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

Original Application No. 250 of 2025

IN THE MATTER OF:

Vaishali Rana Trustee Aravalli Bachao
Citizens Movement ...Applicant

Versus

Union Of India & Ors. ...Respondent(s)

INDEX

Sr. No.	Particular	Page No.
1	Reply on behalf of Respondent No. 11 i.e. Haryana State Pollution Control Board	1-4
2	**Annexure R/1:** A copy of the Laboratory Test Report No. 633M dated 27.10.2026	5-6

Date: 23.11.2026

Filed Through:

Rahul Khurana, Advocate
Counsel for Respondent No. 11
9811894060
rkhuranalegal@gmail.com

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

Original Application No. 250 of 2025

IN THE MATTER OF:

Vaishali Rana Trustee Aravalli Bachao Citizens Movement ...Applicant

Versus

Union Of India & Ors. ...Respondent(s)

Reply on Behalf of Respondent No. 11 i.e. Haryana State Pollution Control Board

MOST RESPECTFULLY SHOWETH:

Preliminary Submissions

1. That the present reply is being filed on behalf of the Haryana State Pollution Control Board (hereinafter referred to as "the Board/HSPCB") through Ramniwas Sharma, Regional Officer, Haryana State Pollution Control Board, Nuh who is authorized to file the same on behalf of answering respondent.

2. That the present Original Application is principally concerned with allegations relating to illegal hunting/poaching of migratory birds, use of nets for trapping birds, biodiversity conservation, protection of wildlife, encroachmentsand declaration of the area as a Biodiversity Heritage Site. The Applicant has sought various directions primarily against the State Government, Forest Department, Wildlife authorities, State Wetland Authority and Biodiversity authorities.

3. It is further submitted that no specific instance of discharge of untreated/industrial effluent, sewage, hazardous waste or other pollutant by anyperson/industry into the Kotla-Akherawaterbody has been referred, falling within the regulatory jurisdiction of the Board.

5. The allegations concerning bird trapping, hunting, poaching and use of "Chinese nets" do not fall within the regulatory jurisdiction of HSPCB.

6. It is further respectfully submitted that, in order to ascertain the factual position regarding the quality of water of the Kotla-Akherawaterbody, a sample of water was collected from the said water body on 13.10.2026 and was sent for laboratory analysis.

8. That the analysis of the said water sample has been completed and the Laboratory Test Report No. 633M dated 27.10.2026 has been issued. As per the said Laboratory Report, the results of the water sample are found to be satisfactory and no adverse finding or abnormality relating to pollution/contamination of the water of the Kotla-Akherawaterbody has been reported. The said report, therefore, does not indicate any pollution of the water body attributable to any activity or source regulated by the Board. A copy of the said Laboratory Test Report No. 633M dated 27.10.2026 is annexed herewith and marked as **ANNEXURE R/1.**

9. Without prejudice to the above submissions, HSPCB respectfully submits that it remains committed to prevention and control of pollution and to protection of the environment in the State.

PARA-WISE REPLY

1. That the contents of Para 1-3, insofar as they relate to the Applicant and service of notices, are matters of record. No specific comments are called for from the Board.

2. That the contents of para 4 alleges substantial questions relating to wildlife poaching, biodiversity, Biodiversity Heritage Site and wetland conservation primarily concern authorities other than HSPCB. To the limited extent pollution is referred to, the Board submits that no specific pollution incident attributable to any person/industry within the Board's jurisdiction has been established in the OA and no pollution source is there presently in the said Kotla- Akherawater as per the site verification

by the Board. Further, as per the analysis report, the results of the water sample are found to be satisfactory and no adverse finding or abnormality relating to pollution/contamination of the water of the Kotla-Akherawaterbody has been reported.

3. That the contents of para 5, concerning jurisdiction of this Hon'ble Tribunal are matters for this Hon'ble Tribunal. It is, however, submitted that mere invocation of environmental jurisdiction does not establish any specific default on the part of HSPCB.

