

943

BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

OA NO. 88 OF 2025

IN THE MATTER OF:

Devidas Khatri

..Applicant

Versus

MoEF&CC & Ors.

.....Respondent(s)

INDEX

S.No.	Particulars	Page Nos.
1.	Reply under affidavit on behalf of Respondent No. 4, Rajasthan State Pollution Control Board ("RSPCB").	1-6
2.	<u>Annexure-R1:</u> True copy of a list detailing operational e-waste recycling and refurbishing units, along with particulars regarding facilities, inspections conducted, and pollution control mechanisms in place.	7-8

Rajasthan State Pollution Control Board

Through its Counsel

Nishant Awana/Ekta Kundu
FOR NMA Law Chambers

Advocates

A-320, First Floor, Defence Colony, New Delhi-110024

Ph- 011-35550654, +91-7838760760

mail@nmalawchambers.in/nishantawana@outlook.com

Date: 30.06.2025

Place: New Del

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

OA NO. 88 OF 2025

IN THE MATTER OF:

Devidas Khatri

...Applicant

Versus

MoEF&CC & Ors.

....Respondent(s)

**AFFIDAVIT ON BEHALF OF RESPONDENT NO. 4- RAJASTHAN
STATE POLLUTION CONTROL BOARD ("RSPCB")**

(In compliance with the order dated 03.03.2025)

I, Arvind Kumar Agarwal, S/o Sh. B.R.Agarwal, working as Group Incharge (E-Waste) in Rajasthan State Pollution Control Board, having office at 4, Institutional Area, Jhalana Doongri, Jaipur, Rajasthan – 302004, do hereby solemnly affirm and state as under:

1. That I am the authorized officer of the Respondent No. 4 and am fully conversant with the facts and circumstances of the present case and am competent to swear this affidavit.

The present reply under affidavit is being filed in compliance with the direction issued by the Hon'ble Tribunal vide order dated 03.03.2025 in O.A. No. 88/2025, whereby the Respondents No. 2 to 6 were directed to file a reply under affidavit including the comprehensive report indicating the inspection status of e-waste recycling units, the infrastructure available therein, and whether any physical verification was undertaken prior to their registration.

ATTESTED
NOTARY PUBLIC JAIPUR
(RAJ) INDIA

24 JUN 2025

Arvind Kumar Agarwal
Senior Environmental Engineer
Rajasthan State Pollution Control Board, Jaipur

3. It is respectfully submitted that as per the E-Waste (Management) Rules, 2022, the Rajasthan State Pollution Control Board (RSPCB) is empowered and mandated to issue the following to e-waste processing units within the State:

- I. Consent to Establish (CTE) and Consent to Operate (CTO) under the provisions of the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981;
 - II. Authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
4. In accordance with the established procedure, RSPCB, prior to granting CTO and Authorization, invariably conducts physical inspections of all e-waste processing units to verify the adequacy and functioning of pollution control devices, the presence and operational capacity of plant and machinery, site compliance with siting norms, and general environmental safeguards.
5. As per the E-Waste (Management) Rules, 2022, the responsibility for granting Extended Producer Responsibility (EPR) registration rests solely with the Central Pollution Control Board (CPCB), which manages a centralized portal for this purpose. RSPCB has no control over the approval or rejection process of EPR registration, although the possession of valid CTO and Authorization issued by RSPCB is a mandatory prerequisite for applicants seeking registration on the CPCB portal.

6. It is submitted that CPCB has issued detailed Standard Operating Procedures (SOPs) for the registration and verification of e-waste

ATTESTED
NOTARY PUBLIC JAIPUR 2,
(RAJ) INDIA
24 JUN 2025


Arvind Kumar Agrawal
Senior Environmental Engineer
Rajasthan State Pollution Control Board, Jaipur

recyclers under the E-Waste (Management) Rules, 2022. RSPCB scrupulously follows these SOPs and ensures strict compliance while evaluating applications for Consent and Authorization.

