

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 06 OF 2012**

**In the matter of:**

Nizamuddin West Association

...Applicant

Versus

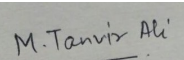
Union of India & Ors

...Respondents

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Date: 20.05.2026



Zain Haider & Tanvir Ali

Advocate for the Applicant(s)

A20, Basement, Jangpura Extension, New Delhi-110014

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
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**In the matter of:**

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**Affidavit on behalf of the Applicant pursuant to joint inspection  
dated 12.05.2026.**

1. That, in compliance with the order dated 14.10.2025 passed by this Hon'ble Tribunal, DJB had submitted the affidavit/status report dated 01.01.2026 with timeline for trapping all sub-drain outfall points into the Barapullah Nala, ensuring that no sewage flows untreated into the Barapullah drain. The relevant part of the affidavit dated 01.01.2026 is as under:

“3. That in continuation of and in obedience to the aforesaid directions, the answering respondent respectfully submits that the present report comprehensively places on record the status of

- i. Interception and trapping of sewage at source
- ii. Identification and remediation of sub-drains outfalling into the Barapullah drain, and
- iii. Planning, tendering and execution of STP/DSTP projects along with their corresponding sewerage infrastructure, all in a coordinated and timebound manner.”

“4. That, as a first and most critical step, DJB has adopted the principle of "tapping of drains at source" so as to prevent the ingress of untreated sewage into storm water drains at the very point of origin. In furtherance thereof, DJB has already successfully tapped fifteen (15) drains, in which flow observed in Rainy season in 5 drains at identified locations, thereby ensuring immediate diversion of sewage into the sewerage system...”

2. That the DJB in its next status report dated 20.03.2026 submitted on affidavit that as of the date of the affidavit, 17 drains in the Barapullah Nala region being trapped leading to no discharge of untreated sewage into the river system. The relevant part of the DJB status report/affidavit dated 20.03.2026 is as under:

“2. That it is respectfully submitted that out of the total 43 identified drains, substantial progress has been achieved in terms of trapping and diversion of sewage. As on date, 17 drains have been successfully trapped and diverted, thereby preventing direct discharge of untreated sewage into the river system...”

#### **Independents field survey done by the Applicant**

3. That, upon perusal of the status report dated 01.01.2026 filed by the DJB, the Applicant undertook an independent site survey to verify the actual condition of the trapping points as identified therein. The Applicant were able to inspect only 3 out of the 15 trapping points detailed by the DJB; however, at each of these locations, they were confronted with conditions that were wholly inconsistent with and contrary to the representations and claims made by the DJB in its said status report, thereby raising serious concerns regarding the accuracy and reliability of the information placed before this Hon'ble Tribunal.

4. The findings of the independent field survey done by the Applicant with respect to the information provided by DJB in status report dated 01.01.2026 is as under:
- i. **S. No. 26: A block, Vasant Vihar-** DJB in its report dated 01.01.2026 reported **“no flow, flow observed in rainy season”**  
Whereas, in the photos dated 24.03.26, captured by the Applicant, it can be clearly seen that the **sewage is flowing freely, even when it is not a rainy season in March. And there is no fencing or barrier at the Nala to prevent dumping of any kind of waste or debris.**
  - ii. **S. No. 28: Nehru Ekta Camp, RK Puram-** DJB in its report dated 01.01.2026 reported **“trapped in a DJB sewer line”**  
Whereas, the reality is that **sewage is flowing free** and the same can be seen the photos dated 24.03.26, which were captured by the Applicant upon the field inspection.
  - iii. **S. No. 21: Coolie Camp, Vasant Vihar-** DJB in its report dated 01.01.2026 reported **“trapped in DJB sewer line”**  
Whereas, on inspection it has been found out that the **community toilet is discharging straight into the Nala. Though the boundary wall is built along the nala which has reduced the dumping of debris in nala,** the boundary wall is broken or the grill fencing is missing at some places because of which the dumping of debris is happening at such places.
5. The Applicant, having conducted an independent survey at 3 of the identified trapping points, have found conditions wholly inconsistent with the claims made by the DJB, giving rise to a reasonable and bona fide apprehension that similar discrepancies persist at the remaining locations

as well. Pursuant thereto, an objection application dated 28.03.2026 was filed to the reports filed by the DJB.

