantity of effluent generated shall be utilized for secondary/gainful purposes. Record in respect of quantity of effluent generated and quantity of CETP treated effluent received for secondary/gainful purposes shall be maintained on daily basis. Record shall be submitted to this Office as and when asked for.
- 29 That, notwithstanding anything provided hereinabove, the State Board shall have the power and reserves its right, as contained under Section 27(2) of the Water Act and under Section 21(6) of the Air Act to review anyone or all of the conditions imposed here in above and to make such variation as it deems fit for the purpose of compliance of the Water Act and Air Act.
- 30 That the grant of this **Consent to Establish** is issued from the environmental angle only, and does not absolve the project proponent from the other statutory obligations prescribed under any other law or any other instrument in force. The sole and complete responsibility, to comply with the conditions laid down in all other laws for the time-being in force, rests with the industry/ unit/ project proponent.
- 31 That the grant of this **Consent to Establish** shall not, in any way, adversely affect or jeopardize the legal proceedings, if any, instituted in the past or that could be instituted against you by the State Board for violation of the provisions of the Act or the Rules made thereunder.

This **Consent to Establish** shall also be subject, besides the aforesaid specific conditions, to the general conditions given in the enclosed Annexure. The project proponent will comply with the provisions of the **Water Act and Air Act** and to such other conditions as may, from



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time to time, be specified by the State Board under the provisions of the aforesaid Act(s). Please note that, non compliance of any of the above stated conditions would tantamount to revocation of **Consent to Establish** and project proponent / occupier shall be liable for legal action under the relevant provisions of the said Act(s).

Yours sincerely,

Regional Officer[ Bhiwadi ]

(A): Copy to:-

1 Master File.

Regional Officer[ Bhiwadi ]



**Regional Office Bhiwadi**  
**Rajasthan State Pollution Control Board**  
**G.O-I, Phase-2, RIICO Industrial Area, Bhiwadi**  
**Phone: 01493-221435**



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**File No :** F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1757-1758

**Order No:** 2023-2024/Bhiwadi/9339

**Date:** Mar 21 2024 1:57PM

**Unit Id :** 1318

**M/s Gracure Pharmaceuticals Ltd.**

**E-1105, RIICO Industrial Area , Bhiwadi Tehsil:Tijara**

**District:Alwar**

**Sub: Consent to Operate** under Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section 21(4) of Air (Prevention & Control of Pollution) Act, 1981.

**Ref:** Your application for Consent to Operate dated 10/11/2023 and subsequent correspondence.

Sir,

**Consent to Operate** under the provisions of Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 (hereinafter to be referred as the Water Act) and under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981, (hereinafter to be referred as the Air Act) as amended to date and rules & the orders issued thereunder is hereby **granted** for your **Gracure Pharmaceuticals Ltd. plant** situated at **E-1105, RIICO Industrial Area, Bhiwadi RIICO INDUSTRIAL AREA , Bhiwadi Tehsil:Tijara District:KHAIRTHAL-TIJARA**, Rajasthan, subject to the following conditions:-

- 1 That this Consent to Operate is valid for a period from **10/11/2023 to 31/10/2033** .
- 2 That this Consent is granted for manufacturing / producing following products / by products or carrying out the following activities or operation/processes or providing following services with capacities given below:

Particular	Type	Quantity with Unit
Change of fuel in Boiler (400 Kg/Hr) PNG	Activity	400.00 KG/HOUR
Change of fuel in Boiler (850 Kg/Hr) PNG	Activity	850.00 KG/HOUR
D.G. Set 250 KVA Convert into dual fuel	Activity	250.00 KVA
ETP 30 KLD	Service	1.00 NO.
STP 25 KLD	Service	1.00 NO.
Two D.G. Set 500 KVA Convert into dual fuel	Activity	500.00 KVA EACH



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**File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1757-1758**

**Order No : 2023-2024/Bhiwadi/9339**

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- 3 That this Consent to Operate is for existing plant, process & capacity and separate Consent to Establish/Operate is required to be taken for any addition / modification / alteration in process or change in capacity or change in fuel.
- 4 That the quantity of effluent generation along with mode of disposal for the treated effluent shall be as under:

Type of effluent	Max. effluent generation (KLD)	Recycled Qty of Effluent (KLD)	Disposed Qty of effluent (KLD)and mode of disposal
Domestic Sewage	16.400	NIL	16.400 STP and Gardening/Plantation
Trade Effluent	10.500	NIL	10.500 Recycle back into the process/ Discharge into RIICO drain Leading to CETP Bhiwadi

- 5 That this CTO( Exp.) is being issued to your project having investment in Land ,Building, Plant & Machinery etc.@ Rs. 2027.18 Lakhs. In case of any increase in capacity or addition/ modification/ alteration/ or change in product mix or process or raw material or fuel, the project proponent is required to obtain fresh consent to operate from the Board.
- 6 That this CTO(Exp.) is being issued to the unit in Orange Category as per the State Board's categorization dated 02/06/2020.
- 7 That the industry shall apply for either renewal of this consent or for consent to operate at least 60 days in advance prior to expiry date of this consent letter else additional fee shall have to be deposited in accordance with the Rajasthan Water & Air (Prevention & Control of Pollution) (Amendment) Rules 2016.
- 8 That any information submitted/mentioned in the consent application form/declaration/ affidavit/ supporting enclosures if found incorrect later on, shall make the industry liable for legal action under section 42 of the Water Act,1974 and section 38 of the Air Act,1981
- 9 That total water consumption for the industry shall not exceed to 84 KLD ( 25 KLD for domestic use, 42 KLD industrial purpose/Boiler & 19 KLD for utilities & other use) and same shall be met from ground water (69 KLD), RIICO supply 15 KLD.



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File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1757-1758

