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

(in O.A. 317 of 2023)

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Dated: 11-10-2025
Place: Ludhiana

Kuldeep Singh Khaira
(Applicant No. 2 in Person)
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Mobile: 9855544433

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
AT PRINCIPAL BENCH, DELHI
(In O.A. No. 317 of 2023)

In the matter of:

Kapil Dev & anr. Applicants

vs.

State of Punjab & ors. .. Respondents

Rejoinder against another false and misleading status report by way of Affidavit dated 30-07-2025 submitted by the District Magistrate.

Hon'ble sir,

Most respectfully showeth

The Applicants humbly submit as under:

1. That the District Magistrate, Ludhiana, Sh. Himanshu Jain, IAS, has submitted a Status Report dated 30-07-2025 by way of an affidavit, which is completely contrary to the actual and factual conditions prevailing at the sites where garbage continues to be dumped on a daily basis. The said report is misleading, false, and appears to be yet another attempt by the concerned authorities to evade their lawful duties and responsibilities. It is submitted that the District Magistrate, the Municipal Commissioner of Ludhiana, the Chairman of the Ludhiana Improvement Trust, the Chief Administrator of GLADA, as well as the District Development and Panchayat Officer, Village Gill, Ludhiana, have collectively failed to take effective and timely action to address the

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persistent issue of illegal garbage dumping, thereby causing severe environmental and public health hazards.

2. That the Applicants had submitted Rejoinder dated 28-07-2025 supported by photographs of impugned locations with GPS location, date and time which clearly depicts that the Status Report dated 30-07-2025 is baseless, false and non-compliant to orders of this Hon'ble Tribunal as well as SWM rules 2016. Further, the actual and factual condition of locations is still pathetic from the photographs clicked in the month of August, September and October and same are produced herewith as **Annexure PX-O**.

3. That just like other locations, the impugned site at Model Town Extension has never been cleaned and same is evident from representation dated 25-09-2025 given to the Applicant by the residents of adjoining locality and same is produced herewith as **Annexure PX-P**. The Applicants are producing the actual and factual conditions regarding impugned locations as under:

S. No.	Particulars as per Original Application	<u>PRESENT STATUS OF LOCATIONS</u>
1	<p>Near Village Gill on both sides of Road</p> <p>Garbage is being dumped into <u>Village Pond</u> and roadsides by MCL, Village Panchayat & Private Hoteliers/Marriage Palaces</p>	<p>The garbage which was lying on Pond Bed and surrounding area has been illegally buried within the village pond, causing severe environmental degradation and contamination of groundwater due to the leaching of toxic fluids from the buried waste. It is submitted that the Block Development and Panchayat Officer (BDPO) has constructed a wall within the pond</p>

		area, thereby altering its natural structure and aggravating the environmental damage. Furthermore, instead of ensuring proper processing and disposal of the waste, the garbage is now being indiscriminately dumped along the roadsides under the supervision or inaction of the Sarpanch, while the BDPO has failed to take any remedial measures till date.
2	Block-C, Model Town Extension - Garbage is being dumped on daily basis into plot of LIT by MCL and put on fire by migrant labours	The site has never been cleared and fresh garbage is dumped on daily basis resulting in health hazard for nearby residents and causing damage to the Environment. One representation dated 25-09-2025 given by nearby residents (who earlier gave submission to the learned Court Commissioner) depicting false and misleading submission by DM & MC is produced herewith as Annexure PX-P.
3	Model Town Ext. Block-D Road to ATI Chowk	The unsegregated garbage is collected here as shifted to primary garbage dump site where no processing of garbage is done, resulting into increase in legacy waste day by day and it seems that department is waiting for outburst of epidemic in Ludhiana.
4	Jawahar Nagar Camp	As above
5	Near Suffian Chowk	As above

