

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 616 OF 2019
WRIT PETITION (PIL) NO. 114 OF 2018**

IN THE MATTER OF:

Ramdevbhai Samatbhai Sanjva

... Applicant

Versus

State of Gujarat & Ors.

....Respondents.

**SUR REJOINDER/ REPLY BY WAY OF AFFIDAVIT FOR
AND ON BEHALF OF RESPONDENT NO. 7 TO
REJOINDER OBJECTIONS TO THE COMPLIANCE
REPORT OF THE JOINT COMMITTEE REPORT FILED
BY THE APPLICANT**

[ADVOCATE FOR THE RESPONDENT NO.7, DHARITA MALKAN]

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THE APPLICANT**

I Dipakkumar Balvantray Bhatt S/o Balvantray J Bhatt, aged about 56 years holding the post of Office Manager, Jetpur Dyeing And Printing Association, Respondent no. 7 herein having office at Kanakia Plot, Jetpur, Rajkot, Gujarat – 360370 do hereby solemnly affirm and state as under:

1. That I am working and holding the post of Office Manager in the Office of Jetpur Dyeing and Printing Association (hereinafter the Answering Respondent no. 7) and as such in my official capacity I am well acquainted with the facts and circumstances of the present case and therefore, competent to swear the present Affidavit.
2. I have read the contents of the Rejoinder/ Objection filed by the Applicant dated 07.04.2025 to the Compliance Report dated 05.11.2020



Dipakumar

(inadvertently mentioned as 23.11.2020) of the Joint Committee and I say that the contents therein to the extent they are inconsistent with submissions made by the Respondent no. 7 in the Reply / Counter Affidavit dated 10.12.2024. Unless any averment or contention is specifically admitted or traversed, the same may be treated as denied. The Answering Respondent no. 7 is filing present Sur Rejoinder / Reply by way of Affidavit traversing the contentions and allegations that are material and relevant at the present and seeks the liberty of this Hon'ble Tribunal to file additional or detailed Affidavit as and when directed by this Hon'ble Tribunal.

3. It is respectfully submitted that Respondent no. 7 has always been conscious and forthcoming with respect to the protection of environment and prevention of water pollution and ensure that no harm is caused to the River Bhadar on account of the dyeing and printing industry in Jetpur. The Respondent no. 7 vide Reply / Counter Affidavit dated 10.12.2024 has placed on record before this Hon'ble Tribunal the remedial steps and measures that have been taken by the Respondent no. 7 to ensure no pollution is cause on account of the Respondent no. 7. The Respondent no. 7 has also placed on record that it has complied to the letter and spirit with the recommendations and suggestions made in the Compliance Report dated 05.11.2020. The Respondent no. 7 has also placed on record Bhadar River Water Quality Data from January 2019 till July 2024 before this Hon'ble Tribunal which shows that pollution load in the river Bhadar has decreased significantly. The



Jaj Aziz

tabular chart of the Bhadar River Water Quality Data from July 2024 till August 2025 is annexed hereto and marked as **Annexure – R1**.

4. It is further submitted that the Respondent no. 7 has fully implemented the suggestion of this Hon'ble Tribunal and GPCB to relocate the collection sump and pump house and to remove the open 'C' type channel. The problems of overflow of 'C' type open channel carrying industrial effluent along with overloaded domestic sewage have been completely solved by Respondent no. 7 through implementation of mode of effluent conveyance and transfer to CETP. Because of this full proof mechanism developed by Answering Respondent no. 7, now there is no effluent water of the member units being discharged in the River Bhadar and this system is being monitored by GPCB on regular basis. Even the joint inspection team of CPCB and GPCB have taken the visit at Jetpur and have seen the action taken by the Answering Respondent no. 7.



It is respectfully submitted that on account of the aforesaid actions being taken by the Answering Respondent no. 7, now whatever sewage or effluent which may be discharged into the river, it is not of any member units of Answering Respondent no. 7 and may be from the other sources of effluent coming into river over which the Answering Respondent no. 7 does not have any control. It is respectfully submitted that photographs being relied upon by the Applicant in the Rejoinder dated 07.04.2025 does not show the true and correct picture of the

D. S. Shah

situation on the ground, and the latest photographs are being annexed herein and marked as **Annexure – R2**.

- 6. It is respectfully submitted that the Respondent no. 7 has to the best of its ability placed qualitative facts within the knowledge of the Respondent no. 7, however, in case any aspect has been left out inadvertently on account of oversight, the Respondent no. 7 craves the leave of this Hon'ble Tribunal to file further reply.