Order No: 2023-2024/Bhiwadi/9339

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- 10 That the industry shall operate and maintain Effluent Treatment Plant (30 KLD ETP) of adequate capacity for treatment of entire trade effluent (20.5 KLD) up to prescribed norms
- 11 That treated trade effluent shall be reused/ recycled in process with in premises up to maximum possible extent and excess/surplus effluent (if any) may be discharged after proper treatment as per prescribed norms in to close conduit pipeline leading to CETP, Bhiwadi.
- 12 That entire domestic waste water (19 KLD) shall be treated/disposed through sewage treatment plant of (25KLD).
- 13 That this consent is subject to any order or direction from Hon'ble Supreme Court/High Court/NGT or any other Court of the competent jurisdiction.
- 14 That this consent will not be used as an evidence for ascertain the land title and its use.
- 15 That this Consent does not absolve the project proponent from the other statutory obligations prescribed under any other law or any other instrument of force. The sole and complete responsibility, to comply with the conditions laid down in all other laws for the time being in force, rests with the industry/unit/project proponent.
- 16 That the industry shall not use petcoke/furnace oil in any process/service/utility in compliance to the order dated 17/11/2017 of Hon'ble Supreme Court, wherein ban has been imposed on the use of pet coke and furnace oil in the State of Rajasthan.
- 17 That the industry shall comply with the standards as prescribed vide MOEF notification no. GSR 826(E) dated 16th November 2009 with respect to National Ambient Air Quality.
- 18 That the domestic effluent generated from the industry shall be treated as IS: 2470 (Part-I & II) and the treated effluent shall be disposed through septic tank and soak pit.
- 19 That effective control measures shall be provided to control fugitive emissions during processing, transportation, packaging etc
- 20 That this Consent is being issued on the basis of mechanism for environmental management of critically and severely polluted areas and consideration of activities/ projects in such areas in compliance to Hon'ble NGT order dated 23/08/2019 in matter of O.A. No.1038 CTO /2019 vide RSPCB, Head Office Jaipur Office Order No.F.14(99)Corres/Plg(VI)/2709-2716 dated 26/12/2019
- 21 An action plan with time lines for implementation of all the conditions shall be submitted to the Board with bank guarantee of 10 % of the cost of the additional pollution control equipment/arrangements required to be installed subjected to minimum bank guarantee of Rs. 50,000/-, within 30 days of issuance of consent.



**Regional Office Bhiwadi**  
**Rajasthan State Pollution Control Board**  
**G.O-I, Phase-2, RIICO Industrial Area, Bhiwadi**  
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**File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1757-1758**

**Order No: 2023-2024/Bhiwadi/9339**

**Date: Mar 21 2024 1:57PM**

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- 22 That the unit shall apply & obtain membership of local trust, if any constituted for operation & maintenance of common effluent treatment plant and submit a copy of membership document to this office within one month from the date of issuance of this consent letter.
- 23 That this Consent is liable to be revoked, if any complaint regarding Air, Water or Noise pollution is received and found correct after verification and in case Unit fails to comply with the Guideline & Specific Conditions laid down by the State Board.
- 24 That the industry shall comply all the applicable directions issued by CAQM-NCR (Commission for Air quality management) from time to time.
- 25 The this Consent is not valid for operation D.G sets which are non-compliant with direction no 76 issued by the CAQM-NCR vide letter no F. No. A- 110018/01/2021 -CAQM/15322-15331 dated 29.09.2023
- 26 That CETP treated effluent equivalent to the quantity of effluent generated shall be utilized for secondary/gainful purposes. Record in respect of quantity of effluent generated and quantity of CETP treated effluent received for secondary/gainful purposes shall be maintained on daily basis. Record shall be submitted to this Office as and when asked for
- 27 That, notwithstanding anything provided hereinabove, the State Board shall have the power and reserves its right, as contained under Section 27(2) of the Water Act and under Section 21(6) of the Air Act to review anyone or all of the conditions imposed here in above and to make such variation as it deems fit for the purpose of Air Act & Water Act.
- 28 That the grant of this **Consent to Operate** is issued from the environmental angle only, and does not absolve the project proponent from the other statutory obligations prescribed under any other law or any other instrument in force. The sole and complete responsibility to comply with the conditions laid down in all other laws for the time-being in force, rests with the industry/ unit/ project proponent.
- 29 That the grant of this **Consent to Operate** shall not, in any way, adversely affect or jeopardize the legal proceeding, if any, instituted in the past or that could be instituted against you by the State Board for violation of the provisions of the Water Act and Air Act or the Rules made thereunder.
- 30 That the Project Proponent shall comply with provisions of the E-waste (Management) Rules, 2016 and ensure that e-waste generated by them is channelized through collection centre or dealer of authorized producer or dismantler or recycler or through designated take back service provider of the producer to authorized dismantler or recycler.



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**Rajasthan State Pollution Control Board**  
**G.O-I, Phase-2, RIICO Industrial Area, Bhiwadi**  
**Phone: 01493-221435**

**Registered**

**File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1757-1758**

**Order No : 2023-2024/Bhiwadi/9339**

**Date: Mar 21 2024 1:57PM**

**Unit Id : 1318**

- 31 That the Project Proponent shall maintain record of e-waste generated by them in Form-2 and make such records available for scrutiny by the Board.
- 32 That the Project Proponent shall file annual returns in Form-3, to the Board on or before the 30th day of June following the financial year to which that return relates.
- 33 That the transportation of e-waste shall be carried out as per the manifest system whereby the transporter shall be required to carry a document (three copies) prepared by the sender, giving the details as per Form-6.
- 34 That the Project Proponent shall comply with provisions of the Batteries (Management and Handling) Rules, 2001 (as amended) and submit half yearly returns (as bulk consumer, importer, auctioneer, recycler as the case may be) to the State Board as provided under Rule 10 (2) (ii) of the Battery (Management and Handling) Rules, 2001 (as amended). In case the Project Proponent is not a bulk consumer even then the used batteries shall be returned to the authorized dealers or recyclers only.
- 35 That the record of batteries purchased and sold/ returned to registered dealers and/ or authorized recyclers shall be maintained and made available to the officers of the Board during inspections.

This **Consent to Operate** shall also be subject, besides the aforesaid specific conditions, to the general conditions given in the enclosed Annexure. The Project Proponent will comply with the provisions of the **Water Act and Air Act** and to such other conditions as may, from time to time, be specified, by the State Board under the provisions of the aforesaid Act(s). Please note that, non compliance of any of the above stated conditions would tantamount to revocation of **Consent to Operate** and Project Proponent / occupier shall be liable for legal action under the relevant provisions of the said Act(s).

**Yours sincerely,**

**Regional Officer [ Bhiwadi ]**

(A): **Copy to:-**

1 Master File.



**Regional Office Bhiwadi**  
**Rajasthan State Pollution Control Board**  
**G.O-I, Phase-2, RIICO Industrial Area, Bhiwadi**  
**Phone: 01493-221435**

**Registered**

**File No : F(HSW)/KHAIRTHAL-TIJARA(Tijara)/7714(1)/2023-2024/1757-1758**

**Date: Mar 21 2024 1:57PM**

**Order No: 2023-2024/Bhiwadi/9339**

**Unit Id : 1318**

**Regional Officer[ Bhiwadi ]**

**GRACURE PHARMACEUTICALS LTD.****Manufacturing Unit:**

E-1105, RIICO Industrial Area, Phase-III, Bhiwadi,  
Alwar - 301019, Rajasthan, (INDIA)

Phones : +91-01493-221316,87 Fax : +91-1493-220659

E-mail : info@gracure.com

URL : www.gracure.com

CIN : U24232DL1992PLC049002

To  
The Regional officer,  
State Pollution Control Board,  
Bhiwadi, Rajasthan  
301019

Date: 29/09/2025

Subject: Submission of Environmental Statement Report (Form-V) FY (2024-2025)


Respected Sir,

Please find the attached Environmental Statement Report (Form-V) for the financial year 2024-2025.

This for your information and records please.