4. That the contents of Para 6(i)–(xxiii) raising allegations concerning the ecological significance of the area, migratory birds, bird trapping, Chinese nets, poaching, wildlife protection, international conventions and biodiversity conservation are primarily matters concerning the competent Forest/Wildlife/Biodiversity authorities.To the extent, the Applicant has alleged pollution or contamination, the same is denied for want of specific particulars and supporting technical evidence against HSPCB. The contents of preliminary submissions are being reiterated.

5. Reply to Grounds A–J: The grounds principally concern biodiversity, wildlife protection, constitutional environmental rights, public trust doctrine, poaching and conservation. No specific omission or statutory default of HSPCB has been submitted.

In view of the above facts and submissions, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to take the present reply on record and dismiss the Original Application qua the answering Respondent.

Date: 23.11.26
Place: Nuh.

Regional Officer,
Haryana State Pollution Control Board, Nuh

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

Original Application No. 250/2025

IN THE MATTER OF:

Vaishali Rana Trustee Aravalli Bachao Citizens Movement ...Applicant

Versus

Union Of India & Ors. ...Respondent(s)

AFFIDAVIT

I, Ramniwas Sharma, aged 46 posted as Regional Officer Haryana State Pollution Control Board, Nuh do here by solemnly affirm and state as under:

1. That, I am the authorized representative of Respondent No. 11 and in the aforesaid official capacity, I am well conversant of the facts and circumstances of the present case, hence competent to swear this affidavit.
2. That I have gone through the contents of the accompanying reply which has been drafted under my instructions.

5276 P64
23/11/26

NOTARY MOHD. IRFAN Regd. No. 16504 GOVT. OF INDIA

Deponent

VERIFICATION

Verified at Nuh on this 23 day of November, 2026 that the contents of this affidavit are true and correct to the best of my knowledge, based on the information derived from the official records which I believe to be true. No material fact has been concealed there from.

ATTESTED
23/11/26
MOHD. IRFAN
NOTARY PUBLIC
GOVT. OF INDIA
DISTT COURTS. NUH

Deponent

Annexure - R/1

REGIONAL LABORATORY
Haryana State Pollution Control Board
Sector-16A, Opp. HEWO Apartment, Faridabad

TEST REPORT

Test Report No.	:	633 M
Issue Date	:	27/10/2026
Issued To	:	Regional Officer, Nuh/Member Secretary HSPCB
Sample Type	:	Surface Water
Sample collected on dated	:	13/10/2026
Sample Collected by	:	Sh. Manish Yadav, AEE
Sample received on dated	:	14/10/2026
Sample Location	:	Kotla Lake, Village-Kotla, Nuh
Sample Quantity	:	2 Litre
Date of Analysis started	:	14/10/2026
Dated of analysis completed	:	27/10/2026

RESULTS

Sr. No.	Parameter	Protocol used	Result	Unit
1.	Sample Code	----	HSPCB-FBD/DW/2026/10/633	
2.	pH Value at 25°C	APHA 4500 H+ B 24th Edition 2023	7.23	----
3.	Conductivity at 25°C	IS 3025 (Part 14) : 1984 (reaffirmed 2002)	1210	µS/cm
4.	Total Suspended Solids	IS 3025 (Part 17):2022	16	mg/L
5.	Total Dissolved Solids	IS 3025 (Part 16) : 2023	660	mg/L
6.	Biological Oxygen Demands (at 27° C for 3 Days)	IS 3025 (Part 44) : 2023	2.4	mg/L
7.	Chemical Oxygen Demand	IS 3025 (Part 58) : 2023	32	mg/L
8.	Oil & Grease	IS 3025 (Part 39) : 2021	BDL(DL=4)	mg/L
9.	Alkalinity	IS 3025 (Part 23) : 2023	60	mg/L
10.	Chloride as Cl	IS 3025 (Part 32):2025	129.9	mg/L
11.	Calcium as Ca	APHA 3500-Ca (B) 24th Edition 2023	27.2	mg/L
12.	Magnesium as Mg	APHA 3500-Mg (B) 24th Edition 2023	16.5	mg/L
13.	Total Hardness (as $CaCO_3$)	APHA 23rd Edition 2340.C.	140	mg/L

Notes:
1. The results relate only to the items tested.
2. The test report shall not be reproduced except in full without approval of the laboratory.
3. The results apply to the sample as received.
4. If sample not preserved, results may vary.

