

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

ORIGINAL APPLICATION NO. 06 OF 2012

In the matter of:

Nizamuddin West Association

...Applicant

Versus

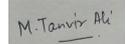
Union of India & Ors

...Respondents

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Filed by:

Zain Haider & Tanvir Ali

Advocates for the Applicant(s)

Date: 28.03.2026

Place: New Delhi

A20, Basement, Jangpura Extension, New Delhi-110014

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

ORIGINAL APPLICATION NO. 06 OF 2012

In the matter of:

Nizamuddin West Association ...Applicant

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Union of India & Ors ...Respondents

**Objection Affidavit on behalf of the Applicants to the Affidavit/Progress
Reports dated, 01.01.2026 & 20.03.2026 filed by the DJB before this
Hon'ble Tribunal**

1. That, in compliance with the order dated 14.10.2025 passed by this Hon'ble Tribunal, DJB had submitted the affidavit/status report dated 01.01.2026 with timeline for trapping all sub-drain outfall points into the Barapullah Nala, ensuring that no sewage flows untreated into the Barapullah drain. The relevant part of the affidavit dated 01.01.2026 is as under:

“3. That in continuation of and in obedience to the aforesaid directions, the answering respondent respectfully submits that the present report comprehensively places on record the status of

i. Interception and trapping of sewage at source

- ii. Identification and remediation of sub-drains outfalling into the Barapullah drain, and
- iii. Planning, tendering and execution of STP/DSTP projects along with their corresponding sewerage infrastructure, all in a coordinated and timebound manner.”

“4. That, as a first and most critical step, DJB has adopted the principle of "tapping of drains at source" so as to prevent the ingress of untreated sewage into storm water drains at the very point of origin. In furtherance thereof, DJB has already successfully tapped fifteen (15) drains, in which flow observed in Rainy season in 5 drains at identified locations, thereby ensuring immediate diversion of sewage into the sewerage system...”

2. That the DJB in its next status report dated 20.03.2026 submitted on affidavit that as of the date of the affidavit, 17 drains in the Barapullah Nala region being trapped leading to no discharge of untreated sewage into the river system. The relevant part of the DJB status report/affidavit dated 20.03.2026 is as under:

“2. That it is respectfully submitted that out of the total 43 identified drains, substantial progress has been achieved in terms of trapping and diversion of sewage. As on date, 17 drains have been successfully trapped and diverted, thereby preventing direct discharge of untreated sewage into the river system...”

Independents field survey done by the Applicants

3. That, upon perusal of the status report dated 01.01.2026 filed by the DJB, the Applicants undertook an independent site survey to verify the actual condition of the trapping points as identified therein. The Applicants were able to inspect only 3 out of the 15 trapping points detailed by the DJB; however, at each of these locations, they were confronted with conditions that were wholly inconsistent with and contrary to the representations and claims made by the DJB in its said status report, thereby raising serious concerns regarding the accuracy and reliability of the information placed before this Hon'ble Tribunal.
4. The findings of the independent field survey done by the Applicants with respect to the information provided by DJB in status report dated 01.01.2026 is as under:
 - i. **S. No. 26: A block, Vasant Vihar-** DJB in its report dated 01.01.2026 reported **“no flow, flow observed in rainy season”**
Whereas, in the photos dated 24.03.26, captured by the Applicants, it can be clearly seen that the **sewage is flowing freely, even when it is not a rainy season in March. And there is no fencing or barrier at the Nala to prevent dumping of any kind of waste or debris.**
Photos of the findings at the A-block, Vasant Vihar trapping point is at Annexure A-1 (pg. 8 to 10).
 - ii. **S. No. 28: Nehru Ekta Camp, RK Puram-** DJB in its report dated 01.01.2026 reported **“trapped in a DJB sewer line”**
Whereas, the reality is that **sewage is flowing free** and the same can be seen the photos dated 24.03.26, which were captured by the Applicants upon the field inspection.

Photos of the findings at the Nehru Ekta Camp, RK Puram trapping point is at Annexure A-2 (pg. 11 to 14).

- iii. **S. No. 21: Coolie Camp, Vasant Vihar-** DJB in its report dated 01.01.2026 reported **“trapped in DJB sewer line”**

Whereas, on inspection it has been found out that the **community toilet is discharging straight into the Nala**. Though the **boundary wall is built along the nala which has reduced the dumping of debris in nala**, the boundary wall is broken or the grill fencing is missing at some places because of which the dumping of debris is happening at such places.

Photos of the findings at the Coolie Camp, Vasant Vihar trapping point is at Annexure A-3 (pg. 15 to 17).

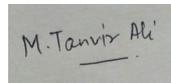
5. The Applicants, having conducted an independent survey at 3 of the identified trapping points, have found conditions wholly inconsistent with the claims made by the DJB, giving rise to a reasonable and bona fide apprehension that similar discrepancies persist at the remaining locations as well. It is respectfully submitted that the material placed on record clearly demonstrates that the statements made by the DJB in its affidavits/status reports before this Hon'ble Tribunal are incorrect, misleading, and not borne out by the actual ground situation.
6. That such conduct, amounting to the filing of false and inaccurate statements on affidavit, undermines the sanctity of proceedings before this Hon'ble Tribunal. It is, therefore, most respectfully prayed that this Hon'ble Tribunal may be pleased to take stringent action against the DJB

for placing misleading information on record, and further impose exemplary costs, in the interest of justice and to ensure accountability.

