

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH AT NEW DELHI

ORIGINAL APPLICATION NO. 253 OF 2023

IN THE MATTER OF:

Raja Muzaffar Bhat

...Applicant

Versus

Union Territory of Jammu & Kashmir & Ors.

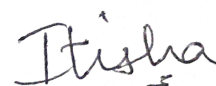
...Respondents

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Through


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Place:- Delhi

Dated:- 16.04.2025

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**PRINCIPAL BENCH AT NEW DELHI****ORIGINAL APPLICATION NO. 253 OF 2023****IN THE MATTER OF:**

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RESPONSE TO REPORT DATED 21.12.2024**MOST RESPECTFULLY SHOWETH:**

1. That the above titled Application pertains to rampant and illegal disposal of solid and bio-medical waste on the banks of Poonch River, in the area falling between Sher-E-Kashmir Bridge (NH 144A) and the confluence of Poonch River and Belar Nala in Poonch Town, Union Territory of Jammu & Kashmir. Poonch River is a tributary of Jhelum River and towns such as Poonch, Sehra, Tatta Pani, Kotli and Mirpur are situated on its banks and the river water of Poonch is also a source of drinking water for the population living downstream.
2. That the Jammu & Kashmir Pollution Control Committee submitted a Report dated 21.12.2024 providing the status on ground with respect to solid waste disposal in District Poonch and the status of imposition and payment of environmental compensation for such violations.

Response to Report by the Applicant

3. That the Applicant has the following response to the points raised in the Report:

A. The Applicant was not able to locate the processing facilities as have been claimed to be set up in Surankote and Poonch

4. That the Report at Page 344 states that as per the Report dated 20.12.2024 of the Chief Executive Officer, Municipal Council, Poonch processing sites have been set up at Poonch and Surankote. Further, it is stated that material recovery facility and compost pits have been set up at Surankote.
5. That the Report also makes a claim that,
“Out of 15000 MT of legacy waste lying at the site at Shanker Nagar near SK Bridge, 5000 MT (approximately) of legacy waste has been scientifically disposed of through bio-mining by the Municipal Council Poonch. Bio-mining of remaining 10000 MT of legacy waste is at progress for which work has been allotted and likely to be complete by the end of January 2025.”
6. It is the submission of the Applicant that the claim that such facilities to manage waste have been set up at Surankote and Poonch could not be verified by the Applicant even after visiting the site.
7. That when the Applicant visited the site in question, it was found that a red shed has been installed at the site, at the banks of River Poonch, but the same cannot be construed as a waste processing facility. It is pertinent to mention that any such kind of facility would be in violation of the Solid Waste Management Rules, 2016 as it is located at the banks of a river.

Copy of photographs showing red shed at the site is annexed herewith as

ANNEXURE R-1.

B. Fresh waste is being dumped at the site on the riverbank

8. That the claim made in the Report that waste is being lifted from the dumping site on the banks of River Poonch in the area falling between Sher-E-Kashmir Bridge (NH 144A) and the confluence of Poonch River and Belar Nala in Poonch Town is completely false and incorrect. The Applicant visited the site and found that rather than lifting the legacy waste, fresh

waste is being dumped by the Municipal Council. The Applicant is producing photographs dated 07.04.2025 and 10.04.2025 showing that the situation on ground is the same and waste is continuously flowing into River Poonch. Photographs dated 15.04.2025 are being produced to show that fresh waste is being dumped at the banks of the river.

Copy of photographs dated 07.04.2025 and 10.04.2025 taken near Sher-E-Kashmir Bridge on the banks of River Poonch is annexed herewith as **ANNEXURE R-2.**

Copy of photographs dated 15.04.2025 taken on the banks of River Poonch showing fresh dumping of waste is annexed herewith as **ANNEXURE R-3.**

9. That the Applicant has taken videographic evidence of the site to show how continuous dumping of waste at the site has led to huge magnitude of waste flowing into River Poonch. The Applicant can show the video during the course of the hearing and can be also accessed at:
https://drive.google.com/file/d/1hQU6_CC7Q362qXg6gCQYj5ENmtyatgW/view?usp=sharing

C. Claim that entire waste will be cleared by January, 2025 is incorrect

10. That the Report claims that out of 15,000 MT of waste, 5,000 MT of waste has already been cleared and the rest of the waste will be cleared by January, 2025.
11. That the Applicant submits that a comparison of the photographs submitted along with the Original Application (Annexure A-2 of the OA) and the photographs being submitted with the present Response will show that there is no difference in the situation on ground. The authorities have missed a deadline of January, 2025 that was set by themselves in the Report.

