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**BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

IN

ORIGINAL APPLICATION NO. 606 OF 2018

IN THE MATTER OF:


**COMPLIANCE OF MUNICIPAL SOLID WASTE MANAGEMENT RULES, 2016 AND
OTHER ENVIRONMENTAL ISSUES**

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Dated: 18.05.2026

New Delhi



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Observation note by the Amicus Curiae to Status Report/ Compliance Affidavit filed by the Respondent State of Karnataka

It is most respectfully submitted that upon perusal of the Status Reports and annexed material filed by the Respondent State of Karnataka in the present proceedings, the following material deficiencies, compliance gaps, and environmental concerns emerge for consideration of this Hon'ble Tribunal.

S.NO	TOPIC	OBSERVATION
1.	Population	i. Total population in the State- ii. Total ULBs- 326
2.	Solid waste (pg. 6117/ 6132)	i. GAP (generation and processing)- 1920 TPD ii. Total waste generated- 13273 TPD iii. Total waste processed- 11352 TPD iv. Total waste disposed- SWM facility/ some at locations for which coordinates are given but no explanation furnished whether they are SLF/ SWM sites.

		<ul style="list-style-type: none"> v. MSW residue/ reject- mostly sent to SLF, landfilling (pg. 6169, ULB no. 238, 239, 243) vi. WTE Plant- 600 TPD capacity plant KPCL Bidadi (energy produced is 11.5 MW) vii. RDF disposed in- Cement factories/ some RDF is stored at ULBs viii. C& D plant- ix. Authorised waste recyclers- x. Bio- methanation plant- xi. Sanitary waste collection & processing- xii. Flyash & bottom Ash (WTE)- disposed in SLF xiii. Quality of compost- xiv. Plastic waste- xv. Other information-
3.	Legacy waste (pg. 6176/ 6193)	<ul style="list-style-type: none"> i. Total identified LWS- 231 (Bangalore has 9 LWS) ii. Total area covered by LWS- 1071.5604 Acres iii. Total legacy waste- 1,21,52,694 MT iv. Daily waste added- 1920 TPD v. WTE Plant- 1 @ 600 TPD capacity vi. Operational SLF in 327 ULB(for inert, pg. 6122)- 191 Operational, 72 under construction, 11 work completed but not operationalised, 11 ULBs are newly upgraded, some ULBs don't have SLF/ landfill/ NA. vii. Inert & Silt- 1300 TPD viii. Leachate disposal- information not provided ix. Total Legacy waste remediated- 54,55,879 MT x. Total land recovered- 406.0197 Acres xi. Site Remediation plan for LWS (soil & ground water)- information not provided xii. Utilisation plan for recovered land from LWS- information not provided

4.	Liquid waste (pg. 6195/ 6204)	<ul style="list-style-type: none"> i. GAP (in 196 ULBs)- 1752.96 MLD ii. Total sewage generation- 4146.69 MLD iii. Total STPs- 196 (in 327 ULBs) iv. STP operational capacity- 3120.786 MLD v. STP utilised capacity- 2393.73 MLD vi. Final discharge- Shimsa river, recharging lakes (pg. 6206, namely Madiwala, dubasipalya, Halagevaderahalli, Uttarahalli, Dorekere, Devarahalli lakes), biodiversity park, industrial area, near Nala, open channel, Irrigation nala, agricultural purposes, gardening. vii. STP operating at 100-95 % capacity- Bangalore GBA, Uttara kannada, Kalaburagi, Udupi, Davangere etc. viii. STP underutilised- Mangaluru, Belagavi, Haveri, Humnabad, etc. ix. Water quality analysis of rivers/ streams- not provided x. Water quality analysis of STP inlet- information not provided xi. Water quality analysis of 62 STPs- (pg. 6214) <ul style="list-style-type: none"> a) High BOD- Rabkavi Banahatti (250), Anekal (4020, Chintamani, Byadagi, Ramnagara, Sira, Tiptur & Talikote (250), Vijayapura (175), Hansur (252) etc. b) High FC- Badami & Guledagudda (998), Anekal (894), Banur and KR Nagar in Mysore have hazardously high FC matter. c) High COD- Hansur (682) xii. Number of sewage drains- information not provided xiii. Number of storm water drains used for sewage disposal- information not provided xiv. Number of streams used for sewage disposal- xv. Household connections targeted- 37,34,608 xvi. Household connected already- 16,49,714 xvii. Flood plain zoning of streams/ rivers/ storm drains/ water bodies- xviii. STP sludge utilisation- xix. STP performance at Bangaluru (PG. 6216)- <ul style="list-style-type: none"> a) Total STP- b) 34 operational STPs
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		<ul style="list-style-type: none"> c) 22 underconstruciton STPs d) Most STPs are functioning over capacity e) Installed capacity- 1348.5 MLD f) Utilised capacity- 1218.75 MLD
5.	Ring fence account (pg. 6194)	<ul style="list-style-type: none"> i. Single dedicated account opened- Yes ii. Amount deposited- 3400 Cr. iii. Amount released- 725.70 Cr. iv. Amount Utilised- 539.27 Cr. v. Timeline for completion of projects- March 27 to Dec 27 vi. Rs. 3,400 crores deposited; Rs. 539.27 crores utilised — a utilisation rate of 15.86%.

Accordingly, the following suggestions are respectfully proposed to ensure time-bound compliance, strengthen institutional accountability, enhance environmental safeguards, and align implementation with statutory mandates and judicial directions.

A. SOLID WASTE

1. State of Karnataka and all Urban Local Bodies to ensure 100% source segregation within a fixed and time-bound schedule, preferably within 90 days.
2. Establishment of decentralised Material Recovery Facilities and ward-level dry waste collection centres in all ULBs generating more than 100 TPD waste.
3. RDF shall not remain stored at any ULB premises beyond 50 days and require district-wise co-processing linkage plans with cement industries.
4. Establish of regional C&D waste recycling facilities in districts generating substantial construction waste and mandate utilisation of recycled products in public infrastructure projects.
5. Manufacturers producing more than 10 tonnes per month of sanitary products for the Karnataka market shall fund at least 5 decentralised sanitary waste incinerators in the State per year as part of their EPR/ CSR obligation.

B. LEGACY WASTE

1. All biomining and remediation contracts to incorporate scientifically verifiable recovery benchmarks and third-party environmental verification mechanisms.

2. Monthly groundwater, surface water, and ambient air quality monitoring at all legacy waste sites with reports placed in the public domain.
3. Preparation of scientifically validated post-remediation land restoration and utilisation plans.

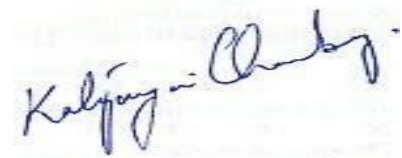
C. LIQUID WASTE MANAGEMENT

1. Prohibition of discharge of untreated or partially treated sewage into rivers, lakes, drains, canals, and water bodies.
2. Installation of online continuous effluent monitoring systems connected to CPCB and KSPCB servers for all STPs.
3. Karnataka State Pollution Control Board to conduct inspections of all non-compliant STPs and file facility-wise compliance status reports.
4. Preparation of district-wise timelines for sewer connectivity and completion of sewage infrastructure projects.

The observation note is respectfully submitted for the kind perusal of the Hon'ble National Green Tribunal, Principal Bench, New Delhi.

AND FOR THIS ACT OF KINDNESS, THE ADVOCATE AS IN DUTY BOUND SHALL EVER BE GRATEFUL.

Dated: 18.05.2026
New Delhi



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