Sample analyzed by:
JSA-I / JSA-II / SSA-I / SSA-II / Sc-'B'-I/Sc-'B'-II

Lab Incharge
Regional Laboratory Faridabad

HSPCB/LAB/F/2026/ 7178 - 79

Dated: 27/10/2026
Page 1 of 2

REGIONAL LABORATORY
Haryana State Pollution Control Board
Sector-16A, Opp. HEWO Apartment, Faridabad

TEST REPORT

Test Report No.	:	633 M
Issue Date	:	27/10/2026
Issued To	:	Regional Officer, Nuh/Member Secretary HSPCB
Sample Type	:	Surface Water
Sample collected on dated	:	13/10/2026
Sample Collected by	:	Sh. Manish Yadav, AEE
Sample received on dated	:	14/10/2026
Sample Location	:	Kotla Lake, Village-Kotla, Nuh
Sample Quantity	:	2 Litre
Date of Analysis started	:	14/10/2026
Dated of analysis completed	:	27/10/2026

RESULTS

Sr. No.	Parameter	Protocol used	Result	Unit
1.	Colour	----	Almost Colorless	----
2.	Odour	----	Odourless	----
3.	Total Kjeldhal Nitrogen	APHA 4500-N_{org}-B (24th Edition 2023)	4.48	mg/l.
4.	Fluoride as F	APHA 4500 F-D (24th Edition 2023)	0.25	mg/l.
5.	Sulphate as SO_4	IS 3025 (Part-24) :2022	55	mg/l.
6.	Boron as B	3120-B ICP-OES Method (APHA 24th Edition 2023)	0.041	mg/l.
7.	Sulphide as S	APHA 4500 S^{2-} (24th Edition 2023)	0.4	mg/l.
8.	Ammonical Nitrogen as N	APHA 4500 NH_3-F-(24th Edition 2023)	1.56	mg/l.
9.	Nitrate as NO_3^-	4500- NO_3-B- APHA (24th Edition 2023)	1.7	mg/l.
10.	Iron as Fe	3120-Fe ICP-OES Method (APHA 24th Edition 2023)	BDL(DL=0.0005)	mg/l.
11.	Zinc as Zn	3120-Zn ICP-OES Method (APHA 24th Edition 2023)	BDL(DL=0.0009)	mg/l.
12.	Nickel as Ni	3120-Ni ICP-OES (APHA 24th Edition 2023)	BDL(DL=0.002)	mg/l.
13.	Arsenic as As	3120-As ICP-OES (APHA 24th Edition 2023)	BDL(DL=0.001)	mg/l.
14.	Phenolic Compounds as C_6H_5OH	IS 3025 (Part-43) Sec 1-2022	ND	mg/l.
15.	Hexavalent Chromium as Cr^{+6} mg/l	APHA 3500-Cr (B) (24th Edition 2023)	ND	mg/l.
16.	Total Chromium as Cr	3120-Cr ICP-OES (APHA 24th Edition 2023)	BDL(DL=0.0008)	mg/l.
17.	Fecal Coliform MPN/100 ml	APHA 9221-E (24th Edition 2023)	17	----

Sample analyzed by:

JSA-I / JSA-II / SSA-I / SSA-II / Sc-'B' -I/Sc-'B'-II

Lab Incharge
Regional Laboratory Faridabad

HSPCB/LAB/F/2026/ 7178 - 79

Dated: 27/10/2026.

O/C

----------End of Test Report----------