12. That this act on the part of the authorities not only shows their lackadaisical approach towards the environment but also makes them liable for strict action by this Hon'ble Tribunal.

D. There is discrepancy in the details given in the Report and the letter of CEO, Municipal Council, Poonch (annexed as Annexure 6 of the Report)

13. That the Report at Page 344 places reliance on a letter dated 20.12.2024 of the Chief Executive Officer, Municipal Council, Poonch that gives information on the collection and transportation of waste at facilities at Poonch and Surankote. The Report reads as follows:

*"The **Chief Executive Officer, Municipal Council, Poonch has submitted his report vide his letter No. MCP/2024-25/1568-71 dated 20-12-2024 (copy enclosed as Annexure 6) which is briefly summarised as under:-***

i. Municipal Council, Poonch is collecting 10 to 11 TPD of waste (Dry 50 % and wet 50 % Waste) which is being transported and processed on daily basis to the processing site at Poonch and Surankote.

ii. About 35 to 40% of recycled dry waste is collected by the registered rag pickers and scrap dealers and remaining 55 % to 60% dry waste is processed at the Material Recovery Facility (MRF) centre Surankote (District Poonch)."

14. That the Report has placed reliance on Annexure 6 (at page 362) to state that the CEO, Municipal Council, Poonch has stated and given the abovementioned facts in a letter dated 20.12.2024. However, a perusal of the annexure will show that there is a discrepancy in the facts stated in the letter of CEO and the facts mentioned in the Report.

15. That the Report states that "*Municipal Council, Poonch is collecting 10 to 11 TPD of waste (Dry 50% and wet 50% Waste)*" which is being transported and processed on a daily basis. However, the letter dated

20.12.2024 nowhere states that there is 50% dry and 50% wet waste being generated in Poonch. In fact, it provides no such demarcation between wet and dry waste. It is pertinent to mention that the percentage of wet and dry waste cannot be in such precise and equal percentages when collected at a large scale. The J&K Pollution Control Committee is trying to mislead this Hon'ble Tribunal by stating incorrect facts with respect to quantity of wet and dry waste.

16. That further the Report states that "*About 35 to 40% of recycled dry waste is collected by the registered rag pickers and scrap dealers and remaining 55 % to 60% dry waste is processed at the Material Recovery Facility*".

However, the letter dated 20.12.2024 on which reliance has been placed states that 35-40% of recyclable dry waste was collected by the registered rag pickers and scrap dealers.

17. That by way of filing of this Report, the J&K Pollution Control Committee has tried to mislead this Hon'ble Tribunal with respect to the submissions made by the Municipal Council, Poonch. Usage of word 'recycled' in place of 'recyclable' changes the import of the submission as 'recyclable' is any waste that has the potential of being recycled, however 'recycled' is any waste that is recycled. By using the word 'recycled', the J&K Pollution Control Committee has tried to mislead this Hon'ble Tribunal that a larger quantity of waste is being recycled.

E. No environmental compensation has been computed beyond 30.09.2024, even though the violation continues till date and even that compensation is not recovered

18. That the Report at Page 343 states that an environmental compensation of Rs. 108.9 lacs for the period 01.02.2024 to 30.09.2024 was computed and a show-cause notice in this regard has been sent to Chief Executive Officer, Municipal Council, Poonch.