6	Budha Nallah near Gaushala Funeral Ground	No garbage is dumped here
7	Focal Point Road opp. Vishwanath Mandir	Unsegregated Garbage is still dumped at this location & burnt frequently.
8	On Main G.T. Road opp. Wholesale vegetable market	The unsegregated garbage in huge quantity is being dumped on daily basis resulting in major environmental issues. No processing is being done and the garbage is put on fire too.
9	Saidan Chowk	No garbage is being dumped here
10	Near Budha Nallah, Bajwa Nagar	There is no Static Compactor near this location. The garbage might be dumped at some other place and shifted to primary dump where no processing is being done, resulting in increase in legacy waste
11	On 200' bypass near railway lines	The unsegregated garbage is still being dumped & burnt at various locations and no processing is done.
12	Shaheed Bhagat Singh Nagar, Pakhowal Road, Ludhiana	The garbage is being dumped at this location and put on fire on routine basis. The cleaning done at the time of visit by the learned court commissioner was mere an eyewash as garbage can be seen dumped along roadsides near this location.
13	Near Lakkar Wala Pul (Old Kacheri area)	The Garbage is being dumped on road as well as under the bridge outside Static Compactor Building daily in huge quantity on daily

		basis. The garbage was burnt by the sweepers of MCL on 17-09-2025 and despite such incident, the garbage continued to be dumped on road and under the bridge.
14	Inner Roads at Bahadur K Road	The unsegregated garbage is being shifted to Wholesale Vegetable Market where most of the garbage collected from inner roads of Bahadur K Road area is being dumped in open during night hours.
15	Churpur Road	Garbage is being dumped in open plots along this road on daily basis again and there is no provision of processing of garbage.
16	Garbage dumped on Bank of Budha Nallah near Bachan Singh Marg	The condition at this location has worsened as garbage in huge quantity is dumped here.
17	Giaspura EWS Flats	WORST CONDITION AT THIS LOCATION AS Garbage is huge quantity is still lying there and no action has been taken till date. Major portion of Garbage has been buried under the soil to run away from duty of processing it scientifically.
18	Old Primary Site at Hambran Road	Huge piles of garbage is laying there resulting in contamination of groundwater and environment. Now, the MCL has started processing the same but timeline for same is not known and way of handling of RDF is again a

		mystery.
FEW ISSUE OF ORGANIC WASTE PUT ON FIRE ON ROUTINE BASIS		
19	At Leisure Valley Block C, BRS Nagar, Ldh	No further incident of fire now
20	In and outside two nearby Parks of Block-G, near City Centre, SBS Nagar, Ludhiana	As above
21	AT Civil Surgeon Office, Civil Lines Ludhiana	As above
22	Model Town near Barista Chowk	As above
23	Near MGM School, dugri	The garbage is still put on fire in routine. Despite repeated complaints to Sh. Vipal Malhotra and Commissioner, MC Ludhiana, no action is taken against the contractor of Daily Vegetable Market.
24	Fire to organic waste in Park Opp. Jain Mandir, 200' Road	No further incident of fire now
25	DC Office, Ludhiana	Garbage is still dumped within the premises of DC Office, Ludhiana
26	Non-utilisation of resources	More than 80 E-Rickshaws out of 350 are missing and since garbage is collected through informal sector, such rickshaws might being used for other purposes. The Commissioner, MC has no clue regarding missing rickshaws and has taken no action till date.
27	Shaheed Bhagat Singh Nagar, Pakhowal road	Garbage is still put on fire frequently

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4. That the Applicants have not produced photographs of the sites falling under the jurisdiction of GLADA; however, the condition of garbage at those locations remains identical and is evident from the photographs dated 26-07-2025 already placed on record with the Rejoinder dated 28-07-2025. It is respectfully submitted that GLADA is evading its statutory duty to monitor and ensure proper management of garbage generated by the colonies approved by it, as no solid waste processing unit has been installed by any of the colonies situated near **Churpur Road or Bachan Singh Marg** as mandatory under SWM Rules 2016. The garbage from these colonies is being collected and dumped at the impugned location, thereby causing severe environmental degradation. Similar conditions prevail along the 200 Feet Road as well. Despite serving notice, no reply has been given by the Chief Administrator, GLADA in this regard.