PRAYER

7. It is therefore prayed that this Hon'ble tribunal may be pleased to:
- a. To direct the DJB to produce the photographs of all the 17 trapped sub-drains as mentioned by them in the affidavit/status reports dated 01.01.2026 and 20.03.2026, filed before this Hon'ble Tribunal;
 - b. To summon the senior DJB officials before this Hon'ble Tribunal to explain why the false affidavit has been furnished before this court.
 - c. Pass such other or further orders as this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case.

Filed by:



Zain Haider & Tanvir Ali

Date: 28.03.2026

Advocates for the Applicant(s)

Place: New Delhi

A20, Basement, Jangpura Extension, New Delhi-110014

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

ORIGINAL APPLICATION NO. 06 OF 2012

In the matter of:

Nizamuddin West Association

...Applicant

Versus

Union of India & Ors.

...Respondents

Affidavit

I, Mohammad Haneef, S/o Mohammed Yousuf, aged about 75 years old, r/o G-6, Nizamuddin West, South Delhi, Delhi 110013, do hereby solemnly affirm and state as follows:

1. That I am the Applicant in the above-mentioned case and I am well conversant with facts and circumstances of the case and as such I am competent and authorized to swear this affidavit.
2. That I have understood the content of the objection application and the same has been explained to me in the vernacular language known to me and is being filed under my instructions and the contents thereof are true and correct to the best of my knowledge and nothing material has been concealed therein.
3. That I have gone through the accompanying annexures to the objection application and state that the contents of the same are correct and true to the best of my knowledge.



MOHAMMAD HANEEF
PRESIDENT (NWA)
9811903388


DEPONENT

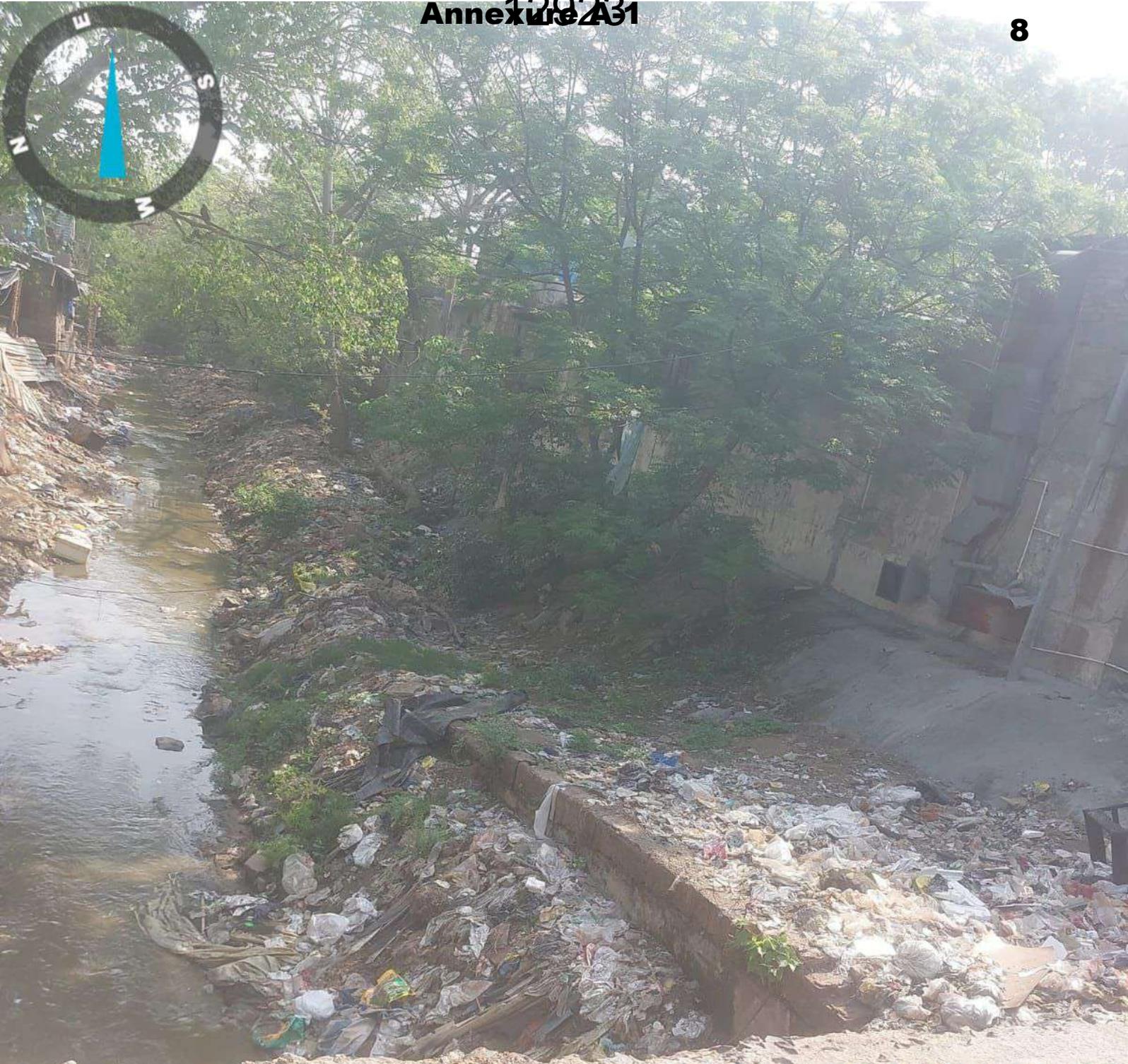
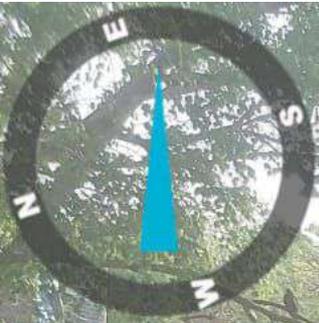
VERIFICATION

