

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH, NEW DELHI**  
**EXECUTION APPLICATION NO. 20 of 2025**  
**IN**  
**O.A. NO. 678 of 2023**  
**(Under Section 25 of the National Green Tribunal Act, 2010)**

**IN THE MATTER OF:**

JRF RWA &amp; ORS.

....APPLICANTS

VERSUS

GOVERNMENT OF NCT OF DELHI &amp; ORS.

....RESPONDENTS

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*Yogeshwar*

**Dated: 13.10.2025**  
**Place: New Delhi**

**(Jangpura Extension Residents Forum RWA)**  
**SPA HOLDER**

**THROUGH COUNSEL**

*A Bhushan*

(Nipun Bhushan)  
 Advocates,  
 Bhushan & Associates,  
 i-34, GF, Jangpura Ext.,  
 New Delhi-110014  
 Mobile: 9958799788  
 Email: [adv.nipunbhushan@gmail.com](mailto:adv.nipunbhushan@gmail.com)

Enrolment No.-D/8131/2022

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH, NEW DELHI**  
**EXECUTION APPLICATION NO. 20 of 2025**  
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**O.A. NO. 678 of 2023**  
**(Under Section 25 of the National Green Tribunal Act, 2010)**

**IN THE MATTER OF:**

JRF RWA & ORS. ....APPLICANTS  
VERSUS  
GOVERNMENT OF NCT OF DELHI & ORS. ....RESPONDENTS

**ADDITIONAL AFFIDAVIT TO PLACE ON RECORD PROOF OF FURTHER NON-COMPLIANCE BY R.NO. 1/ MCD TO THE HON'BLE TRIBUNAL'S DIRECTIONS FOR STOPPING DUMPING OF WASTE ISSUED VIDE ITS ORDER DT. 09.07.2025 IN E.A. 20 OF 2025 AND A COMPLETE DISREGARD OF THE FINAL OPPORTUNITY TO COMPLY WITH THE SAID DIRECTIONS GRANTED IN THE SAME ORDER**

I, Yogeshwar Mohan Mahajan, aged 70 years, S/o Late Sh. Som Nath Mahajan, R/o N-13, Jangpura Extension, Dist. South East, Delhi, do hereby solemnly declare and state as under:-

1. That I am the President of Applicant No. 1, i.e., '**Jangpura Extension Residents Forum RWA**' in the Execution Application titled above and being well conversant with the facts and circumstances of the case, I am competent to swear this Additional Affidavit.
2. That further, **Applicants 2-5 have authorized me**, to carry out the proceedings on their behalf before this Hon'ble Tribunal in the instant Execution Application. The authorization includes, *inter alia*, swearing this Additional Affidavit.

I further solemnly declare and state as under:

**R.NO. 1/MCD IS DISOBEYING THIS HON'BLE TRIBUNAL'S STRICT DIRECTIONS AND HAS NEGLECTED THE LAST OPPORTUNITY**

- A. It must be noted that R.No. 1/MCD has been brazenly disobeying the directions issued to it by this Hon'ble Tribunal vide its Order dated 09.07.2025 and has been overtly neglecting the final opportunity granted to it to comply with the directions of this Hon'ble Tribunal (in order to prevent to **Penalty** provided for under **Section 26 of the National Green Tribunal Act, 2010**) vide the same Order.
- B. It must also be noted that R.No. 1/MCD has been brazenly disobeying the directions issued to it by this Hon'ble Tribunal vide its Order dated 25.02.2025 in O.A. 678 of 2023 (marked as Annexure 1 in E.A. 20/2025) and has even been casually breaching its own undertaking as recorded in this Hon'ble Tribunal's Order dated 03.04.2025 in E.A. 20 of 2025 by



evidently omitting to prevent the dumping of waste at the Block-H and Block-D dhalaos which were closed down by this Hon'ble Tribunal vide its aforementioned Order dated 25.02.2025 in O.A. 678 of 2023.

**Photos showing continued dumping of waste at the Block-H dhalao, even after the exceptional indulgence given by this Hon'ble Tribunal to R.No. 1/MCD is annexed herewith as Annexure 1 (colly) and those showing dumping at the Block-D dhalao have been annexed herewith as Annexure 2 (colly).**

**R.NO. 1/MCD IS EVEN BRACHING ITS OWN OFFICE ORDER DATED 08.05.2025**

C. It is extremely vital to note that, in an attempt to mislead this Hon'ble Tribunal and to create a false perception amongst the public that everything is okay, R.No. 1/ MCD issued an office order on 08.05.2025 and put it across in the general public that from the said date, the MCD would be deploying its staff at the Block-H and Block-D dhalao, ostensibly, in order to stop all instances of the routine illegal dumping of waste at the said dhalaos.