Keeping in view of the produced facts as well as report of learned court commissioner Sh. Bhanwar Pal Jadon, the DC Ludhiana, MC Ludhiana, Chief Administrator GLADA, Chairman LIT and BDPO & Sarpanch of Village Gill are repeatedly submitting false report, thus the report is liable to be set aside and all authorities are liable to be prosecuted as per the provisions of Environment Protection Act 1986, SWM Rules 2016 as well as NGT Act 2010.



Date: 11-10-2025

Kuldeep Singh Khaira

Place: Ludhiana

(Applicant No. 2)

ANNEXURE PX-O

Garbage at Village Gill being dumped along roadsides instead of processing



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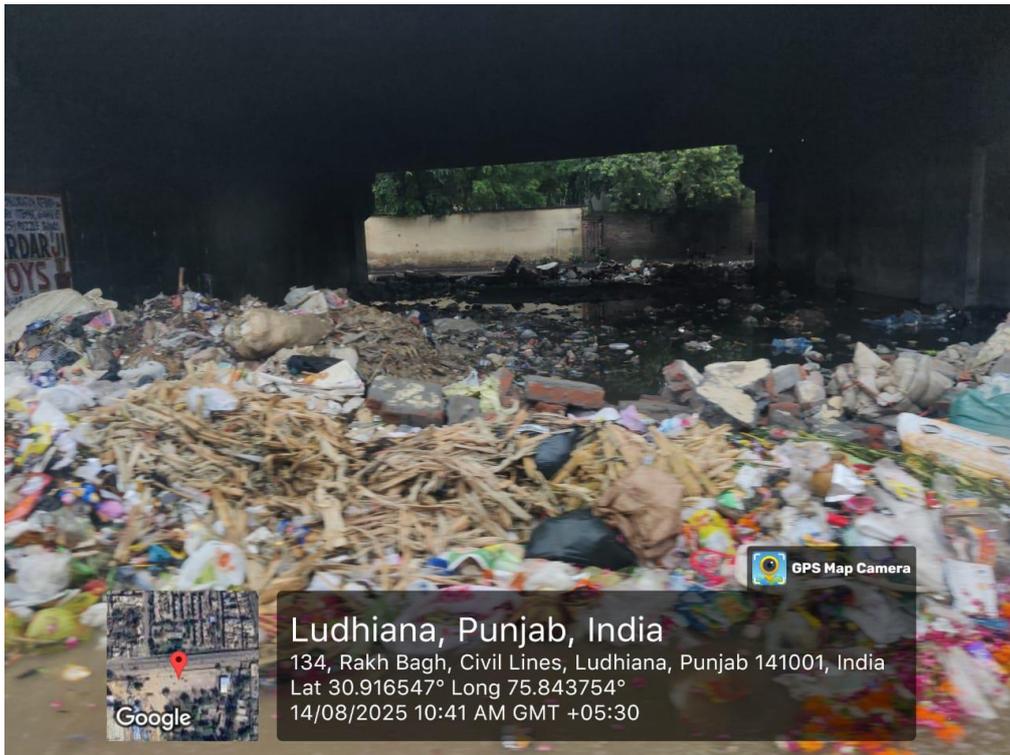
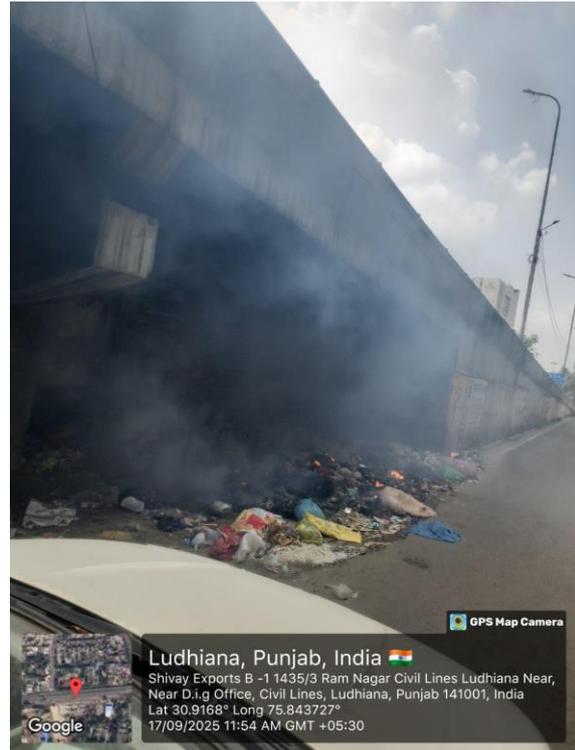
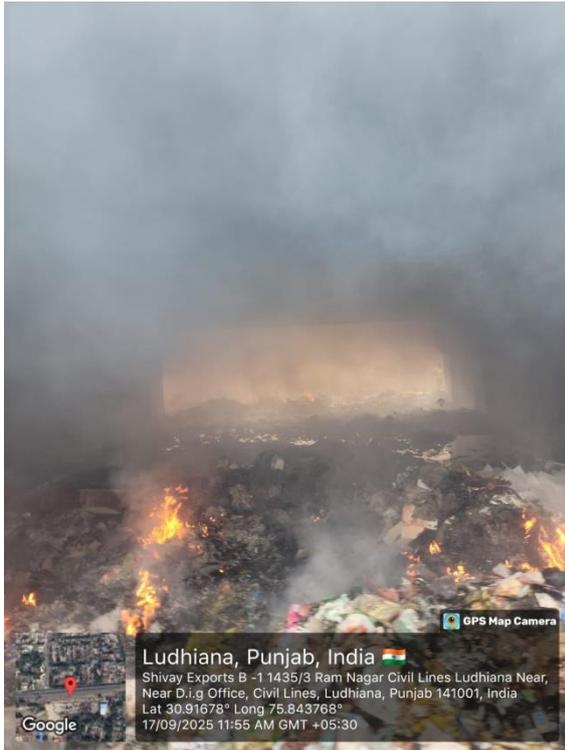
REAR SIDE OF GIASPURA FLATS





