

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH AT NEW DELHI

ORIGINAL APPLICATION NO. 74 OF 2026

IN THE MATTER OF:

RAJA MUZAFFAR BHAT

...APPLICANT

VERSUS

UNION TERRITORY OF

JAMMU & KASHMIR AND ORS

...RESPONDENTS

INDEX

S.NO	PARTICULARS	PAGE NO.
1.	RESPONSE ON BEHALF OF THE APPLICANT TO THE REPORT DATED 03.08.2026 FILED BY RESPONDENT NO.2, CENTRAL POLLUTION CONTROL BOARD AND REPORT DATED 18.04.2026 FILED BY RESPONDENT NO. 3 JAMMU AND KASHMIR POLLUTION COMMITTEE	1-18
2	Proof of service	19

THROUGH



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PLACE: NEW DELHI

DATE: 17.10.2026

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**RESPONSE ON BEHALF OF THE APPLICANT TO THE
REPORT DATED 03.08.2026 FILED BY RESPONDENT NO.2,
CENTRAL POLLUTION CONTROL BOARD AND REPORT
DATED 18.04.2026 FILED BY RESPONDENT NO.3 JAMMU AND
KASHMIR POLLUTION COMMITTEE**

MOST RESPECTFULLY SHOWETH:

1. The applicant herein has filed the present application before this Hon'ble Tribunal under section 14 read with section 15 and 20 of the National Green Tribunal Act, 2010 against discharge of sewage and solid waste in Manasbal wetland, directly and through Lar Canal, in District Ganderbal, Jammu & Kashmir.
2. That this Hon'ble Tribunal vide order dated 30.01.2026 has categorically directed the Respondent No. 2, Central Pollution Control Board (CPCB) and Respondent no.3 Jammu and Kashmir

Pollution Control Board (J&KPCC) to ascertain the status of water quality of the wetland in question and also find out the sources of discharge of pollutants in this wetland and submit the status and action taken report. The relevant extract is hereby reproduced:

“10. The Respondent No. 2- CPCB and Respondent no.3- (J&KPCC) are directed to ascertain the status of water quality of the wetland in question and also find out the sources of discharge of pollutants in this wetland and submit the status and action taken report atleast one week before the next date of hearing.”

3. That Respondent No. 2-CPCB and Respondent No.3 J&KPCC have filed their respective Reports dated 03.08.2026 and 18.04.2026 before this Hon’ble Tribunal, setting out their findings on the status of water quality of Manasbal Wetland, the sources of discharge of pollutants into the Wetland, and the action taken by the Wullar-Manasbal Development Authority (WMDA).
4. That, in these Reports, both Respondents have recorded that untreated domestic wastewater from households located along the periphery of the Wetland is discharged directly into it. The Respondents have also recorded dumping of mixed municipal solid waste on the banks of the Wetland, and CPCB has further recorded that such waste is partially submerged. CPCB has found that none of the seven samples collected by it complies with Class-B (outdoor bathing) criteria, while J&K PCC has itself recorded that two of its four monitoring locations do not meet Class-B criteria in respect of BOD.

Response to the report submitted by Respondent no.2 CPCB

5. That as per the report submitted by Respondent no. 2 CPCB dated 03.08.2026, regarding status of water quality, sources of discharge of pollutants and action taken report in Manasbal wetland the applicant herein is filing the present Response thereby making following submissions / objections to the Report:

I. Vague findings on untreated municipal sewage discharge into the Mansabal Lake and LAR Canal

6. The applicant humbly submits that the CPCB has given no clear answer about the discharge of untreated sewage from 14 villages being discharged in the Manasbal Wetland through Lar Canal. It has only submitted water quality assessment in its report as its response classifying the *water sample taken at Lar Canal ML-7 under Class-D of its Designated Best Use (DBU) classification system and has further submitted that interactions with with officials of J&k PCC, Wullar-Manasbal Development Authority and residents of the villages indicated that sewage from individual household is managed through soak pits and some official of J&K PCC that discharge of sewage through small surface drains was observed by J&K PCC team during their last inspection conducted on 17.02.2026.*
7. But CPCB itself has not inspected and reported its clear and comprehensive findings on sewage discharge in the Manasbal lake and the Lar canal and has limited its own inspections to Municipal solid waste and grey water only. Ascertainment of the sources of discharge of Pollutants in the wetland was one of the primary directions given by the Hon'ble Tribunal and it is rightly essential to assess the key sources of pollutants discharge into the wetland so that right remedial

measures can be taken to prevent further deterioration of the wetland which the CPCB has failed to provide.

