

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

OA 47/2024

In the matter of:

Gen Secretary Industrial Focal

Point Welfare Association

...Applicant

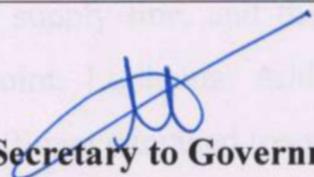
Versus

State of Punjab & Ors.

...Respondents

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Special Secretary to Government of Punjab

Department of Science, Technology and Environment

(On behalf of the State of Punjab)

Date: 24.07.2025

Place: Chandigarh

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**WRITTEN SUBMISSIONS ON BEHALF OF RESPONDENT NO.
1/STATE OF PUNJAB PURSUANT TO ORDER DATED 18.07.2025**

Most respectfully showeth:

1. The present case dealt with the allegation that industrial effluent is put in a well near the water supply line, and then into the main sewerage line near Focal Point, Ludhiana. Additionally, it was alleged that the overflowing effluent damaged trees in the area.
2. The respondent/State of Punjab has filed its reply in the matter stating that the Punjab Pollution Control Board ("PPCB") (arrayed as respondent no. 2) is the prescribed authority to enforce environmental laws in the State of Punjab, and the reply filed by PPCB shall be adopted by the State of Punjab.
3. That this Hon'ble Tribunal was pleased to appoint an Ld. Amicus Curiae in the matter vide order dated 10.07.2024 and several filings have been made by the Ld. Amicus Curiae and other parties.



4. The position that emerges from the said filings is that of the 49 existing industries in the area, only 9 generate effluent, as stated by the PPCB in paragraph 4 of its reply dated 09.08.2024 (pages 33-36 of the judicial record). The said reply further stated, in paragraph 5, that no industrial unit is discharging industrial waste water into the sewer line except domestic sewage.
5. That Municipal Council, Khanna, in paragraph 1 of its reply dated nil (affidavit affirmed on 16.12.2024) (pages 425-431 of the judicial record), has relied on a letter dated 02.12.2024 (pages 432-433 of the judicial record) to state that the work of desilting/cleaning of existing sewer lines and 250 mm i/d DIK9 rising main in various streets in and around Focal Point, Khanna Town, Ludhiana is 100% complete.
6. The PPCB in paragraph 4 of its reply dated 13.12.2024 (pages 442-444 of the judicial record) stated that the site in question was visited by their officer on 04.12.2024 and the stagnation caused earlier had also been removed and 100% work of desilting of sewer line and cleaning of intermediate pumping station has been completed. In paragraph 5 of the same reply, the PPCB further sampled the effluent in November 2024 from STP Khanna (29 MLD capacity), and the water analysis report showed that the sample was within prescribed standards.
7. The Ld. Amicus Curiae, in his submissions dated 04.03.2025 (pages 470 – 479 of the judicial record) has detailed his inspection of the site and relevant industries and clearly stated, at the end of paragraph 3, that *“domestic sewer lines were not in close proximity with the*



storage tanks and no trace was found of trade effluent being discharged in the sewer connection."

8. The applicant, in its rejoinder submission (page 826 of the judicial record), has further stated that "*there is no overflow of sewer effluent on the grounds*" and they are "*fully satisfied by the action taken by Municipal Council Khanna*".
9. In light of the above, the answering respondent respectfully submits that the present OA be disposed off.


**Special Secretary to Government of Punjab
Department of Science, Technology and Environment
(On behalf of the State of Punjab)**

Date: 24.07.2025

Place: Chandigarh