

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI**

**O.A No. 16 of 2025**

**IN THE MATTER OF:**

PUBLIC ACTION COMMITTEE & ORS

...APPLICANTS

VERSUS

STATE OF PUNJAB & ORS

...RESPONDENTS

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**Place: Ludhiana  
Date: 24.04.2026**

**Er. Kapil Dev  
(Applicant in person)  
EMAIL: [aroraengineers@gmail.com](mailto:aroraengineers@gmail.com)  
Mobile: 9872007872**

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
AT PRINCIPAL BENCH, DELHI**

In O.A. No. 16 of 2025

In the matter of:

Public Action Committee & ors. .... Applicants

vs.

State of Punjab & ors. .. Respondents

Additional Submission Regarding **THIRD ILLEGAL GARBAGE DUMP** at another location and Unauthorized **Construction of Boundary Wall for Park over land of Choe by Municipal Council, Sirhind** in Violation of Solid Waste Management Rules, 2016 and Environmental Norms.

**Hon'ble sir**

**Most Respectfully showeth,**

**The Applicants humbly submits as under:**

1. That this Hon'ble Tribunal vide orders dated 27-01-2026 pleased to direct as under thus;

*Para 4. Learned Counsel for respondent no.3 has submitted that dumping of solid waste at the old site has been stopped but he does not dispute that solid waste earlier dumped is lying there and has not been cleared till now. He has submitted that same will be cleared by 31.03.2026.*

*Para 5. Such a statement, unless translated into reality and action is taken at the ground level by respondent no.3, has no meaning.*

Xxx xxx xxx

9. *Mere passing the orders levying environmental compensation on paper does not serve any purpose especially in a case where respondent no.3 is not taking any effective steps to solve the issue of solid waste dumping at the unauthorized site and in fact it is multiplying such sites even pending this original application. This issue needs to be seriously considered by Member Secretary and Chairman, PPCB and effective action is required to be taken by them against respondent no.3*

10. *Thus, we require the Member Secretary, PPCB and Executive Officer of respondent no. 3 to appear virtually on the next date of hearing and apprise the Tribunal about action taken in this regard.*

11. *It will be open to respondent no.3, in the meanwhile, to file status report disclosing the current status of dumping/clearing of solid waste from the above two sites.*

12. *The applicant appearing virtually has submitted that respondent no.3 is raising some constructions at the new site though there is no authorization/permission exists for that site. The Member Secretary, PPCB will duly consider this issue and will take appropriate action in accordance with law.*

2. That the Respondent No. 3, Municipal Council, Sirhind, vide Affidavit dated 23-01-2026 (at running Page No. 253), had categorically undertaken that the

solid waste lying on the land of the Choe would be cleared by 31-03-2026. However, in blatant disregard of its own assurance, the said garbage continues to remain at the site, causing continuous and severe environmental degradation. It is evident that the Municipal Council, Sirhind has not only failed in its obligation but has also deliberately refrained from undertaking any remediation, cleaning, or restoration measures in the impugned buffer zone of Hansla Nadi, thereby aggravating environmental harm with each passing day. Six Photographs clicked on 19-04-2026 depicting huge quantity of Garbage still lying over land of Natural Waterbody, Hansla Nadi are produced herewith as **Annexure P-19**.

3. That as per the directions of the Hon'ble Supreme Court, this Hon'ble Tribunal, and established environmental norms, no construction is permissible over natural water bodies, including their buffer zones. **However, in complete disregard of these binding directions, the Respondent No. 3, Municipal Council, Sirhind, instead of undertaking restitution of the impugned area, has proceeded to construct a boundary wall** for development of a park at the site. It is most pertinent to submit that the **garbage still remains lying at the site**, and despite the matter being subjudice before this Hon'ble Tribunal and environmental compensation already imposed by the Punjab Pollution Control Board, the **Respondent No. 3 has shown no such speed and urgency toward environmental restoration**. On the contrary, it has acted in undue haste to further damage the environment by raising the said boundary wall. It is further submitted that the issue of the **MRF building constructed over the land of the said Choe is already under challenge in the present Original Application**; nevertheless, the **Respondent No. 3 has**

continued with such encroachment upon the impugned area, leading to wastage of public funds, and that too without obtaining any permission from the lawful custodian of the land, i.e., the Department of Water Resources. Two Photographs clicked on 19-04-2026 depicting boundary wall constructed over impugned land of choe is produced herewith as **Annexure P-20**.

