

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

Original Application No. 524 / 2024

(Under Section 14 Of The National Green Tribunal Act, 2010)

In the matter of

Tejasvi Minhas Applicant
-Vrs-
Central Pollution Control Board & ORS ... Respondents

WITH

Original Application No. 526 / 2024

(Under Section 14 Of The National Green Tribunal Act, 2010)

Varinder Malik Applicant
-Vrs-
Ministry of Local Government, Punjab & ORS ... Respondents

We hereby submit the below facts before the Hon'ble court for the hearing dated 01.04.2025:

- 1) In the order after the last hearing dated 06.12.2024, the Hon'ble court had declared that **“Dumping of garbage by the Municipal Corporation, Jalandhar in the open land on roads and roadsides is patently illegal”** and had directed Municipal Corporation Jalandhar to **“to stop dumping of**

garbage forthwith on the road/roadsides/open spaces and to remove the garbage already dumped there and transport the same to closed transfer stations earmarked by it in accordance with Solid Waste Management Rule, 2016” and “ensuring that the grievance of the applicant is redressed in respect of the spot in question at Model Town, Jalandhar”

- 2) **However, in a gross contempt of the Hon’ble court, Municipal Corporation Jalandhar did not stop dumping waste the Model Town Cremation dump for almost 2 months after the order. Kindly refer to Annexure 1 (Page 4) for GPS tagged photos of the site several days and weeks after the order.** The applicants gave multiple reminders to Municipal Commissioner Shri Gautam Jain, Joint Commssioner Ms. Mandeep Kaur and Assistant Commissioner Ms. Sumandeep Kaur. However, their reply was that they do not know who is dumping waste at the site and they’re looking into it.
- 3) Due to local corporation elections, there was a lot of public pressure to remove the dump, because of dumping of waste there was eventually stopped, several weeks after the court order. **The media has clearly mentioned the stopping of dumping as a political gift and not a court order. Kindly refer to Annexure 2 (Page 10), a report by the Tribune dated December 16, 2024. However, a strange twist of events, dumping of garbage was resumed on the site after the results were declared. This dumping went on for several weeks.**
- 4) **In another gross contempt of Hon’ble court and mockery of justice, Municipal Corporation, Jalandhar moved the dump site next to PPR Market on the roadside, which is less than 100 meters from the cremation ground.** Now all the unsegregated garbage which was being dumped on the road opposite the cremation ground is being dumped on the roadside near PPR Market. Several complaints regarding this have already been done but the authorities haven’t take any action. **Kindly refer to Annexure 3 ((Page 13) for the GPS tagged photos of the site.**
- 5) **In another gross contempt of the Hon’ble court, all big roadside dumps remain like before and absolutely no effort has been done to remove them.** This includes the below major sites with massive garbage dumps on the roadside:

