

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
EXECUTION APPLICATION NO. 87/2025
IN
ORIGINAL APPLICATION NO. 158 OF 2025**

IN THE MATTER OF:

Jaibir Singh & Anr. ...Applicant(s)

Versus

State of Haryana & Ors. ...Respondent(s)

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Next Hearing Date 13-07-2026

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THROUGH



ROOPANSH PUROHIT & NARAYANI SEPAHA

Advocates for the Respondent No. 7

I-5, 4th Floor, Jangpura Extension,

New Delhi - 110014

Mobile No.: 98104 40322

Email Id.: contactrpalegal@gmail.com

Place: New Delhi

Dated: 06.04.2026

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REPLY ON BEHALF OF RESPONDENT NO. 7

MOST RESPECTFULLY SHOWETH:

1. That the present reply is being filed on behalf of Respondent No. 7, namely M/s Baljeet Poultry Research and Breeding Farm (hereinafter referred to as the "answering respondent"), which is a poultry hatchery unit situated at Village Dharan, Kharkri Makhwan Road, Tehsil Tosham, District Bhiwani, Haryana, bearing Khewat No. 230/216, Khasra Nos. 26/10, 27/8, 7 and 15.
2. That the present Execution Application is wholly misconceived, devoid of merit and is liable to be dismissed, as it does not disclose any wilful or deliberate non-compliance of the order dated 21.04.2025 passed by this Hon'ble Tribunal in O.A. No. 158 of 2025.

3. That the scope of execution proceedings is limited to enforcement of the directions issued by this Hon'ble Tribunal. The applicants, under the guise of execution, are seeking to reopen issues relating to alleged pollution, expansion and compliance.
4. That the order dated 21.04.2025 passed by this Hon'ble Tribunal directed the competent authorities, including the Haryana State Pollution Control Board (HSPCB), to inspect the respondent's unit in question to verify the complaints and take appropriate action in accordance with law.
5. That it is submitted that the issue of compliance with the order dated 21.04.2025 has already been duly examined and addressed by Respondent Nos. 2 and 3, i.e., the HSPCB, which is the competent statutory authority as reflected in its reply dated 13.03.2026 filed before this Hon'ble Tribunal.
6. That pursuant to the directions of this Hon'ble Tribunal contained in the order dated 21.04.2025 the following actions as recorded in by respondent no.2 & 3 in their reply have been taken in relation to answering respondent:-
 - (i). A letter was issued by the concerned authority vide No 434 dated 10.06.2025 to the Worthy Member Secretary, HSPCB on 10.06.2025 seeking constitution of a team for compliance of the Hon'ble Tribunal's order dated 21.04.2025 passed in Original Application No. 158 of 2025.

- (ii) Thereafter, the Member Secretary, HSPCB constituted a team on 01.09.2025 consisting of Regional Officer, HSPCB, Hisar Regional Officer, HSPCB, Bahadurgarh.
- (iii) The team was directed to carry out ground verification in compliance with the directions of the Hon'ble Tribunal and submit an inspection report.
- (iv) Inspection was conducted on 30.12.2025. During inspection, the answering respondent was found complying as per norms and operating with approximately 12,000 birds. The following suggestions were also made:
 - a) Installation of DG Set in accordance with CAQM directions.
 - b) Improvement of existing septic tank for its effluent generated from hatch section.
 - c) Maintenance of proper ventilation, medicinal sprinkling and reuse of its effluent generated from daily activities in gardening/irrigation etc.
 - d) Prepare proper logbook of medicines utilised to control odour and flies must be maintained.

Accordingly, directions were issued by Regional Office, HSPCB Bhiwani on 31.12.2025.

- (v) The unit submitted its compliance reply on 13.01.2026. In order to verify the compliance of the directions issued, a joint inspection was conducted on 11.02.2026 by a team consisting of the following officers: Regional Officer, HSPCB, Assistant

Environmental Engineer, HSPCB, SDO, Animal Husbandry Department, Veterinary Surgeon and Government Veterinary Hospital, Tosham.

(vi) During inspection on 11.02.2026, following deficiencies were observed:

- a. Inadequate manure protection from run-off and insects.
- b. Improper manure storage design.
- c. Insufficient ventilation in cages.

