BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

IN

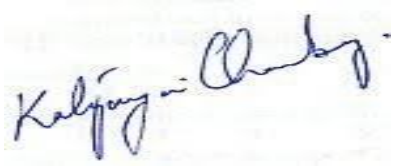
ORIGINAL APPLICATION NO. 606 OF 2018

IN THE MATTER OF:

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

INDEX

Dated: 27.05.2026
New Delhi



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OBSERVATION NOTE FOR THE STATE OF GUJARAT

It is respectfully submitted that the undernoted observations emerge from the affidavits and compliance reports filed in the above-captioned matter by the States of Gujarat:

S.NO	TOPIC	OBSERVATION
1.	Population	i. Total population in the State- 6.04 Cr ii. Corporations- 1.46 Cr iii. 158 Municipalities- 1.11 Cr iv. Urban population- 2.57 Cr v. Total ULBs- 169
2.	Solid waste (4862/ 4866)	i. GAP- 923.36 TPD (pg. 4881/92) ii. Total waste generated- 11269 TPD (wet waste- 5797 & dry- 5084) iii. Total waste collected- 11042 TPD iv. Total waste transported- 11042 TPD v. Gap between generation and collection- **227 TPD** vi. Final destination of transported waste- entralized waste processing plants, Integrated waste management facility, processing plant, dumpsite, resource recovery station, MRF plant and dumpsite, vii. Total waste processed- viii. MRF- 2705 TPD (residue/ reject- sent to SLF, landfill, dumpsite and in Ahmedabad it is sent to cement industry and WTE)

		ix. RDF produced- 1085. 93TPD (utilised as alternative fuel/ residue and reject is disposed at SLF, dumpsite and landfill site) x. 5 RDF Plant capacity- 2222 TPD (pg. 4870) xi. RDF Utilisation- cement, boiler industries as alternative fuel i. **2 WTE Plant**: 1600 MT (pg. 4871) a) Ahmedabad 1000 MT- utilised capacity is 925 TPD (**input 492 TPD of dry waste** is sent to cement industry and WTE.. pg. 4872) b) Jamnangar 600 MT- utilised capacity- 100 TPD (total dry waste generated is 150 TPD+10 inert) xii. Inert & Silt- 388 TPD xiii. 4 Bio- methanation plant- 417.30 TPD xiv. C& D plant- info not provided xv. Sanitary waste collection & processing- information not provided xvi. Flyash & bottom Ash (WTE)- Inert substance like Fly ash and Bottom Ash is used in construction of Dholera Expressway and remaining is disposed to SLF xvii. Compost intake- 4933 TPD xviii. Compost generated- 1370 TPD xix. Other information- a) Major ULBs are reflecting 0 gap in waste generation and processing. (pg. 4881) b) Gap between generation and collection is 227 TPD, which is unaccounted. Indicating that collection is not 100%. c) Ahmedabad has no legacy waste site. d) Jamnagar WTE is underutilised
3.	Legacy waste (4881/ 4893/ 5006)	ii. Total identified LWS- 173 iii. Total legacy waste- 12.72 LMT (298.08 LMT) iv. Daily waste added- 923 TPD (2.01 LMT) v. Gap in LWS remediation- 12.72 LMT vi. Inert & Silt- 161.15 LMT vii. Daily waste added to LWS- **923.36 TPD** (approx. 2.01 LMT/ year)

		viii. RDF utilisation- cement industries/ landfill ix. Leachate disposal- leachate quality report (pg. 4982) x. Total legacy waste remediated- 286.67 LMT (p. 5009) xi. Total land recovered- 826.06 acres (out of 974.34 LWS occupied) xii. Site Remediation plan for LWS (soil & ground water)- information not provided xiii. Utilisation plan for recovered land from LWS- information not provided xiv. Other information: a) Ahmedabad shows **0 LWS**- However, during the course of the arguments before the Hon'ble Tribunal, it was admitted by the State counsel that another SLF (probably Ghanshyam) exists in Ahmedabad where the residue and rejects from daily waste is being dumped. b) Ahmedabad (pg. 4862) generates 2569 TPD of daily waste which is reportedly disposed at "*centralised waste processing plant*." But (at pg. 4866) Residue and reject from MSW is disposed in landfill cell.
4.	Liquid waste (pg. 5106/ 5089/ 5234 /5378/5565)	i. GAP- 399 MLD ii. Total sewage generation in 169 ULBs- **4903 MLD** iii. Total STPs in 168 ULBs- 212 (pg. 5116) {at p. 4823 the number of STP is 212) iv. STP installed capacity- 6125 MLD (p. 4834/ 5116) v. STP utilised capacity- 4504 MLD vi. Gap between installed and utilised- 399 MLD (p. 4834) vii. Number of sewage drains (p.5106)- many ULBs don't have any drain. viii. **Final discharge**- Irrigation canal, Creek, ponds, Machchu River, Sangh River, Chekla drain, Sabarmati, Ragmati, Vishwamitri, Shedhi, Utavli, Falku, Gangasar, Maha river, Thebi, Gautmi River, Machchundri, Shetruji, Hiran, Rudramata Dam, Gondli river,