6. This Hon'ble Tribunal vide order dated 01.04.2026 passed an order allowing Joint Inspection of Applicant with the officials of DJB of three sub drains as mentioned in the objection application of the Applicant. The relevant extract of the order is as under:

“9. Learned counsel for the Applicant has raised the objection to the earlier report of the DJB and has submitted that sub-drains which are mentioned in that reply are still discharging untreated sewage in the storm water drain. Counsel for the DJB has submitted that she has the latest photograph available with her indicating these three points have been tapped and has sought two weeks' time to place it on record. She has also fairly submitted that if the Applicant wants to conduct a joint inspection with the Authorities of DJB then he can inform them in advance and in the joint inspection point out any such location where the action is required to be taken.

7. That the Applicant and the DJB officials conducted the Joint Inspection on 12.05.2026 and it was found that the conditions of these drains are similar to what was highlighted in the previous Objection Application filed by the Applicant. The sewage is flowing freely in these drains. In most of these drains, the sewage line is not connected to homes of the residents.

Photos of the findings at the Nehru Ekta Camp, RK Puram trapping point is at Annexure A-1 (pg. 8).

Photos of the findings at the Coolie Camp, Vasant Vihar trapping point is at Annexure A-2 (pg. 9 to 10).

Photos of the findings at the A-block, Vasant Vihar trapping point is at Annexure A-3 (pg. 11).

8. It is respectfully submitted that the material placed on record clearly demonstrates that the statements made by the DJB in its affidavits/status reports before this Hon'ble Tribunal are incorrect, misleading, and not borne out by the actual ground situation.
9. That such conduct, amounting to the filing of false and inaccurate statements on affidavit, undermines the sanctity of proceedings before this Hon'ble Tribunal. It is, therefore, most respectfully prayed that this Hon'ble Tribunal may be pleased to take stringent action against the DJB for placing misleading information on record, and further impose exemplary costs, in the interest of justice and to ensure accountability.

**PRAYER**

10. It is therefore prayed that this Hon'ble tribunal may be pleased to:
  - a. To take the present Affidavit on record;
  - b. Pass such other or further orders as this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case.

Date: 20.05.2026

Place: New Delhi

Zain Haider & Tanvir Ali

Advocate for the Applicant(s)

A20, Basement, Jangpura Extension, New Delhi-110014

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

in

**ORIGINAL APPLICATION NO. 06 OF 2012**

**In the matter of:**

Nizamuddin West Association

...Applicant

Versus

Union of India & Ors

...Respondents

**Affidavit**

I Mohammad Haneef, s/o Mohammad Yousuf, aged about 75 years old, r/o G-6, Nizamuddin West, South Delhi, Delhi 110013, do hereby solemnly affirm and state as follows:

1. I am the Applicant in this matter before this Hon'ble Tribunal and as such I am well conversant with the facts and circumstances of the present case and competent to swear this affidavit.
2. That the current Objection to the Affidavit/Status Report of DJB has been drafted by my counsel on my instructions and the contents therein are true and correct to the best of my knowledge and belief.
3. That the annexures attached to the present Objection to the Affidavit/Status Report of DJB are true copies of their respective originals and the contents of the same are true and correct to the best of my knowledge and belief.



  
DEPONENT

**MOHAMMAD HANEEF  
PRESIDENT (NWA)  
9811903388**

VERIFICATION

19 MAY 2026

I, the above-named deponent, do hereby verify at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 2026 that the contents of the present Affidavit are true and correct to the best of my knowledge and belief. No part of it is false and nothing material has been concealed therefrom.