Accordingly, a Show Cause Notice was issued to the unit vide this office letter No. 2448 on 12.02.2026.

(vii) The unit submitted its reply on 25.02.2026 with documents. The verification of claimed compliances was done during inspection conducted on 26.02.2026 by the Field Officer, HSPCB. During inspection, the following observations were made:

- a. Properly provided facility for manure storage and no sign of runoff water from manure
- b. Proper ventilation facility provided
- c. No sign of foul smell and no fly nuisance was found.
- d. For the violations observed during inspection dated 11.02.2026, an Environmental Compensation assessment report was forwarded to Head Office vide letter No. 2449 dated 27.02.2026 for an amount of Rs. 80,000/-

7. That inspections have been conducted and directions have been issued regarding compliance by the competent authority. The present execution application is wholly misconceived as it seeks to re-agitate

the issue of compliance in blatant ignorance of the status of compliance placed on record by the competent authority.

8. That the answering respondent is operating under a valid Consent to Operate (CTO) dated 12.08.2021 granted by the HSPCB for the period between 12.08.2021 to 31.12.2025 for capacity of thirty thousand breeder chicks. Subsequently, the answering respondent obtained the renewal of CTO for the period of 01.01.2026 to 31.12.2030. In view thereof, the allegation that the answering respondent is operating without requisite consent or in violation of statutory provisions is incorrect and denied.
9. That the applicants have mislead this Hon'ble Tribunal by relying upon a refusal of Consent to Establish (CTE) dated 06.06.2022. That it is necessary to clarify the fundamental erroneous factual premise as the said document pertains to an entirely different entity, namely "M/s Baljeet Poultry Farm", and not to the answering respondent, which is "M/s Baljeet Poultry Research and Breeding Farm". The reliance placed on the said document is therefore wholly misplaced.
10. That the respondent no. 2 & 3 on page no.5 of the reply dated 13.03.2026 filed before this Hon'ble Tribunal has clarified that the applicants have attempted to create confusion by referring to a different unit than the answering respondent. The allegations with regard to CTE are founded on a selective and incorrect presentation of facts thereby misleading this Hon'ble Tribunal.
11. That the reliance placed by the applicants on the CPCB Guidelines for Poultry Farms dated January, 2022 is wholly misconceived. The said

guidelines are prospective in nature and apply only to new poultry farms established after the issuance of the said guidelines. The answering respondent's unit was established in the year 2011, much prior to the issuance of the said guidelines, and therefore the criteria contained therein is not applicable to the answering respondent. Copy of Khatouni for the year of 2010-11 & 2011-12 is annexed here as **Annexure A-1**.

12. That in the original application, the applicants had not raised any issue regarding applicability of the said siting criteria. The attempt to rely upon the said guidelines at the stage of execution is therefore an afterthought and beyond the scope of the present proceedings.
13. That the applicants have placed reliance on a Show Cause Notice dated 02.06.2023. The issuance of a show cause notice is part of the regulatory process and does not by itself establish violation. The answering respondent has duly responded to the said notice and complied with the requirements of the authority.
14. That the allegations regarding expansion of the unit beyond the permitted area, based on satellite imagery are denied. It is submitted that such unverified material cannot be relied upon to establish illegality, particularly in the absence of any conclusive finding by the competent authority.
15. That the allegations regarding violation of CPCB guidelines relating to distance from residential areas and water bodies are also denied. The location of the unit has been examined by the competent authority

at the time of grant of consent to operate and no adverse finding has been recorded in this regard.

16. That the alleged incident dated 16.02.2025 relating to discharge of wastewater is denied. No official finding or adjudication has established the same. Similarly, representations dated 22.07.2025 and communication dated 05.08.2024 merely reflect complaints and do not establish any violation in accordance with law.
17. That the applicants are attempting to prosecute the answering respondent for alleged non-compliance of this Hon'ble Tribunal's order. However, in the present case, the record itself demonstrates that inspections have been conducted, directions have been issued and compliance has been undertaken and no wilful and deliberate disobedience of the order of the Tribunal has taken place.
18. That the present execution application is based on perceived inadequacy of compliance and on disputed and incorrect facts, and does not disclose any wilful non-compliance. The same is therefore liable to be dismissed.