4. That instead of managing solid waste in a scientific and lawful manner, the Respondent No. 3, Municipal Council, Sirhind, initially commenced illegal dumping of municipal solid waste at Bassi Pathana. Upon the issue being highlighted by the Applicants and local residents, rather than complying with the Solid Waste Management Rules, 2016 (as applicable and updated), the Respondent No. 3 has further aggravated the violation by creating a **THIRD UNAUTHORIZED DUMPING SITE** and has started dumping garbage at GPS Location 30.623311, 76.425327 without obtaining any permission or authorization from the Punjab Pollution Control Board, thereby continuing its blatant disregard for environmental norms and statutory provisions. Four Photographs clicked on 19-04-2026 depicting third unauthorized dumping site by Respondent No. 3 are produced herewith as **Annexure P-21**.
5. That the status of the second unauthorized dumping site created at Bassi Pathana remains unchanged to date, and despite clear directions issued by this Hon'ble Tribunal, the Respondent, Punjab Pollution Control Board, has failed to take any effective or deterrent action against Respondent No. 3. Consequently, the officials of Respondent No. 3 continue, with complete impunity, to cause ongoing environmental damage while repeatedly resulting

in wastage of public funds. Four photographs depicting present status of second illegal dump created by R-3 are produced herewith as **Annexure P-22**.

6. That the issue of solid waste management in the States and UTs is presently subjudice before this Hon'ble Tribunal in O.A. No. 606 of 2018. In this regard, the State of Punjab through the Chief Secretary (Respondent No. 1 herein) has filed an Affidavit dated 15-12-2025 claiming complete remediation of legacy waste in a large number of Urban Local Bodies (132 + 27 = 159 ULBs). **However, it is submitted that no such effective remediation has been carried out in areas which are specifically under consideration before this Hon'ble Tribunal, including Municipal Council Sirhind, Municipal Corporation Batala, Municipal Corporation Ludhiana, Municipal Council Sangrur, MC Mohali, etc.,** which continue to be closely monitored by local residents and NGOs such as the Public Action Committee. **This conduct reflects a pattern wherein, instead of actual scientific remediation, the State authorities are merely shifting waste from one location to another and/or dumping or burying it in open low-lying areas, as has been observed in Batala and is now being replicated in Sirhind.** It is further pertinent to submit that Respondent No. 1 has, till date, failed to file any reply on the specific issue of solid waste mismanagement at Sirhind, thereby exhibiting a lack of accountability on a matter of serious environmental concern.

That in view of the **facts, circumstances, and unimpeachable material placed on record hereinabove**, which clearly establish **continued, deliberate, and wilful violations of environmental laws and the binding**

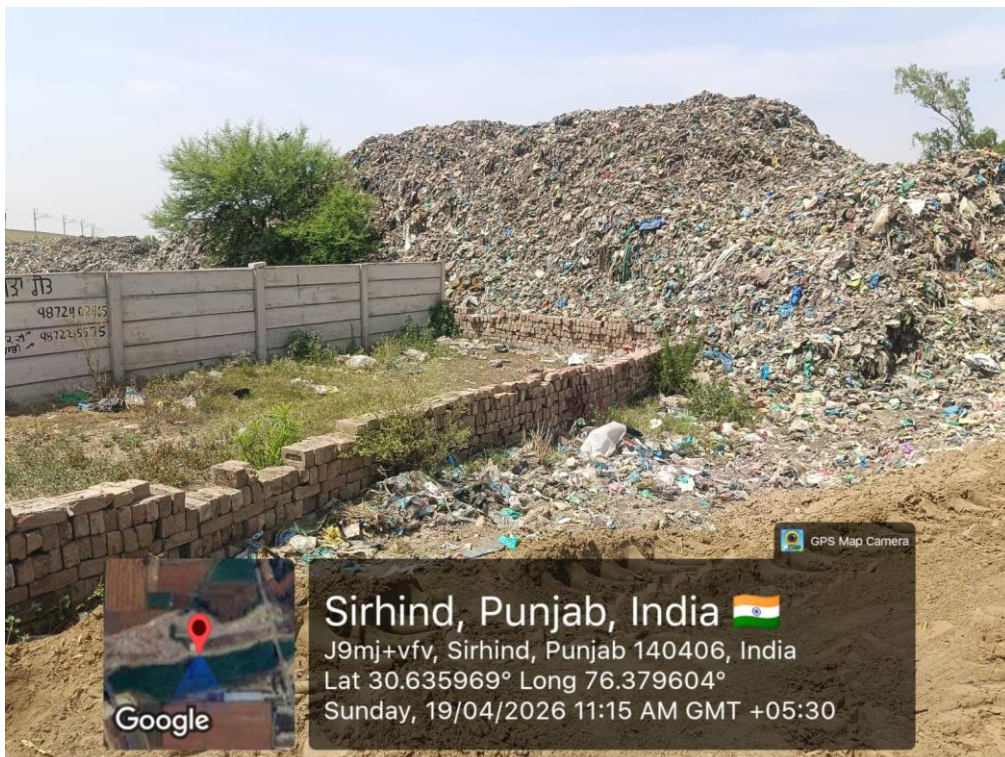
**directions of this Hon'ble Tribunal** by the Respondents 1 to 3, the Applicants most respectfully pray that this Hon'ble Tribunal may be pleased to **consider and allow the prayers already made in the Original Application**, and to **pass such further orders and directions as may be necessary to ensure immediate compliance, prevent further environmental degradation, protect public health and to pass such further orders as may be necessary to prevent further environmental degradation.**