19. That the Applicant submits that the Report fails to justify as to why environmental compensation has only been computed until 30.09.2024 and not beyond this period. As is clear from the photographs annexed with this response, violation of dumping of waste continued even after 30.09.2024 and continues even today. There is no reasoning for restricting the time period for compensation till 30.09.2024.
20. That the Report also fails to give clarification on the environmental compensations that were imposed by previous Reports filed in the present matter before this Hon'ble Tribunal. Report dated 22.05.2024 of J&K Pollution Control Committee had stated that an environmental compensation of Rs. 81 lacs was imposed on Municipal Council, Poonch (at Page 248). Further, Report dated 04.12.2024 of District Magistrate, Poonch had stated that an environmental compensation of Rs. 162.9 lacs was imposed by J&K Pollution Control Committee (at Page 281). However, the present Report does not give any information on recovery of the previously imposed environmental compensations.
21. That further, it is submitted that the Municipal Council, Poonch has failed to even make payment for the environmental compensation computed till 30.09.2024 and J&K Pollution Control Committee has failed to recover the same. There is complete lack of seriousness on the part of the Municipal Council, Poonch and J&K Pollution Control Committee in taking steps to clear the waste and undertake restoration of the area.

**VIOLATIONS RECORDED THROUGH SEVERAL REPORTS
SUBMITTED AND ORDERS OF THIS HON'BLE TRIBUNAL
REQUIRES PENAL ACTION AGAINST THE VIOLATORS**

**A. Violations recorded in the Reports and orders of this
Hon'ble Tribunal**

22. That this Hon'ble Tribunal had taken cognizance of the issue of dumping of waste and vide Order dated 13.04.2023 directed J&K Pollution Control

Committee and District Magistrate, Budgam to furnish a report after verifying the facts. That despite multiple opportunities granted by this Hon'ble Tribunal, Reports were only filed with a delay of 4 months.

23. That these Reports not only gave inadequate information but also failed to show any action taken by the authorities to remediate the situation on ground. This was well recorded in the Order dated 30.11.2023 of this Hon'ble Tribunal in the following manner:

*"3. The report on behalf of District Magistrate, Poonch dated 11.07.2023 has been filed stating that **representative of J & K PCC had refused to file joint report.** The report states that the Municipal Council Poonch was directed to resolve the issue of disposal of municipal solid waste in an environmental friendly and scientific manner and such remedial measures were taken. **No detailed information in respect of the extent of problem and its remediation has been disclosed in the report.***

*4. A separate report on behalf of J & K PCC has been filed **which clearly reveals the open dumping, unscientific dumping and disposal of municipal solid waste** on the bank of Suran River near Sher-e-Kashmir at Poonch as for that violation environmental compensation of Rs. 81.00 lacs (Rs. Eighty One Lacs) was levied for violation of Solid Waste Management Rules, 2016. **There is no disclosure about realization of the environmental compensation.** It has also been pointed that action for levy of environmental compensation was taken prior to filing of original application but subsequently there is no action by the competent authority."*

24. That vide Order dated 13.03.2024, the Hon'ble Tribunal yet again noted the lackadaisical approach of the government authorities in dealing with the issue. It was noted that even though it was found that no improvement has been seen, no action was taken. The Hon'ble Tribunal also recorded that despite notices having been issued, the authorities have failed to enter appearance:

"3. Shri J.N. Sharma, Executive Engineer, J&K PCC has appeared virtually and has informed that **Shri Harshad Mirza, District Officer has recently visited the site and has found no improvement.** He has noticed the dumping of solid waste on the bank of river. Hence, the violation of norms by the Municipal Council, Poonch is still continuing but **the report of J&K PCC does not reflect that any action has been taken against the respondent,** Municipal Council, Poonch for violation after November, 2022. Shri Sharma, Executive Engineer, J&K PCC has informed that the action has been initiated for imposition of EC for the subsequent period also.

...

5. In spite of service of Notice, **respondent no. 6, Municipal Council, Poonch has neither filed the reply nor has entered appearance and in spite of pendency of the matter and direction by the Tribunal, the violation is still continuing.** Hence, we direct Chief Executive Officer, Municipal Council, Poonch to appear virtually on the next date of hearing."

25. That vide Order dated 24.05.2024, this Hon'ble Tribunal had directed the authorities to file an updated report, in light of the inadequacy of the earlier reports. It was directed that further reports will also highlight the steps taken to address the situation:

"3. Mr. J.N. Sharma, Executive Engineer appearing for the Member Secretary, J&K PCC has informed that **neither the earlier amount of EC of Rs. 81 lakhs nor the later amount of EC of Rs. 162.9 lakhs has been deposited by the MC, Poonch.** He has stated that for the earlier amount, thrice the communication was sent to the Deputy Commissioner/District Magistrate, Poonch but **no action has been taken.**

...