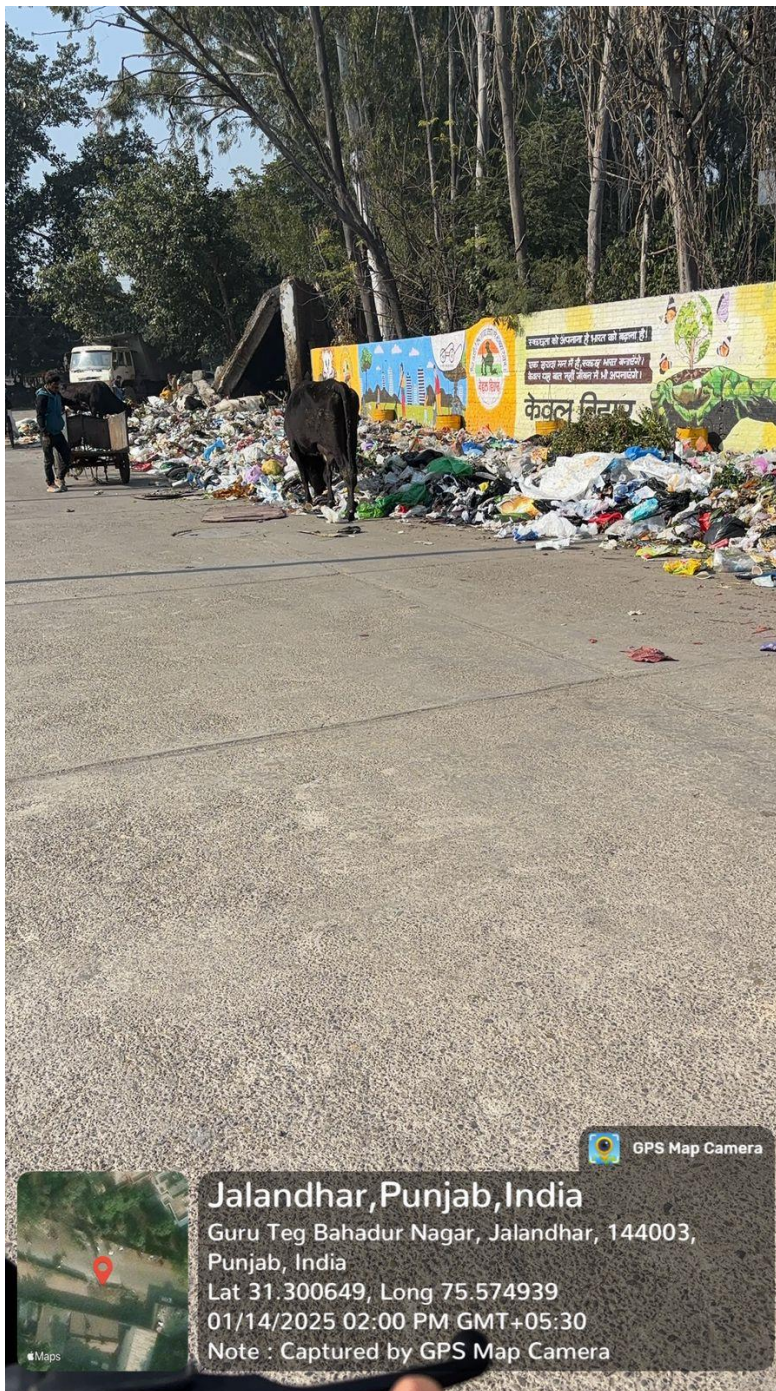
- **Between Doaba Khalsa School and Nari Niketan (Kindly refer to Annexure 4 (Page 14))**
 - **Outside DC Office, near Car Parking**
 - **Bus Stand Road, Near BMC Chowk**
 - **Ladowali Road (Kindly refer to Annexure 5 (Page 16))**
 - **Partap Bagh (Kindly refer to Annexure 5 (Page 16))**
 - **Under DAV College Flyover (Kindly refer to Annexure 5 (Page 16))**
 - **Near Jyoti Chowk & Dilkusha Market besides Old Courts**
- 6) **The dump between Doaba Khalsa School and Nari Niketan on Nakodar Road is right next to a school. The dump outside the DC Office in the car parking area can easily be seen by all the officers of the city. The dump on Bus stand road, near BMC chowk is flooded with garbage and so are the rest of them. Kindly refer to Annexure 5 (Page 16), a report by The Tribune dated August 2, 2024.**
- 7) **The Wariana dump site, which houses tonnes and tonnes of legacy waste of the city, is just becoming bigger and more toxic and has seen an alarming increase in waste accumulation, from 700 metric tonnes (MT) to a staggering 10 lakh MT of garbage. Instead of bio mining and reducing the dump, tonnes of unsegregated garbage is being added there every day. We would like to bring to the Hon'ble court's notice that a major fire broke out at the site on March 24, 2025 and it took more than 6 hours to douse the flames. As the Fire Department, "Team members said already so much of heat was there at the dump, gases were emanating which caused fire at the dump." At present, there is 8 lakh cubic metric waste at the site that forms a hill-like structure of garbage. Kindly refer to Annexure 6 (Page 19), a report by the Tribune dated March 24, 2025.**

While the city and its residents are bearing the brunt, the officers concerned seem to be totally indifferent, ineffective and overall uninterested in doing anything to change the scenario. We humbly request that all these concerned officers should be held PERSONALLY ACCOUNTABLE for the gross dereliction of duties and strictest possible action should be taken against them. Furthermore, a time bound practical plan that can be monitored by the Hon'ble court should immediately be implemented.



