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BEFORE THE 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

STATE OF JAMMU & KASHMIR AND ORS.

...RESPONDENTS

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THROUGH

Rahul Choudhary

Kaustav Dhar

RAHUL CHOUDHARY KAUSTAV DHAR

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PLACE: NEW DELHI

DATE: 20.11.2025

737

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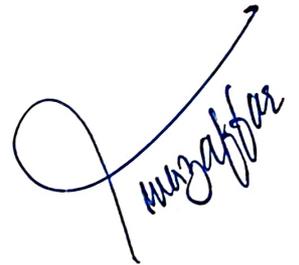
VERSUS

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.... RESPONDENTS

ADDITIONAL AFFIDAVIT ON BEHALF OF THE APPLICANT

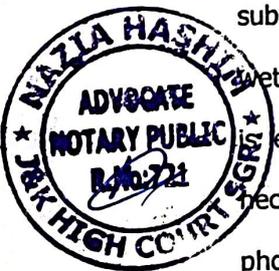
1. I, Raja Muzaffar Bhat, aged about 40 years, S/o Bashir Ahmed Bhat, R/o 64, Alamdar Colony, Gopalpura, District Budgam Jammu & Kashmir, the Deponent herein is the Applicant in the above titled matter and is competent to sear this affidavit.
2. The Deponent herein is filing the present Additional Affidavit to bring on record the present status of the Hokersar Wetland, Wullar Lake both of which are Ramsar Site and Kreentchoo-Chandhara Wetland with regard to the persistent disposal of municipal solid wastes across the Wetlands.
3. That the above-titled Execution Application was filed under Section 25 of the National Green Tribunal Act, 2010, 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 351 of 2019)*. It is submitted that the primary concern of the Applicant herein was with respect to Hokersar Wetland, Wullar Lake both of which are Ramsar Sit and Kreentchoo-Chandhara Wetland alleging the unscientific dredging, rampant illegal encroachments and dumping of municipal solid waste on the three major wetlands of Jammu and Kashmir. It is pertinent to point out that this Hon'ble Tribunal vide order and judgment dated 25.11.2021 has directed protection and conservation of all the Wetlands in the Jammu and Kashmir.
4. That the present matter was first heard on 23.04.2025. This Hon'ble Tribunal issued




notice and all the Respondents were served and Affidavit of Service was filed on

03.06.2025. It is submitted that even after receiving the notice issued by this Hon'ble Tribunal, no necessary action is taken by any of the Respondents. Thereafter, the matter was again listed on 28.08.2025. That even after specific directions by this Hon'ble Tribunal on subsequent two hearings, till date no steps have been taken by any of the Respondents and dumping of solid waste and other activities in complete violation of Wetland Rules and directions passed by this Hon'ble Tribunal is continuing. Thus, the Applicant is constrained to place before this Hon'ble Tribunal the status of the wetlands as present.

5. That this Hon'ble Tribunal has recorded in Para No. 10 of the Judgment dated 25.11.2021 about an Integrated Management Plan for Hokersar, Hygam, Shallabugh, Mirgund, Chattlum, Manibugh, Fashkooori and Kreentchoo Wetland for which budgetary outlay of Rs. 46.70 crores was prepared by Department of Wildlife Protection, J&K. That 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.
6. That the Applicant in this regard has filed an Additional affidavit dated 26.08.2025 placing on record the pictorial evidences of the then status of the Hokersar, Wullar and Kreentchoo-Chandhara Wetlands. That till date the situation remains the same.
 - i. **Hokersar Wetland** – The Hokersar wetland which is a Ramsar Site was required to be demarcated and the vulnerable areas were to be closed by chain-link fencing, barbed wire fencing and bio fencing so that the waste from the River Doodhganga does not enter the Hokersar Wetland. However, the area is still being used as dumping of waste flowing from River Doodhganga gets accumulated. It is submitted that the trash guard constructed to stop the waste to flow into the wetland is very low and broken and as a result the entire waste from Doodhganga entering into Hokersar Wetland. Despite the grave scenario, till date no necessary action has been taken by the any authorities. The copy of the recent photographs dated 08.11.2025 taken by the Applicant of Hokersar Wetland is annexed herewith as **ANNEXURE A/1**.
 - ii. **Wullar Lake** – The dumping of municipal solid waste in the Wullar Lake, which is a Ramsar Site is still continuing. No steps has been taken by the Municipal Council