OUTSIDE STATIC COMPACTOR – NEAR LAKKAR WALA PUL





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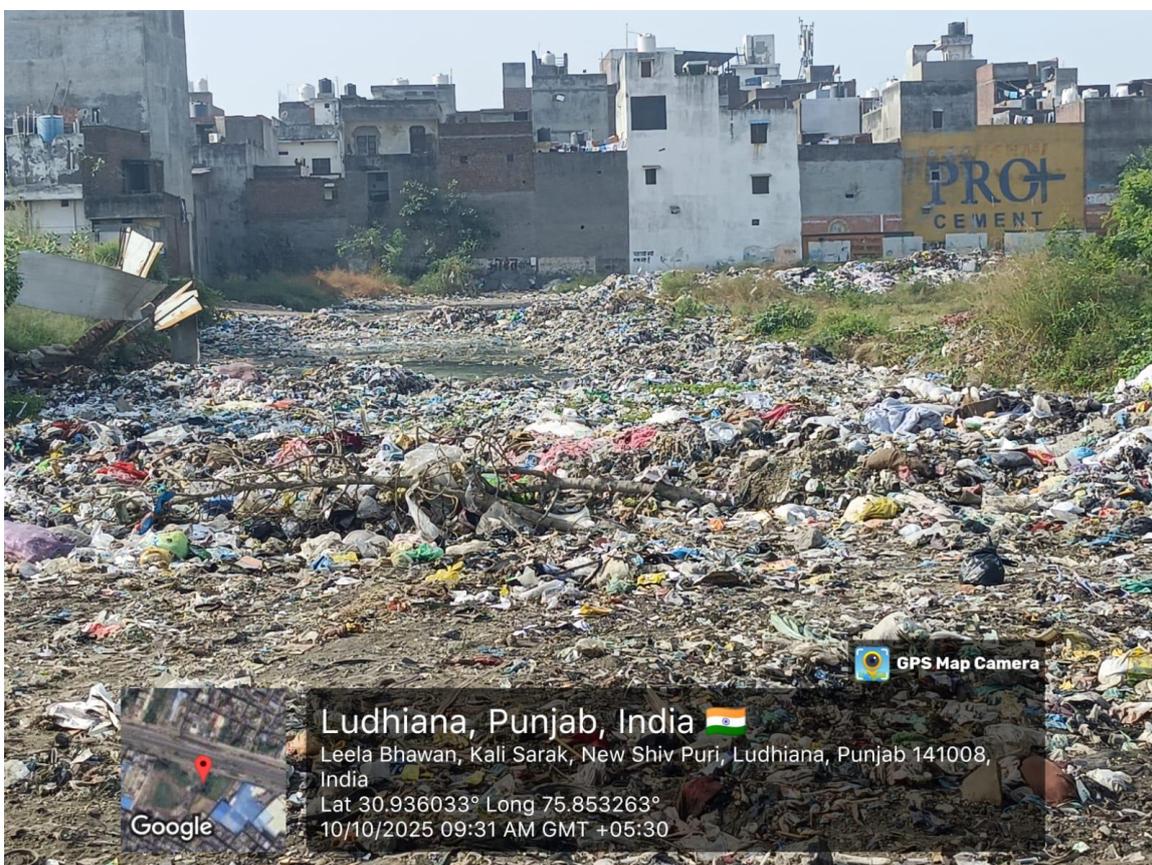
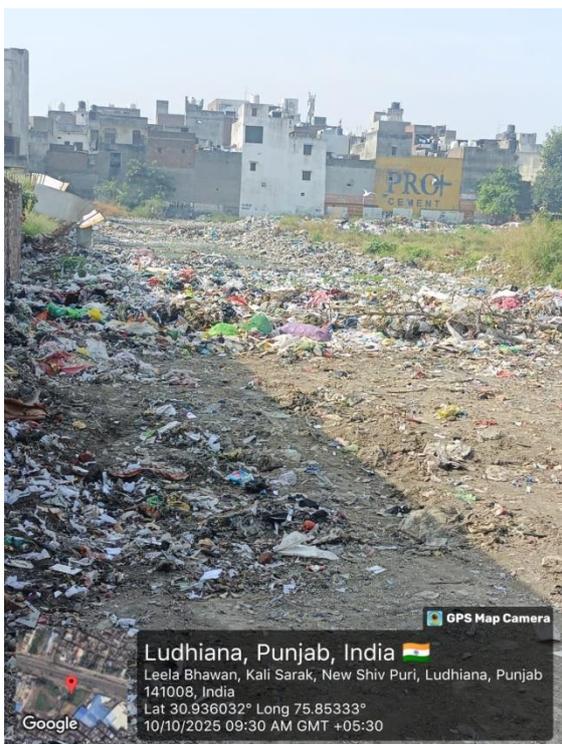


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INNER ROADS FROM BAHADUR KE ROAD AREA



