

# Hiranya Pandey

Advocate High Court, Mumbai.

Mobile : 98214 06824

Office Tel No : 022-65121292

E mail : hiranyapandey@yahoo.com

Office :

123-B, 1st Floor,  
Esplande Mansion,  
144, M. G. Road,  
Kalaghoda, Fort,  
Mumbai - 400 023.

**By R.P.A.D.**

Date: 19/08/2014

To,  
Greenpeace India  
Having Head Office at  
60, Wellington Street, Richmond Tower,  
Banglore-560025.

And also at  
A-23, Second Floor,  
Green Park, (Near Aurbindo Market)  
New Delhi-110016.

On behalf of and under instructions of my client's **Crop Care Federation of India** having address at Uniphos House, Madhu Park, 11<sup>th</sup> Road, Khar (West), Mumbai - 400 052, I have to address you as under:

1. That my client is registered non-profit organization established in the year 1962. That my client's members includes Manufacturers & Marketers of Pesticide, Insecticides, etc in India and my client's main objective among others is to safeguard the interest of Manufacturers & Marketers of various Pesticides, Agro Chemicals, Insecticides, Weedicides in India. That my client along with its members provides wide range of pesticides to cater to all the farming requirements for most crops and also endeavors to improve the production of crops in India. Further my clients impart knowledge and know how to Indian farmers by educating them on the use of agrochemicals without any health and environment hazards.

2. That my clients are well known and highly acclaimed Non-Profit Organization in India and have earned a mark of respect due to their contribution to the Indian Society. They have also received several awards and certificates of excellence etc. from government and other agencies in respect of manufacturing and marketing of various Pesticides, Agro Chemicals, Insecticides, Weedicides etc, in India.

3. That You have published a false and fabricated report namely **“TROUBLE BREWING Pesticides residues in tea samples from India”** with a criminal intention to malign not only the Insecticides Industry of India but also Indian Tea Industry.

4. My client states that the said report /study conducted by you is completely unscientific and is false and fabricated by you to lower the esteem of Indian Pesticides Industry in the eyes of general public at large.

5. My clients states that your said report/study is full of lies as Monocrotophos is not used in tea at all, though Monocrotophos is used in other farm product as it is very effective pesticides and the biggest advantage is it decomposes very fast and it does not leave any toxic residues, that is why farmers and others find it effective and it is reasonably priced. However in your said report you shown Monocrotophos being found in the Tea is a outright false and exposes your ignorance about Monocrotophos and your intention to malign the image of Indian Pesticides Industry.

6. Moreover you have mentioned that Monocrotophos was responsible for the death of 23 school children in Bihar. My client states that if you had really done any investigation as claimed by you at the very beginning of your said report, you would have come to know that other so called environmentalists of your category had published false stories about Monocrotophos being responsible for the death of 23 school children in Bihar and now it has been proved beyond doubt that there was no Monocrotophos whatsoever were found in the meals of school children of Bihar.

# Hiranya Pandey

Advocate High Court, Mumbai.

Mobile : 98214 06824

Office Tel No : 022-65121292

E mail : hiranyapandey@yahoo.com

Office :

123-B, 1st Floor,  
Esplande Mansion,  
144, M. G. Road,  
Kalaghoda, Fort,  
Mumbai - 400 023.

---

7. Further you have written volumes about tea in your so called report and it seems that you have no basic knowledge about how the tea is processed? My client states that even if Monocrotophos is used by mistake in tea plantation, during the process of picking up tender leaves, drying up in sun and heating it in 100°C it is impossible that Monocrotophos can survive as it is highly unstable compound and as such before making any cock & bull story you should use some common sense if you don't possess any technical knowledge.

8. My client and scientific bodies of pesticides industry in the past have called upon you to furnish raw data of your analysis/reports published by you earlier in respect of pesticides residue but you had refused to furnish, which proves that Greenpeace is anti-Indian, anti-progress and very fond of publishing false stories to harm the progress and development of the developing country like India. Moreover it is known that you are getting lot of foreign funds to harm the development and progress of India.

9. My clients states that by making and publishing false and defamatory allegations you have scared the public at large in India in consuming Tea and further you portrayed the manufacturers and marketers of pesticides in India and my client's being one of the same as the exploiter, dishonest and bad having malicious intention to draw the false picture of my client's in the minds of public at large by making a false and defamatory statement in your aforesaid Report and showing my clients in bad light in the eyes of the Farmers, Consumers of Tea's, Friends and Public at Large by publishing false, frivolous and defamatory report with sole intention to defame my clients and Indian Pesticides Industry.

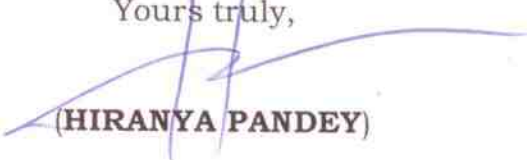


10. That by the publication and printing of the aforesaid report directly and indirectly by my clients nature of business, latently and specifically referring to manufactures of pesticides in India, you have deliberately, dishonestly, and maliciously defamed my clients business and profession and alleged that my clients are not worthy of the status, office, and the position that my clients holds in professional and social field. That you have by the aforesaid Article have greatly injured the credit, the prestige and the reputation of my client's and my client's credit, prestige and reputation have been greatly lowered and as a consequence my client's has suffered much pain and has been humiliated and you are indivisibly liable for causing damage to the credit, the prestige and the reputation of my client's.

11. My client's states that thus by publishing patently false, defamatory and derogatory report/Article by you, you have committed the offence as defined U/s. 499 of the Indian Penal Code, 1860 and are liable to be punished U/s. 500 of the Indian Penal Code, 1860.

I hereby call upon you to furnish copy of entire raw data of analysis / study/report conducted by you as claimed in the aforesaid Report to my clients and also tender an unconditional and unqualified written public apology within 7 days on receipt of this notice, failing which my client has no remedy but to initiate legal proceedings against you under sections 500 of the Indian Penal Code and also will file suit of Rs. 50,00,00,000/- (Rs. Fifty Crores Only) against you for defaming my client's in public. Needless to add that the entire proceedings will be at your risk, as to cost and consequences thereof which please note.

Yours truly,

  
(HIRANYA PANDEY)