

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH SITTING AT NEW DELHI  
EXECUTION APPLICATION No. 26 of 2025  
in  
ORIGINAL APPLICATION No. 351 of 2019**

**IN THE MATTER OF:-**

RAJA MUZAFFAR BHAT

...APPLICANT

VERSUS

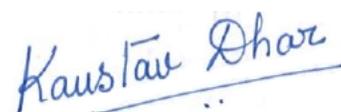
UNION TERRITORY OF JAMMU AND KASHMIR &amp; ORS.

...RESPONDENTS

**INDEX**

<b>S. NO.</b>	<b>PARTICULARS</b>	<b>PAGE NO.</b>
1	ADDITIONAL AFFIDAVIT ON BEHALF OF THE APPLICANT	220-224
2	<b>Annexure A-1</b> Copy of photograph dated 25.08.2025 showing trash collected and entering the wetland	225-228
3	<b>Annexure A-2</b> Copy of photograph dated 19.08.2025 showing large scale dumping of waste in the wetland	229-230
4	<b>Annexure A-3</b> Copy of photograph dated 25.08.2025 showing the illegal road inside the wetland	231-232
5	<b>Proof of Service</b>	233

Through


**RAHUL CHOUDHARY**

**KAUSTAV DHAR  
ADVOCATES**

Counsel for the Applicant  
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Email:- [Litigation@dclawchambers.com](mailto:Litigation@dclawchambers.com)

Place:- New Delhi/Bhopal

Dated:- 26.08.2025

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**ADDITIONAL AFFIDAVIT ON BEHALF OF THE APPLICANT**

**MOST RESPECTFULLY SHOWETH:-**

1. I, Raja Muzaffar Bhat, aged about 48 years, S/o Bashir Ahmed Bhat, R/o 64, Alamdar Colony, Gopalpura, District-Budgam, Jammu & Kashmir, the deponent herein is applicant in above titled matter and is competent to swear this affidavit. The applicant has filed Execution Application under Section 25 of NGT Act seeking execution and compliance of order dated 25.11.2021 passed by this Hon'ble Tribunal in the matter titled *Raja Muzaffar Bhat vs. State of Jammu and Kashmir & Ors.* (Original Application No. 351 of 2019). It is submitted that the concern of the applicant was primarily with respect to Hokersar wetland, Wullar lake, both of which are Ramsar site and also Kreentchoo-Chandhara wetland. It is pertinent to point out that the Hon'ble Tribunal by order and judgment dated 25.11.2021 has directed for protection of all wetland in the State.



2. That the Hon'ble Tribunal issued notice on 23.04.2025 and all the respondents were served and Affidavit-of-Service already filed on 03.06.2025. It is submitted that even after receiving the notice issued by this Hon'ble Tribunal for the execution of order and judgment dated 25.11.2021 in O.A. No. 351 of 2019, no steps has been taken by any of the respondent and dumping of solid waste and other activities in violation of Wetland Rules and directions passed by this Hon'ble Tribunal is continuing. The applicant is constrained to place before this Hon'ble Tribunal the status of the wetland as present.
3. That the Hon'ble Tribunal has recorded in para 10 of the judgment about Integrated Management Action Plan for Hokersar, Hygam, Shallabugh, Mirgund, Chattlum, Manibugh, Fashkooori and Krenctchoo wetland for which budgetary outlet of Rs. 46.70 Crores was prepared by Department of Wildlife Protection, J & K. As per the knowledge of the applicant, the amount for implementation of the plan is already released to the Wildlife Department, however, no steps has been taken. It is submitted that following are the status of some of the wetland at present:



- i. As per the proposal Hokersar wetland in District Srinagar and Budgam was required to be demarcated and vulnerable area was to be closed by chain-link fencing, barbed wire fencing and bio fencing by plantation of 286700 willow and other plant. However, the area is still being used as dumping of waste and waste flowing from Doodhganga gets collected here in the wetland. It is submitted that trash guard constructed to stop the waste to flow into the wetland is

broken and entire waste is now flowing into the wetland through river Doodhganga. The copy of photograph dated 25.08.2025 showing trash collected and entering the wetland is annexed herewith and marked as **ANNEXURE A/1**.