However, notwithstanding, the issuance of the aforementioned office notice and notwithstanding the tall claims of the MCD to stop illegal dumping, it is the MCD itself which continues to let the informal-sector waste-collectors dump waste at these dhalaos under the MCD's very watchful eye and possibly in collusion with the concerned MCD engineers within the MCD's Department of Environmental Management Services (DEMS) considering the fact that the concerned engineers have been provided with numerous reports by the residents of Applicant No. 1 colony but none of the said engineers has ever acted on those numerous reports. A photo of the said office notice issued by R.No 1/ MCD has been annexed herewith as **Annexure 3**.

**R.NO. 1/MCD IS BRAZENLY TRYING TO VITIATE THIS HON'BLE TRIBUNALS'S ORDER DATED 25.02.2025 IN O.A. 678 OF 2023 BY SETTING UP AN FCTS AT THE BLOCK-H AND BLOCK-D DHALAO EACH**

D. It must be noted that R.No. 1/MCD has been tirelessly trying to vitiate/nullify this Hon'ble Tribunal's Order dated 25.02.2025 (as explained in E.A. 20/2025) by setting up an FCTS at the Block-H and Block-D dhalao each, despite the recommendation made by the Solid Waste Management Committee of 12 types of alternative uses for the closed dhalaos which are enumerated as follows:

1. **Merged with Parks**
2. Amul Booth
3. Attendance Shelter
4. Office
5. MRF
6. EV charging point
7. Senior Citizen Recreation
8. Telephone Power



9. Outsourced CSR
10. RP Cell
11. Library
12. FCTS

It is quite clear from the preceding list of alternative uses as enumerated by the Solid Waste Management Committee (published by the Department of Environment, GNCTD and the DPCC) **that it is well within the scope of its recommended alternative uses to subsume the Block-H Dhalao into the park which it adjoins** for the meaningful purpose of planting more trees and for even setting up aero-bins which would help in realizing the goal of 'utilization of wet waste at source' so that at least some Blocks of Jangpura Extension can become 'Zero-wet-waste'. **This recommendation serves as an excellent substitute to the MCD's perverse plan of establishing an FCTS and the Block-H dhalao** which will inevitably affect:

- *at least 40-50 families;*
- *at least 3000 school students of the two schools situated just metres away from the said dhalao;*
- *countless worshippers visiting the mandir and the langar hall situated just 30-40 meters away;*
- *countless members of the general public visiting the H-Block park which adjoins the Block-H Dhalao; and*
- *countless members of the general public who walk past this hazardous dhalao to get to their places of work etc.*

As for the Block-D Dhalao, the MCD's plan to establish an FCTS and its site will inevitably affect:

- *Also, at least 15-20 families; and*
- *countless worshippers visiting the two huge mandirs situated near the said dhalao.*

Thus, the ***proposed installation of FCTS*** at the locations of the aforementioned dhalaos in question ***will perpetuate the existing suffering of the Applicants and of the other residents living near the said dhalaos*** as R.No. 1/MCD's agreement with DDSIL (R.No. 3 in O.A. 678/2023) makes it **mandatory for such an FCTS to have a provision that enables residents to dump their waste which will only serve to perpetuate the issue of illegal dumping of waste at the said locations.**

*Yashpal*

DEPONENT

#### VERIFICATION

I, the above named deponent, presently at New Delhi do hereby verify that all what is contained in my foregoing Additional Affidavit is true and correct to the best of my knowledge and belief.



Verified and signed at New Delhi on this 13th day of October, 2025.