ANNEXURE 1

GPS TAGGED PHOTO DATED 14/01/2025



GPS TAGGED PHOTO DATED 12/01/2025

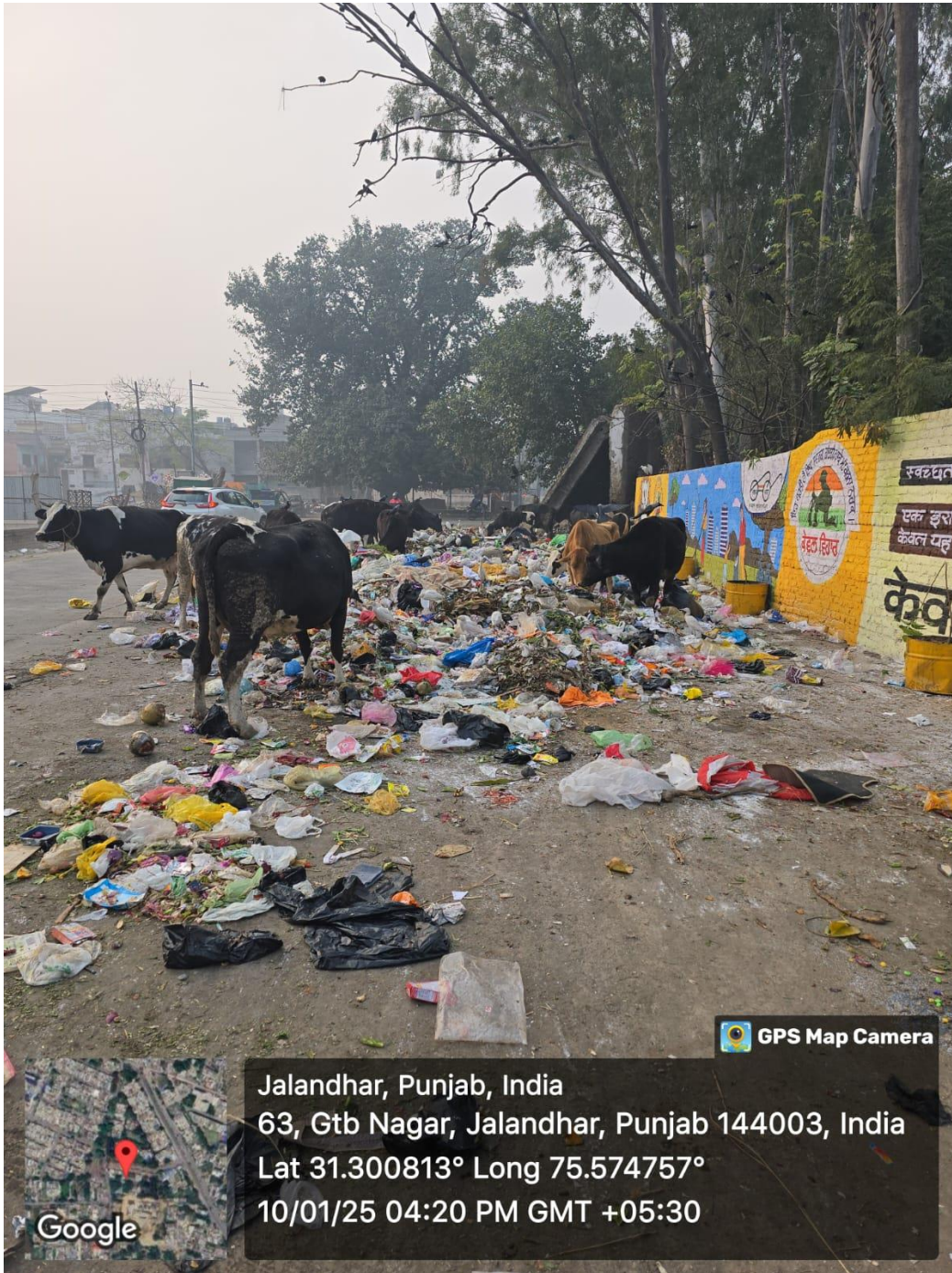


 GPS Map Camera



Jalandhar, Punjab, India
63, Gtb Nagar, Jalandhar, Punjab 144003, India
Lat 31.300739° Long 75.574671°
12/01/25 02:26 PM GMT +05:30