Solemnly affirmed at Jetpur on this 4th day of September, 2025.

Dnshtar
Deponent

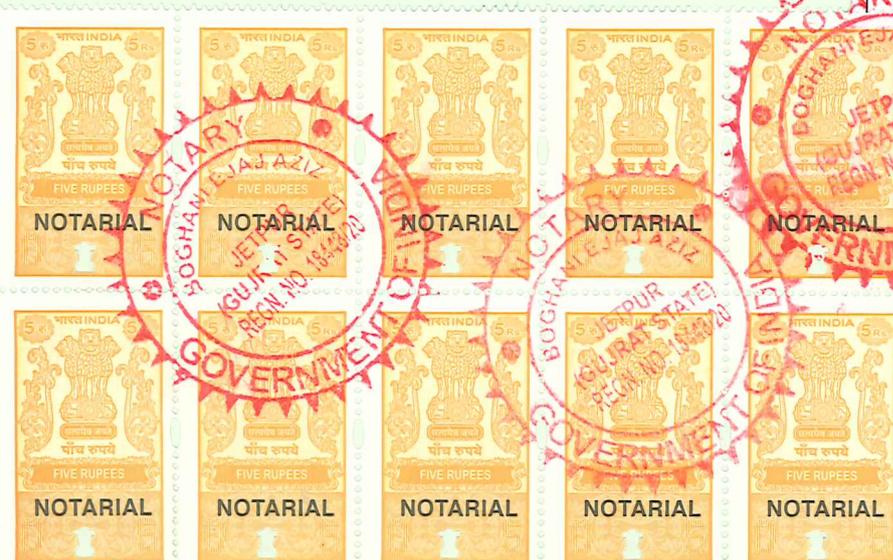
Verification

Verified at Jetpur on this 4th day of September, 2025 that the contents of the present Affidavit are correct to the best of information, knowledge and belief, no part of it is false and nothing material has been concealed there from.

Book No. 11/2025
 Page No. 18
 Serial No. 4216
 Date 4/9/25



Dnshtar
Deponent



Solemnly Affirmed Before me by Dipankar Kumar Bhatnagar, Shakti
 who is identified by Self
 Whom I know personally

[Signature]
BOGHANI EJAJ AZIZ
NOTARY
GOVT. OF INDIA
4/9/2025



भारत सरकार



आधार

ભારત સરકાર
Government of India

ભારતીય વિશિષ્ટ ઓળખ પ્રાધિકરણ
Unique Identification Authority of India

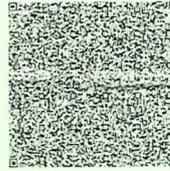
નામાંકન ક્રમ સંખ્યા / Enrollment No.: 2715/54317/02119

To
ભટ્ટ દીપકકુમાર બળવંતરાય
Bhatt Dipakkumar Balvantray
aashapura,
juna panchapipala road,
opp. prajapati samaj ni wadi,
VTC: Jetpur, PO: Jetpur,
Sub District: Jetpur, District: Rajkot,
State: Gujarat,
PIN Code: 360370,
Mobile: 9408504108

87430015



KC874300154FL

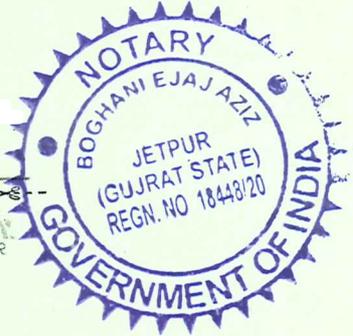


આપનો આધાર નંબર / Your Aadhaar No. :

મારો આધાર, મારી ઓળખ



ભારત સરકાર
Government of India



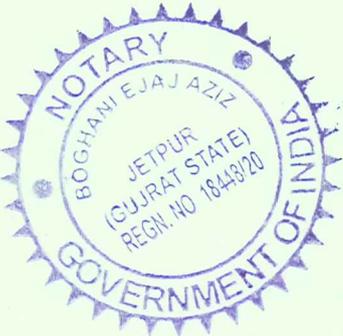
Aadhaar no. issued: 17/06/2013



ભટ્ટ દીપકકુમાર બળવંતરાય
Bhatt Dipakkumar Balvantray
જન્મ તારીખ / DOB: 15/04/1969
પુરુષ / Male

આધાર એ ઓળખનો પુરાવો છે, નાગરિકતા અથવા જન્મ તારીખનો નહીં.
તેનો ઉપયોગ માત્ર વહીવટી લ્યોનલાઇન પ્રમાણીકરણ અથવા ક્યુઆર
કોડ/ઓફલાઇન એકસમેમએલનું સ્કેનિંગ સાથે જ થવો જોઈએ.
Aadhaar is proof of identity, not of citizenship
or date of birth. It should be used with verification (online
authentication, or scanning of QR code / offline XML).