*Mohammad Haneef*  
DEPONENT

MOHAMMAD HANEEF  
PRESIDENT (NWA)  
9811903388

Identified the deponent who has signed in my presence



VERIFIED THAT THE DEPONENT  
Shri/Smt./Km. *Mohammad Haneef*  
S/o, W/o R/o. *Shri. M. Yusuf*  
Identified by Shri/Smt. *Zohra Afnan*  
Has solemnly affirmed before me  
Delhi on *19 MAY 2026 (23)*  
That the contents of the affidavit which  
have been read & explained to him/he  
are true & correct to his/her knowledge

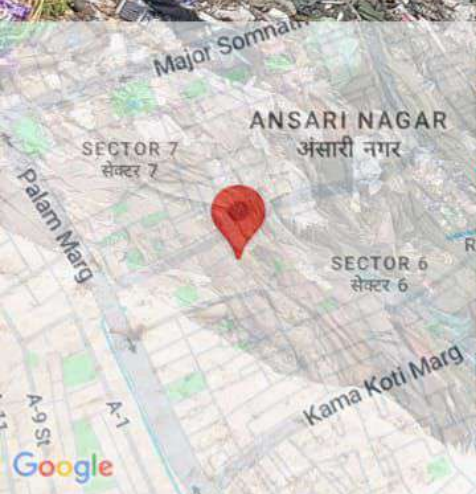
NOTARY



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New Delhi

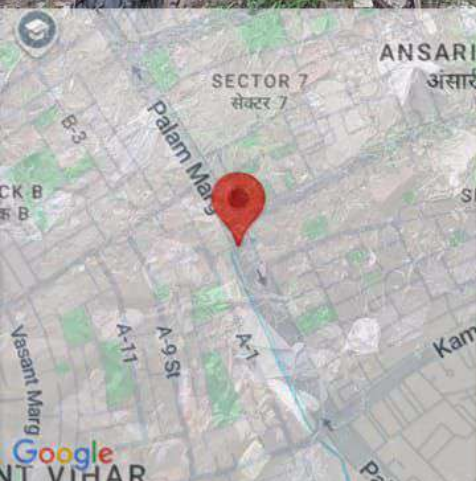
Delhi Division

Delhi

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Tanvir &lt;advocatetanvirali@gmail.com&gt;

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**Advance Service of Additional Affidavit on behalf of Applicants in Case No. O.A. No. 6 of 2025, filed in NGT, New Delhi**

1 message

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**Tanvir** <advocatetanvirali@gmail.com>

Wed, May 20, 2026 at 9:14 PM

To: "secy-moef@nic.in" <secy-moef@nic.in>, PUJA KALRA <pujakalra09@gmail.com>, "bhanwar09jadon@gmail.com" <bhanwar09jadon@gmail.com>, "rk407@rediffmail.com" <rk407@rediffmail.com>, "sk.bhardwaj24@gov.in" <sk.bhardwaj24@gov.in>, "deeksha.kakar@scladi.com" <deeksha.kakar@scladi.com>, "msdpcc@nic.in" <msdpcc@nic.in>, "csdelhi@nic.in" <csdelhi@nic.in>, "eecdr6.djb@gmail.com" <eecdr6.djb@gmail.com>, "irrigation@hry.nic.in" <irrigation@hry.nic.in>, "kaushalsanjeev@hry.nic.in" <kaushalsanjeev@hry.nic.in>, "sslg.delhi@gov.in" <sslg.delhi@gov.in>, "seclg@nic.in" <seclg@nic.in>, "mangal.singh@mcd.nic.in" <mangal.singh@mcd.nic.in>, "office@marklegal.co.in" <office@marklegal.co.in>, "Jmalawoffices@gmail.com" <Jmalawoffices@gmail.com>, "Sahayk@gmail.com" <Sahayk@gmail.com>, "advzainhaider@gmail.com" <advzainhaider@gmail.com>, "advpriyankaswami@gmail.com" <advpriyankaswami@gmail.com>, NARENDER PAL SINGH <narenderpalsingh@gmail.com>, pranav siroha <pranav.siroha@gmail.com>

Dear Sir/Ma'am,

Please find the attached copy of the Additional Affidavit filed on behalf of the Applicants in Case titled "Nizamuddin West Association (Regd.) Versus Union of India and Ors," with case no., "O.A. No. 6 of 2025", filed in NGT, New Delhi.

Regards,  
Mohammad Tanvir Ali  
Advocate for the Applicants  
9560181884

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 **Additional Affidavit (19.05.26).pdf**  
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