3

7. In furtherance of its regulatory mandate RSPCB has proactively monitored and enforced environmental compliance among e-waste processing units within Rajasthan. A list detailing operational e-waste recycling and refurbishing units, along with particulars regarding facilities, inspections conducted, and pollution control mechanisms in place, is annexed herewith and marked as **Annexure R-1**.
8. In line with its commitment to strengthening e-waste management in the State, RSPCB is committed to strengthening e-waste management in the State and has adopted both regulatory and outreach measures to ensure sustainable and lawful disposal of e-waste, prevention of informal sector activity, and public awareness.
9. It is respectfully submitted that paragraphs 4.1 to 4.3 of the Original Application relate to the guidelines and notifications issued by the Central Pollution Control Board (CPCB), the applicability of the E-Waste Rules, and the functioning of the CPCB-managed EPR portal, no specific comments are warranted from RSPCB on those aspects.
10. With respect to the averments in paragraph 4.4, it is submitted that the issuance of Consent to Operate (CTO) and Authorization to e-waste processing units by RSPCB is undertaken only after a detailed site inspection, which assesses the installation of plant and machinery and

24 JUN 2025

ATTESTED
NOTARY PUBLIC JAIPUR
(RAJ) INDIA

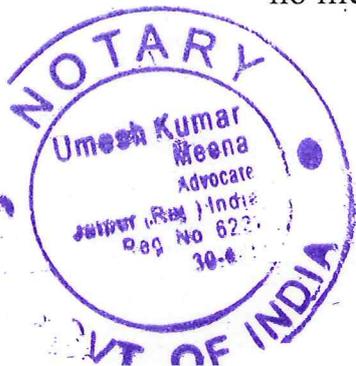
Arvind Kumar Agrawal
Senior Environmental Engineer
Rajasthan State Pollution Control Board, Jaipur

the adequacy of pollution ~~control~~ ⁹⁴⁷ devices. This ensures that only environmentally compliant units are granted approvals. It is reiterated that the online registration process through CPCB's portal is managed solely by CPCB, and any decisions pertaining to EPR registration fall exclusively within its domain.

4

11. In response to the content of paragraph 4.5, RSPCB abides by the Standard Operating Procedures (SOPs) issued by CPCB while processing applications for consent. Compliance with these SOPs is verified during physical inspections, and consent is granted only to those units that meet the prescribed requirements.

12. In response to paragraph 4.6, RSPCB states that it has undertaken multiple proactive measures. The Board, in collaboration with EPTRI, Hyderabad, conducted a detailed inventorization of e-waste in Rajasthan, which was launched on 02.02.2024. This inventorization covered 21 categories under the 2016 Rules and is publicly accessible. An updated inventorization process as per the 2022 Rules, covering 106 categories, is currently underway. It is submitted that the issuance of Consent to Operate (CTO) and Authorization to e-waste processing units by RSPCB is undertaken only after a detailed site inspection, which assesses the installation of plant and machinery and the adequacy of pollution control devices. RSPCB has also directed its field offices to conduct surprise inspections of suspected informal e-waste handlers, and no illegal activities have been reported to date.



24 JUN 2024
ATTESTED
NOTARY PUBLIC JAIPUR
(RAJ.) INDIA

Arvind Kumar Agrawal
Senior Environmental Engineer
Rajasthan State Pollution Control Board, Jaipur

948
Furthermore, RSPCB launched E-Waste Awareness and Collection Drive 2025 across nine major cities beginning June 5, 2025. As of June 19, a total of 51.04 tonnes of e-waste has been collected.

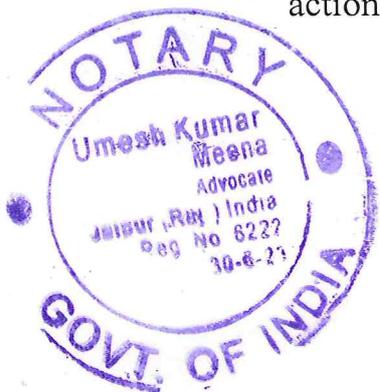
5

13.Regarding paragraph 4.7, since it pertains exclusively to the EPR registration process governed by CPCB, RSPCB does not offer any comment. Similarly, paragraph 4.8 acknowledges CPCB's Environmental Compensation Guidelines dated 09.09.2024, and RSPCB affirms that appropriate enforcement actions will be initiated against defaulting units in accordance with said guidelines. Paragraph 4.9 relates to procedural history of a previously disposed OA and hence requires no response from RSPCB.

14.RSPCB has consistently acted in accordance with the provisions of the E-Waste Management Rules, 2022, as well as the Standard Operating Procedures and directions issued by the Central Pollution Control Board (CPCB).

15.Enforcement and inspection protocols are strictly followed by RSPCB, and wherever violations are identified, appropriate penal action is initiated in accordance with law.

16.Units found operating without adequate pollution control measures are either denied consent or directed to rectify the deficiencies, failing which action is promptly taken under the relevant legal provisions.