Thanking You,

Sincerely yours,  
For Gracure Pharmaceuticals Ltd

  
Authorized Signatory



Regd. Office : 251-254, 2nd Floor, DLF Tower, Block-IV, 15, Shivaji Marg, New Delhi-110015

Phones : +91-11-47770900 Fax : +91-11-47770999

Manufacturing Unit II: A-1118(F), RIICO Industrial Area, Phase-III, Bhiwadi, Alwar - 301019, Rajasthan, (INDIA)

Ph : +91-01493-294387

**FORM - V**  
(See Rule 14)

Environmental Statement for the financial year ending the 31<sup>st</sup> March on or before 30<sup>th</sup> of September every year

**PART - A**

- (i) Name and address of the owner/occupier of the industry operation or process.  
**M/S Gracure Pharmaceuticals Limited**  
**E-1105, RIICO INDUSTRIAL AREA, Phase-III**  
**Bhiwadi Alwar (Raj.) 301019**
- (ii) Industry category primary: - (STC Code) Secondary - (SIC Code)  
**Medium**
- (iii) Production capacity: -
- |                                    |                        |
|------------------------------------|------------------------|
|                                    | Units                  |
| Capsule                            | 22.39 Million Nos.     |
| Ointment                           | 3.5 Million Nos.       |
| Oral Liquid (Bottle of 50 ML Each) | 1.72 Million Nos.      |
| Tablets                            | 813.25 Million Tablets |
- (iv) Year of Establishment:-
- (v) Date of the last environmental statement submitted: -Sept-2024

**PART - B**

Water and Raw Material Consumption

1. Water consumption m<sup>3</sup>/day

Process - 42.00  
 Domestic - 25.00  
 Utilities & others - 19.00

Name of products	Process water consumption per unit of product output	
	During Previous financial year	During Current financial year
	1	2
Capsule Ointment Oral Liquid (Bottle of 50 ML Each) Tablets	-	Log book attached

2. Raw Material Consumption

Name of raw materials	Name of products	Consumption of raw material of product output	
		During the previous financial year	During the current financial year
PARACETAMOL, ANALGIN, IBU PROFIN, SULPHAMETHOXAZO LE, TRIMETHOPRIM, CHLOROQ UINE PHOSPHATE	Capsule Ointment Oral Liquid (Bottle of 50 ML Each) Tablets	-	1258764.315 Kg

\*Polluting industry may use codes if disclosing details of raw material would violate contractual obligations, otherwise all industries have to name the raw material used.

**PART - C**

Pollution discharged to environment/unit of output  
(Parameter as specified in the Consent issued)

Pollution	Quantity of pollutants discharged. (mass/day)	Concentration of pollutants in discharges. (mass/volume)	Percentage of variation from prescribed standards with reasons.
<b>WATER</b>	Domestic-19.00 KLD Process -20.50 KLD	Test Reports encl.	Satisfactory
<b>AIR</b>	D. G. Set 2 -500 KVA D. G. Set 1 -250 KVA  One Gas Fired Boiler400 Kg/Hr One Gas Fired Boiler850 Kg/Hr	Test Reports encl.	Satisfactory

**PART -D****HAZARDOUS WASTES**

(as specified under Hazardous Wastes (Management and Handling) Rules, 1989)

Hazardous Waste	Total Quantity	
	During the previous financial year	During the current financial year
From process	-	ETP Sludge—192.92 Kg Date expired product -15187.515 Kg
From pollution control facilities	-	-

**PART - E****SOLID WASTE**

		Total Quantity	
		During the previous financial year	During the current financial year
(a)	From process	-	ETP Sludge—192.92 Kg Date expired product - 15187.515 Kg
(b)	From pollution control facility	-	
(c)	Quantity recycled or re-utilized within the unit	-	-
	Sold	-	-
	Disposed	-	CTDF Udaipur

**PART - F**

Please specify the categorization (in terms of composition and quantum) of hazardous as well as Solid wastes and indicate disposal practice adopted for both the categories of wastes.  
**We are generating type of Hazardous waste i.e. Cat.-35.3, 28.1, 28.4, 28.5, 5.1 & the same is disposed to Ramkey Enviro Engineering Ltd. Udaipur.**

**PART-G**

Impact of the pollution abatement measures taken up on conservation of natural resources and on the cost of production.  
**We are operating ETP for treatment of process water to control water pollution & adequate APCM for controlling the Air pollution.**

**PART - H**

Additional measures/investment proposal for environment protection abatement of pollution, prevention of pollution.  
**Adequate plantation has been done. This is a regular practice at our Unit.**

**PART - I**

Any other particular for improving the quality of the environment.  
**We are organizing to get the Water & Air Test Reports regularly.**

**For Gracure Pharmaceuticals Limited**



**BETWEEN**

M/s GRACURE PHARMACEUTICAL LTD. a company registered under the Indian Companies Act, 1956, having its office at 251-254, IInd Floor, DLF Tower, 15, Shivaji Marg, New Delhi – 110 015 (India) and works at E-1105, Industries Area Phase – III, Bhiwadi Dist. Alwar, Rajasthan-301019, the party of the first part, hereinafter referred to as “the Company”.

&

Mr. Salman Khan of M/S NAGINAA TRADERS having its address Plot No. 05, Near Indian Petrol Pump Khori Kalan, Tawru Mewat (Haryana) - 122105 the party of the second part, hereinafter referred to as “Scrap Collector”.

Whereas the FIRST PARTY Company is engaged in the manufacture and sale of Pharmaceutical product for human health, works at E-1105, Industrial Area Phase – III, Bhiwadi Distt. Alwar, Rajasthan-301019.

And whereas SECOND PARTY having a scrap yard and lift the scrap from Industrial Units.

And whereas the SECOND party has offered its service to FIRST PARTY for providing the facility to lift scraps from FIRST PARTY as per terms and conditions mentioned below:-

**I. SCOPE OF WORK**

The SECOND PARTY will collect and carry out the Scrap from premises of FIRST PARTY in daily basis which is each working day.

The SECOND PARTY will not lift any valuable items from premises of FIRST PARTY without information.

The SECOND PARTY will responsible to arrange transportation and man power for lifting of scrap from premises of FIRST PARTY.

**II. VALIDITY AND RENEWAL OF THE AGREEMENT**

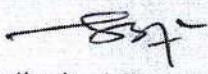
The AGREEMENT shall commence on 01<sup>st</sup> APRIL 2024 and unless easier as per agreed, remains in force for 24 calendar month.

The AGREEMENT shall, unless terminate earlier, expire by effluxes on the 31<sup>st</sup> March – 2026.

**III. PAYMENT SCHEDULE**

The SECOND PARTY shall pay as per Billed Amount + GST as applicable to FIRST PARTY for cleaning the scrap yard.

For Gracure Pharmaceuticals Ltd.

