

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

Original Application No. 1181/2024

IN THE MATTER OF:

NEERAJ TIWARI

.... Applicant

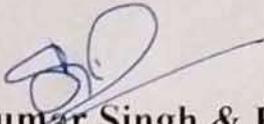
Versus

STATE OF UTTAR PRADESH & ORS.

.... Respondents

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**Vineet Kumar Singh & Ehraz Zafar**  
Advocates

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
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IN THE MATTER OF:

NEERAJ TIWARI

.... Applicant

Versus

STATE OF UTTAR PRADESH & ORS.

.... Respondents

REJOINDER ON BEHALF OF THE APPLICANT TO THE REPLY DATED 23.04.2025 FILED BY THE MUNICIPAL COMMISSIONER PRYAGRAJ NAGAR NIGAM RESPONDANT NO.3 ALONG WITH AFFIDAVIT IN SUPPORT.

IT IS MOST RESPECTFULLY SHOWETH:

1. At the outset, all the contentions, allegations and statements made by the Respondent No.3 in the reply dated 23.04.2025 filed by the Respondent No. 3 are denied and nothing therein shall be deemed to be admitted by the Applicants, by reason of non-traverse or otherwise, unless specifically admitted herein. It is submitted that the reply dated 23.04.2025 filed by the Respondent No.3 is devoid of any merit and therefore, liable to be dismissed.



*Neeraj Tiwari*

2. The reply filed by Prayagraj Nagar Nigam is an evasive document, lacking substantive compliance with the directions passed by this Hon'ble Tribunal. Despite clear orders requiring verifiable and scientific data concerning legacy waste processing, RDF disposal, and fresh waste management (particularly in relation to the Kumbh Mela), the Respondent has failed to produce any legitimate evidence, thus amounting to willful disobedience of judicial directions and attracting contempt jurisdiction.
3. That Respondent No. 2 who is primarily responsible for supervision and has real-time updated of this entire system and its working, has failed to file any affidavit and/or reply. Similarly, Respondent No. 1 who has personally given an undertaking to this hon'ble court that all the legacy waste will be processed strictly in accordance with MSW rules and NGT Orders, has also failed to file any response.
4. That the Municipal Corporation has claimed to have processed 21.5 lakh MT of legacy waste, but its data is not only inconsistent but scientifically untenable. It relies on manipulated density values (ranging from 1.0 to 1.90 T/m<sup>3</sup>) to adjust figures, without any scientific justification or third-party validation. A density of 1.90 T/m<sup>3</sup> suggests intentional falsification since such values are applicable to stone, not municipal solid waste. These manipulations were made in connivance with MNIIT and contractors like M/s Ecostan and M/s BVG to inflate volumes and facilitate ghost billing.
5. That out of a claimed processing of 21.5 lakh MT of legacy waste, at least 3.65 lakh MT of RDF should have been produced (based on the normative



*Neeraj Tiwari*

yield of 17%). However, only 1.19 lakh MT is shown as generated and disposed, that too with dubious disposal certificates—lacking E-way bills, end-user verifications, and in many cases, signed by unidentified persons or pre-dated. A forensic examination of these certificates would reveal large-scale fraudulent reporting, strongly indicative of either ghost billing or illegal dumping. Various media reports also substantiate the version of applicant.

6. That The affidavit admits to dumping legacy waste in privately owned low-lying areas. However, no valid khasra/khatauni details, no land conversion approvals, no environmental clearances, and no mining permits have been produced. The extraction of soil from depths of 10 to 25 meters and its commercial usage is a blatant violation of the Uttar Pradesh Minor Minerals Rules, 1963 and the Mines and Minerals (Development and Regulation) Act, 1957. Such unauthorized activity not only constitutes illegal mining but also renders the Municipal Commissioner's affidavit legally untenable.
7. The inflated waste quantity (from 14.89 lakh tons as on Jan 2022 to 26.22 lakh tons in 2025) proves over billing and misuse of public funds to the tune of Rs. 64 Crores, calling for an independent forensic audit and a criminal investigation under the Prevention of Corruption Act, 1988.
8. Total waste received in Prayagraj Plant Upto January 2022 (date of first Survey by MNIIT):