6. There is no clear stand of the District Magistrate, Poonch as to why the action has not been taken till now for the realization of the EC which has been imposed by the J&K PCC.

7. The response by the Municipal Council, Poonch has been belatedly filed on 16.05.2024. Mr. M. Yaqoob, CEO, Municipal Council, Poonch has appeared virtually and has informed that

*11 tonnes of MSW is generated in Municipal Council Poonch everyday out of which only five tonnes is processed. Hence, per day additional to the legacy waste in the Municipal Council, Poonch is 6 tonnes. The record further reflects that even for processing, the existing legacy waste including the Biomedical Wastes, no proper steps have been taken by the Municipal Council, Poonch. **The violation is continuing which is creating health hazard, therefore, the J&K PCC is to take action against those who are responsible for creating such health hazard.** The representative of the Member Secretary, J&K PCC has submitted that due action for prosecution will be taken and the report in this regard will be submitted before the next date of hearing."*

26. That when the matter was taken up on 09.09.2024, the Hon'ble Tribunal had noted that there has been complete non-compliance with the directions. No action had been taken by the authorities, in pursuance of which a cost of Rs. 10,000 was imposed on the authorities:

*"4. No fresh report has been filed by the District Magistrate, Poonch, till now. Hence, **we impose a cost of Rs. 10,000 upon Deputy Commissioner/District Magistrate, Poonch, for not complying with the order of Tribunal and not filing the report.**"*

27. That since the matter was admitted on 13.04.2023, there has been a delay of more than 2 years now, however, the authorities have failed to show any concrete steps taken to address the situation. In light of this, the Hon'ble Tribunal may consider directing for prosecution of the officials responsible for non-compliance with the directions of this Hon'ble Tribunal and for not taking any action to remediate the issue on ground.

B. Prosecution of the violators

28. That the Solid Waste Management Rules, 2016, issued under Section 3, 6 and 25 of the Environment (Protection) Act, 1986 provides for steps to be taken by all concerned parties for effective management of solid waste. Rule 22 provides for timeline for implementation of the provisions of the

Rules, for which the local bodies are obligated to create necessary infrastructure. A perusal of Rule 22 will show that the Municipal Council, Poonch has missed all timelines for effective management of solid waste. These timelines are calculated from the date of notification of the Rules i.e. from 08.04.2016. Relevant activities with corresponding timelines are being reproduced below:

S. No.	Activity	Timeline (from the date of notification of Rules)
1.	Identification of suitable sites for setting up solid waste processing facilities	1 year
2.	Procurement of suitable sites for setting up solid waste processing facility and sanitary landfill facilities	2 years
3.	Enforcing waste generators to practice segregation of bio degradable, recyclable, combustible, sanitary waste domestic hazardous and inert solid wastes at source	2 years
4.	Ensure door to door collection of segregated waste and its transportation in covered vehicles to processing or disposal facilities	2 years
5.	Setting up solid waste processing facilities by local bodies and census towns below 100000 population	3 years

29. That these timelines are accorded with respect to the obligations of different parties involved, as provided in the Rules. Rule 15 provides for the duties and responsibilities of local authorities such as Municipal Councils and Corporations. These duties range from preparing a waste management plan, arranging door to door collection of waste, setting up material recovery facilities and waste processing facilities, establishing

waste deposition centres for domestic hazardous waste, ensure safe storage and transportation of domestic hazardous waste etc.

30. That Rule 16 provides for duties and responsibilities of Pollution Control Boards and includes duties such as monitoring environmental safeguards and issue authorisation for setting up waste management facilities.
31. That it is clear in the present case that the Municipal Council, Poonch as well as the J&K Pollution Control Committee have failed in fulfilling their duties and obligations under the Rules.
32. That the Environment (Protection) Act, 1986 provides that in case of contravention of the provisions of the Act and its Rules, the violator is liable to be prosecuted. In the present case, since there is violation of Solid Waste Management Rules, which are issued under the provisions of the Environment (Protection) Act, 1986, the offenders are liable to be punished. Section 15 reads as follows:

"15. Penalty for contravention of the provisions of the act and the rules, orders and directions.-

(1) Whoever fails to comply with or contravenes any of the provisions of this Act, or the rules made or orders or directions issued thereunder, shall, in respect of each such failure or contravention, be punishable with imprisonment for a term which may extend to five years with fine which may extend to one lakh rupees, or with both, and in case the failure or contravention continues, with additional fine which may extend to five thousand rupees for every day during which such failure or contravention continues after the conviction for the first such failure or contravention.