  
Authorised Signatory

For NAGINAA TRADERS

Salman  
Proprietor

The FIRST PARTY shall make of the agreed remuneration to the SECOND PARTY. Latest by Tenth day of the month succeeding the month during which the services were rendered and the remuneration became payable.

**IV. LEGAL ISSUES**

In case of dispute and or difference is resolved by joint discussion of the FIRST PARTY and the SECOND PARTY necessitating legal redress, the same shall be referred to an Arbitrator who shall be appointed with mutual consent of both the parties and whose decision shall be final and binding.

This AGREEMENT is executed in duplicate with one copy being with each PARTY.

In WITNESS thereof the PARTIES have put their hands and seals on the day and year first herein above written.

Signed for and on behalf of  
M/s GRACURE PHARMACEUTICAL LTD.  
For Gracure Pharmaceuticals Ltd.

  
Authorised Signatory

AUTHORISED SIGNATORY

Signature of Second Party  
M/s NAGINAA TRADERS  
For NAGINAA TRADERS  
*Salman*  
Proprietor

SALMAN KHAN

GSTIN : 06JMHPK2575L1ZH

Mob.: 9813448064  
7417456109  
7351466200**NAGINAA TRADERS**

Deals in :- All type of Industrial Scrap

Add.: Plot No. 5, Near Indian Oil Petrol Pump, Khori Kalan  
Teh. Tauru, Mewat (Haryana) 122105

Ref. : .....

Date : .....

01/04/2024

मैं सलमान खान, नगीना ट्रेडर्स खोरी कलां मेवात (हरियाणा) जो कि आपकी कंपनी (ग्रेक्योर फार्मास्युटिकल्स) से स्क्रेप ले जाने का काम करता हूं। मैं आपको यह वचन देता हूं कि ग्रेक्योर फार्मास्युटिकल्स से जो भी स्क्रेप मैं लेकर जाऊंगा उसको ऑथराइज्ड रिसाइकिल वाले के यहां रिसाइकिल कराऊंगा तथा मैं अपने गोदाम पर सही से डंप करूंगा, जिससे पर्यावरण को किसी भी प्रकार की क्षति या हानि नहीं होगी, अगर मेरे द्वारा किसी भी प्रकार की कमी पाई जाती है या मैं पर्यावरण को क्षति पहुंचाता हूँ तो उसका मैं स्वयं जिम्मेदार रहूंगा।

धन्यवाद

For NAGINAA TRADERS  
Salman  
Proprietor



## DELHI POLLUTION CONTROL COMMITTEE

(Government of N.C.T. of Delhi) 4th & 3rd Floor, ISBT Building  
Kashmere Gate, Delhi 110006  
(Visit us at <https://www.dpccocmms.nic.in>)



### CONSENT ORDER

Certificate No. :G-35780

Name of the unit	NAGINAA TRADERS
Address	GROUND FLOOR, 143/414, Kanjhawala Industrial Estate, Delhi 110081, Kanjhawala Industrial Estate, Delhi - 110081
Consent Order No	DPCC/CMC/2024/10482342
Date of issue	13/01/2024
Product/Activity	Plastic Processed Goods (without plastic carry bags / plastic sheets or hke used for packing, wrapping the commodity and other than banned SUP items)
Manufacturing Activities	Plastic pallets
Category Name	[GREEN]
Product Capacity	500 Kg/Day

This Consent to Operate is hereby granted under section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 under GREEN Category. This consent is subjected to terms and conditions specified overleaf. This is being issued with reference to your application id 10482342 valid from 10/01/2024 to 09/01/2039.

**Satender Kumar**  
Digitally signed by Satender Kumar  
Date: 2024.01.15 13:48:27 +05'30'  
Senior Environmental Engineer



## DELHI POLLUTION CONTROL COMMITTEE

(Government of N.C.T. of Delhi) 4th & 5th Floor, ISBT Building  
Kashmere Gate, Delhi 110006  
(Visit us at <https://www.dpccorcmms.nic.in>)



### CONSENT ORDER

Certificate No. :G-35672

Name of the unit	:	NAGINAA TRADERS
Address	:	GROUND FLOOR, 143/414, Kanjhawala Industrial Estate, Delhi 110081, Kanjhawala Industrial Estate, Delhi - 110081
Consent Order No	:	DPCC/CMC/2024/10471016
Date of issue	:	09/01/2024
Product/Activity	:	Plastic Processed Goods (without plastic carry bags / plastic sheets or like used for packing, wrapping the commodity and other than banned SUP items).
Manufacturing Activities	:	Plastic pallets from Waste Plastic Processed Goods
Category Name	:	[GREEN]
Product Capacity	:	500 Kg/Day

This Consent to Establish based on self certification is hereby granted under section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 under GREEN Category. This consent is subjected to terms and conditions specified overleaf. This is being issued with reference to your application id 10471016 valid from 09/01/2024 to 08/01/2025.

This is system generated and does not require any signature. Following terms and condition shall be complied with:-



Government of India  
Form GST REG-06  
[See Rule 10(1)]

Registration Certificate

Registration Number : 07JMHPK2575L1ZF

1.	Legal Name	SALMAN KHAN			
2.	Trade Name, if any	NAGINAA TRADERS			
3.	Additional trade names, if any				
4.	Constitution of Business	Proprietorship			
5.	Address of Principal Place of Business	GROUND FLOOR, 143/414, LAL DORA EXTN, Kanjhawala, New Delhi, North West Delhi, Delhi, 110081			
6.	Date of Liability				
7.	Period of Validity	From	01/11/2023	To	Not Applicable
8.	Type of Registration	Regular			
9.	Particulars of Approving	Centre			
Signature		Signature Not Verified Digitally signed by DS GOODS AND SERVICES TAX NETWORK 07 Date: 2023.11.01 12:45:26 IST			
Name		Vijay Goyal			
Designation		Superintendent			
Jurisdictional Office		Ward 1			
Date of issue of Certificate		01/11/2023			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					

This is a system generated digitally signed Registration Certificate issued based on the approval of application granted on 01/11/2023 by the jurisdictional authority.



Goods and Services Tax Identification Number: 07JMHPK2575L1ZF

Details of Additional Place of Business(s)

Legal Name	SALMAN KHAN
Trade Name, if any	NAGINAA TRADERS

Total Number of Additional Places of Business in the State 0

Goods and Services Tax



Goods and Services Tax Identification Number: 07JMHPK2575L1ZF

Legal Name SALMAN KHAN  
Trade Name, if any NAGINAA TRADERS

Details of Proprietor

1



Name SALMAN KHAN  
Designation/Status proprietorship  
Resident of State Uttar Pradesh

Goods and Services Tax



GRACURE

## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

## STANDARD OPERATING PROCEDURE

Name of Department	Environment Health & Safety	SOP No. : ES/013/03
Title: Waste Control and Management		Supersedes No. : 02
		Page No. : 1 of 8
Effective Date	17/07/2025	Review Date
		16/07/2028

## 1.0 OBJECTIVE

To lay down the procedure for control and management of plant waste including solid and liquid waste containing materials, products or intermediates.

