

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 627 OF 2022**

IN THE MATTER OF:

PRAKASH YADAV

...APPLICANT

VERSUS

STATE OF HARYANA & Ors.

...RESPONDENTS

WRITTEN SUBMISSION ON BEHALF OF THE APPLICANT

MOST RESPECTFULLY SUBMITTED:

1. The present submission is filed in compliance with the verbal directions issued by this Hon'ble Tribunal during the hearing dated 11.12.2025 for submission of the reliefs sought by the Applicant. It is in continuation of the earlier pleadings highlighting **persistent environmental violations, including the operation of Sewage Treatment Plants (STPs) without valid Consent to Operate (CTO). Despite the matter being under active consideration of this Hon'ble Tribunal,** regulatory failure persists. Untreated or inadequately treated sewage continues to be discharged into the Masani Barrage and its connected channels, resulting in ongoing environmental degradation.
2. It stands admitted on record that industrial effluents are entering sewer systems, impairing STP functioning. Despite acknowledged violations, effective enforcement, and recovery of environmental compensation against non-compliant STPs and industries remain incomplete and unclear.
3. The absence of periodic drinking water testing and credible scientific assessment raises concerns regarding public health and groundwater safety.

PRAYER

In these circumstances, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- A. Direct State of Haryana to ensure immediate stoppage of discharge of untreated or partially treated sewage into the Masani Barrage and its connected channels;
- B. Direct the Haryana State Pollution Control Board (HSPCB) to ensure statutory compliance by all the STPs, including recovery of Environmental Compensation, prosecution where required, and filing of a time-bound compliance report;
- C. Direct the State of Haryana to frame and implement, within a fixed timeline, a comprehensive workable plan for reuse of treated sewage through supply to identified end users, thereby minimizing discharge and promoting resource recovery. Only excess treated sewage may please be allowed for disposal into the Sahibi River;
- D. Direct the State of Haryana to establish aptly planned and designed, fully functional Common Effluent Treatment Plants (CETPs) and strictly prohibit industrial effluent discharge into municipal sewer networks, under continuous oversight of the HSPCB;
- E. Direct the constitution of a Monitoring Committee for a period of five years to oversee the remediation of the Masani Barrage, drawing upon the experience and best practices adopted by the CPCB in similar cases, interstate river flow dynamics, and compliance with all directions passed by this Hon'ble Tribunal;
- F. Pass any further orders necessary to secure restoration of the affected environment and protection of public health.

AND FOR THIS ACT OF KINDNESS, THE APPLICANT AS IN DUTY BOUND SHALL EVER PRAY.

Place: Gurugram
Date: 20.02.2026

Filed by:



Sanjaya Kumar Mishra
Advocate for the Applicant
Contact No. 9818326647, 9310326647



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**Advance Service of Written Submission on behalf of Applicant in OA No. 627/2022
Prakash Yadav v. State of Haryana & Ors.**

1 message

S.K. Mishra, Advocate <sanjayakmishra@gmail.com>
To: rkhuranalegal@gmail.com

Mon, Feb 23, 2026 at 11:38 AM

Sir,

Please find attached the Written Submission on behalf of Applicant in OA No. 627/2022 Prakash Yadav v. State of Haryana & Ors.

Thanks and Regards,

Advocate Sanjaya K. Mishra **Mobile:** +91-98183 26647 **Email:** sanjayakmishra@gmail.com

 **Written Submission Reliefs Sought in OA 627 of 2022.pdf**
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