(2) If the failure or contravention referred to in sub-section (1) continues beyond a period of one year after the date of conviction, the offender shall be punishable with imprisonment for a term which may extend to seven years."

33. That further, if the offence is by government departments, the head of the department will be held guilty of the offence and liable to be proceeded against:

"17. Offences by government departments.-

(1) Where an offence under this Act has been committed by any Department of Government, the Head of the Department shall be deemed to be guilty of the offence and shall be liable to be proceeded against and punished accordingly.

Provided that nothing contained in this section shall render such Head of the Department liable to any punishment if he proves that the offence was committed without his knowledge or that he exercise all due diligence to prevent the commission of such offence.

(2) Notwithstanding anything contained in sub-section (1), where an offence under this Act has been committed by a Department of Government and it is proved that the offence has been committed with the consent or connivance of, or is attributable to any neglect on the part of, any officer, other than the Head of the Department, such officer shall also be deemed to be guilty of that offence and shall be liable to be proceeded against and punished accordingly."

34. That this Hon'ble Tribunal, in the past, has also passed directions for initiating criminal prosecution against officers-in-charge. In the case of ***Abhisht Kusum Gupta v. State of Uttar Pradesh & Ors. (OA No. 859 of 2022)***, vide Order 15.12.2023, this Hon'ble Tribunal had directed for criminal prosecution under Section 43 of the Water Act, 1974:

"24. In these circumstances, we direct Member Secretary, UPPCB forthwith to initiate or get initiated criminal prosecution by lodging criminal complaint in appropriate court for committing offence under Section 43 read with Section 24 of Water Act, 1974 against the Officers-in-Charge of Municipal Corporations/Municipal Bodies of Saharanpur, Muzuffarnagar, Shamli, Meerut, Baghpat, Ghaziabad and Gautam Budh Nagar and also initiate criminal prosecution against industries which are discharging polluting materials in the river."

35. That it has also been held in a plethora of cases that special legislations such as Environment (Protection) Act, 1986 will prevail over general laws such as Code of Criminal Procedure and therefore, provisions relating to prosecution under the special laws will prevail over CrPC.
36. That in the case of **Noorulla Khan v. Karnataka State Pollution Control Board & Ors. (Criminal Appeal No.599 of 2021)**, the Hon'ble Supreme Court had also held that provisions of special laws relating to environment such as Water Act will prevail over CrPC:

"11. What emerges from these decisions of this Court is:

a. If the violation of the provisions of the Water Act was at the hands of a Department, subject to the satisfaction of the requirements under Section 48 of the Water Act, "the Head of the Department" would be deemed to be guilty. This would of course be subject to the defences which are available to him to establish whether the offence in question was committed without his knowledge or that he had exercised all due diligence to prevent the commission of such offence.

*b. **By virtue of the decision of this Court in V.C. Chinnappa Goudar (Supra), because of deeming fiction under Section 48 of the Water Act, the protection under Section 197 of the Code would not be available and the matter ought to be considered de hors such protection.***

37. That in light of this, the protection available to the authorities under Section 197 of CrPC will not be applicable and the officers are liable to be prosecuted.

38) Pass any other order as this Hon'ble Tribunal may deem fit in the facts and circumstances of the present case.



APPLICANT

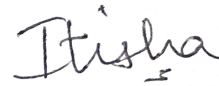
THROUGH



RITWICK DUTTA



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ITISHA AWASTHI
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Mobile: +91 9312407881
Email: dclaw160@gmail.com

VERIFICATION

Verified by Raja Muzaffar Bhat, S/o Bashir Ahmad Bhat, aged about 48 years, R/o 64, Alamdar Colony, Gopalpura, District Budgam, Jammu & Kashmir-191113 do hereby verify that the contents of Paragraphs 1 to 38 are true to my personal knowledge and nothing material has been concealed therefrom.