II. Failure to analyse microbiological data and to identify faecal contamination from the Lar Canal and peripheral settlements

8. The Applicant further submits that CPCB has placed microbiological data on record but has not analysed it in the body of its Report. CPCB's Designated Best Use (DBU) criteria classify inland surface waters into Classes A to E according to the use for which the water is fit (CPCB Report, para 2.2(iii), Annexure-8, p. 33). The parameters relevant here are pH (acidity or alkalinity), dissolved oxygen (DO, oxygen available to aquatic life), biochemical oxygen demand (BOD, a measure of organic pollution), and total and faecal coliform (indicators of faecal contamination) which requires pH of 6.5 to 8.5, DO of 5 mg/l or more, BOD of 3 mg/l or less, and total coliform of 500 MPN/100 ml or less. Both Respondents have assessed the Wetland against Class B A water body that fails Class B is not fit for outdoor bathing.
9. At para 2.2(iv)-(v), CPCB states only that all seven samples are non-complying with Class-B. In the test result, Coliform counts are lowest at the centre of the lake (ML-02: faecal 20, total 45 MPN/100 ml) and highest at the inflow and peripheral locations. At the Lar Canal (ML-07), faecal coliform is 2,200 and total coliform is 22,000 MPN/100 ml, the highest faecal figure of all seven locations. At the southern lake location near Kondabal (ML-01), faecal coliform is 780 and total coliform is 35,000 MPN/100 ml, the highest total coliform

figure of all seven locations. The temple spring (ML-05) and the spring near the lake (ML-06) also show elevated counts. Total coliform at ML-01, ML-05, ML-06 and ML-07 exceeds the Class-B limit of 500 MPN/100 ml, in ML-01's case by about seventy times. Faecal coliform at ML-01, ML-05 and ML-07 exceeds the desirable limit of 500 MPN/100 ml. CPCB's physico-chemical data points the same way, with the Lar Canal showing the highest phosphate (0.41 mg/l).

- 10 This pattern is consistent with faecal contamination entering from the canal and the peripheral settlements from which an inference can be rightly drawn about the presence of sewage discharge into the lake. Despite this, CPCB has not stated whether the Lar Canal is carrying sewage, which was the core allegation in the Application and the very question this Hon'ble Tribunal directed it to examine. The Report is therefore incomplete on the sources of pollutants and the Applicant prays that CPCB be directed to carry out a supplementary investigation, and file a clear finding on the sources of sewage entering the Wetland and the quantum discharged.

III. No action report on grey water (waste water) treatment and no details about the capacity of the Sewage Treatment Plant (STP) proposed to be built for the sewage generated in the 14 villages.

11. The applicant humbly submits that the CPCB in response to its action taken report has not submitted that how will the grey water discharge be managed as it has been submitted in their report that

grey (waste) water was being discharged directly into the lake from the villages situated along the periphery of the lake. They have not proposed to undertake any remedial steps towards this or proposed any Decentralized Waste Water Treatment Systems (DEWATS) in the villages or whether the proposed STP will be solving both the issues.

12. The applicant further submits that in regard to the setting up of a Sewage Treatment Plant (STP) for the management of sewage discharge it has not submitted any response regarding the estimated sewage discharge in the area and how much is the capacity of the proposed STP to justify one STP as the viable solution of Sewage discharge from 14 villages considering the geographic and technical conditions of the villages situated on the periphery of Manasbal Wetland. Moreover, CPCB has also not shared the detailed action plan for the setting of the STP with the Hon'ble Tribunal to ascertain its ground realities.