*Neeraj Tiwari*

Calender Year	Fresh Waste Intake (MT)	C&DS Waste Intake (MT)	Legacy waste (MT)*
2015-July (As per submission in High Court of Allahabad Opening balance of legacy waste)			300,000
2015	60,000	22,500	82,500
2016	146,000	54,750	200,750
2017	146,000	54,750	200,750
2018	146,000	54,750	200,750
2019	146,000	54,750	200,750
2020	146,000		146,000
2021	146,000		146,000
2022 Jan	12,400		12,400
<b>Total</b>	<b>948,400</b>	<b>241,500</b>	<b>1,489,900</b>

\* Assuming all the waste were simply dumped converting 100% in legacy

9. Respondent no 3 has admitted on record that waste have been dumped / shifted around the plant area in the vicinity of 200-300 Mtr radius of the river Ganga. Respondent no 4 further admits in writing through IGRS reply to the Complainant at Para 45 of his affidavit that bio soil dumped around plant site contains 2–2.5% plastic (Which is a false claim as Bio Soil cannot have any percentage of plastic), confirming applicants claim of unprocessed waste layering. This violates the Solid Waste Management Rules, 2016, and NGT orders, threatening the Ganga river ecosystem, groundwater, and public health.
10. Moreover, since only 5.5% RDF has been disposed, 94.5% of the total 21.5 Lakh tons of legacy waste i.e., 20.3 Lakh tons of legacy waste has just been shifted to the backyards of the existing plant which is just 200 Mtr. from river Ganga.
11. It can logically be summarize that out of 26.22 lakh tons of legacy waste as per Nagar Nigam;



*Neeraj Kumar*

- a. 11.33 lakh tons of billing is marred with suspicion
  - b. 10.41 lakh tons have actually been processed and disposed (considering 17% as RDF)
  - c. 4.47 lakh tons have just been dumped unprocessed with plastics etc (Nagar Nigam own submission that dumped material does contain plastics to the tune of 2.5 % without consideration of other RDF material like shoes, chappals, rubber, polystere etc., which will eventually increase the percentage of RDF available in dumped material in backyards significantly)
12. That the unexplained and illogical billing to the tune of Rs. 64 Crores by Municipality to Ecotan & BVG calls for independent scrutiny and investigation.
13. A rough estimate of waste Generation and Dumping for the purpose of understanding the quantum of damage to environment by acts and omissions of respondents:

Prayagraj processed ~3,05,000 MT of fresh MSW from June 2024 to February 2025, including ~2,05,000 MT of regular waste (21,000 MT/month from June–December 2024 + 59,000 MT in January–February 2025) and ~1,00,000 MT from Kumbh Mela 2025 (~40 crore visitors at 250 gm/capita/day). Of this, ~1,20,000 MT of bio-digestible waste (40% of input) was dumped untreated across Prayagraj and adjoining areas, containing:

6,000 MT of methane (emitted via anaerobic decomposition).

60,000 MT of leachate (contaminating groundwater).

45,000 MT of RDF material (unprocessed and dumped).

14. That the CPHEEO guidelines mandate windrow formation on 30,000 sqm for scientific aerobic digestion of 700 TPD waste. M/s Ecotan was in



*Neeraj Dwari*

possession of 20,000 Sq Mtr of windrow pad. They failed to utilize even a sq mtr of windrow pad from June'24- September'24, during which time they were simply dumping all incoming waste without any processing across the city. After lots of hue and cry was made by the petitioner, they started using 5000 Sq Mtr of space for creating small unorganized heaps, which were never turned or cultured.