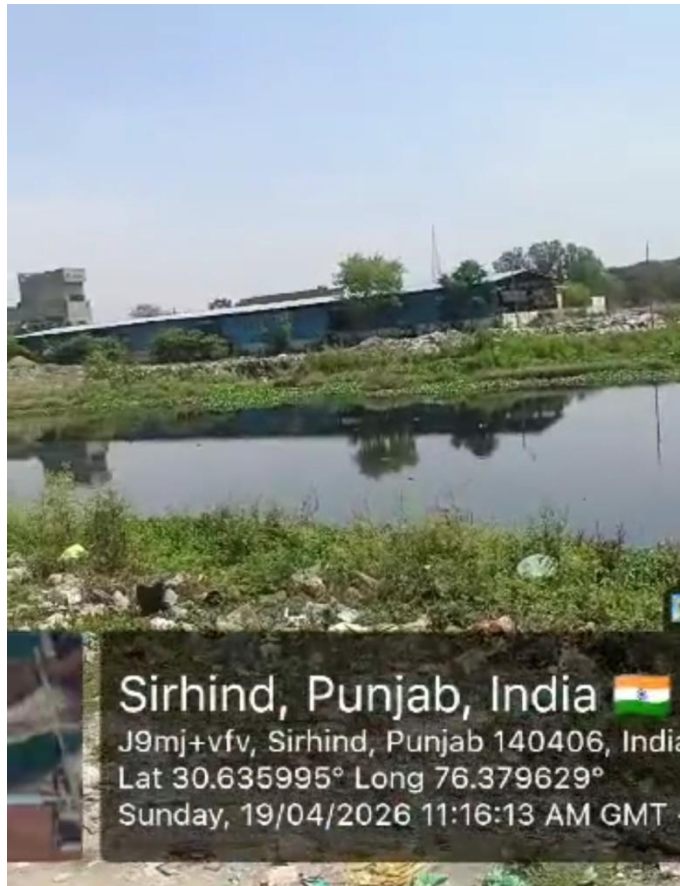


Dated: 24-04-2026  
Place: Ludhiana

Er. Kapil Dev  
(Applicant No. 2)