Muzaffar

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Bandipora. The copy of the recent photographs dated 15.11.2025 taken by the Applicant showing massive dumping of municipal solid waste is annexed herewith as **ANNEXURE A/2.**

iii. **Kreentchoo-Chandhara** – The Wildlife Department of J&K has not taken any step for the restoration of the Kreentcho-Chandhara Wetland. The illegally constructed kaccha road has now been converted into a pucca road. Huge amount of dust, gravels, JCBs and road rollers were used to construct the same in blatant violation of the Wetland Rules, 2017. The illegal work started on 29.10.2025 - 30.10.2025. This illegally constructed road is used for the transportation of soil by conducting illegal mining from nearby Karewa Mountains which is happening even in the night. That the Applicant submits that there have been multiple instances of fires breaking out in the Kreentchoo-Chandhara Wetland, which have had a devastating impact on the wetland’s ecology and biodiversity. The same has been submitted by the Applicant in the Execution Application. The copy of the photographs dated 30.10.2025 and 05.11.2025 showing illegal pucca road inside the wetland is annexed herewith as **ANNEXURE A/3.**

7. That in light of the present situation of these three wetlands and also inaction with respect to other wetlands in J&K, this Hon’ble Tribunal may pass appropriate directions to the Respondents and to comply the same in a time-bound manner.



Muzaffar Bhat
DEPONENT

VERIFICATION

Verified by Raja Muzaffar Bhat, aged about 40 years, S/o Bashir Ahmed Bhat, R/o 64, Alamdar Colony, Gopalpura, District Budgam Jammu & Kashmir, do hereby verify that the Paragraphs No. 1 to 7 are true to my personal knowledge and nothing material has been concealed.

Certified that the statement declared on oath before me on 20/11/25 at Srinagar and who is identified by [Signature]