- ii. The waste dumping is continue in the Wullar lake which is a Ramsar site in the area Zalwan in Bandipora district. No steps has been taken by the concerned respondent to stop dumping of waste and restore the wetland. The copy of photograph dated 19.08.2025 showing large scale dumping of waste in the wetland is annexed herewith and marked as **ANNEXURE A/2**.
  - iii. The respondents have not taken any step for restoration of Kreentchoo-Chandhara wetland. The illegally constructed road from the wetland is used for transportation of soil by doing illegal mining from nearby Karewa mountains. The transportation happening in the night and movement of vehicle in the day disturb the wetland. The copy of photograph dated 25.08.2025 showing the illegal road inside the wetland is annexed herewith and marked as **ANNEXURE A/3**.
4. That in the light of the present situation of these three wetlands and also inaction with respect to other wetlands in the State, the Hon'ble Tribunal may pass appropriate directions to the respondents to be complied in time-bound manner.



A handwritten signature in blue ink, appearing to read "Nazia Hashim", written in a cursive style.

**DEPONENT**

**VERIFICATION:**

Verified by Raja Muzaffar Bhat, aged about 48 years, S/o Bashir Ahmed Bhat, R/o 64, Alamdar Colony, Gopalpura, District-Budgam, Jammu & Kashmir, do hereby verify that the contents of Paragraphs 1 to 4 are true to my personal knowledge and nothing material has been concealed therefrom.

  
DEPONENT



**Certified that the statement  
declared on oath before me  
on 26/4/25 at Srinagar  
and who is identified by  
Achante Badrudin**

  
**Nazia Hashim (Advocate)  
Notary Public Srinagar**



सत्यमेव जयते

## INDIA NON JUDICIAL

## Government of Jammu and Kashmir

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**Certificate No.** : IN-JK76721019419800X  
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**Unique Doc. Reference** : SUBIN-JKJK1254110438967895769556X  
**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  
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190017, , 190017,  
Lat 34.096136° Long 74.716867°  
25/08/2025 01:51 PM GMT +05:30



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190017, , 190017,  
Lat 34.096093° Long 74.716773°  
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Latitude: 34.403569  
Longitude: 74.633277  
Elevation: 1584.09±3.00 m  
Accuracy: 3.98 m  
Time: 19-08-2025 18:01:56

NoteCam @ iOS



Latitude: 34.403580  
Longitude: 74.633268  
Elevation: 1584.00±4.03 m  
Accuracy: 4.75 m  
Time: 19-08-2025 18:02:05



 **GPS Map Camera**



# Patal Bag

Xwqh+wgq, Patal Bag, 192122,  
Lat 33.991441° Long 74.930742°  
25/08/2025 01:56 PM GMT +05:30



 **GPS Map Camera**



**Patal Bag**  
Xwqh+wgq, Patal Bag, 192122,  
Lat 33.99146° Long 74.930712°  
25/08/2025 01:57 PM GMT +05:30



233

Litigation . &lt;litigation@dclawchambers.com&gt;

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**Copy of Additional Affidavit on behalf of the Applicant in EA No. 26 of 2025 in OA No. 351 of 2019 Raja Muzaffar Bhat Versus. Union Territory of Jammu and Kashmir & Ors**

1 message

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**Litigation .** <litigation@dclawchambers.com>

Tue, Aug 26, 2025 at 12:30 PM

To: cs-jandk@nic.in, membersecretaryjkspcb@gmail.com, jkwildlife78@gmail.com, ce-ifckashmir@jk.gov.in, commissioner-smc@jk.gov.in, dcbudgam@gmail.com, bandipore@nic.in, dcpul-jk@nic.in, secy-moef@nic.in  
Cc: Kol Office <kol\_office@dclawchambers.com>

Dear Sir/madam,

Please find attached- Copy of Additional Affidavit on behalf of the Applicant in EA No. 26 of 2025 in OA No. 351 of 2019 Raja Muzaffar Bhat Versus. Union Territory of Jammu and Kashmir & Ors

Thanks & Regards  
Counsel for the Applicant

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 **Add Affidavit on behalf of the Applicant.pdf**

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