OPEN PLOT AT GT ROAD – OPP. WHOLESALE VEGETABLE MARKET

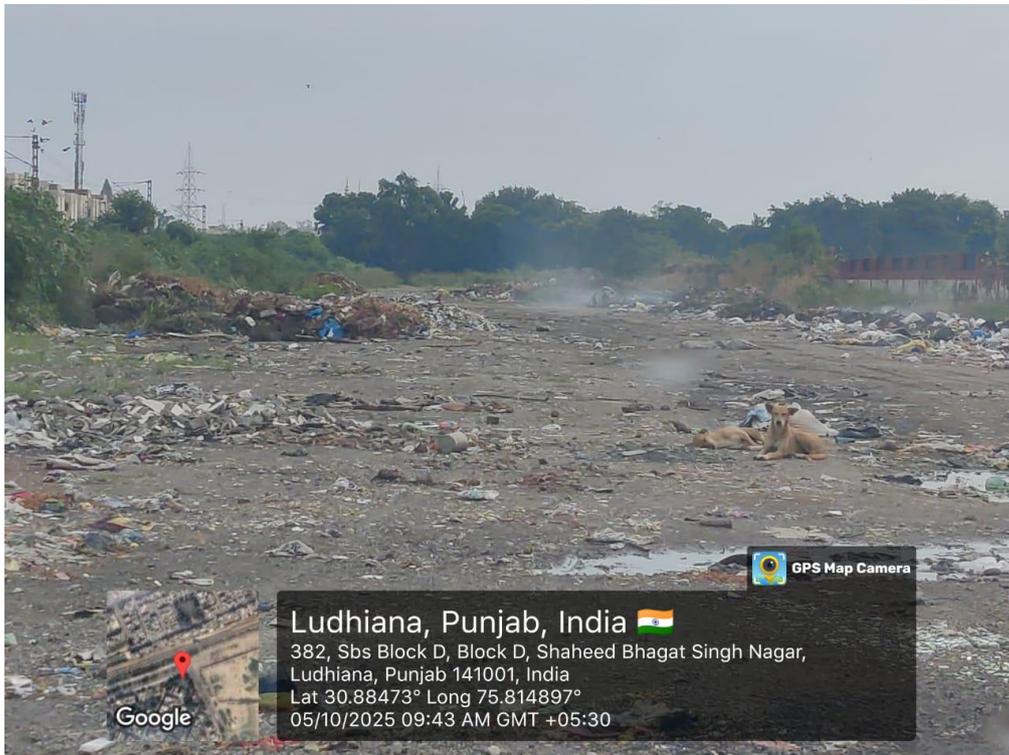


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WITHIN WHOLESALE VEGETABLE MARKET – GARBAGE COLLECTED FROM INNER ROADS OF BAHADUR KE ROAD



SHAHEED BHAGAT SINGH NAGAR OPEN PLOT – GARBAGE PUT ON FIRE FREQUENTLY



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GARBAGE DUMPED ON ROAD LEADING TO OPEN PLOT OF SBS NAGAR (WITHIN 200 METERS)



September 25, 2025

The Hon'ble Chairperson
Principal Bench,
National Green Tribunal,
New Delhi

Through: Er. Kapil Dev, Applicant in O.A. No. 317 of 2023

Subject: Garbage at Model Town Extension Plot – impugned location as part of O.A. 317 of 2023

Hon'ble sir,

Respectfully showeth,

The residents of Block-C, Model Town Extension, Ludhiana humbly submit as under:

1. That our residences are situated adjoining to the impugned location, i.e., an open plot of the Ludhiana Improvement Trust, where garbage is being dumped on a daily basis for the last several years. Despite repeated representations and peaceful protests conducted by the residents along with various NGOs for removal of the said garbage, the same has never been cleared. The continued dumping and accumulation of waste at the site is causing grave health hazards, particularly to children and senior citizens residing in the vicinity.
2. That during the rainy days, the condition of the site becomes unbearable on account of foul stench and large-scale breeding of mosquitoes and flies, posing a serious health hazard to the residents of the vicinity. It is further submitted that, as per information, the Municipal Commissioner, Ludhiana, has submitted a report to the Deputy Commissioner, Ludhiana, claiming that the entire garbage has been removed from the site. However, the said report is factually incorrect and misleading, as the garbage continues to remain at the location, and thus the Municipal Commissioner has deliberately furnished a false report to the Deputy Commissioner, Ludhiana, in order to conceal the inaction and non-compliance on the part of the authorities.
3. That the Municipal Corporation Ludhiana (MCL) has awarded a contract to a private agency for installation and operation of *Jhulas (swings etc.)* till Dussehra in the subject plot i.e. adjoining various Residential localities including MT Extension. However, it is submitted that only a portion of the plot, which was earlier filled with debris/demolition waste, was

partially cleared after 10-09-2025 and is located towards Dugri Road side whereas the garbage lying at the site has never been removed. It is further submitted that a substantial portion of the garbage has been unscientifically concealed by merely dumping soil over it, instead of ensuring its proper removal and scientific disposal, in violation of the statutory norms and directions of this Hon'ble Tribunal.