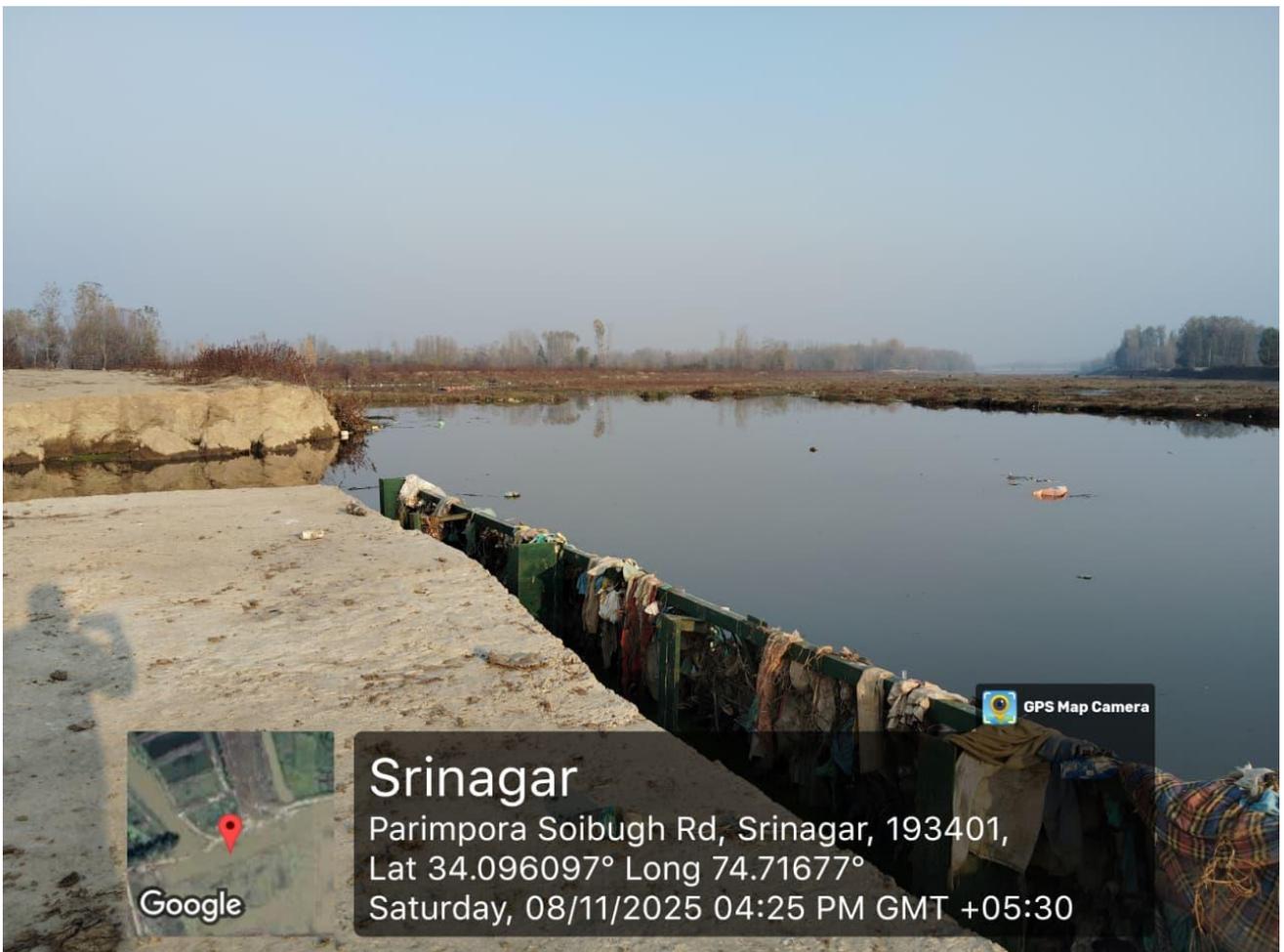
**Nada Hashim (Advocate)
Notary Public Srinagar**

[Signature]
Nadine Dye
Advocate

[Signature]
DEPONENT

ANNEXURE A/1

**COPY OF THE RECENT PHOTOGRAPHS DATED 08.11.2025 TAKEN BY THE
APPLICANT OF HOKERSAR WETLAND.**



ANNEXURE A/2

COPY OF THE RECENT PHOTOGRAPHS DATED 15.11.2025 TAKEN BY THE APPLICANT SHOWING MASSIVE DUMPING OF MUNICIPAL SOLID WASTE.