13. The Applicant therefore submits that CPCB's Report records grey water discharge from seven peripheral villages directly into the Wetland, and records through the WMDA's note that the proposed STP is still only at DPR stage with no action taken on the request to the J&K Economic Reconstruction Agency (Annexure-9, p. 188). Yet the Report proposes no interim measure for grey water, gives no estimate of the sewage and grey water generated, no capacity or design basis for the proposed STP, and no timeline for it. The Report is thus incomplete on the "action taken" limb of this Hon'ble Tribunal's direction. The Applicant prays that CPCB, with J&K PCC and the WMDA, be directed to file a time-bound action plan covering

(a) the quantum of sewage and grey water generated, (b) the capacity and location of the proposed STP, and (c) interim decentralised treatment for the peripheral villages.

IV. No Environment Compensation recovered for violation of Wetlands (Conservation and Management) Rules, 2017 and Directions of the Hon'ble Supreme Court given in M.K Balakrishnan v. Union of India (Writ Petition (Civil) No. 230 of 2001)

14. The failure of competent statutory authorities to assess or recover Environmental Compensation for violation of Rule-4 of the **Wetlands (Conservation and Management) Rules, 2017 and 2010** constitutes a direct contravention of the mandates of the Supreme Court of India. In *M.K. Balakrishnan & Ors. v. Union of India & Ors. (Writ Petition (Civil) No. 230 of 2001)*, the apex court expanded judicial protection over **2,01,503 wetlands** mapped across the country, making their conservation a binding state duty. By failing to penalize unauthorized activities, dumping, or local encroachments, regulatory bodies completely abdicate their statutory responsibilities. This inaction compromises the "Polluter Pays" principle enforced by the National Green Tribunal (NGT) and violates citizens' fundamental right to a healthy environment under Article 21 of the Constitution.
15. The Applicant therefore submits that, although both Respondents have recorded dumping of solid waste and discharge of untreated household wastewater into a wetland, neither Report records any assessment or recovery of Environmental Compensation from the defaulting authorities. J&K PCC's own report notes only that

Environmental Compensation formats were called for from its committee (p. 109, para 5), and no amount has been assessed or recovered. The Applicant prays that CPCB and J&K PCC be directed to assess Environmental Compensation on the polluter pays principle against the persons and authorities responsible, and to apply it towards restoration of the Wetland.

Response to the report submitted by Respondent no.3 J&K PCC

16. That as per the report submitted by Respondent no. 3 J&K PCC, regarding status of water quality, sources of discharge of pollutants and action taken report in Manasbal wetland the applicant herein is filing the present Response thereby making following submissions / objections to the Report:

I. Erroneous findings on the status of water quality in Manasbal Lake, including unreliable microbiological findings arising from defective sampling

17. The Applicant submits that the water quality findings of J&K PCC do not reflect the true condition of the Wetland and cannot be relied upon. J&K PCC sampled four in-lake locations on (17.02.2026) and reported that all four conform to Class-B criteria for pH, dissolved oxygen and faecal coliform, and that only two of the four fail on BOD (pp. 114-115). By contrast, CPCB sampled seven locations on 04.04.2026, covering the lake, the feeder springs and the Lar Canal, and found that none of the seven samples complies with Class-B criteria (para 2.2(iv), p. 154). The marked difference between the two sets of findings raises serious questions about the manner in which

J&K PCC's sampling and assessment were conducted, as set out below.