GPS TAGGED PHOTOS DATED 10/01/2025

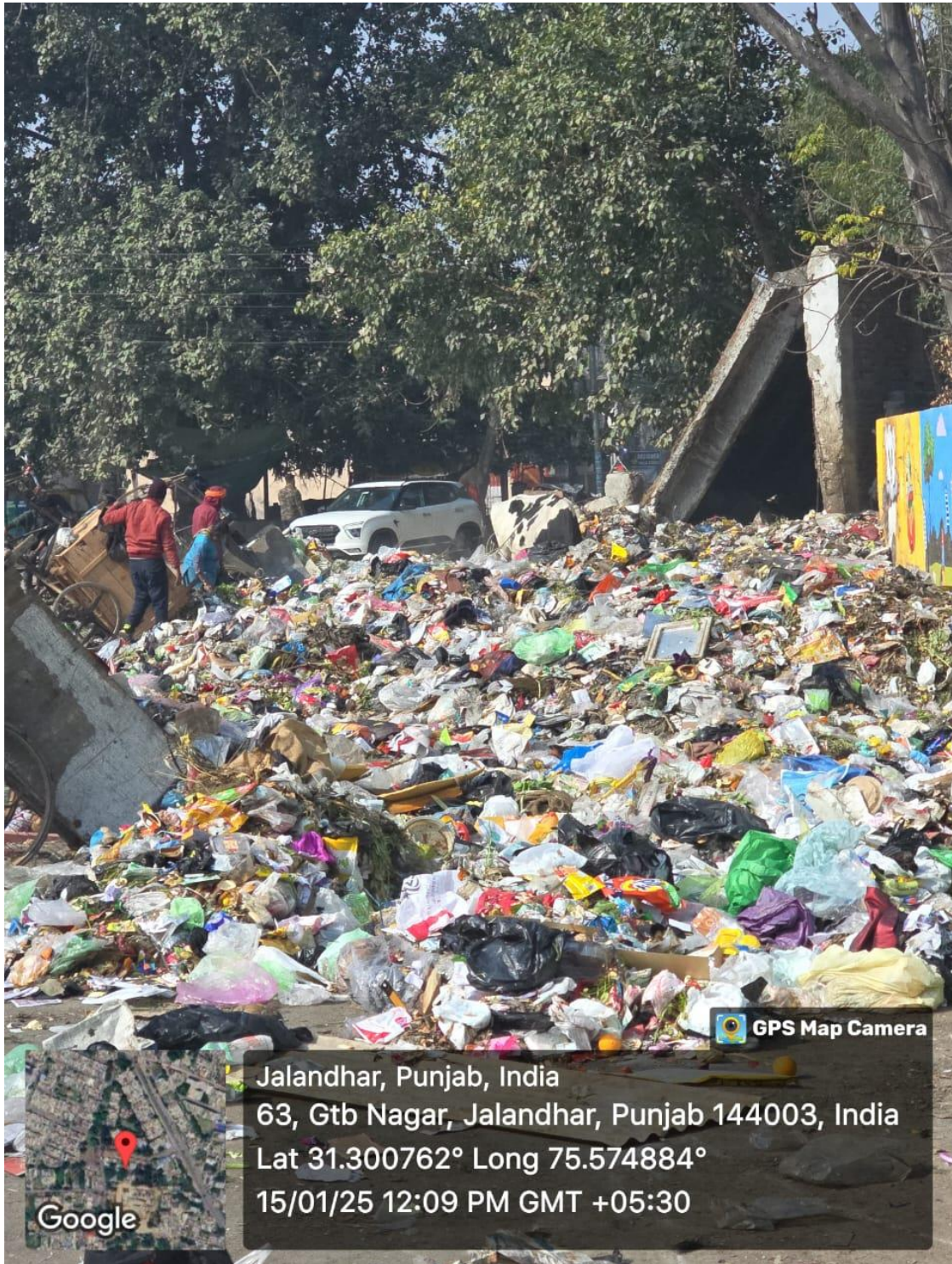




GPS TAGGED PHOTO DATED 07/01/2025



GPS TAGGED PHOTO DATED 15/01/2025



GPS Map Camera

Jalandhar, Punjab, India
63, Gtb Nagar, Jalandhar, Punjab 144003, India
Lat 31.300762° Long 75.574884°
15/01/25 12:09 PM GMT +05:30



ANNEXURE 2 (NEWS ARTICLE)

AAP leaders demolish boundary wall of garbage dump site in Jalandhar

A day after Punjab AAP President and Cabinet Minister Aman Arora pledged the removal of 28 garbage dumps across Jalandhar as a part of the party's key promises for the upcoming elections, AAP workers launched their campaign with a demonstration...

APARNA BANERJI

Jalandhar, Updated At : 04:15 AM Dec 16, 2024 IST

A day after Punjab AAP President and Cabinet Minister Aman Arora pledged the removal of 28 garbage dumps across Jalandhar as a part of the party's key promises for the upcoming elections, AAP workers launched their campaign with a demonstration at the Model Town garbage dump.

Dozens of AAP leaders, including Cantt constituency in-charge Rajwinder Kaur Thiara, leader Pawan Tinu and Ward 33 councillor candidate Aruna Arora, gathered at the site, armed with a JCB machine.

The group demolished the boundary wall of the designated dump site, with Thiara declaring, "The AAP delivers what it promises." The leaders also used the opportunity to rally support for Aruna Arora, a former Congress member who recently joined the AAP, by seeking votes for her candidacy in the upcoming municipal elections.

The removal of garbage dumps is one of the key promises made by the AAP ahead of the Municipal Corporation (MC) polls. The party claimed that if it formed the MC house this time, it would address the longstanding issue of garbage in the city.