*Yasheshwar*

DEPONENT



*A. Bhushan*  
I identified the deponent who  
has signed in my presence

**ATTESTED**  
NOTARY PUBLIC  
(INDIA)

**13 OCT 2025**

PICTURES SHOWING PILES OF MIXED MUNICIPAL SOLID WASTE DUMPED AT THE BLOCK-H DHALAO DESPITE CLEAR TRIBUNAL DIRECTIONS AND DESPITE FINAL OPPORTUNITY TO COMPLY WITH ITS DIRECTIONS

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

17th July 2025

GPS Map Camera



Google

New Delhi, Delhi, India

10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.582324° Long 77.242084°

17/07/2025 07:30 AM GMT +05:30

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

18th July 2025

Supervisor No: 72900411037

GPS Map Camera



Google

New Delhi, Delhi, India

10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.582366° Long 77.242124°

18/07/2025 07:08 AM GMT +05:30

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

28th July 2025

GPS Map Camera



Google

New Delhi, Delhi, India

H-10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.582351° Long 77.242193°

28/07/2025 06:35 AM GMT +05:30

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

24th August 2025

New Delhi, Delhi, India

H6mr+4q5, Jangpura, Block J, Jungpura Extension,  
New Delhi, Delhi 110014, India

Lat 28.582421° Long 77.242054°

24/08/2025 06:05 AM GMT +05:30

Google

GPS Map Camera

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

18th September 2025

GPS Map Camera

New Delhi, Delhi, India 

10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.582342° Long 77.242115°

18/09/2025 07:26 AM GMT +05:30

Google

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

24th September 2025

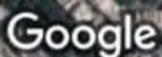
GPS Map Camera

New Delhi, Delhi, India 

H6mr+4q5, Jangpura, Block J, Jungpura Extension,  
New Delhi, Delhi 110014, India

Lat 28.582441° Long 77.242013°

24/09/2025 07:11 AM GMT +05:30

Google 

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

25th September 2025

GPS Map Camera

New Delhi, Delhi, India

10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.582241° Long 77.242051°

25/09/2025 07:18 AM GMT +05:30

Google

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

02nd October 2025

GPS Map Camera

New Delhi, Delhi, India 

10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.58235° Long 77.242117°

02/10/2025 07:33 AM GMT +05:30

 Google

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

06th October 2025

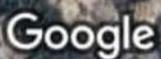
 GPS Map Camera

New Delhi, Delhi, India 

H-10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.582375° Long 77.242157°

06/10/2025 08:13 AM GMT +05:30

 Google

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-H DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

13th October 2025



GPS Map Camera

New Delhi, Delhi, India 

H-10, Block H, Jungpura Extension, New Delhi, Delhi  
110014, India

Lat 28.582352° Long 77.242139°

Monday, 13/10/2025 07:13 AM GMT +05:30

Google

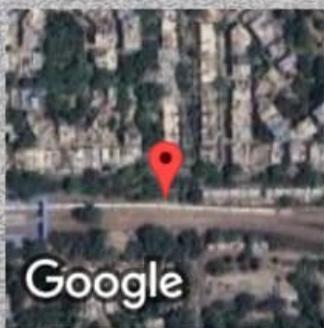
PICTURES SHOWING PILES OF MIXED MUNICIPAL SOLID WASTE DUMPED AT THE BLOCK-D DHALAO DESPITE CLEAR TRIBUNAL DIRECTIONS AND DESPITE FINAL OPPORTUNITY TO COMPLY WITH ITS DIRECTIONS

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17th July 2025



GPS Map Camera



Google

New Delhi, Delhi, India

C26, Jangpura, Block C, Jungpura Extension, New Delhi, Delhi 110014, India

Lat 28.579458° Long 77.245494°

17/07/2025 07:37 AM GMT +05:30

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-D DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

18th July 2025



GPS Map Camera



New Delhi, Delhi, India

4, Jangpura, Block G, Jungpura Extension, Jal Vihar,  
New Delhi, Delhi 110014, India

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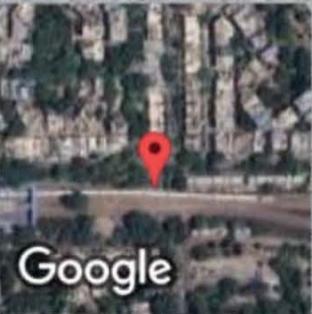
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MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-D DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

19th July 2025



GPS Map Camera



Google

New Delhi, Delhi, India

4, Jangpura, Block G, Jungpura Extension, Jal Vihar,  
New Delhi, Delhi 110014, India

Lat 28.579444° Long 77.245524°

19/07/2025 07:27 AM GMT +05:30

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-D DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

24th September 2025



GPS Map Camera

New Delhi, Delhi, India 

D5, Mannu Marg, Near Eros, Block D, Jungpura Extension, New Delhi, Delhi 110014, India