		Bhadar River, Rupavati, Purna, Kim River, Tapi, Umargam river, Dhadhar, Bokadiya, Pardi, kotar, Ambika, vanki, Narmada, Mindhola, Auranga, Dudhimati, Meshfree (pg. 5116) ix. **Water quality analysis of STP outlet**- (pg. 5134) 60 MLD Vadaj STP TC is very high (while FC is 95). Similarly, is the position of 35 MLD Vinzol STP at pg. 5136. Same for STPs- Maleksaben, Shankarbhavan, Kotarpur etc. This is indicates underutilisation or misutilisation of chlorination system. x. Number of storm water drains used for sewage disposal- information not provided xi. Number of streams used for sewage disposal- (ref. pg. 5116) xii. Household connections- timeline for Ahmedabad is by July 2026 xiii. STP sludge utilisation- information not provided
5.	Ring fenced account (pg. 4846/ 4833/ 5697)	i. Account opened- 26.03.23 ii. Amount to allocated- 2100 cr iii. Amount disbursed- 1894 cr iv. Amount Utilised- 1213.98 cr

Despite being India's premier industrial hub, Gujarat continues to struggle with multiple river stretches designated as critically polluted by the Central Pollution Control Board (CPCB), presenting a profound mismatch between capital expenditure and actual ecological remediation. While the State has demonstrated significant administrative intent- allocating ₹2,100 crore into a dedicated, ring-fenced account (p. 4833/4846), expending over ₹1,010 crore under the National River Conservation Plan (NRCP) for the Sabarmati, Mindhola, and Tapi rivers, and deploying unprecedented municipal infrastructure like Waste-to-Energy (WTE) plants and Material Recovery Facilities (MRFs)- its tangible environmental outcomes remain deficient. Crucially, the State's own compliance affidavit reveals an ongoing failure to achieve containment, noting that 923 tonnes per day (TPD) of solid waste is continuously added to legacy dumpsites, while vital river systems, including the Sabarmati, Vishwamitri, Bhadar, and Tapi, remain compromised too. Consequently, the core issue requiring adjudication by this

Honorable Tribunal is this profound disconnect between the physical infrastructure established by the State and the substandard environmental outcomes realized on the ground.

SUGGESTIONS

In view of the foregoing analysis and findings, the following suggestions are most humbly submitted for your kind perusal:

1. The State of Gujarat may, within thirty days, file a corrected disclosure in respect of ULBs/ Municipal Corporation's legacy waste, which shall include:
    a) identification, by name and address, of every landfill, SLF, or dump site in the ULBs, including Ahmedabad Municipal Corporation area- both Pirana site, the Ghanshyam SLF admitted by State counsel, and any other site;
    b) the quantum of accumulated waste at each site;
    c) the rate of daily addition of residue, reject, and unprocessed waste to each site;
    d) leachate collection and treatment status at each site
    e) a time-bound remediation plan with quarterly milestones
    f) a plan for land utilisation at remediated sites
    g) a soil and groundwater quality assessment for each site
2. The conduct an independent physical verification of all ULBs that have reported zero gap between waste generation and waste processing in the compliance affidavit:
    a) whether any residue, reject, inert waste, or fly ash from processing facilities is being deposited at any location not declared as an LWS.
    b) The actual quantum of such deposits
    c) Are there any low lying areas being filled with solid waste/ rejects- residue/ inert etc materials.
    d) C&D waste, sanitary waste, and plastic waste collection and disposal data
3. Jamnagar WTE performance audit-
    a) Reason for underutilisation (100 TPD as against actual capacity of 600 TPD)
    b) technical audit of the emissions control systems, including continuous emission monitoring data for particulate matter, dioxins/furans, mercury, cadmium, and other regulated pollutants
    c) assess the possibility of whether waste from additional ULBs and industrial clusters can and should be routed to the Jamnagar plant to improve utilisation.

d) file test reports for heavy metal content- lead, cadmium, mercury, arsenic, chromium, dioxins, furans- of fly ash and bottom ash generated at both WTE plants (Ahmedabad and Jamnagar) and confirm whether or not utilisation of such ash is safe in Dholera expressway.

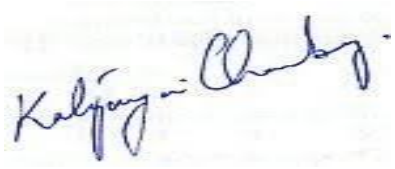
e) both WTE plants (Ahmedabad and Jamnagar) must have- with real-time data on particulate matter, dioxins, heavy metals, and other regulated emissions accessible publicly on the GPCB website

4. The State may furnish detailed information on- total- actual current sewage generation from all ULBs with list of each sewer network/ drain/ storm water drain/ stream/ nalla/ river which is being used to discharge sewerage or mixed effluent in all 168 ULBs.
5. The State has 137 STPs in 168 ULBs, it is requested that the State may provide following information regarding performance and function of each STP:
   a) design capacity and actual inflow
   b) installation and utilisation capacity of STP
   c) BOD, COD, TSS, total coliform, faecal coliform and faecal streptococci
   d) Whether STP has functioning chlorination system
   e) Final discharge point (receiving water bodies)
   f) Enforcement action taken against each non- compliant STP (eg. Vadaj, Vinzol, Kotarpur etc.)
   g) STP sludge quantum, treatment, and utilisation with heavy metal test results
   h) water quality of all 38 receiving rivers and water bodies
   i) all STPs above 10 MLD capacity- with real-time effluent quality data accessible on the GPCB website
6. State should also furnish the information on Industrial effluent generation, discharge and treatment. It may also provide data regarding ETP/ CETP/ STP- capacity and utilisations for each industrial cluster alongwith list of industries/ units that maybe operating without ETPs.

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: 27.05.2026
New Delhi



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