24 JUN 2025
ATTESTED
NOTARY PUBLIC JAIPUR 5.
(RAJ.) INDIA

Arvind Kumar Agrawal
Senior Environmental Engineer
Rajasthan State Pollution Control Board, Jaipur

17. The present reply under affidavit has been prepared in compliance with the directions of the Hon'ble Tribunal and places on record the factual position, regulatory steps undertaken, and the ongoing efforts by the Rajasthan State Pollution Control Board in the matter of e-waste management within the State. The contents herein are true and correct to the best of my knowledge and are submitted for the kind consideration of this Hon'ble Tribunal.


 DEPONENT
 Arvind Agrawal
 Senior Environmental Engineer
 Rajasthan State Pollution Control Board, Jaipur

VARIFICATION:

I, the deponent above named do hereby verify that the contents of my present affidavit are true and correct to my knowledge & belief, information on basis of records maintained by the certificate holder bank and legal advice received and believed to be true. No part of it is false and nothing material has been concealed therefrom

Verified at ..**Rajasthan**...on this the 27 day of June, 2025.

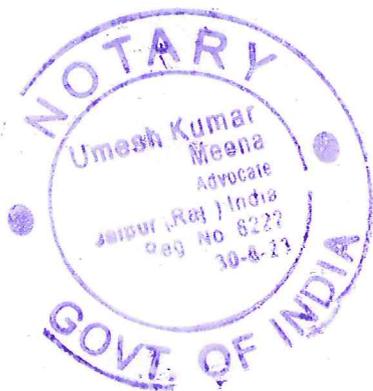

 DEPONENT
 Arvind Agrawal
 Senior Environmental Engineer
 Rajasthan State Pollution Control Board, Jaipur

Rajasthan State Pollution Control Board

Through its Counsel


 Nishant Awana/Ekta Kundu
 FOR NMA Law Chambers
 Advocates

A-320, First Floor, Defence Colony, New Delhi-110024
 Ph- 011-35550654, +91-7838760760
mail@nmalawchambers.in/nishantawana@outlook.com



ATTESTED

 NOTARY PUBLIC JAIPUR
 (RAJ) INDIA
 24 JUN 2025

Date: 30.06 .2025

Place: New Delhi

List of E-waste Refurbishers/Recyclers Authorised by RSPCB

Annexure-R1

Sr.No.	Name of unit	Address of unit	Activity	Status of Consent	Inspection date	Major facility available	Major Pollution control measures
1	M/s Shukla E-waste Processor	H-309 (B), RIICO Industrial area, Bhiwadi	Recycling	Valid	16.03.2021 & 08.11.2022	Dismantling table, Shredder, furnace etc.	Suction hood, Dust collector, Wet scrubber, adequate stack height etc
2	M/s GS International	Plot no. G1-101, Shri Khatushyam Ji Ind. Complex, Sri Madhopur Ringus, Sikar 332404	Dismantling & Refurbishing	Valid	25.01.2022 & 18.01.2024	Dismantling table, De dusting system etc.	Suction hood, Dust collector, adequate stack height etc.
3	M/s Adatte E-Waste Management Pvt. Ltd.	F-120, Industrial Area, Karoli, Tapukara Extension, Tehsil: Tijara District: Alwar	Recycling & Dismantling	Valid	08.09.2020 & 12.06.2023	Dismantling table, Shredder, PCB dismantling, furnace etc.	Dust collector, Suction hood, bag house, cyclone, wet scrubber, Adequate stack height etc.
4	M/s. Urban Metals	E-2118, Ramchandrapura RIICO Industrial area, Sitapura, Tehsil: Sanganer, District-Jaipur	Dismantling and Recycling	Valid	12.02.2021 & 21.10.2021	Dismantling table, shredder, separator, furnace etc.	Dust collector, Suction hood, cyclone, Bag house and Adequate stack height etc.
5	M/s Etc E-waste Recycler Private Ltd.	SB- 23, Shilp Bari, Road No. 14-15, VKI Area, Jaipur	Dismantling, Recycling & Refurbishing	Previous CTO was valid upto 30.04.2024 & CTO renewal is under consideration	03.03.2025 & 22.05.2025	Dismantling table, shredder, separator, furnace etc.	Dust collector, Suction hood, bag house, cyclone, wet scrubber, Adequate stack height etc.
6	M/s H.M.E-waste Management	G1-226, RIICO Ind. Area, Kehrani Bhiwadi (Extn.) Tijara Distt- Alwar	Refurbishing & Recycling	Valid	28.06.2021 & 09.11.2023	Dismantling table, Shredder, separator, Furnace etc.	Dust collector, Suction hood, bag house, wet scrubber, Adequate stack height etc
7	M/s Abaad Developers Private Limited, A-294, Okhla Industrial Area, First Floor, Part-1, Delhi 110020 (G1-747 RIICO Ind. Area, Chopanki Bhiwadi, Teh.- Tijara, Alwar)	G1-747 RIICO Ind. Area, Chopanki Bhiwadi, Teh.- Tijara, Alwar	Recycling & Refurbishing	Valid	29.10.2021	Dismantling table, Shredder, furnace etc.	Dust collector, suction hood, bag house, wet scrubber, Adequate stack height etc.
8	M/s Golden Green Recyclers	G1-11, S.K.S. Industrial Area, Ringus, Sri Madhopur Ringus, Sikar 332404	Dismantling, Recycling & Refurbishing	Valid	16.03.2022 & 01.01.2024	Dismantling table, Shredder, furnace etc.	Dust collector, suction hood, adequate stack height etc.
9	M/s Green Web Recycling	H1-865, Industrial Area, Manda-II, Chomu, Jaipur 303702	Dismantling & Refurbishing	Valid	24.02.2022	Dismantling table, De dusting system etc.	Suction hood, Dust collector, adequate stack height etc.