18. J&K PCC's sampling was confined to open-water locations. It did not sample any of the surface drains at Kondabal, Chesma Manasbal, Gratbal and Jarokbal Bagh, which it itself identified as discharge points (p. 113), nor the Lar Canal or the feeder springs. Samples from open water are diluted and cannot reveal the load entering at the point of discharge. By contrast, CPCB sampled on 04.04.2026 at the periphery, canal and springs and recorded faecal coliform of 780 and 2,200 MPN/100 ml at Kondabal and the Lar Canal respectively, and total coliform of 35,000 and 22,000 MPN/100 ml.
19. J&K PCC's conclusions are also internally inconsistent. It records that untreated domestic sewage is conveyed through open drains and discharged directly into the lake, that solid waste management is "highly unsatisfactory", and that the lake is under "moderate ecological stress" (pp. 113, 116, 117). It nevertheless reports the lake as conforming on microbiological parameters. This conclusion rests on faecal coliform alone. J&K PCC's own total coliform values of 640 to 1,000 CFU/100 ml at all four locations (p. 118) exceed the Class-B limit of 500, a point its Report does not address.
20. The Applicant therefore submits that the water quality findings of J&K PCC are unreliable and cannot be accepted as a true assessment of the Wetland.

II. Failure of the Inspection Report to adequately identify and quantify the sources of discharge of pollutants into the Lake

21. J&K PCC identifies residential settlements along the lake periphery as the source of untreated household wastewater, but its Report stops at naming the villages. It gives no particulars of the discharge points, volumes or households, and says nothing on whether the sewage of the villages alleged in the Application reaches the Wetland through the Lar Canal. Such non-disclosure prevents appropriate measures from being taken to restore the Wetland, as the correct sources of the pollutants responsible for its deterioration remain unascertained.

22. The Applicant therefore submits that J&K PCC's Report ***does not discharge the direction of this Hon'ble Tribunal to find out the sources of discharge of pollutants into the Wetland.*** Although it records untreated household wastewater from peripheral settlements reaching the lake through open drains (pp. 113, 116), it does not quantify the discharge or map the drains and outfalls, and it does not state the number of households or the volume of wastewater generated. It does not examine whether sewage from the villages named in the Application reaches the Wetland through the Lar Canal. It records only that the canal was under renovation and its flow diverted at Dursom on the day of inspection (p. 113), and it does not say where that flow goes or what it carries. No sample was taken from any drain or outfall, so no discharge has been linked to a source. Without this, effective remedial measures cannot be planned. The Applicant prays that J&K PCC be directed

to file a supplementary report with a source-wise inventory of discharges, covering drain-wise location, estimated volume, the villages and households served, and the status of the Lar Canal's flow.

III. Failure to enforce compliance with Solid Waste Management Rules”

23. The Applicant submits that J&K PCC has recorded serious violations of solid waste management norms around the Wetland. Its own inspection found that residential areas along the lake fringe indiscriminately dispose of both biodegradable and non-biodegradable waste on the lake banks, that mixed and unsegregated waste is present at Kondabal, Gratbal, Chesma Manasbal and Jarokbal, that no system of segregation at source exists, that there is no infrastructure for collection, processing, treatment or disposal, and that the absence of door-to-door collection has resulted in open dumping. It describes the solid waste management scenario as “highly unsatisfactory” (p. 116). J&K PCC's response has been limited to issuing directions, to the CEO of the Manasbal Development Authority on 27.06.2024 and 25.11.2025 and to the BDO Safapora on 27.03.2026, and to asking its committee for Environmental Compensation formats on 30.03.2026 (pp. 107-109).
24. The Applicant therefore submits that the directions issued by J&K PCC have not produced compliance. By its Report, J&K PCC records that directions under the Solid Waste Management Rules, 2016 were issued to the CEO, Manasbal Development Authority on 27.06.2024 (Annexure 4, p. 126), and that these were followed by a further communication dated 25.11.2025, which relied on a Regional Director's report of 31.10.2025 recording continuing violations and

again called upon the Authority to comply (Annexure 5, p. 136; Report, para 4, pp. 108-109). The Report does not state whether any response was received to these directions. Directions were also issued to the BDO Safapora on 27.03.2026 (Annexure 3, p. 119). Despite this, J&K PCC's own inspection of 17.02.2026 found open dumping, no segregation at source and no collection infrastructure (p. 116), and CPCB's inspection on 04.04.2026 found mixed municipal solid waste along the lakefront, partially submerged at several locations (Report dated 03.08.2026, para 2.3, p. 155).