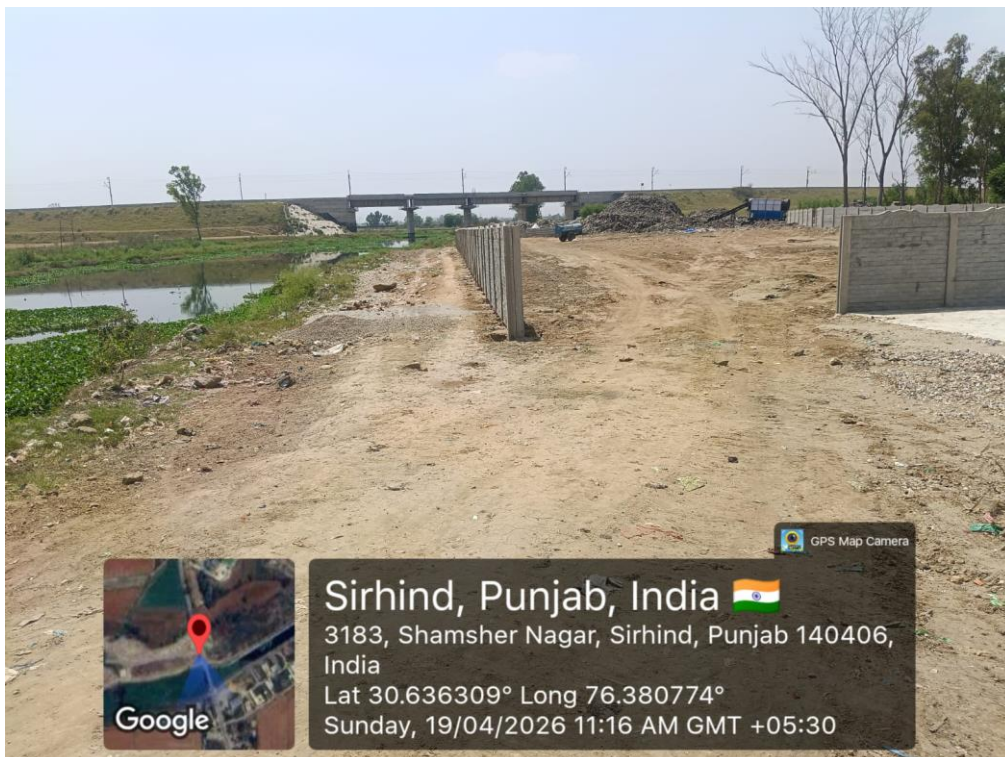
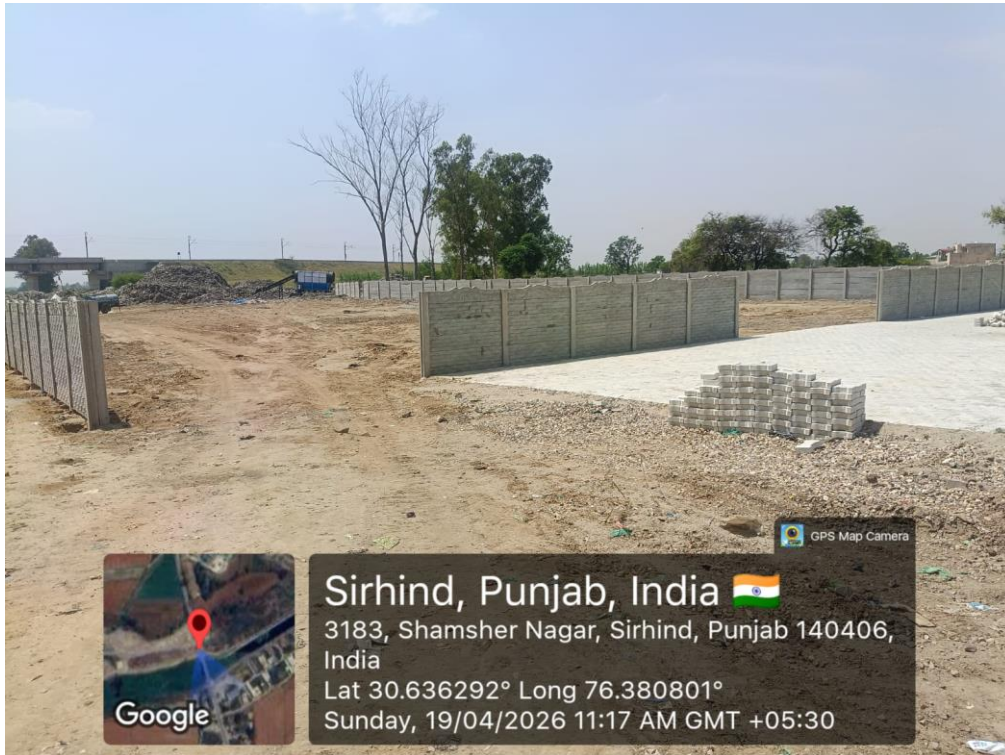
ANNEXURE P-19







