

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 OF INDIA & ORS.**

**...RESPONDENTS**

**ADDITIONAL AFFIDAVIT ON BEHALF OF APPLICANT**

I, Raja Muzaffar Bhat, R/o 64, Alamdar Colony, Gopalpura, District Budgam, Jammu & Kashmir- 191113, presently at Nagpur do hereby solemnly affirm and declare as under:

1. That I am the Applicant in the above titled application and conversant with the facts and circumstances of the case and competent to swear this affidavit.
2. That the above-titled Original Application has been filed highlighting the 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.
3. That the Hon'ble Tribunal took cognizance of the issue of dumping of waste on the banks of Poonch River on 13.04.2023 and subsequently vide Order dated 17.04.2025 had recorded the statement of CEO, Municipal Council,



Poonch made in the Report dated 15.04.2025 that the entire legacy waste will be cleared by August 2025:

*"The report states that the entire legacy solid waste will be remediated by August 2025, subject to smooth tendering process."*

4. That in this regard, the Hon'ble Tribunal vide Order dated 17.04.2025 had directed the CEO to file an affidavit giving this undertaking:

*"3. The CEO, Poonch is directed to file an undertaking in the form of affidavit stating that the entire legacy waste will be remediated by 31.08.2025 and also give the clear details with supporting material in respect of 100% treatment of the daily generated waste."*

5. That however, no action has been taken on the site on ground. The Applicant has, in the past, produced photographs to show that no steps to remove waste and remediate the site has been taken. These photographs are annexed at **Pages 52, 465-467 and 526-527.**

6. That the Applicant is producing recent photographs dated 04.01.2026 and 05.01.2026 (taken by Mr. Lokesh Sharma, working on environmental issues in the area and known to the Applicant) to show that not only the waste is still lying on the site, for example near S K Bridge but it is also entering the river, which will resultantly cause pollution downstream.

Copy of photographs dated 04.01.2026 and 05.01.2026 is annexed herewith as **ANNEXURE A-1.**

7. That the authorities have failed to remediate the situation on ground and have taken no steps to ensure that the river water, which forms source of drinking water for people living downstream, is not polluted. If no immediate



steps are taken, irreversible damage will be caused to the environment and human health.

- 8. That in light of the above facts and circumstances and in the interest of justice, this Hon'ble Tribunal may pass suitable orders.

*[Handwritten Signature]*

**DEPONENT**

**BEFORE ME**

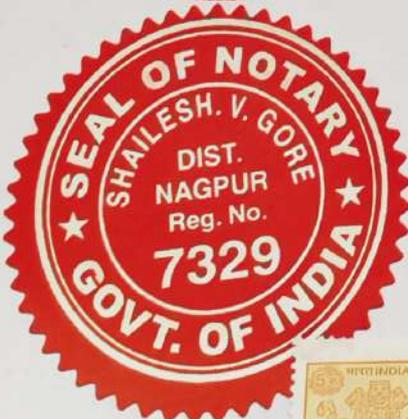


Sworn before me on this.....<sup>5</sup>.....dt.  
 day of.....<sup>Jan</sup> 20<sup>26</sup>.....at Nagpur by  
 Shri/Smt./Ku. *Raja Muzaffar Bhat*  
 R/o. Nagpur who has been identified  
 by Shri/Smt. *Self*  
 Advocate, Nagpur.

*[Handwritten Signature]*  
 5/1/2026

NOTARY  
GOVT. OF INDIA  
Nagpur (M.S.) India

**5 JAN 2026**



NOTARIAL REG.  
 ENTRY NO. *45*  
 DATE **5 JAN 2026**



Photographs dated 04.01.2026 and 05.01.2026