I, the above-named deponent, do hereby verify at North Xcel on this 29th day of March 2026 that the contents of the present affidavit are true and correct to the best of my knowledge and belief. No part of it is false and nothing material has been concealed therefrom.




DEPONENT

MOHAMMAD HANEEF
PRESIDENT (NWA)
9811903388



24-Mar-2026 09:56:23

110° E

Rama Krishna Puram

New Delhi

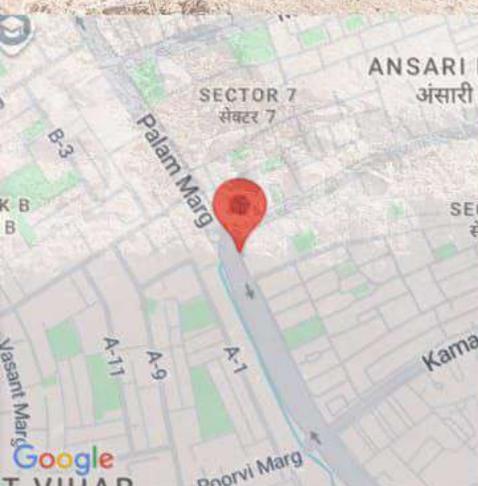
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Delhi

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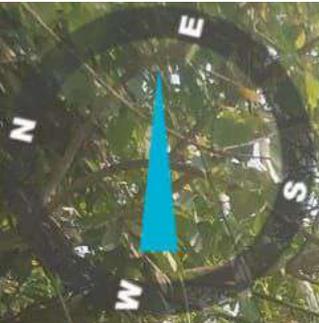
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9



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71° E

Rama Krishna Puram

New Delhi

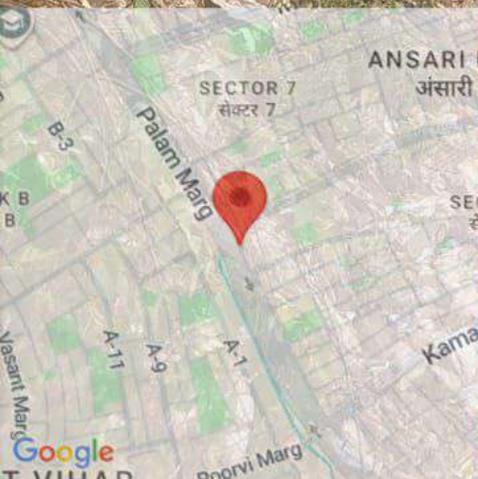
Delhi Division

Delhi

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Annexure A-2









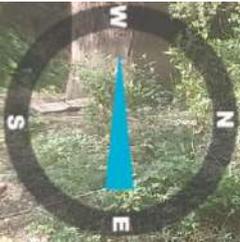
Annexure A-3



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Index number: 134







24-Mar-2026 10:19:13
271° W
Vasant Vihar
New Delhi
Delhi Division
Delhi
Altitude:197.3msnm
Speed:0.0km/h
Index number: 133



12933



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Tanvir <advocatetanvirali@gmail.com>

Advance Service of Objection Application on behalf of Applicants in Case No. O.A. No. 6 of 2025, filed in NGT, New Delhi

1 message

Tanvir <advocatetanvirali@gmail.com>

Mon, Mar 30, 2026 at 11:42 AM

To: Jyoti Mendiratta <jyoti.legal@gmail.com>, PUJAKALRA09@gmail.com, "narendrapalsingh@gmail.com" <narendrapalsingh@gmail.com>

Dear Sir/Ma'am,

Please find the attached copy of the Objection Application filed on behalf of the Applicants in Case titled "Nizamuddin West Association (Regd.) Versus Union of India and Ors," with case no., "O.A. No. 6 of 2025", filed in NGT, New Delhi.

Regards,
Mohammad Tanvir Ali
Advocate for the Applicants
9560181884

**Objection Application.pdf**

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