APPLICANT

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PRINCIPAL BENCH AT NEW DELHI

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...Applicant

Versus

Union Territory of Jammu & Kashmir & ors.

...Respondents

AFFIDAVIT

I, Raja Muzaffar Bhat, S/o Bashir Ahmad Bhat, aged about 48 years, R/o 64, Alamdar Colony, Gopalpura, District Budgam, Jammu & Kashmir-191113, do hereby solemnly affirm and declare as under:

1. That I am the Applicant in the above titled case, and hence well conversant with the facts and circumstances described in the present case and as such competent to swear this Affidavit.
2. That the contents of the accompanying Response are true and correct and nothing material has been concealed therefrom.



Raja Muzaffar
 DEPONENT

VERIFICATION

Verified on this 16 day of April 2025 that the contents of the present Affidavit are true and correct to my knowledge and belief and nothing material is concealed therefrom.

Certified that the statement declared on oath by and to the effect of this day of 16/4/2025 by Raja Muzaffar who is identified by Shamima Aziz

Shamima Aziz
 SHAMIMA AZIZ
 NOTARY PUBLIC

Raja Muzaffar
 DEPONENT



सत्यमेव जयते

INDIA NON JUDICIAL

Government of Jammu and Kashmir

२१०

e-Stamp

Certificate No. : IN-JK54258882505584X
Certificate Issued Date : 16-Apr-2025 01:00 PM
Account Reference : NEWIMPACC (SV)/ jk12541104/ SRINAGAR/ JK-SN
Unique Doc. Reference : SUBIN-JKJK1254110495456964842687X
Purchased by : Raja Muzaffar
Description of Document : Article 4 Affidavit
Property Description : Not Applicable
Consideration Price (Rs.) : 0
 (Zero)
First Party : Raja Muzaffar
Second Party : Not Applicable
Stamp Duty Paid By : Raja Muzaffar
Stamp Duty Amount(Rs.) : 10
 (Ten only)



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Please write or type below this line

**Statutory Alert:**

1. The authenticity of this Stamp certificate should be verified at 'www.shcilestamp.com' or using e-Stamp Mobile App of Stock Holding. Any discrepancy in the details on this Certificate and as available on the website / Mobile App renders it invalid.
2. The onus of checking the legitimacy is on the users of the certificate
3. In case of any discrepancy please inform the Competent Authority.

ANNEXURE A-1



ANNEXURE A-2



Latitude: 33.759153
Longitude: 74.092738
Elevation: 982.91±7 m
Accuracy: 1.5 m
Azimuth: 102° (E)
Pitch: -17.0° (0.9°)
Time: 07-04-2025 10:22

Powered by AngliCam



Latitude: 33.758005
Longitude: 74.092248
Elevation: 986.62±21 m
Accuracy: 3.9 m
Azimuth: 354° (N)
Pitch: -2.4° (1.3°)
Time: 10-04-2025 09:29

Powered by AngliCam



ANNEXURE A-3

Photograph showing fresh dumping of waste on 15.04.2025



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21

Litigation . <litigation@dclawchambers.com>

Copy of Response to report on behalf of the Applicant in OA No. 253 of 2023 Raja Muzaffar Bhat Versus. Union Territory of Jammu & Kashmir & Ors.

1 message

Litigation . <litigation@dclawchambers.com>

Wed, Apr 16, 2025 at 2:23 PM

To: "membersecretaryjkspcb@gmail.com" <membersecretaryjkspcb@gmail.com>, eopoonch-jk@nic.in, cs-jandk@nic.in, hudd-jk@nic.in, "housingudd9@gmail.com" <housingudd9@gmail.com>, "additionalsecretaryhealth@gmail.com" <additionalsecretaryhealth@gmail.com>, ccb.cpcb@nic.in, poonch@nic.in, "CMOPoonch@gmail.com" <CMOPoonch@gmail.com>

Cc: itishaawasthi@proton.me

Dear Sir/madam,

Please find attached- Response to Report

Thanks & Regards
Counsel for the Applicant

**Response to report behalf of Applicant 16.04.2025.pdf**

3216K