મારો આધાર, મારી ઓળખ



Dnsht

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01/04/2024	400	2.3	0.138	315	1940	12	80.16	4.3	<2	0.046	97.28	BDL	0.096	0.154	7.80	0.052	0.23	40.9	4	124	600	<2	1126	2.24
01/10/2024	615	2.1	0.122	273	1843	8	72.14	4.6	<2	0.254	85.12	-	0.097	0.176	7.48	0.0860	0.20	130	6	101	530	<2	1086	1.68

5. Bhadar

(A)

Progress/Status Report of the River/PRS water quality monitoring for the Month February -2025:

Sr. No.	Month/ Date	Location ID	Name of Location	Parameter					
				pH	DO (mg/l)	BOD (mg/l)	COD (mg/l)	Fecal coliform (MPN/100ml)	Total coliform (MPN/100 ml)
1	June-2021	31211	Dublipat	8.26	BDL	18	54.37	150	540
2	July-2021	31211	Dublipat	8.23	BDL	22	72	220	540
3	August-2021	31211	Dublipat	7.87	BDL	6	29.6	210	540
4	Sept-2021	31211	Dublipat	7.45	6	2.6	18.38	170	540
5	October-2021	31211	Dublipat	7.59	6.2	2.3	8	110	350
6	Nov-2021	31211	Dublipat	7.86	5.9	2.4	10.4	140	350
7	Dec-2021	31211	Dublipat	8.38	BDL	14	55	150	350
8	January-2022	31211	Dublipat	8.02	BDL	9	34	140	350
9	February-2022	31211	Dublipat	8.50	BDL	21	62	170	350
10	March-2022	31211	Dublipat	8.18	BDL	69	202	350	920
11	April-2022	31211	Dublipat	8.26	BDL	39	128	350	920
12	May-2022	31211	Dublipat	7.91	4.1	25.45	147	540	920

13	June-2022	31211	Dublipat	7.67	3.1	7.75	42.14	350	920
14	July-2022	31211	Dublipat	7.98	5.8	2.4	14.15	280	920
15	August-2022	31211	Dublipat	7.61	2.0	13	39.60	220	920
16	Sept-2022	31211	Dublipat	6.79	6.1	2.2	10.67	240	920
17	October-2022	31211	Dublipat	8.10	4.8	4.0	21.20	170	540
18	Nov-2022	31211	Dublipat	8.42	5.5	2.5	15.05	140	540
19	Dec-2022	31211	Dublipat	8.05	BDL	32	92	110	350
20	January-2023	31211	Dublipat	8.37	BDL	25	77	94	280
21	February-2023	31211	Dublipat	8.42	BDL	20	74	79	240
22	March-2023	31211	Dublipat	8.06	BDL	29	85	70	220
23	April-2023	31211	Dublipat	8.40	BDL	45	129	79	280
24	May-2023	31211	Dublipat	8.22	BDL	22.7	149	70	220
25	June-2023	31211	Dublipat	There was no flow observed in Bhadar river at the upstream of the said location					
26	July-2023	31211	Dublipat	7.18	6.2	2.2	14.01	13	49
27	August-2023	31211	Dublipat	7.54	6.5	2.1	8.91	6.8	21
28	Sept-2023	31211	Dublipat	5.5	7.17	5.8	26.71	22	4.5
29	October-2023	31211	Dublipat	7.59	2.5	14	47.39	14	47
30	Nov-2023	31211	Dublipat	8.14	5.5	7	27.52	33	140
31	Dec-2023	31211	Dublipat	7.54	2.7	12	41	34	170
32	January-2024	31211	Dublipat	8.09	BDL	28	115	70	170
33	February-2024	31211	Dublipat	7.94	BDL	25	78	49	140
34	March – 2024	31211	Dublipat	8.24	BDL	28	86	46	110
35	April – 2024	31211	Dublipat	8.18	BDL	27	83	140	39
36	May – 2024	31211	Dublipat	During inspection on dated 01/05/2024, at this sampling location there is no live flow observed in river Bhadar, only stagnant ponding is observed; hence, water sample from this					