## 2.0 SCOPE

This procedure shall be applicable for all the waste generated at Gracure Pharmaceuticals Ltd., Bhiwadi.

## 3.0 RESPONSIBILITIES

Production, housekeeping, engineering and store personnel shall be responsible for collection, segregation and disposal of plant waste, generated in their respective departments during routine/non-routine activities.

EHS officer is responsible for the monitoring and implementation of the SOP.

Plant Head/Head Quality shall ensure the overall compliance of this SOP.

## 4.0 DISTRIBUTION

- Master copy : Quality Assurance Department  
 Controlled Copy 1: Quality Control Department  
 Controlled Copy 2: Production Department  
 Controlled Copy 3: Administration Department  
 Controlled Copy 4: Warehouse Department  
 Controlled Copy 5: Engineering Department  
 Controlled Copy 6: EHS Department  
 Controlled Copy 7: Production Packing Department

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kaushal Singh	Devendra kr Gupta	F. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

STANDARD OPERATING PROCEDURE			
Name of Department	Environment Health & Safety		SOP No. : ES/013/03
Title: Waste Control and Management			Supersedes No. : 02
			Page No. : 2 of 8
Effective Date	17/07/2025	Review Date	16/07/2028

## 5.0 PROCEDURE

5.1 Various types of waste generated in the plant include the following but not limited to

5.1.1 Material and Product Residues.

5.1.2 Rejected or Expired Products, Rejected Intermediates.

5.1.3 Non-Biodegradable waste.

5.1.4 Bio-Degradable waste.

5.1.5 Paper waste of printed and unprinted packaging materials.

5.1.6 Waste generated in the Warehouse.

5.1.7 Expired Documents.

5.1.8 Market returned goods (Damaged and Expired).

## 5.2 MATERIAL AND PRODUCT RESIDUE

5.2.1 These are include the following but not limited to

5.2.1.1 Leftover residues after completion of batch manufacturing and packing.

5.2.1.2 Spilled powder during dispensing, sampling and processing.

5.2.1.3 Leftover in-process samples or waste generated during destructive testing.

5.2.1.4 Dust recovered from vacuum cleaners, dust collectors of dust extraction system and Air Handling Systems.

5.2.1.5 Dust recovered during filter cleaning.

5.2.1.6 Dust spillage at various stages of processing.

5.2.1.7 Solid dosage units that spill on the floor during manufacturing and packing.

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kaushal Singh	Devendra K. Gupta	f. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

## STANDARD OPERATING PROCEDURE

Name of Department	Environment Health & Safety	SOP No. : ES/013/03
Title: Waste Control and Management		Supersedes No. : 02
		Page No. : 3 of 8
Effective Date	17/07/2025	Review Date
		16/07/2025

- 5.2.1.8 Rejects collected during inspection of solid dosage units.
- 5.2.1.9 Rejects generated during in process checks, machine settings or during machine breakdowns.
- 5.2.1.10 Online packing rejects of the product.
- 5.2.2 **Method of Disposal**
- 5.2.2.1 Residue waste shall be collected in a closed polythene lined container labeled as "Rejects for Disposal".
- 5.2.2.2 At the end of each shift, transfer the residual rejects to EHS department for disposal at TSDF Site.
- 5.2.2.3 **Expired control samples and stability samples**
- 5.2.2.3.1 Solid dosage units shall be taken out from their immediate packaging material, collected in a closed container lined with polythene bag.
- 5.2.2.3.2 Emptied primary packaging material (bottles, blister packs, Alu-Alu packs, strips, sachets, etc.) shall be crushed manually/ or cut by using scissors. Glass bottles shall be broken to prevent reuse. HDPE bottles shall be punctured with a sharp needle / crushed manually/ or cut by using scissors. Secondary packaging material (Labels, Cartons, leaflets, boxes) shall be torn to pieces to prevent only reuse.
- 5.2.2.4 **Expired or rejected products, expired raw materials**
- 5.2.2.4.1 After obtaining the approval for disposal, the rejects shall be transferred to EHS for disposal at TSDF Site.
- 5.2.2.4.2 Disposal activity shall be documented and shall be done in presence of QA and EHS.
- 5.2.2.4.3 Disposal records of expired / rejected / returned goods shall be attached with the concerned batch document.

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kaushal Singh	Devendra K. Gupta	G. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

## STANDARD OPERATING PROCEDURE

Name of Department	Environment Health & Safety	SOP No. : ES/013/03
Title: Waste Control and Management		Supersedes No. : 02
		Page No. : 4 of 8
Effective Date	17/07/2025	Review Date
		16/07/2025

5.2.2.4.4 Disposal records of expired raw material shall be maintained by warehouse in-charge for further reference.

### 5.3 NON-BIODEGRADABLE WASTE

#### 5.3.1 Non-Biodegradable waste include

5.3.1.1 Plain and Printed Aluminum foil, rejected on-line.

5.3.1.2 Rejected, Printed and Plain Aluminum Foil.

5.3.1.3 Empty blisters / strips / sachets generated during initial machine settings or during actual run.

5.3.1.4 Used polythene bags, polythene sheets, foam, and thermocol.

5.3.1.5 Rejected / Damaged HDPE (high density polyethylene) containers and lids during operations.

5.3.1.6 Damaged /Rejected punches and dies.

5.3.1.7 Damaged / Rejected meshes, sieves, glass bottles, poly bags, spoons, PP caps and measuring cups.

5.3.1.8 PVC (Poly vinyl Chloride) cuttings generated during initial machine setting.

5.3.1.9 Online rejection of PVC or PVC / PVDC film.

#### 5.3.2 Method of Disposal

5.3.2.1 The waste shall be segregated, item wise.

#### 5.3.2.2 Rejected foil roll(s) or portion of the roll(s) rejected online

5.3.2.2.1 These rejects shall be shifted to secured area specified for keeping rejects. After destruction approval from Head - Quality, the roll(s) shall be damaged with a sharp blade/or drill by using drill machine to the extent of preventing its reuse. The damage material shall be transfer to scrap yard for final disposal.

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kaushal Singh	Devendra kumar Gupta	F. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

STANDARD OPERATING PROCEDURE			
Name of Department	Environment Health & Safety		SOP No. : ES/013/03
Title: Waste Control and Management			Supersedes No. : 02
			Page No. : 5 of 8
Effective Date	17/07/2025	Review Date	16/07/2028

5.3.2.2.2 Disposal shall be documented and the records shall be filed for future reference.

5.3.2.2.3 Plain Aluminum foil roll(s), rejected online shall be shifted to secured area specified for keeping rejects. After destruction approval from Head Quality, the plain foil roll(s) shall be disposed using sharp blade using a drill machine to the extent of prevent misuse. The damage material shall be sent to the scrap yard for final disposal.

