BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

IN

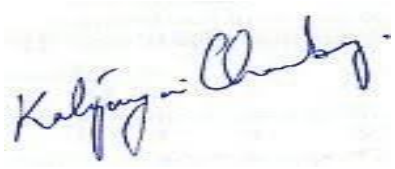
ORIGINAL APPLICATION NO. 606 OF 2018

IN THE MATTER OF:

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

INDEX

Dated: 20.03.2026
New Delhi



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OBSERVATION NOTE FOR AFFIDAVIT CUM SIX MONTHLY PROGRESS REPORT ON BEHALF OF THE STATE OF ARUNACHAL PRADESH (MARCH 26)

The present submission is filed in response to the status report placed on record concerning solid waste, legacy waste, and sewage management across the concerned Urban Local Bodies. While the report purports to indicate progress in certain areas, a closer examination reveals persistent systemic deficiencies, significant gaps in infrastructure, and a lack of effective implementation.

It is respectfully submitted that the data disclosed in the report itself demonstrates that waste processing remains grossly inadequate in comparison to the volume of waste generated. The submissions herein, therefore, seek to highlight these shortcomings and place on record the urgent need for time-bound, verifiable, and accountable measures.

TOPIC	JULY 2025	MARCH 2026
Solid waste	1. The report candidly records that out of a total waste generation of 215.78 TPD across 27 census towns, only 83.91 TPD is being processed, leaving a substantial unaddressed gap of 131.87 TPD.	Across 27 Urban Local Bodies (ULBs), the status of solid waste management is as follows: (Ref.: Annex I, pp. 1121 & 1152) 1. The total municipal solid waste generation has been recorded at 168.53 tonnes per day (TPD).

	2. It is submitted that while certain incremental improvements are reflected, they remain insufficient to bridge the systemic deficit: a) Marginal reduction in waste generation (January 2025 to July 2025): 1.6 TPD b) Increase in processing capacity: 29.25 TPD c) Net progress in gap reduction: 30.85 TPD (from 162.72 TPD to 131.87 TPD) (Ref: Pg. 1065, Annex) Despite these figures, a significant proportion of waste continues to remain unprocessed, indicating partial and inadequate compliance. 3. It is further submitted that only 16 out of 27 towns have functional Material Recovery Facilities (MRFs), demonstrating incomplete infrastructure coverage and lack of uniform implementation. 4. The report states that wet waste is being utilised under socio-cultural practices. However, in the absence of institutional mechanisms or verifiable data, such reliance cannot be construed as a scientifically managed or sustainable waste processing method. 5. The proposal to outsource end-to-end solid waste management by June 2025	2. A significant proportion of wet waste (19.74 TPD) is not entering the municipal collection system, as it is reportedly being utilized at the household level through composting or diverted for consumption in piggeries and livestock rearing. 3. After accounting for household reuse and informal recycling through scrap dealers (25.56 TPD), the residual waste requiring municipal collection is estimated at 123.23 TPD. 4. Out of this, 120.32 TPD is presently being collected, leaving approximately 2.91 TPD uncollected. 5. Of the waste collected, 105.50 TPD is being processed at designated facilities. 6. Consequently, there exists a gap of 63.03 TPD between total waste generation and processing capacity. 7. Even with respect to the waste actually collected, a processing deficit of 14.82–17.73 TPD persists, indicating that not all collected waste is being scientifically treated. 8. At present, 18 Material Recovery Facilities (MRFs) are operational with a combined processing capacity of 21.59 TPD. It has been indicated that four additional MRFs are proposed to be established by March 2026.

	(Ref: Pg. 1080) is noted. However, the same appears prospective in nature and does not address the present deficiencies or ongoing environmental concerns.	However, the following critical aspects remain unclear and require specific clarification: • The mechanism for collection, treatment, and final disposal of sanitary waste in compliance with applicable Solid Waste Management Rules. • The system in place for segregation, storage, and disposal of household hazardous waste, including biomedical waste, plastic waste, and electronic waste. • The existence or proposed establishment of a construction and demolition (C&D) waste processing facility or designated disposal mechanism. • Details regarding the proposed waste collection cluster hub at Kimin, Yupia Division, adjacent to the Kimin–Potin Highway, with an earmarked area of 20,082 sq. m., including its operational design, capacity, and implementation timeline.
Legacy waste	1. The report records a cumulative **2,55,582.64 MT** of legacy waste as of July 2025. Notably, no remediation activities were undertaken between April and July 2025, during which an additional 22,518.73 MT of waste was added. (Ref: Pg. 1065, Annex)	(Ref.: Annex XII, p. 1179) 1. The total quantum of legacy waste in the State is reported to be **2,55,546.64 MT** as of July 2025. 2. It is stated that within the last six months, the State has successfully undertaken complete (100%)