Bandipora Zalwan Rd, Qazipora
Patushi, 193502

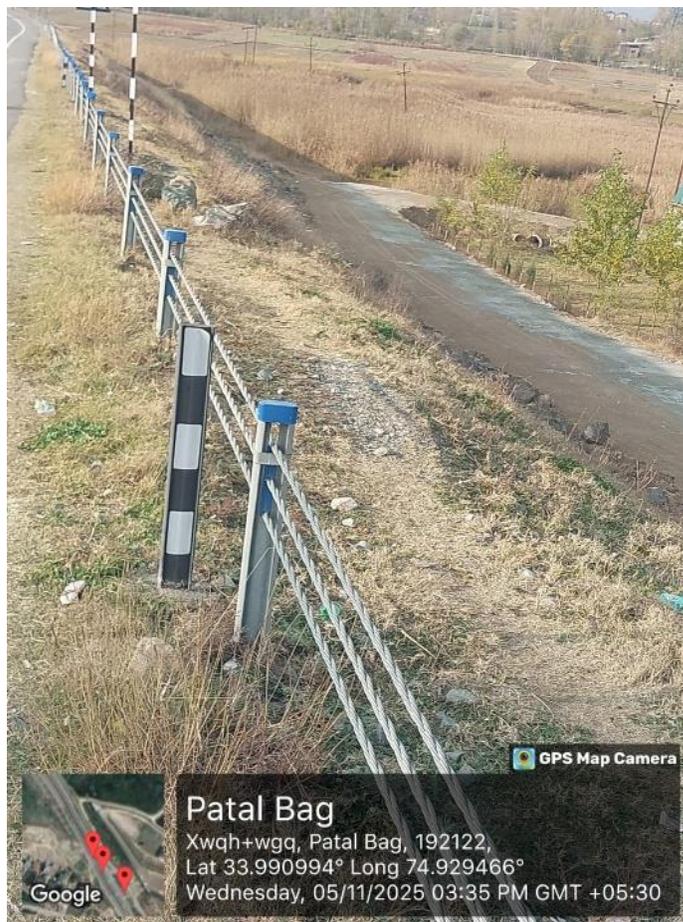
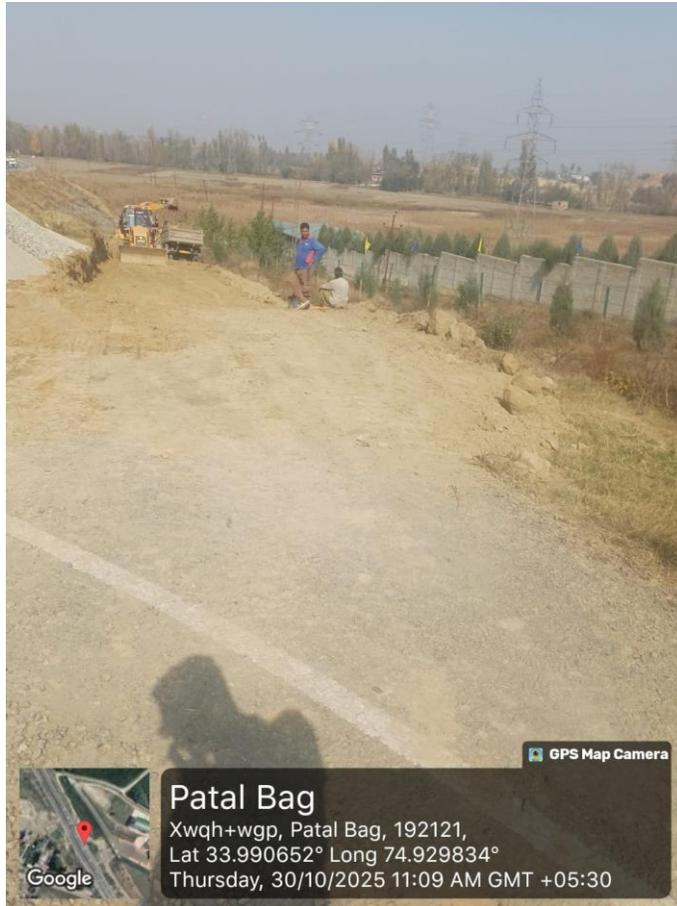
Lat: 34.40355, Lng: 74.63326

15/11/25 11:53:14 AM

GMT+05:30

ANNEXURE A/3

**COPY OF THE PHOTOGRAPHS DATED 30.10.2025 AND 05.11.2025 SHOWING
ILLEGAL PUCCA ROAD INSIDE THE KREENTCHO-CHANDHARA WETLAND:**





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Litigation . <litigation@dclawchambers.com>

Additional Affidavit on behalf of the Applicant in EA No. 26 of 2025 Raja Muzaffar Bhat Versus. State of Jammu & Kashmir & ors.

1 message

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Thu, Nov 20, 2025 at 12:22 PM

To: "rohan.gupta@enlex.co.in" <rohan.gupta@enlex.co.in>, Gautam Singh <gautamsinghh.ind@gmail.com>

Cc: Kol Office <kol_office@dclawchambers.com>

Dear Sir,

Please find attached- Additional Affidavit on behalf of the Applicant in EA No. 26 of 2025 Raja Muzaffar Bhat Versus. State of Jammu & Kashmir & ors.

Thanks & Regards
Counsel for the Applicant

 **Additional Affidvit on behalf of Applicant.pdf**
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