25. The Report does not disclose whether any official has been identified for prosecution as the directions required, or whether any Environmental Compensation has been assessed or levied, J&K PCC having only called for Environmental Compensation formats from its committee on 30.03.2026 (Annexure 6, p. 138). Directions that are not followed up with enforcement do not amount to effective compliance.

26. The Applicant prays that J&K PCC be directed to file a compliance statement on each direction issued, to levy Environmental Compensation on the Manasbal Development Authority and the BDO Safapora on the polluter pays principle, and to initiate prosecution under the Environment (Protection) Act, 1986 against the officials found responsible.

IV. Non-compliance with the directions of the Hon'ble Supreme Court in *Paryavaran Suraksha Samiti & Anr. v. Union of India & Ors.*, (2017) 5 SCC 326

27. The Hon'ble Supreme Court in *Paryavaran Suraksha Samiti* (supra),

decided on 22.02.2017, considered the setting up of Common Effluent Treatment Plants and fixed a period of three years for the purpose. It made clear that the directions apply equally to Sewage Treatment Plants. It placed responsibility for functional CETPs/STPs within the stipulated timeline on the Member Secretary of the concerned Pollution Control Board, made the Secretary of the Environment Department of the State or Union Territory answerable for default, and directed the Pollution Control Boards to initiate such civil and criminal action as is permissible in law against the defaulters.

28. The three-year period expired in February 2020. The record before this Hon'ble Tribunal shows that no STP is yet in place for the settlements around Manasbal Lake. The WMDA's note records only that a DPR has been prepared and that action on its communication dated 09.02.2026 is awaited (Annexure-9, p. 188). The report of the study relied on by the Applicant, extracted in this Hon'ble Tribunal's order dated 30.01.2026 (para 5), records that the STP project was initiated nearly a decade ago and that untreated sewage continues to enter the lake. J&K PCC's Report is silent on any step taken by it to ensure the setting up of an STP, or to initiate action against the defaulters, as the Hon'ble Supreme Court required.

29. The Applicant therefore submits that the mandate of the Hon'ble Supreme Court has not been complied with and that responsibility for the default must be fixed. The Applicant prays that the Respondents be directed to file affidavits explaining the default, to place a time-bound schedule for a functional STP (with capacity and location) for the villages around the lake, and to state what

civil and criminal action has been initiated against the defaulters.

V. Failure to enforce statutory provisions against the discharge of untreated wastewater and dumping of solid waste into the Wetland

30. J&K PCC's own Report records that untreated household wastewater is discharged directly into the lake through open drains, and that mixed solid waste is dumped on the lake banks (pp. 107-108, 113, 116). Section 24 of the Water (Prevention and Control of Pollution) Act, 1974 prohibits any person from knowingly causing or permitting polluting matter to enter a stream, which includes inland waters. The Report does not identify any person or authority responsible for such discharge, and does not state that any proceeding has been initiated for contravention of Section 24.

31. Manasbal is a wetland outside forest and wildlife protected areas, covered by the Wetlands (Conservation and Management) Rules, 2017 (Order dated 30.01.2026, para 2). Rule 4 of the Wetlands (Conservation and Management) Rules, 2017 prohibits the discharge of untreated wastes and effluents from industries, cities, towns, villages and other human settlements into such wetlands, as well as solid waste dumping. Section 18 of the Jammu & Kashmir Water Resources (Regulation and Management) Act, 2010 likewise prohibits any activity that pollutes, fouls or reduces the wholesomeness of water resources. J&K PCC's own Report records that untreated household wastewater from the peripheral villages is discharged directly into the lake through open drains, and that mixed solid waste is dumped on the lake banks (pp. 107-108, 113, 116). These are contraventions of both provisions. The

Report does not state that any proceeding has been initiated against the persons or authorities responsible under the 2010 Act, under Section 15 of the Environment (Protection) Act, 1986 for contravention of the Wetlands (Conservation and Management) Rules, 2017, or that the State Wetlands Authority has been called upon to act. Directions alone, without prosecution, compensation or follow-up, have not stopped the pollution, and J&K PCC has thereby failed to discharge its enforcement mandate.

