

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

**In OA No. 1281 of 2024**

Amarjit Singh and others

...Applicants

Versus

State of Punjab and others

...Respondents

**Rejoinder-affidavit by Amarjit Singh , S/o Sh.  
Sadhu Singh, R/o W. No.7, Dashmesh Colony,  
Kurali., on behalf of the Applicants in  
response to the reply affidavit filed by the  
respondent No. 2 (Municipal Council, Kurali)**

**RESPECTFULLY SHOWETH:**

**PRELIMINARY OBJECTIONS/SUBMISSIONS**

1. That the respondent Nagar Council, Kurali has stated that the site in question is not the landfill site, but it is a "Compost Infrastructure Unit" prepared by the Municipal Council, Kurali. It is further contended by the Nagar Council, Kurali that in view of the aforesaid position, Schedule I of the Solid Waste Management Rules, 2016 is not attracted to the instant case and that the case has to be examined in terms of Schedule II of the Solid Waste Management, 2016.

2. That the aforesaid stand taken by the respondent Nagar Council (respondent No. 2) is in total contradiction to the stand taken by respondent No. 3 (Punjab Pollution Control Board), in their affidavit. In the said affidavit, Er. Rantej Sharma, Environmental Engineer, Regional Office, SAS Nagar, Mohali has categorically stated in para No. 4 that Municipal Council, Kurali had applied for obtaining the authorization under the Municipal Solid Waste Management

*Amarjit Singh*

Rules, 2016 for setting up of a waste processing facility. Further, it has been stated in para No. 8 of the said reply affidavit that site was visited by the officers of the Board on 03.09.2024 along with Sanitary Inspector of Municipal Council, Kurali. Thereafter, an opportunity of personal hearing was granted to the officers of the Nagar Council, Kurali by the Punjab Pollution Control Board on 24.09.2024. It is further stated in para No. 9 that officers of the Nagar Council Kurali had assured that no further waste will be brought at the processing site and he further assured to comply with the Solid Waste Management Rules, 2016 all the time. It is further stated in the said paragraph of the reply affidavit filed by the respondent Nagar Council Mohali that the Board constituted by the Punjab Pollution Control Board had visited the site of MC Kurali and thereafter made certain observations, which are contained in para No. 10 of the said reply affidavit . It is further stated in para No. 11 of this led reply affidavit that in view of the violation of certain provisions of the Schedule to the Solid Waste Management Rules, 2016 regarding choosing the site for landfill, the application submitted by the Nagar Council Kurali for obtaining authorisation under the Solid Waste Management Rules, 2016, was rejected. Besides, in terms of the orders passed by this Hon'ble National Green Tribunal dated 01.01.2020 in OA No. 606 of 2018, a huge amount of compensation was also imposed upon the Nagar Council Kurali. It is further stated in para No. 14 of the said reply affidavit that representative of the Municipal Council, Kurali had informed the Chairman of the Pollution Control Board that there will be no further dumping of solid waste at the site.

3. That the aforesaid contents of reply affidavit filed by the respondent No. 3 (Punjab Pollution Control Board) are in total conflict with the stand taken by the Nagar Council, Kurali in their reply affidavit. It is difficult to believe that the authorization application submitted by the respondent Nagar Council, Kurali was erroneously processed and rejected by Punjab Pollution Control Board, and it was only thereafter that the officers of the Nagar Council, Kurali came to realize that the case put up before the Punjab Pollution Control Board should have been examined from the angle that the Nagar Council, Kurali

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proposed to set up "Compost Infrastructure Unit", and not the landfill at the site mentioned in the report submitted by the respondent No. 3 Punjab Pollution Control Board. Thus, the Original Application filed by the Applicants deserves to be allowed and the proposal/decision of the respondent Nagar Council, Kurali to set up the landfill site at the place mentioned in their authorization application, be set aside and quashed, with heavy costs and compensation to be awarded against the respondent Nagar Council, Kurali, in the facts and circumstances of the instant case.

**PARA-WISE REJOINDER TO THE CONTENTS OF REPLY AFFIDAVIT FILED BY RESPONDENT NO.2 (MUNICIPAL COUNCIL KURALI)**

**1 to 10.** That the contents of these paras are quite misleading, and are totally in conflict with the contents of the reply filed by the respondent No. 3 Punjab Pollution Control Board. The detailed submissions in this regard have been made in the preceding paragraphs under "Preliminary Objections/Submissions" to the instant Rejoinder. The said "Preliminary Objections/Submissions" be treated as part and parcel of rejoinder of the Applicants to the contents of these paragraphs No. 1 to 10 also.

**REJOINDER BY THE APPLICANT TO THE PARA-WISE REPLY OF "BRIEF FACTS"**

**1 to 4.** That in view of the position explained under "Preliminary Objections/Submissions" and detailed exhaustive reply filed by the respondent No. 3 Punjab Pollution Control Board to the Original Application, the contentions raised by the respondent No. 2 Nagar Council, Kurali in these paragraphs No. 1 to 4 are misconceived and unsustainable, besides being false and incorrect.

**It is therefore respectfully prayed this Hon'ble Court may kindly be pleased to allow the Original Application (OA) with heavy costs and compensation, in the facts and circumstances of the instant case and in the interest of justice.**

*Amaj Singh*

*Amarjit Singh*

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Place: Chandigarh

Dated: 27.10.2025

**(AMARJIT SINGH)**

DEPONENT

**VERIFICATION:**

Verified that the contents of para No. 1 and 2 of the Preliminary Objections/Submission, Para No. 1 to 10 of Para Wise Reply and Para 1 to 8 of the Para Wise Reply to "Brief facts " the Replication are true and correct to my knowledge and nothing relevant has been kept concealed therein.

*Amarjit Singh*

Place: Chandigarh

Dated: 27.10.2025

**(AMARJIT SINGH)**

DEPONENT

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ATTESTED AS IDENTIFIED  
NOTARY, CHANDIGARH

*Amarjit Singh*  
Signature  
I identified the deponent  
who has signed this  
document in my presence  
and he has signed this  
document in my presence

27 OCT 2025