#### 5.3.2.3 Aluminum waste

5.3.2.3.1 The Aluminum and PVC/PVDC waste generated during packing shall be transferred to scrap yard for final disposal.

5.3.2.3.2 Pockets of empty blister packs or sachets shall be punctured / or cut using scissor before being transferred to scrap yard.

5.3.2.3.3 Metal stereotypes shall be damaged with a hammer and transferred to the scrap yard for final disposal.

5.3.2.3.4 Damaged sieves or meshes shall be de-shaped and punctured before transferring to scrap yard for final disposal.

5.3.2.3.5 Rejected/damaged punches and dies shall be taken to the workshop, de shaped by expert technicians and transferred to scrap yard for final disposal.

#### 5.4 BIODEGRADABLE WASTE

5.4.1 Biodegradable waste consists of

5.4.2 Empty gelatin shells

5.4.4 Leftover, expired or used media or expired solid media from microbiological testing laboratory.

5.4.5 Method of Disposal

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kaushal Singh	Devendra kumar Gupta	f. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

## STANDARD OPERATING PROCEDURE

Name of Department	Environment Health & Safety	SOP No. : ES/013/03
Title: Waste Control and Management		Supersedes No. : 02
		Page No. : 6 of 8
Effective Date	17/07/2025	Review Date
		16/07/2025

5.4.5.1 Empty gelatin shells shall be crushed and transferred to EHS for disposal at TSDF Site or with authorized agency.

5.4.5.2 Unused leftover media, expired solid media shall be kept in disposable bag after autoclaving and transferred to EHS for disposal at TSDF Site or with authorized agency.

5.4.5.3 Used media shall be sterilized in autoclave and transferred to EHS for disposal at TSDF Site or with authorized agency.

#### 5.5 PACKAGING MATERIAL WASTE (PAPER WASTE)

##### 5.5.1 Types of Packaging Material Waste are

5.5.1.1 Printed Packaging Materials, labels, leaflets, cartons and printed shippers.

5.5.1.2 Unprinted packaging materials (corrugated shippers, boxes etc.).

5.5.1.3 Paper waste of packaging material is generated due to :

5.5.1.4 Excess over printed packing materials.

5.5.1.5 Online rejection of printed / unprinted packing materials

##### 5.5.2 Method of Disposal

5.5.2.1 Paper waste shall be cut into small pieces & transferred to scrap yard.

5.5.2.2 Unprinted packing material waste (corrugated shippers, boxes etc.) shall be cut to pieces by using scissors or torn off manually and transferred to the scrap yard for final disposal.

##### 5.5.3 WAREHOUSE WASTE

##### 5.5.3.1 Types of warehouse waste include

5.5.3.1.1 Empty drums of raw material in form of Fiber, HDPE & PVC where raw material is supplied in double polybags.

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kaushal Singh	Devendra kr Gupta	A. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

## STANDARD OPERATING PROCEDURE

Name of Department	Environment Health & Safety	SOP No. : ES/013/03
Title: Waste Control and Management		Supersedes No. : 02
		Page No. : 7 of 8
Effective Date	17/07/2025	Review Date
		16/07/2028

- 5.5.3.1.2 Packing material or other raw material which are supplied in corrugated box.
- 5.5.3.1.3 Empty Container / Drum / Barrel used to supply liquid & solvent depending on requirements.
- 5.5.4 **Method of Disposal**
- 5.5.4.1 Approved / Rejected status labels of QC and the manufacturer's labels on the shippers, containers and drums shall be made invalid by putting a cross (X) across label.
- 5.5.4.2 Corrugated waste, poly bags of emptied out raw material containers and empty bottles of consumables shall be transferred to scrap yard for final disposal.
- 5.5.4.3 Empty Container / Drum / Barrel (HDPE/PVC/MS) shall be ensured for the fully entries out and then rinses with pressure and final rinses with hot water, there after physically verified to ensure the non-availability water droplet. After that tightly close the container and then transfer to scrap yard.
- 5.5 **WASTE GENERATED IN THE MAINTENANCE DEPARTMENT**
- 5.5.1 **Types of Maintenance waste**
- 5.5.1.1 Rejected nuts, bolts, machine spares and machine parts.
- 5.5.1.2 Out of calibration gauges, instruments.
- 5.5.1.3 Rejected air filters and HEPA filters.
- 5.5.1.4 Rejected pulley belts, machine belts, etc.
- 5.5.1.5 Metal scrap.
- 5.5.1.6 **Method of Disposal**
- 5.5.1.6.1 Items for disposal shall be segregated and transferred to scrap yard for final disposal.
- 5.5.1.6.1 Air Filters shall be punctured to prevent their reuse, before transferring to scrap yard.

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kaushal Singh	Devendra Lal Gupta	f. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## GRACURE PHARMACEUTICALS LTD

E-1105, RIICO INDUSTRIAL AREA, PHASE-III, BHIWADI, ALWAR (RAJASTHAN)

## STANDARD OPERATING PROCEDURE

Name of Department	Environment Health & Safety	SOP No. : ES/013/03
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		Page No. : 8 of 8
Effective Date	17/07/2025	Review Date
		16/07/2028

## 5.6 EXPIRED DOCUMENTS

5.6.1 After preserving the documents till the required retention period, each page of the expired document shall be torn into pieces and transferred to scrap yard for final disposal.

5.7 Solid or semi-solid or liquid waste shall be handed over to EHS. The other waste material shall be sent to scrap yard. Entry of all shared waste shall be made in annexure-1.

5.8 Disposal activity at EHS department shall be carried out as per SOP ES/013 (current version).

## 6.0 ANNEXURES

S. No.	Annexure No.	Title of Format	Format No.
01	Annexure 1	Record of Destruction	F/QA/045-001/06

## 7.0 ABBREVIATIONS

QA	: Quality Assurance
SOP	: Standard Operating Procedure
HDPE	: High Density Poly Ethylene
PVC	: Poly Vinyl Chloride
HEPA	: High Efficiency Particulate Air Filter
EHS	: Environment Health And Safety
ES	: Environment And Safety

## 8.0 REFERENCES

NA

	Prepared By User Department	Checked By Department Head or Designee	Approved by Head Quality or Designee
Name	Kausal Singh	Devendra K. Gupta	Dr. Arman
Signature			
Date	16/07/2025	16/07/2025	16/07/2025



## Regional Office, Bhiwadi

# Rajasthan State Pollution Control Board

Plot No. GO-1, Phase-II, RIICO Industrial Area, Bhiwadi-301019

e-mail: [robhiwadi@gmail.com](mailto:robhiwadi@gmail.com)

Through e-mail / Post

No. RPCB/RO/BWD/60/1846

Date: 25/07/2025

M/s Gracure Pharmaceuticals Ltd.,  
Plot no. E-1105, Phase-III,  
RIICO Industrial Area, Bhiwadi  
District Khairthal Tijara  
e-mail: [info@gracure.com](mailto:info@gracure.com), [sudhir.bhargava@gmail.com](mailto:sudhir.bhargava@gmail.com)

