

**BEFORE THE NATIONAL GREEN TRIBUNAL**

**PRINCIPAL BENCH, NEW DELHI**

**IN**

**Original Application No. 606/2018**

(.A. No. 163/2021)

**IN THE MATTER OF:**

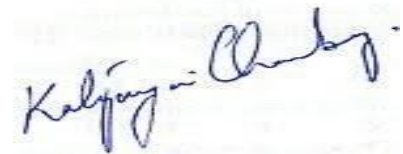
**COMPLIANCE OF MUNICIPAL SOLID WASTE MANAGEMENT RULES, 2016  
AND OTHER ENVIRONMENTAL ISSUES**

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Dated: 09.04.2026

New Delhi



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

**OBSERVATION NOTE FOR AFFIDAVIT FILE ON BEHALF OF THE CHIEF SECRETARY,  
STATE OF PUNJAB**

The present response is being filed in continuation of the affidavit submitted by the State, which purports to demonstrate compliance with the Solid Waste Management regime. At the outset, it is respectfully submitted that the said affidavit, while extensive in form, is deficient in substance, and fails to meet the threshold of compliance as required under the evolved regulatory and judicial framework governing solid waste management.

The affidavit under consideration does not adequately address these core parameters and instead relies on aggregated and unverified data, thereby obscuring the true extent of non-compliance and environmental harm.

Issue	Affidavit dated 05.02.2026	Observation/ suggestions
<b>Solid waste</b> Annex pg. 1808-1850/ 1817 summary of daily waste)	1. Total ULBs- 166 2. Total waste generated- 4008 TPD 3. Total waste processed- 3605 TPD 4. Waste transported- 3968 TPD (pg. 1817)	1. Digital tracking (online portals/ centralized CPCB portals) and bulk generator registration should be undertaken. 2. Mandatory 100% source segregation with ward-level

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	<ol style="list-style-type: none"> <li>5. WTE Gobindgarh, Fatehpur sahib- 15 TPD (pg. 1843/ 1837)</li> <li>6. Gap in generation and transportation- 40 TPD (If so, where is this waste accumulating?)</li> <li>7. Gap in transported and processed- 363 TPD</li> <li>8. <b>Gap in generation and processing- 403 TPD</b> (pg. 1850)</li> <li>9. Waste processing- MRF capacity is 2320 TPD, but intake of dry waste is 1076 (inert- 113 TPD disposed in industries, paper mill and cement plant, pg. 1835)</li> <li>10. Informal waste pickers- <b>388 TPD</b> (pg. 1843)</li> </ol>	<ol style="list-style-type: none"> <li>monitoring and third-party audits (preferable by regional government colleges).</li> <li>3. Prohibit mixed waste entry into processing plants.</li> <li>4. Market linkage for compost (agriculture departments, fertilizers)</li> <li>5. Waste processing Plant-wise utilization certificates to be submitted.</li> <li>6. Mandatory ULB-wise waste accounting (166 ULBs) with:             <ol style="list-style-type: none"> <li>a. Daily generation vs. processing logs</li> <li>b. Facility-wise allocation</li> <li>c. Sanitary and household biomedical waste collection and disposal</li> </ol> </li> <li>7. Strictly enforce Extended Producers Responsibility.</li> <li>8. Identify ULBs contributing to:             <ol style="list-style-type: none"> <li>a. 40 TPD non-transported waste</li> <li>b. 363 TPD processing gap</li> <li>c. 388 ton dry waste given to unregistered rag pickers.</li> </ol> </li> <li>9. Informal sector handling significant waste without integration- they must have 'Formal' inclusion into MRF operations.</li> <li>10. Deploy:</li> </ol>
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		<ul style="list-style-type: none"> <li>a. Decentralized composting (for small ULBs)</li> <li>b. Cluster-based processing facilities</li> </ul> <p>11. Kindly explain where the remaining 403 TPD of waste is being disposed of on a daily basis?</p>
<p><b>Legacy waste</b> (Annex pg. 1851- 1866)</p>	<ul style="list-style-type: none"> <li>1. Total no. of Legacy Waste Site (LWS)- 149</li> <li>2. Total legacy waste (Jan 26)- 84.09 Lakh MT</li> <li>3. Total legacy waste (Jan 24/Jan 25) was also 84.09 Lakh MT</li> <li>4. Annex A (pg. 1866)- current quantity of legacy waste- 41,11,060 MT (in 166 ULBs)</li> </ul>	<ul style="list-style-type: none"> <li>1. The State claims it has remediated 30.22 lakh MT in Jan 2024 and 36.24 lakh MT in Jan 2025 and further 41.75 lakh MT by Sept 2025- then how does the total legacy waste still remains 84.09 lakh MT. (pg. 1805)?</li> <li>2. Mandatory Requirements for Legacy waste sites: <ul style="list-style-type: none"> <li>a. Groundwater testing</li> <li>b. Leachate containment</li> <li>c. Post-remediation land-use certification</li> <li>d. Monsoon contingency Plan</li> <li>e. Time bound bio-mining/ bio remediation</li> </ul> </li> <li>3. Installation and operation of functional leachate treatment plants at all sites.</li> <li>4. Creation of a real-time digital waste tracking system (CPCB centralized portal)</li> <li>5. No site to be declared “remediated” without: <ul style="list-style-type: none"> <li>a. Groundwater testing</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>b. Soil quality report</li> <li>c. Leachate elimination proof</li> </ul>
<p><b>Liquid waste</b> (pg. 1868 Annex B)</p>	<ol style="list-style-type: none"> <li>1. Total generation in the State- 2219.91 MLD</li> <li>2. Total treatment- 2009.50 MLD (STP Utilisation capacity)</li> <li><b>3. Gap- 210.41 MLD</b></li> <li>4. Total STP- 162</li> <li>5. Non- complying- 6</li> <li>6. Under stabilization- 28</li> <li>7. Under maintenance- 05</li> <li>8. Ajnala (ULB) 4 MLD STP- damaged due to flooding (pg. 1868)</li> </ol> <p><b>138 ULBs</b></p> <ol style="list-style-type: none"> <li>a) Total drains- 425 @ 360.89 MLD flow (pg. 1882)</li> <li>b) Total sewage generation- 1676.11 MLD</li> <li>c) ULBs STP installed capacity- 1721.50 MLD (pg. 1882)</li> <li>d) ULBs STP Utilization capacity- 1475.03 MLD</li> <li>e) GAP- 201.08 MLD</li> </ol> <p>**Amritsar ULB STP is being used at 100% capacity (217 installed, 217 utilized) similar situation in- Maur, Rampura phul, Fazilka, Ferozepur, Umar tanda... etc.</p> <p><b>24 MCs</b></p> <ol style="list-style-type: none"> <li>a) Total drains- 32 @ 13.08 MLD</li> <li>b) Total sewage generation- 481.08 MLD</li> </ol>	<ol style="list-style-type: none"> <li>1. Temporary modular treatment units (decentralized STPs)</li> <li>2. Install interception &amp; diversion systems at all major drains (till all households are connected)</li> <li>3. STPs location must be outside the highest flood point</li> <li>4. Within 3 months: All 6 non-complying STPs must achieve standards.</li> </ol>