However, the track record of the MC Jalandhar, and even the AAP's performance over the past 2.5 years, has been widely criticised.

In recent years, the Wariana dump site in Jalandhar, designated for the city's collective waste, has seen an alarming increase in waste accumulation, from 700 metric tonnes (MT) to a staggering 10 lakh MT of garbage.

The city's waste management system has struggled, with numerous designated and unauthorised dump sites becoming sources of public discontent.

The Model Town dump site, which AAP leaders targeted in their protest, was also under scrutiny by the National Green Tribunal (NGT), with the MC Jalandhar receiving notices and fines related to the management of multiple dump sites, including Chugitti, Wariana and others.

Citizens have been actively protesting against the large dump at Urban Estate, while the Model Town site has been the subject of repeated public demonstrations.

Jalandhar West MLA and Cabinet Minister Mohinder Bhagat assured that the AAP was committed to addressing the city's garbage problem.

"E-rickshaws are already being used to remove garbage, and more vehicles will be deployed. We are in talks with the safai sewaks' unions to ensure timely collection of waste," said Bhagat.

He also outlined plans to relocate the Wariana dump, which has gradually encroached upon the city, to a more suitable location, while ensuring the existing waste is treated properly.

Meanwhile, the Congress party accused the AAP of violating the model code of conduct during their recent action at the Model Town garbage dump.

District Congress Committee (DCC) president Rajinder Beri condemned the move, calling it a blatant misuse of government machinery for political purposes.