	This reflects a stagnation in remediation efforts alongside continued accumulation. 2. It is submitted that the continuous addition of unprocessed daily waste to legacy dumpsites exacerbates the problem and undermines any claimed remediation efforts. 3. While partial compliance is claimed in certain major towns—Ziro, Pasighat, Itanagar, and Naharlagun—and remediation is stated to be ongoing in Aalo, such efforts are rendered ineffective due to the simultaneous inflow of fresh waste. Consequently, complete remediation remains remote and impracticable under the current approach. 4. The issue of establishing engineered landfill sites remains unresolved, with the report citing scarcity of land and inadequate financial allocation. (Ref: Pg. 1072, Annex A3). These constraints further impede long-term waste management planning and compliance.	remediation of legacy waste in ten (10) ULBs, namely: Basar, Changlang, Deomali, Hawai, Jairampur, Khonsa, Longding, Miao, Yingkiong, and Ziro. 3. In this regard, the following clarifications are required: a) The waste processing methodology/system adopted for remediation; b) The total land area remediated through the said process; c) The post-closure management plan and proposed utilization of the remediated sites. 4. It has further been submitted that, with the ongoing efforts, the entire legacy waste of the State is expected to be remediated within the next 12–18 months. 5. However, it is recorded that 16 ULBs are yet to complete remediation of legacy waste. The indicated timelines for completion range from May 2026 to July 2026, except in the case of Itanagar Municipal Corporation, where the proposed timeline is May 2027. In view of the fact that daily waste addition continues at approximately 63.03 TPD, clarification is sought as to how the State proposes to achieve complete

		remediation of legacy waste within the stipulated timelines.
Liquid waste	1. It is submitted that no Urban Local Body is effectively treating sewage, including in the capital region of Itanagar–Naharlagun, reflecting a complete absence of functional sewage treatment systems. 2. Data pertaining to 15 towns indicates a stark mismatch between generation and treatment capacity: • Sewage generation: **19.89 MLD** • Installed STP capacity: **4.20 MLD** • FSTP capacity (across 12 towns): 0.14 MLD 3. This demonstrates a severe infrastructure deficit and widespread discharge of untreated sewage.	(Ref.: p. 1122 / Annex XIV, p. 1181 – covering 15 ULBs) The status of liquid waste management across 15–16 ULBs is summarized below: 1. The total sewage generation has been assessed at **19.89 million litres per day** (MLD) (2025 data). 2. Existing Sewage Treatment Plants (STPs) treat only **4.20 MLD**, leaving a substantial treatment gap. 3. The resulting shortfall in sewage treatment capacity is approximately 16 MLD. 4. To address this, 14 new STPs with a combined capacity of 17.30 MLD have been proposed. 5. In 12 towns/ULBs, septage generation is estimated at 0.19 MLD, against which the existing treatment capacity is 0.14 MLD, indicating an additional gap in faecal sludge management. 6. It has been stated that the deficit in used water management will be bridged within 24 months; however, detailed implementation schedules and funding arrangements have not been provided. 7. The following additional technical and regulatory details are required:

		a) A list and mapping of all major drains, streams, and receiving water bodies, including flow direction, interception structures, and any existing or proposed diversions to STPs. b) The final discharge points of treated and untreated sewage. c) Water quality monitoring data for both influent and effluent of STPs, including compliance with prescribed discharge standards. d) Status of Online Continuous Effluent Monitoring Systems (OCEMS) and their connectivity to regulatory authorities. e) Details regarding generation, treatment, and end-use or disposal of STP sludge, along with quality testing reports to ensure its suitability for reuse or safe disposal.
Ring fenced account	While the creation of an account with ₹200 Crores in the State Bank of India on 06.02.2025 is acknowledged (Ref: Pg. 1021, March 2025 Affidavit), there is no accompanying record of expenditure, allocation, or project-wise deployment of funds.	It is recorded that a total fund amounting to ₹19.349 Crores has been earmarked and booked to date under the designated ring-fenced account for the relevant waste management activities.

In view of the foregoing, it is respectfully submitted that the respondent authorities have not demonstrated substantial or effective compliance with their statutory obligations in the domain of waste and sewage management. The incremental progress reflected in the report is

overshadowed by continuing gaps in processing capacity, ongoing accumulation of legacy waste and absence of functional sewage treatment systems.

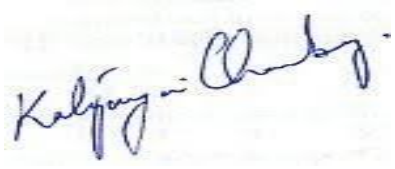
It is further submitted that unless immediate, concrete, and time-bound steps are undertaken—supported by adequate infrastructure, financial accountability, and independent verification—the existing situation is likely to deteriorate further, causing continued environmental degradation and public health risks.

Accordingly, it is prayed that appropriate directions may be issued to ensure strict compliance, periodic monitoring, and expeditious implementation of waste management and sewage treatment measures in a comprehensive and sustainable manner.

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: 20.03.2026
New Delhi



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