Arvind Kumar Agrawal
 Senior Environmental Engineer
 Rajasthan State Pollution Control Board, Jaipur

10	M/s Eraw Waste Management LLP	Plot no E-44, RIICO Industrial Area, Sarekhurd, Tijara, Alwar	Dismantling & Refurbishing	Valid	15.03.2022	Dismantling table, De dusting system etc.	Suction hood, Dust collector,adequate stack height etc.
11	M/s Greenlet Recyclers Private Limited,	Plot No G-15-G, Sotanala Industrial Area, Behror, Tehsil- Behror, District- Alwar	Dismantling & Refurbishing	Valid	20.07.2022	Dismantling table, De dusting system etc.	Suction hood, Dust collector,adequate stack height etc.
12	M/s Go Green Management LLP	G1-612N, Khushkhera RIICO Ind, Area Bhiwadi, Alwar	Recycling	Valid	11.01.2023 & 11.04.2023	Dismantling table, Shredder, de-dusting System, furnace etc.	Suction hood, cyclone, Dust collector,wet scrubber, adequate stack height etc.
13	M/s Marss Recycler Private Limited	G-5 Industrial Area Manda, Tehsil-Chomu (26 E-168 Near Meena Krishi Farm Murlipura Scheme Jaipur- 302039	Dismantling & Refurbishing	Valid	05.08.2022	Dismantling table, De dusting system etc.	Suction hood, dust collector,adequate stack height etc.
14	M/s The Global Metalists	J-176, RIICO, Growth Center, RIICO Industrial Area, Dholpur	Dismantling & Refurbishing	Valid	18.11.2022	Dismantling table, De dusting system etc.	Suction hood, dust collector,adequate stack height etc.
15	M/s Ramdass Trading Company	G1-177-C, RIICO Industrial Area, MIA, Tehsil-Ramgarh, Distt.-Alwar	Recycling	Valid	22.09.2023	Dismantling table, Shredder, furnace etc.	Suction hood, dust collector,wet scrubber,Adequate stack height etc.
16	M/s SAS Tech E-waste Recycling Solutions	Plot no G-286, Road no 1, RIICO Industrial Area, Ratangarh, Churu	Recycling & Refurbishing	Valid	13.12.2023	Dismantling table, de-dusting system, shredder, separator, furnace etc.	Dust collector, Suction hood,cyclone, Adequate stack height etc.
17	M/s Greenscape Eco Management Pvt. Ltd.	Plot no. 203, 203A, MIA Alwar, Tehsil - Ramgarh & Distt.- Alwar (Rajasthan)	Dismantling/Recycling & Refurbishing	Valid	10.09.2024 & 07.11.2024	Dismantling table, shredder, furnace etc.	Dust collector, Suction hood, wet scrubber, adequate stack height etc.
18	M/s Tanwar Traders,	Plot no F-1294(E), Industrial Area, Teh.Tijara, Bhiwadi, Alwar	Recycling	Valid	27.12.2022 & 21.05.2024	Dismantling table, Shredder, furnace etc.	Suction hood,wet scrubber,Adequate stack height etc.
19	M/s S S Enviro Care	E 216B, Sama Dungar Industrial Area, Jhotawara Extension, Jaipur,	Recycling	Valid	27.02.2025 & 04.04.2025	Dismantling table, Shredder, furnace etc.	Dust collector,suction hood, wet scrubber and Adequate stack height etc

951

8

Arvind Kumar Agrawal
Senior Environmental Engineer
State Pollution Control Board, Jaipur