“The AAP has made a mockery of democracy by using government resources for their political gains,” Beri said. He also mentioned that several Congress candidates had faced harassment during the filing of nominations and claimed that the administration had taken no action against these repeated violations.

“We will lodge a formal complaint with the Deputy Commissioner tomorrow, and if no action is taken, we will file a writ petition,” he added.

Jalandhar North Congress MLA Bawa Henry also criticised AAP’s actions, labeling them as political gimmicks.

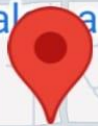
“Not only was today’s act a violation of the code of conduct, but an FIR should also be filed against the AAP leaders for causing damage to government property,” Henry said. He further accused the AAP of failing to fulfill its promises related to garbage collection.

ANNEXURE 3

GPS TAGGED PHOTO DATED 25/03/2025



Urban Pets -
et Sal and...



UE-1
Google

Ground Floor, SCF 25 & 26,
opposite Gurudwara Singh
Sabha, Phase 1, Urban Estate, ...

Latitude: 31.29730
Longitude: 75.59491

25/03/25 - 1:55 PM

ANNEXURE 4 (NEWS ARTICLE)

Call to remove garbage dump on Shobha Yatra route

Ravidas Jayanti on Feb 12

AVNEET KAUR

TRIBUNE NEWS SERVICE

Updated At : 05:10 AM Feb 03, 2025 IST

Ravidas Jayanti on Feb 12

Updated At : 05:10 AM Feb 03, 2025 IST

With Guru Ravidas Jayanti approaching and the Shobha Yatra on February 11 likely, residents and shopkeepers on the Nakodar road are demanding immediate action to remove a massive garbage dump between Doaba Khalsa School and Nari Niketan.

They argue that the unattended waste not is an eyesore, but also poses health hazards, especially when hundreds of devotees are set to visit Sat Guru Ravidas Dham for the celebrations.

Despite repeated complaints, the Municipal Corporation has failed to ensure regular garbage lifting, leading to the waste piling up and at times spilling onto the road.

Locals say the problem has worsened over time, with no proper disposal mechanism in place. "The stench is unbearable and stray dogs and cattle keep rummaging through the garbage. We run a sanitary shop here and customers often walk away because of the foul smell," said Ramesh Kumar, a shopkeeper near the dump.

The area is home to several businesses, including a dhaba, a hospital and schools, all of which are struggling with the unsanitary conditions. "Patients coming to our clinic complain about the unbearable smell. It's shameful that such conditions exist right in the middle of a busy market area," said Anil Sharma, who works in a clinic nearby.

Commuters also say the garbage dump often encroaches on the road, leading to accidents. “Many times, garbage covers nearly half the road. I’ve seen bikers skid and fall while trying to avoid the waste. It’s not just an inconvenience, it’s risky,” said Sukhbir Singh, a daily commuter.

With thousands of devotees expected to walk through the area for the Shobha Yatra and the 'mela' (which is held on this road every year), residents argue that the garbage dump presents a terrible image of the city. “This road will be packed with people from all over the district coming to pay their respects at the guru. Instead of a welcoming atmosphere, they will be greeted by filth and foul smells. It’s embarrassing,” said Surinder Pal, a local resident.

Residents and business owners say that the authorities need to act immediately to clean the area before the celebrations. “We are not asking for anything extraordinary—just basic cleanliness and proper garbage disposal. It’s a necessity, especially with such a significant event around the corner,” said another shopkeeper.

Meanwhile, MC officials claim that proper lifting is being done to ensure the area remains clean. They say swift action will be taken to ensure that the city is clean and presentable before the celebrations.

ANNEXURE 5 (NEWS ARTICLE)

Garbage dumping sites in Jalandhar raise stink, pose a health hazard

Aparna Banerji Jalandhar, August 2 When commuters pass by a government school, right near Nakodar Chowk, they wince. The smell, at its worst, is akin to a putrefying cadaver and at its best it smells like tonnes of vegetables gone...