Sub: Show cause notice for intended revocation/cancellation of Consent to Operate under Section 25/27 of the Water (Prevention & Control of Pollution) Act, 1974 & under section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and show cause notice for intended revocation of authorization under Hazardous & Other Waste Management Rules, 2016 for your industry at Plot no. E-1105, Phase-III, RIICO Industrial Area, Bhiwadi, District Khairthal Tijara

Ref: (i) Consent to Operate(s) granted by the Board vide order no. 2023-2024/Bhiwadi/9339 dated 21/03/2024 having validity up to 31/10/2033 and order no. 2019-2020/CD/6332 dated 12/06/2019 having validity up to 31/01/2029  
(ii) Authorization issued by the Board vide order no. RPCB/HWM/2025-2026/Bhiwadi/HSW/24 dated 22/05/2025 having validity up to 28/02/2030.  
(ii) Letter received from Regional Officer, Nuh, Haryana State Pollution Control Board

Sir/Madam

- Whereas, the Water (Prevention and Control of Pollution) Act, 1974 (hereinafter referred to as the "Water Act") has come into force in whole of the State of Rajasthan w.e.f. 23/03/1974 & the Air (Prevention and Control of Pollution) Act, 1981 (hereinafter referred to as the "Air Act") has come to force in whole of the State of Rajasthan w.e.f. 16/05/1981.
- And whereas, the Water Act & the Air Act have been enacted to provide for the prevention, control and abatement of water pollution & air pollution.
- And whereas, the Environment (Protection) Act, 1986 (hereinafter referred as 'the EP Act'), came into force in whole of the country with effect from 19/11/1986.
- And whereas, in exercise of the powers conferred under the said EP Act, the Government of India notified the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016 vide Notification dated 04/04/2016 (hereinafter referred as 'the Waste Rules') for safe and environmentally sustainable management and handling of the hazardous and other wastes.
- And whereas, Rajasthan State Pollution Control Board (hereinafter referred as 'the Board') constituted under provisions of the Water Act and Air Act has been conferred power to take such steps as are deemed necessary for the prevention, control and abatement of air and water pollution and ensuring environmentally safe handling and management of hazardous and other waste.
- And whereas, an industry is being operated in the name & style of M/s Gracure Pharmaceuticals Ltd., at Plot no. E-1105, Phase-III, RIICO Industrial Area, Bhiwadi, District Khairthal Tijara (hereinafter referred to as 'the industry') for formulation of pharmaceuticals and the process is such that it generates polluted trade/domestic effluent & air emission and hazardous waste.
- And whereas Consent to Operate, under Water Act & Air Act, was granted to the industry vide order no. vide order no. 2023-2024/Bhiwadi/9339 dated 21/03/2024 having validity

अमित जुवाल  
क्षेत्रीय अधिकारी  
स.प्र.नि.सं. भिवाड़ी



# Regional Office, Bhiwadi

## Rajasthan State Pollution Control Board

Plot No. GO-1, Phase-II, RIICO Industrial Area, Bhiwadi-301019

e-mail: [robhiwadi@gmail.com](mailto:robhiwadi@gmail.com)

- up to 31/10/2033 and order no. 2019-2020/CD/6332 dated 12/06/2019 having validity up to 31/01/2029 with the conditions contained therein.
8. And whereas authorization under Hazardous & Other Waste Management Rules was issued to the industry vide order no. RPCB/HWM/2025-2026/Bhiwadi/HSW/24 dated 22/05/2025 having validity up to 28/02/2030 with the conditions mentioned therein for ensuring safe disposal of the Hazardous Waste generated from the industry.
  9. And whereas a letter dated 20/05/2025 has been received from the Regional Officer, Nuh, Haryana State Pollution Control Board, regarding the unauthorized dumping of all kind of industrial waste in Village Khori Kalan, Tauru, District-Nuh of Haryana by your industry.
  10. And whereas, the illicit dumping and unscientific handling of waste is a serious concern, as it poses a threat of pollution and environmental degradation.
  11. And whereas a matter regarding illegal burning of waste scrap in toxic kilns on the border areas of Haryana and Rajasthan is also pending before the Hon'ble National Green Tribunal vide OA no. 21/2025.
  12. And whereas non-compliance of the provisions of the Water Act, Air Act & Hazardous & Other Waste Management Rules, 2016 and the conditions of Consent to Operate & Authorization make industry liable for action under provisions of the Acts including revocation/cancellation of Consent to Operate and Authorization.

Therefore, the Board intends to revoke/cancel the referred Consent to Operate and Authorization issued to the industry vide referred letter dated 21/03/2024, 12/06/2019 and 22/05/2025 respectively under the applicable Acts and Rules.

In view of above, this show cause notice is being issued as to why the Consent to Operate and Authorization issued vide orders under reference may not be revoked/cancelled. In case, if you wish to submit any objection/clarification to the actions intended herein, you may submit your reply along with the supporting documents within 15 days from the date of issue of this letter to this office failing which the actions intended herein may be confirmed without any further notice in the matter.

Copy to:

- i. Master File of Show Cause Notice, RSPCB, Bhiwadi.

24.7.25  
अमित जयल  
(Amit Juyal)  
क्षेत्रीय अधिकारी  
रा.प्र.नि.म. भिवाड़ी

Regional Officer

BIC



## GRACURE PHARMACEUTICALS LTD.

### Manufacturing Unit:

E-1105, RIICO Industrial Area, Phase-III, Bhiwadi,  
Alwar – 301019, Rajasthan, (INDIA)

Phones : +91-01493-221316,87 Fax : +91-1493-220659

E-mail : info@gracure.com

URL : www.gracure.com

CIN : U24232DL1992PLC049002

Date 06/08/2025

To,  
The Regional Officer  
Rajasthan State Pollution Control Board,  
Bhiwadi Alwar (Raj.)

**Sub:-**Reply of show cause notice for intended revocation/cancellation of consent to operate under section 25/27 of the Water (Prevention & Control of Pollution) Act 1974 & under section 21 of the Air (Prevention & Control of Pollution) Act 1981 and show cause notice for intended revocation of authorization under Hazardous & other Waste Management Rules 2016.

**Ref:** - Your Office letter no. RPCB/RO/BWD/ 60/1846 dtd. 25/07/2025

Dear Sir,

In reference to your referred letter our point wise reply is as follows:

**Point No.01 to 07 Noted**

**Point No. 08**

The category which have been taken in our hazardous waste authorization that we are disposing/storing on regular basis to the actual recycler/vendor. The annual return and all other compliance we are submitting at your office on regular basis.

**Point No. 09**

After getting your show cause notice we verified in our plant & we found that we are disposing waste with other waste like paper, corrugated box and other non hazardous waste material which was disposed by the scrap vendor in other adjacent area, but it was not in our knowledge. Now we stopped to give such waste further & we trying to give such waste either to end user or RIICO dumping yard.