In view of the above facts it is most respectfully prayed that this Hon'ble Tribunal may be pleased to take the present reply on record and dismiss the present execution application as being devoid of merit, as the directions passed by the Hon'ble Tribunal in Original Application No. 158 of 2025 have been duly complied by the answering respondent.

The answering respondent undertakes to comply with any further directions issued by this Hon'ble Tribunal in letter and spirit.

Baljeet Singh

RESPONDENT NO.7

THROUGH

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ROOPANSH PUROHIT & NARAYANI SEPAHA

Advocates for the respondent No. 7

I-5, 4th Floor, Jangpura Extension,

New Delhi - 110014

Mobile No.: 98104 40322

Email Id.: contactrpalegal@gmail.com

Place: New Delhi

Dated: 06.04.2026

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AFFIDAVIT

I, Baljeet Singh, aged 47 years, S/o Sh. Ombir Singh AR of R/o M/s Baljeet Poultry Research and Breeding Farm Dharan, Kharkri Makhwan Dharan Road, (Tosham) Tehsil Tosham District Bhiwani-127040, do hereby solemnly affirm and declare as under:-

That I am the respondent no. 7 in the aforesaid matter. I am well conversant with the facts and circumstances of the present case. Hence, I am competent to swear this affidavit.

2. That the accompanying reply has been drafted under my instructions by my counsel and the contents of the same are true and correct to my knowledge, save legal averments, which are based on the legal advice received and believed to be true. The contents of the accompanying reply may be read as part and parcel of the present Affidavit as the same are not being repeated herein for the sake of brevity.



Baljeet Singh

DEPONENT

VERIFICATION

Verified at Bhiwani on this ___ day of April, 2026 that the contents of the above affidavit are true and correct to my knowledge. No part of this Affidavit is false and no material facts have been concealed therefrom.

Baljeet Singh

DEPONENT



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6/4/2026

Certified that the above was declared on oath /affirmation on this *06 April* day *2026* 200...at *Tokern* in the district of *Bhiwani* by *Baljeet Singh* who is identified by *Self* of *Kharkani, Harkwan*. Certified further the affidavit document has been read over and explained to the the declarant who seemed perfectly to understand the same at the time of making thereof.

[Signature]
NOTARY TOSHAM (P.H. 11)
(PRABHU RAM ADVOCATE)

06/4/2026

GOVT. OF INDIA

क्र.सं.	रदायी (संक्षेप में जमाद्वारे संख्या के साथ लिखा हुआ)	कृषक तथा लगान (संक्षेप में खलीनी के साथ लिखा हुआ)	क्षेत्र	विशेषी जमाद्वारे के अनुसार गाँवों का वरीककरण	वर्ष 20			वर्ष 20			वर्ष 20			अन्य	अन्य	अन्य	अन्य	अन्य
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20/12/20
26/10/2020



RPA LEGAL <contactrpalegal@gmail.com>

REPLY ON BEHALF OF RESPONDENT NO. 7 IN EXECUTION APPLICATION NO. 87/2025

1 message

RPA LEGAL <contactrpalegal@gmail.com>

Wed, Apr 15, 2026 at 8:30 PM

To: Tarun kamra <cummra3@gmail.com>, rkhranalegal@gmail.com

Mr. Tarun Cummra, Advocate for Applicants

C 143, Lajpat Nagar- II, New Delhi-110024

Mobile No. 8287474556

E-mail: cummra3@gmail.com**MR. Rahul Khurana)****Advocate for respondents****Off: A-174A 2 ndFloor, Defence Colony , New Delhi-24****Mobile No. 9811894060****e-mail: rkhranalegal@gmail.com**

Dear Sir,s

PFA COPY OF REPLY ON BEHALF OF RESPONDENT NO. 7 IN EXECUTION APPLICATION NO.
87/2025**ROOPANSH PUROHIT & ASSOCIATES****ADVOCATES FOR R-7**I-5, 3RD Floor, Jangpura Extension, New Delhi – 110014Telefax: 011-45152223; E-mail: contactrpalegal@gmail.com**Reply on behalf of respondent no.7 15.pdf**

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