Lat 28.579373° Long 77.245404°

24/09/2025 07:23 AM GMT +05:30

Google

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-D DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

25th September 2025

GPS Map Camera

New Delhi, Delhi, India 

2nd Floor, D-6, Block D, Jungpura Extension, New Delhi, Delhi 110014, India

Lat 28.579318° Long 77.24531°

25/09/2025 07:23 AM GMT +05:30

Google

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-D DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

02nd October 2025

GPS Map Camera



New Delhi, Delhi, India 

4, Jangpura, Block G, Jungpura Extension, Jal Vihar,  
New Delhi, Delhi 110014, India

Lat 28.579424° Long 77.245492°

02/10/2025 07:35 AM GMT +05:30

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-D DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

05th October 2025

 GPS Map Camera



New Delhi, Delhi, India 

4, Jangpura, Block G, Jungpura Extension, Jal Vihar,  
New Delhi, Delhi 110014, India

Lat 28.579474° Long 77.245532°

05/10/2025 10:13 AM GMT +05:30

MCD ALLOWING WASTE TO BE DUMPED AT BLOCK-D DHALAO IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS TO STOP THE SAME WHILE COMPLETELY DISREGARDING THE FINAL OPPORTUNITY GRANTED TO IT TO COMPLY WITH ITS DIRECTIONS

06th October 2025

 GPS Map Camera



New Delhi, Delhi, India 

4, Jangpura, Block G, Jungpura Extension, Jal Vihar,  
New Delhi, Delhi 110014, India

Lat 28.57945° Long 77.245517°

06/10/2025 08:15 AM GMT +05:30



MUNICIPAL CORPORATION OF DELHI  
DEPARTMENT OF ENVIRONMENT MANAGEMENT SERVICES  
CENTRAL ZONE, LAJPAT NAGAR  
NEW DELHI-110024

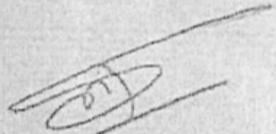
No. 123 /AC/DEMS/CNZ/2024-25

Dated 8/05/25

OFFICE ORDER

Since the Dhalaos of Jungpura Extension have been closed by the NGT, the following safai karamcharies are hereby deployed at D-Block and H-Block Dhalaos of Jungpura Extension, Amar Colony as per below mentioned schedule for the purpose to stop unauthorized dumping of malba/garbage by the nearby/residents, with immediate effect, till further orders.

S.No.	Name and parentage of Safai Karamcharies	BMID No.	Timing	Shift
1.	Sh. Ashok Kumar S/o Sh. Balbir	51200529	06 AM to 02 PM	Ist Shift
2.	Sh. Madan S/o Sh. Rajbir	51200546	06 AM to 02 PM	Ist Shift
3.	Sh. Amit S/o Sh. Prem	51200518	02 PM to 10 PM	IInd Shift
4.	Sh. Rakesh S/o Sh. Ved Prakash	51200539	02 PM to 10 PM	IInd Shift

  
Assistant Commissioner  
Central Zone/MCD

Copy to-

1. All Concerned Safai Karamcharies
2. SS Concerned
3. SI 146
4. O/c

Copy for kind information to:-

DC/Central Zone

  
TRUE COPY



Nipun Bhushan &lt;adv.nipunbhushan@gmail.com&gt;

**Advance Service of Execution Application to be filed before the Hon'ble National Green Tribunal in O.A. 678/2023**

Nipun Bhushan &lt;adv.nipunbhushan@gmail.com&gt;

Mon, Oct 13, 2025 at 10:45 PM

To: commissioner@mcd.nic.in, chdpcc@nic.in, psud@nic.in, pujakalra09@gmail.com

Dear Sir/Ma'am,

Please find attached a copy of the 4rd Additional Affidavit revealing your unending disobedience of law, of the Tribunal directions and breach of your own undertaking, of your own Office Order and your blatant neglect of the final opportunity which you were granted to set things in order, being filed in E.A. 20/2025.

Best Regards,

**Nipun Bhushan**  
Advocate**Bhushan & Associates**  
Address: i-34, Ground Floor, Jangpura Ext., ND-14  
Mobile: +91-9958799788  
Email: [adv.nipunbhushan@gmail.com](mailto:adv.nipunbhushan@gmail.com)

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[Quoted text hidden]

 **4th Additional Affidavit E.A. 20 of 2025 .pdf**  
11414K