	<p>c) STP installed capacity- 500.75 MLD  d) Utilized capacity- 475.75 MLD  e) 12 STPs- utilized at 100% capacity</p> <p><b>Future STPs</b>  2 STPs of 36 MLD and 195.10 MLD capacity will be completed by 31.12.26</p> <p><b>Final Discharge Point</b>  Drain, Choe, Ghaggar river (pg.1885), Kaali bein, Sutlej, Beas drain (pg. 1873), Beas River, Sirhind choe.. etc.  Such pollution of fresh water streams raise serious environmental and public health concern.</p>	
<p><b>Ring fenced account</b>  (pg. 1867 Annex A)</p>	<ol style="list-style-type: none"> <li>1. Date of opening- 19.07.24</li> <li>2. Amount deposited- 80 Cr. + 2000 Cr</li> <li>3. Amount utilized- 80 Cr. + 1192.65 Cr</li> </ol>	<ol style="list-style-type: none"> <li>1. Fix responsibility for: <ol style="list-style-type: none"> <li>a. Each of 166 ULBs</li> <li>b. Each dumpsite (149 sites)</li> <li>c. Disclose project- wise expenditure</li> </ol> </li> </ol>

In view of the foregoing, it is respectfully submitted that the affidavit filed by the State does not inspire confidence and fails to establish compliance in terms of environmental outcomes, statutory obligations, and binding judicial directions.

The deficiencies highlighted herein are not merely procedural but go to the root of environmental protection, as continued gaps in waste management directly result in:

- a) Soil and groundwater contamination,
- b) Air pollution, and
- c) Public health risks.

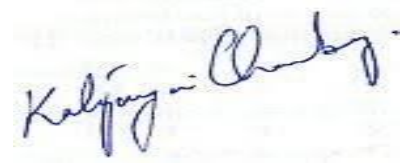
The observation note is respectfully submitted for the kind perusal of the Hon'ble National Green Tribunal, Principal Bench, New Delhi.

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

Dated: 09.04.2026

New Delhi

A handwritten signature in blue ink, appearing to read 'Katyayni Chaubey', is written over a faint, rectangular stamp or watermark.

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