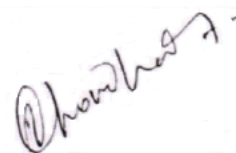
32. J&K PCC's response, as recorded in its Report, is limited to directions to the Manasbal Development Authority (27.06.2024, followed by 25.11.2025) and to the BDO Safapora (27.03.2026) under the Solid Waste Management Rules (pp. 107-109). These directions are for solid waste. The Report records no direction or action for liquid waste, though J&K PCC's letter of 25.11.2025 only asked the CEO to furnish the status of liquid waste management by 15.12.2025 (Annexure 5, p. 137), and the Report does not say whether this was furnished.
33. The Applicant therefore submits that J&K PCC has recorded continuing discharge of untreated wastewater and dumping of solid waste into a wetland, but has not identified the persons or authorities responsible, initiated proceedings under Section 24 of the Water Act or the Wetland Rules, or assessed Environmental Compensation. Directions without follow-up have not stopped the pollution, as both Reports confirm. Hence, the applicant prays for compliances accordingly.

34. Pass any other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the instant case.


APPLICANT

THROUGH





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Email:- litigation@dcclawchambers.com

PLACE:- DELHI

DATED:- 17.10.2026

VERIFICATION

Verified by Raja Muzaffar Bhat, S/o Bashir Ahmed Bhat, aged about 49 years, R/o 64, Alamdar Colony, Gopalpura, District Budgam, Jammu & Kashmir - 191113, that the contents of Paragraphs 1 to 34 are true to my personal knowledge and that I have not suppressed any material fact.


APPLICANT

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
ORIGINAL APPLICATION No. 74 of 2026**

IN THE MATTER OF:

Raja Muzaffar Bhat

...Applicant

Versus

...Respondents

Union Territory of Jammu & Kashmir & Ors.

AFFIDAVIT

I, Raja Muzaffar Bhat, S/o Bashir Ahmed Bhat, aged about 49 years, R/o 64, Alamdar Colony, Gopalpura, District Budgam, Jammu & Kashmir - 191113, do hereby solemnly affirm and declare as under:-

1. That I am Applicant in the above titled Original Application and am well conversant with the facts and circumstances of the case and competent to swear this affidavit.
2. That the contents of accompanying Response are true and correct and nothing material has been concealed therefrom.



DEPONENT

VERIFICATION

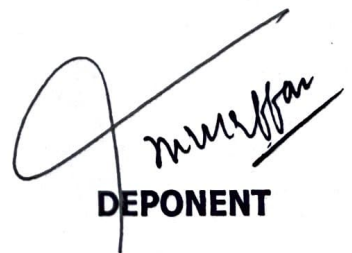
Verified on this 17th day of October, 2026 that the contents of present Affidavit are true and correct to my knowledge and belief and nothing material has been concealed therefrom.

Certified that the above statement is true and correct to my knowledge and belief and nothing material has been concealed therefrom.

17/10/2026

by Raja Muzaffar Bhat
S/o Bashir Ahmed Bhat
Gopalpura Budgam
R/o 64
who is identified by (Signature)

Notary Public
Beerwah, Dist. Budgam.



DEPONENT



सत्यमेव जयते

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Government of Jammu and Kashmir

₹10

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Litigation . <litigation@dclawchambers.com>

Response on behalf of the Applicant

1 message

Litigation . <litigation@dclawchambers.com>

Sat, Oct 17, 2026 at 2:59 PM

To: Gautam Singh <gautamsinghh.ind@gmail.com>

Dear Sir,

Please find attached- Response on behalf of the Applicant

Thanks & Regards
Counsel for the Applicant**Response on behalf of the Applicant.pdf**

1405K