PRAYER:

The Residents of affected locality due to illegal dumping of garbage on daily basis humbly submit before this Hon'ble Tribunal to kindly issue directions for permanent removal of this illegal garbage dump as per Solid Waste Management rules 2016 and take action against the Municipal Commissioner of Ludhiana for submitting false report.

Name	Address & Mobile Number	Signatures
Harsharanjit Sohni	194-C M.T. EXT e. Ludhiana 98773-23811	Harshanjit S
NITIN Dawah	166-C Model town Ext. 9779508700	Nitin D
Sunita Arora	165-C Model Town Ext. 788838611	Sunita
Gunman Singh	167-C M-T EXT 8054540590	Gunman Singh
Jasbir Singh	9814061030 169-C	Jasbir S
Kuldip Kaur	9815233235 192-C	Kuldip Kaur
UPJEET KAUR	9814616743 189-C	Upjeet Kaur
GAURAV KAPOOR	6280585157 175-C	Gaurav K
Anub Kumar	9814001370 170-C	Ruby Dand
Tarinder Singh	9915514294 193-C	Tarinder
Suresh Arora	9872010500 176-C	Suresh Arora
RITH Sherma	9988450206 188-C	Rith S

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

(in OA 317 of 2023)

AFFIDAVIT

Kapil Dev & anr **Applicants**

vs.

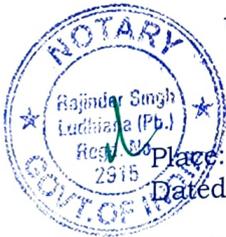
State of Punjab & ors. ... **Respondents**

Affidavit by Kuldeep Singh Khaira (aged 48 years) s/o) s/o s. Ujjagar Singh Khaira, r/o #125, Ishar Nagar, Ludhiana.

RESPECTFULLY SHOWETH:

I, the above mentioned deponent do hereby solemnly affirm and declare as under:-

1. That the deponent is Applicant No. 2 in O.A. 317 of 2023 and is filing rejoinder for kind consideration by this Hon'ble Tribunal.
2. That the Para No. 1 to 4 of the Rejoinder along with Annexures are true to the best of my knowledge.



Place: Ludhiana
Dated: 11.10.2025

Certified that the affidavit/S.P.A./G.P.A. has been read over & explained to the deponent/ executent who seemed thructly to understand the same at the time making thereof.

Kuldeep Singh Khaira
DEPONENT

Verification:

Verified that the contents of para 1 and 2 of this affidavit are true and correct. No part of it is false, and nothing material has been kept concealed therefrom.

Place: Ludhiana
Dated: 11.10.2025

Attested as Identified

Kuldeep Singh Khaira
DEPONENT

NOTARY PUBLIC
Main Courts, Ludhiana PB.

I know the deponent/ executent/identifying Person(s) who has signed/Thumb marked in my presence

17 OCT 2025

Service of documents in OA 317 of 2023

Arora Engineers <aroraengineers@gmail.com>

Mon, Oct 13, 2025 at 9:50 AM

To: cs@punjab.gov.in, dc.ldh@punjab.gov.in, commissionerml@gmail.com, ldh_it_2009@yahoo.co.in, gladaldh@yahoo.com, block ludhiana1 <ludhiana1bdpo@gmail.com>, chairman.ptl.ppcb@punjab.gov.in, ceeldh.ppcb@punjab.gov.in, ceeludhiana@yahoo.com, bhanwar jadon <bhanwar09jadon@gmail.com>

Dear sirs

PFA rejoinder in OA 317 of 2023 as service of documents

Regards

Er. Kapil Dev
(Applicant No. 1)
OA 317 of 2023

**Rejoinder dt. 11-10-2025 by Applicants in OA 317 of 2023.pdf**

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