

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

MISCELLANEOUS APPLICATION NO. 19 OF 2024

IN

ORIGINAL APPLICATION NO. 65 OF 2015

(OLD ORIGINAL APPLICATION NO. 205 OF 2024)



Nagri Hakka Sangarsh Samiti & Ors.) ...Applicants

Versus

Mira Bhayander Municipal)
 Corporation & Ors.) ...Respondents

ADDITIONAL AFFIDAVIT ON BEHALF OF THE APPLICANTS

I, David Nunes, the authorised signatory of the Applicant No. 3 above, do hereby solemnly affirm and state as under:

1. I say that on 18th March 2025 a vehicle was found unauthorisedly transporting untreated sewage waste from the Mira Bhayander city to the dumping ground at Uttan-Pani. Hereto annexed and marked as **Exhibit "A"** are pictures that show this vehicle which was found to be carrying sewage.
2. It may be noted that the site at Uttan-Pali is claimed to be a solid waste processing facility and as such only authorised to treat solid waste. The

authorisation issued under the Solid Waste Management Rules, 2016 (which has expired in December 2023) did not authorise the dumping of sewage.

3. The Applicants herein complained to the Respondent No.1. Notably, in its reply to the said complaint, the Respondent No.1 did not deny the fact that untreated sewage was in fact being dumped at the site at Uttan-Pali.
4. It is thus clear that the dumping ground is being run without any regard to environmental laws posing a severe health risk to the local residents and endangering the environment. The MPCB has entirely failed in its mandate to monitor compliance of the standards as prescribed and the conditions stipulated in the authorisation and under the relevant environmental statutes.
5. The Applicants also continue to observe leachate leaking onto the road from the trucks that are transporting waste to the dumping ground. Apart from spreading a foul smell throughout the area and causing unhygienic conditions, this leachate also makes it unsafe for vehicles as it is slippery and therefore could lead to accidents. No precautions have been taken by the Respondent No.1 to ensure that leachate does not seep out from these trucks. Hereto annexed and marked as **Exhibit "B"** are pictures that show leachate leaking from the trucks transporting garbage to the dumping ground.

Solemnly affirmed at Mumbai)

This 25th day of March 2025)

David Nunes
David Nunes

Identified by me,

[Signature]

Advocate for the Applicants

Before me,

BEFORE ME

[Signature] 25/03/2025

R. S. JADAUN

Advocate & Notary Govt. of India
G-1, B-Wing, Shri Gajanan Prashana C.H.S.,
Opp. Police Station, Bhayander (W),
Dist. Thane-401101. Mobile: 9076149537
Reg. No. 4 Serial No. 583125

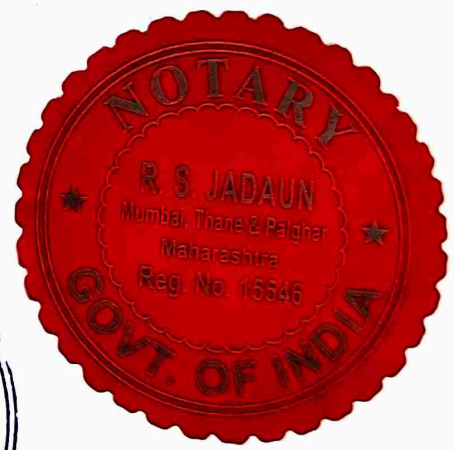


EXHIBIT A



NOTARY
PUBLIC



EXHIBIT B