**Point No. 10**

Our industry is orange category industry & our product is Human Saving product & we never promote any illegal dumping or unscientific handling of waste. In future also you will not get any happing because of our plant.

**Point No. 11**

We never burnt any of hazardous waste scrap.

**Point No. 12 Noted**


Looking to the clarification, kindly revoke your show cause notice & oblige us.

This is also to inform you that we are having copy of agreement done with scrap vendor along with undertaking showing that they will provide the scrap to waste recycler (copy enclosed)

Thanking You,

Sincerely yours,

For Gracure Pharmaceuticals Limited

  
Authorized Signatory



Regd. Office : 251-254, 2nd Floor, DLF Tower, Block-IV, 15, Shivaji Marg, New Delhi-110015

Phones : +91-11-47770900 Fax : +91-11-47770999

Manufacturing Unit II: A-1118(F), RIICO Industrial Area, Phase-III, Bhiwadi, Alwar – 301019, Rajasthan, (INDIA)

Ph : +91-01493-294387



## VAKALATNAMA

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

OA NO. OF 572/2025

DR. AMIT KUMAR

... APPLICANT

VERSUS

UNION OF INDIA &amp; ORS.

... RESPONDENTS

I/We do hereby authorise and empower the undernoted lawyer(s) and any of his Juniors to appear, to plead, to argue, to act, to sign, to submit in my/our name/s, to appear, move and file applications, reply, petitions in original application, objections, miscellaneous, review or appellate proceedings to accept service of notices to produce and take back documents, to apply for and take delivery of copies, to authorise his representative and registered clerks, to take delivery of copies & to do clerical works in this National Green Tribunal, Principal Bench, New Delhi and High Court and any other office or Courts and to apply for refund and receive the refund vouchers to cash the refund vouchers cheques and pay orders to deposit and withdraw money to arrange for and accept any compromise in any proceedings to inspect files records and papers documents filed and orders therein to represent me/us in all matters and to do every other necessary and lawful act incidental in this case or connected proceedings on my/our behalf. I/We further agree to confirm and ratify all their acts done under this power.

Accepted  
*[Signature]*  
 D/1884/2016  
*[Signature]*  
 D/12054/2025  
*[Signature]*  
 D/3382/2023

Place: New Delhi

Date: 10.02.2026

For Gracure Pharmaceuticals Ltd.

*[Signature]*  
 Director  
 Signature of the Party

Address for service on the Counsel:

**K.P. ASSOCIATES**

C-9 (LGF), Defence Colony,

Delhi - 110024.

Phone No. 011 48789809, 9829012069, 9760066964




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**GRACURE PHARMACEUTICALS LTD.**


---

Regd. Office : 251-254, 2nd Floor, DLF Tower,  
Block-IV, 15, Shivaji Marg, New Delhi-110015 (INDIA)  
Phones : +91-11-47770900  
E-mail : info@gracure.com  
URL : www.gracure.com  
CIN : U24232DL1992PLC049002

**CERTIFIED TRUE COPY OF RESOLUTION PASSED AT MEETING OF THE BOARD OF DIRECTORS OF GRACURE PHARMACEUTICALS LIMITED HELD ON SATURDAY 16<sup>TH</sup> MAY 2026 AT 251-254, IIND FLOOR, DLF TOWER, 15 SHIVAJI MARG, NEW DELHI-110015**

RESOLVED THAT Mr. P.K. Rastogi, Director, be and is hereby authorised, for and on behalf of the Company, to represent the Company in the matter titled "Dr. Amit Kumar vs. Union of India & Ors.", Original Application No. 572 of 2025, pending before the Hon'ble National Green Tribunal, and to take all necessary steps in connection therewith, including signing, verifying and filing pleadings, applications, replies, affidavits, vakalatnama(s), authorisations, undertakings, statements and other documents, as may be required before the Hon'ble Tribunal and/or any other authority/forum in relation to the said matter.

RESOLVED FURTHER THAT the aforesaid Authorised Representative be and is hereby authorized to appoint advocates, solicitors and legal counsel on behalf of the Company, issue necessary instructions to them, and do all such acts, deeds and things as may be necessary or incidental for effectively prosecuting and/or defending the aforesaid matter on behalf of the Company.

CERTIFIED TO BE TRUE

For Gracure Pharmaceuticals Limited

*A. S. Bhargava*

Amreshwar Sahai Bhargava  
Managing Director  
Din No 00004468




---

Manufacturing Unit I : E-1105, RIICO Industrial Area, Phase-III, Bhiwadi, Alwar – 301019, Rajasthan, (INDIA)  
Ph : +91-01493-221316,87

Manufacturing Unit-2 : A-1118(F), RIICO Industrial Area, Phase-III, Bhiwadi, Alwar – 301019, Rajasthan, (INDIA)  
Ph : +91-01493-294387

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**SERVICE OF REPLY ON BEHALF OF RESPONDENT NO. 26 in OA No. 572 of 2025 - Dr Amit Kumar Vs Union of India & Ors.****Abhimanyu Singh** <abhimanyu@kpandassociates.in>

20 May 2026 at 14:03

To: Amit Kumar <amit0123.ac@gmail.com>, secy-moef@nic.in, msob.cpcb@nic.in, hqshpcb@hspcb.org.in, hspcbrouh@gmail.com, dcnuh@hry.nic.in, pccf-hry@nic.in, dfo\_mewat@yahoo.com, ceo.hwra@hry.gov.in, agriharyana2009@gmail.com, member-secretary@rpcb.nic.in, robhiwadi@gmail.com, riico@riico.co.in, Imran Khan <imrankh122105@gmail.com>, MOHD TOOFIQ <toofiqtauru2004@gmail.com>, sq430329@gmail.com, krishankumarlamba882@gmail.com, Manoj Verma <accourdweste99@gmail.com>, potechnoplast@yahoo.com

Bcc: Purvi Mathur <purvi@kpandassociates.in>, Kushagra Sharma <kushagra@kpandassociates.in>, Gracure Legal <gracure.legal@kpandassociates.in>

Dear All,


We appear on behalf of the Respondent No. 26 (M/s. Gracure Pharmaceuticals Ltd.) in the captioned matter. Please find attached herewith a copy of the Reply filed in the captioned matter.

[www.kpandassociates.in](http://www.kpandassociates.in)

**Best,**  
**Abhimanyu Singh**  
**Partner**  
**KPASSOCIATES**  
Advocates & Consultants

**C-9, Defence Colony, New Delhi- 110024****206, Axis Mall, Bhagwan Das Road, CScheme, Jaipur-302001****T: + 011- 48789809****M: + 91 97600 66964****E: [abhimanyu@kpandassociates.in](mailto:abhimanyu@kpandassociates.in)****Print Sustainably**

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