				location could not be collected.					
37	June – 2024	31211	Dublipat	During inspection on dated 01/06/2024, at this sampling location there is no live flow observed in river Bhadar, only stagnant ponding is observed; hence, water sample from this location could not be collected.					
38	July – 2024	31211	Dublipat	8.10	6.5	1.9	17	<1.8	<1.8
39	August – 2024	31211	Dublipat	8.22	6.4	2.1	18.36	14	47
40	Sept – 2024	31211	Dublipat	7.48	6.5	2.0	17.0	< 1.8	2
41	Oct – 2024	31211	Dublipat	7.52	6.4	2.3	19.55	17	474
42	Nov- 2024	31211	Dublipat	7.33	6.7	1.9	29.40	11	34
43	Dec-2024	31211	Dublipat	7.88	6.5	1.9	12.38	13	33
44	January-2025	31211	Dublipat	8.07	0.8	11	42.63	17	47
45	February-2025	31211	Dublipat	7.40	BDL	18	68	20	49

(B)

Progress /Status Report for Ground water quality monitoring pertaining to PRS River:

Location	Sampling date	BOD	COD	TDS	pH
Bore well of P. K. Patel	03/02/2025	1.1	9.17	592	7.28

(C)

Drains Details with Flow:

Sr. No.	Location (Latitude and longitude)	Discharge (MLD)	
		Max	Min
1	Opp. Bhadar Stone Crusher	1.5	0.2
2	Sarang Nallah	00	00
3	Behind Gondra area	02	01
4	Behind Kabrastan	1.5	0.5
5	Near railway bridge	00	00
6	Maghedi Vokda	00	00

(D)
STP & CETP results.

Sr. No.	Name of STP/CETP	Discharge Norms		February-2025 Results	
1	CETP of Jetpur Dyeing & Printing Association (PCB ID-19722)	DO (mg/l)	--	DO (mg/l)	--
		pH	6.5 to 9	pH	7.0
		BOD (mg/l)	100	BOD (mg/l)	225
		COD (mg/l)	250	COD (mg/l)	791
		Total coliform (MPN/100ml)	-	Total coliform (MPN/100ml)	--
		Fecal coliform (MPN/100 ml)	-	Fecal coliform (MPN/100 ml)	--
2	CETP of Shri Dhareshwar GIDC Vistar Association (PCB ID-20111)	DO (mg/l)	--	CETP Dhareshwar has obtained permission regarding industrial units associated with CETP of Dhareshwar allowed for change in mode of disposal of wastewater from member industrial units located in GIDC Dhareshwar area in to CETP of JDPA vide letter dated 04/12/2023.	
		pH	6.5 to 9		
		BOD (mg/l)	30		
		COD (mg/l)	100		
		Total coliform (MPN/100ml)	-		
		Fecal coliform (MPN/100 ml)	-		
3	STP of Jetpur Dyeing and Printing Association (PCB ID-39298).	DO (mg/l)	--	DO (mg/l)	--
		pH	6.5 to 9	pH	8.20
		BOD (mg/l)	100	BOD (mg/l)	61
		COD (mg/l)	250	COD (mg/l)	204
		Total coliform (MPN/100ml)	--	Total coliform (MPN/100ml)	14
		Fecal coliform (MPN/100 ml)	--	Fecal coliform (MPN/100 ml)	4









Ryan Singh <adv.singhryan@gmail.com>

Service of Sur Rejoinder/ Reply by way of Affidavit on behalf of Respondent no. 7 Jetpur Dyeing and Printing Association in OA No. 616 of 2019 pending before Hon'ble NGT

1 message

Ryan Singh <adv.singhryan@gmail.com>

Sat, Sep 6, 2025 at 8:22 PM

To: Dharamvir Sharma <dharam.advocate33@gmail.com>

Cc: np_jetpur@yahoo.co.in, collector-raj@gujarat.gov.in, chiefsecretary@gujarat.gov.in, chairman-gpcb@gujarat.gov.in

Bcc: Dharita Malkan <advocatedharitamalkan@gmail.com>

Dear Concern,

Kindly find attached the Sur Rejoinder/ Reply by way of Affidavit on behalf of Respondent no. 7 i.e., Jetpur Dyeing and Printing Association against the Rejoinder Objections filed by the Applicant to the Compliance Report of Joint Committee in the matter entitled "**Ramdevbhai Samatbhai Sanjva vs. State of Gujarat**" Original Application No. 616 of 2019 pending before the Hon'ble National Green Tribunal.

Regards

Ryan Singh

Advocate for Respondent no. 7

 **SUR REJOINDER JDPA.pdf**
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