TRIBUNE NEWS SERVICE

Updated At : 12:02 PM Aug 03, 2023 IST

Aparna Banerji

Jalandhar, August 2

When commuters pass by a government school, right near Nakodar Chowk, they wince. The smell, at its worst, is akin to a putrefying cadaver and at its best it smells like tonnes of vegetables gone bad, emanating a horrifying stench. Further up, between Leather Institute and Guru Ravidass Chowk, another horrible stench nauseates commuters, this time from a nearby slaughter house, which gets particularly nasty in the summers.

Additionally, near Silver Heights Apartments (adjacent to Wadala Chowk), an empty plot has been turned into a hideous garbage dump, which has become a favourite garbage dumping site of residents living nearby looking for a short-cut to littering.

Dumps greet residents

Almost every key public spot is riddled with mounds of litter. There is a dump between near the MC office, at the Civil Hospital, and between the offices of two prominent newspapers which are located right across the Suvidha Centre.

As the dengue season approaches its peak in mid-summer, the so-called ‘smart city’ of Jalandhar is turning into a virtual nightmare for residents with thousands of undesignated garbage sites riddled with tonnes of waste providing city residents with their daily dose of infuriating stench coupled with an already nasty level of air pollution.

Fit case for disease outbreak

Flies and stray dogs hover around roads. Garbage often spills onto the middle of the road. With water accumulating at these sites after rains, it’s a fit case for disease outbreak. Sprays and fogging can’t do anything in areas where garbage is a perennial problem. Kanika Seth, Gurunanak Pura resident

The irresponsible behaviour of residents coupled with administrative apathy is making the city unliveable.

Almost every key public spot is riddled with mounds of litter. There is a dump between near the MC office, at the Civil Hospital, and between the offices of two prominent newspapers which are located right across the Suvidha Centre.

There are huge dumps at Model Town near cremation ground, Ladowali Road, Partap Bagh, Guru Nanakpura, Plaza Chowk, Chugitti and under DAV College Flyover, among other areas. Almost every college and school has a dump somewhere near them.

SUVs and swanky cars can often be seen discarding their fast food wrappings in the middle of the road.

The garbage mounds (and incessant traffic) are the anti-thesis to bountiful greens thriving after plentiful rains in the summers so far.

Boota Pind resident Usha Sharma said: “It is impossible to walk down the road due to the stench from the dump near Silver Heights. Further up Ravidass Chowk and Nakodar Chowk, the smell is hideous. Daily commuters are affected by the stench, which is a direct invitation to diseases amidst rains.”

Gurunanak Pura resident Kanika Seth said: “Flies and stray dogs hover around roads. Garbage often spills onto the middle of the road. With water accumulating at these sites after rains, it’s a fit case for disease outbreak. Sprays and fogging can’t do anything in areas where garbage is a perennial problem. Water from toxic plastic wastes also seeps down, threatening groundwater contamination.”

ANNEXURE 6 (NEWS ARTICLE)

Fire at Wariana dump causes panic among residents

A fire was reported at the Wariana dump in Jalandhar on Sunday night which created panic among migrants living nearby. As per information, the Fire Department received a call around 10 pm last night that there was fire at the...

TRIBUNE NEWS SERVICE

Updated At : 10:11 AM Mar 25, 2025 IST

A fire was reported at the Wariana dump in Jalandhar on Sunday night which created panic among migrants living nearby. As per information, the Fire Department received a call around 10 pm last night that there was fire at the Wariana dump and the smoke had engulfed the area.

A fire brigade team reached the spot and it took the team over six hours to douse the flames.

Team members said already so much of heat was there at the dump, gases were emanating which caused fire at the dump.

At present, there is 8 lakh cubic metric waste at the site that forms a hill-like structure of garbage. The overflowing waste is spewing toxins into the air. People living nearby are in trouble. They are surviving amid pollution and diseases.

"It happens every summer when such incidents happen at the dump. Hopefully with the bio-mining project, things will improve," an official said.

The bio-mining project has been planned to manage and process the waste at the dump.