

**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 & ORS. ....APPLICANTS  
VERSUS  
GOVERNMENT OF NCT OF DELHI & ORS. ....RESPONDENTS

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**Dated: 29.03.2025**  
**Place: New Delhi**

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

**THROUGH COUNSEL**

*(Handwritten signature)*

(Nipun Bhushan)  
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Enrolment No.-D/8131/2022

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**ADDITIONAL AFFIDAVIT TO PLACE ON RECORD COMPELLING PROOF  
SHOWING THAT R.NO.1/ MCD INTENDS TO VITIATE THE HON'BLE NGT'S  
ORDER DT. 25.02.2025 IN O.A. 678/2023 BY SETTING UP AN FCTS AT THE  
BLOCK-H AND BLOCK-D DHALAO EACH.**

I, Yogeshwar Mohan Mahajan, aged about 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 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**

A. 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. 678/2-23) 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.** A Photo of the Solid Waste Management Committee's list of alternative uses of closed dhalaos as published by the Department of Environment, GNCTD and the DPCC is annexed herewith as **Annexure 1**.



**R.NO. 1/MCD HAS ALREADY MADE 'BSES' UNDERTAKE ELECTRICAL WORK AT THE SAID TWO DHALAOS TO SET UP FCTS AT THEIR SITES**

B. It must be noted that in a hurried bid to nullify the final Order dt. 25.02.2025, the MCD has made 'BSES Rajdhani Power Ltd.' to undertake the work of transferring underground, the electric wires which earlier used to run over the said two dhalaos. Most probably, this has been done hurriedly so that the MCD could later establish an FCTS at the said two dhalaos each, using the excuse that the public money has already been spent even though it will have been spent unscrupulously and unwisely considering the numerous Orders made by this Hon'ble Tribunal over the course of proceedings in O.A. 678/2023 indicating that these dhalaos are unfit for any kind of waste-handling. Photos of BSES work that took place at the Block-H and Block-D dhalao as a precursor to the FCTS installation are annexed herewith as Annexure 2 (colly)

*A. Bhushan*  
**I identified the deponent who  
 has signed in my presence  
 D/8/13/2022**  
**VERIFICATION**



*Yasheshwar*

DEPONENT

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 31st day of March, 2025.

**ATTESTED**

**NOTARY PUBLIC  
(INDIA)**

**31 MAR 2025**

*Yasheshwar*

DEPONENT

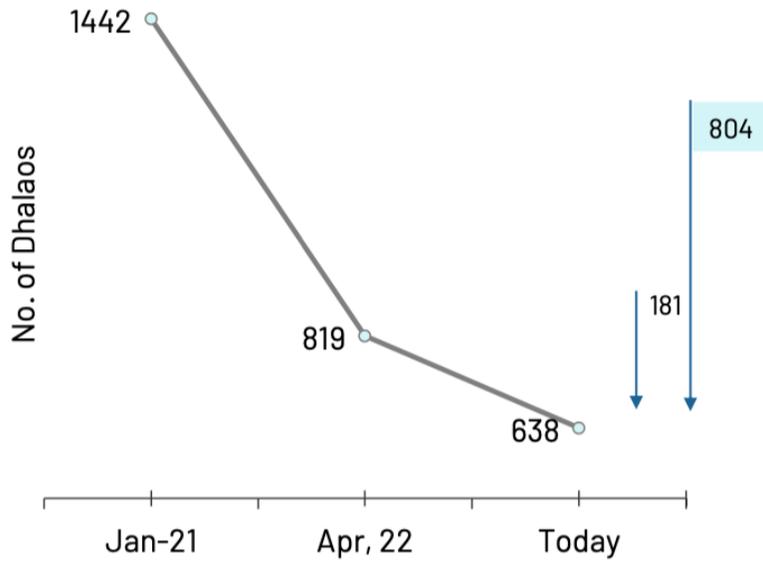
LIST OF ALTERNATIVE USES RECOMMENDED BY THE SOLID WASTE MANAGEMENT COMMITTEE

**3.1 Secondary Storage/ Material Recovery Facilities**

**MCD**

- 638 Dhalaos presently exist
- 521 : Proposed alternative use (Dec, 2024)
- 804 : Dhalaos Closed since Jan 21
  - 450 : Put for alternative use
- Alternative uses
 

Amul Booth	Senior Citizen Recreation
Attendance Shelter/ SI	Merged in Parks
Office/Store	Telephone Tower
FCTS	Outsourced CSR
MRF	RP Cell
EV Charging Point	Library



- *As per SWM Rules door to door collection of waste is to be done and therefore dhalaos should be discouraged.*

# ANNEXURE 2 (COLLY)

5

BSES WORK UNDERTAKEN AT BLOCK-H FOR ESTABLISHING FCTS THERE



**BSES WORK UNDERTAKEN AT BLOCK-D FOR ESTABLISHING FCTS THERE**



# PROOF OF SERVICE



Nipun Bhushan <adv.nipunbhushan@gmail.com>

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

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**Nipun Bhushan** <adv.nipunbhushan@gmail.com>  
To: commissioner@mcd.nic.in, chdpcc@nic.in, psud@nic.in

Wed, Apr 2, 2025 at 8:23 AM

Dear Sir/Ma'am,

Please find attached below a copy of the Additional Affidavit 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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 **Additional Affidavit E.A. 20 of 2025.pdf**  
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