ANNEXURE P-20



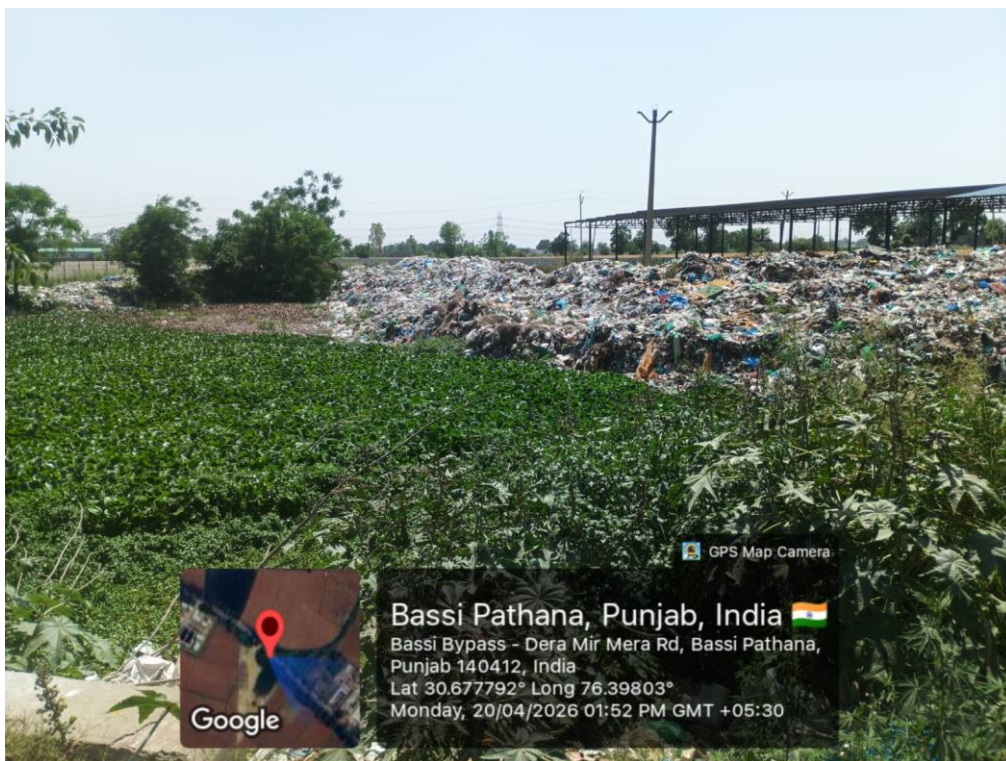
ANNEXURE P-21

THIRD ILLEGAL UNAUTHROISED DUMP SITE CREATED BY  
RESPONDENT NO. 3



ANNEXURE P-22





BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI  
In O.A. No. 16 of 2025

IN THE MATTER OF:

Public Action Committee & Ors.

Applicants

Versus

State of Punjab & Ors..

Respondents

**AFFIDAVIT**

I, Er. Kapil Dev (aged 49 years) s/o Sh. Jagdish Chander, r/o 186-E, BRS Nagar, Ludhiana do solemnly affirms as under:

1. That the deponent is Applicant No. 2 in the present O.A. No. 16 of 2025 and is filing additional submission depicting malafide intentions of Respondent Municipal Council in regard with Solid Waste Management as well as encroachments over land of natural waterbody for kind consideration by this Hon'ble Tribunal.
2. That the facts stated in the Additional Submission from Paragraph No. 1 to 6 from Page No. 1 to 7 accompanying this Affidavit are true and correct to the best of my knowledge and nothing has been concealed there from.



Certified that the affidavit has SPA/CPA has been readover & explained to the deponent executant who seemed directly to understand the same at time making the VERIFICATION

*[Signature]*  
DEPONENT

1753  
24-04-2026

Verified at Ludhiana on this 24th Day of April 2026, I the above-named deponent, do hereby verify that the contents of the above affidavit are true and correct. No part of it is false and nothing material has been concealed there from.

*[Signature]*  
DEPONENT

know the Deponent/Executant personally and he/she has Signed/Thumb impression in my presence

ATTESTED AS IDENTIFIED

*[Signature]*  
NOTARY PUBLIC  
LUDHIANA (PB.)

24 APR 2026

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PAC MattewaraSutlej &lt;mattewarasutlejpac@gmail.com&gt;

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**Service of documents - Additional Submission by Applicants in OA 16 of 2025**

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PAC MattewaraSutlej &lt;mattewarasutlejpac@gmail.com&gt;

Fri, Apr 24, 2026 at 2:16 PM

To: Chief Secretary Punjab <cs@punjab.gov.in>, dc.fth@punjab.gov.in, eomc.sir\_fgs@yahoo.co.in, ghairajinder@gmail.com, eedrainage2023@gmail.com, chairman.ptl.ppcb@punjab.gov.in, eerofgs.ppcb@punjab.gov.in, "sanchar\_anand@yahoo.co.in" <sanchar\_anand@yahoo.co.in>  
Cc: Kapil Arora <aroraengineers@gmail.com>

Dear Sir/Madam

PFA copy of Additional Submission filed by Applicants in OA 16 of 2025. Please consider this as Service of documents.

Regards

Public Action Committee  
through Er. Kapil Dev  
(Applicant No. 1)  
M: 9872007872



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**Additional Submission by Applicants in OA 16 of 2025.pdf**  
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