15. During Kumbh period, when daily incoming waste increased to 2000-3000 MTD, then also they continued to use only 5,000 out of 20,000 Sq Mtr space in their possession, leading to non-processing of waste through aerobic digestion and dumping the un-processed organic waste in surroundings and thereby methane release.
16. There is no leachate treatment plant nor any additional infrastructure for Kumbh waste and in gross violation to NGT's order dated 26.04.2019 passed in in O.A. No. 606/2018, which equated environmental pollution to homicide. The officials and contractors render their acts liable under these ruling and relevant penal statutes. Photos of incomplete SLF & Leachate treatment Plant as on April 2025 after Kumbh was over is attached herewith - **Annexure 1**
17. That the Respondent's actions constitute a clear breach of SWM Rules, 2016, which mandate source segregation, scientific processing (including aerobic digestion of biodegradables), RDF production, and sanitary landfill usage only for rejects. The failure to install adequate windrow infrastructure, scientific composting systems, or leachate treatment units at the Baswar site, particularly in light of the additional load during Kumbh Mela 2025, shows systemic non-compliance and disregard for statutory environmental obligations.



*Neeraj Tiwari*

18. That from June 2024 to February 2025, over 3 lakh MT of fresh MSW (including 1 lakh MT generated during the Kumbh Mela) was received. All of 3 lakh tons (Out of this, at least 1.2 lakh MT of biodegradable waste) was dumped unscientifically across city outskirts, riverbanks, and ponds. This has resulted in the entrapping of ~6,000 MT of methane in nearby areas (which will continuously release over a period of time), the formation of ~60,000 MT of untreated leachate, and the creation of unmanaged RDF heaps, all of which threaten groundwater quality, soil fertility, and public health. These actions have occurred in direct contravention of Rule 15 of the SWM Rules and various orders of this Hon'ble Tribunal in O.A. No. 606/2018. Non-Compliance with Aerobic Digestion: CPHEEO mandates pre-sorting, windrow formation, weekly turning, culture spraying for 4 weeks, curing for 3-4 weeks, and 4mm screening to produce ~12-15% FCO-compliant compost. None of these were adopted.
19. That it is submitted that the actual quantity of waste handled has been inflated through double accounting of legacy and fresh waste. The contractor (M/s Ecostan), previously blacklisted in several urban local bodies, was awarded the tender through manipulated eligibility criteria. Payments exceeding ₹12 crores were released for simply screening and dumping operations without verifying actual processing. We are attaching herewith proof through Drone view which clearly shows how they have covered a legacy waste dump with fresh waste dump and all were together shifted to backyards in the name of inert/reject from Legacy waste for which they were being paid separately. Photos are annexed herewith as -  
**Annexure 2 Colly**



*Neeraj Khurari*

20. That Multiple warnings and reports from the applicant, residents, and internal engineers were ignored. Complaints made to the Municipal Commissioner and Principal Secretary in 2022 by Mukesh Kumar & Dr. Chaturvedi were either whitewashed or never acted upon. Drone surveillance images showing illegal dumping and empty windrow pads during monsoons were ignored. These omissions confirm a systematic cover-up, rendering the Respondent's affidavit not just inadequate but obstructive to justice.

**PARA-WISE REPLY TO AFFIDAVIT OF MUNICIPAL CORPORATION, PRAYAGRAJ**

1. Contents of Para 1–4 are Denied. The general submissions made therein are vague and bereft of any compliance report. The assertion of processing 21.5 lakh MT of legacy waste is unsupported by genuine, verifiable data. The actual record of RDF disposal, vehicle movement, and end-user certifications is deficient, amounting to gross misrepresentation.
2. Contents of Para 5–13 are Denied. The affidavit employs inconsistent density assumptions (1.0, 1.39, 1.90), which are neither scientific nor rational. The density of 1.90 T/m<sup>3</sup> is alarmingly high and is indicative of fabricated data. MNIIT's reliance for volume estimations is questionable and lacks ground-truthing. This is a classic case of volume inflation for dubious billing.
3. Contents of Para 14 are Strongly denied. The data provided by PNN relating to RDF disposal lacks completeness and authenticity. Out of 1,61,100 MT of claimed RDF disposal, only 3,871 MT have accompanying vehicle details. A significant portion of the certificates (over 60%) is either vague, unsigned, or



*Neeraj Tiwari*

unrelated to Prayagraj. The absence of E-way bills and lack of designated end-user details confirms fraudulent reporting. Detailed analysis report is attached herewith as **Annexure 3**.

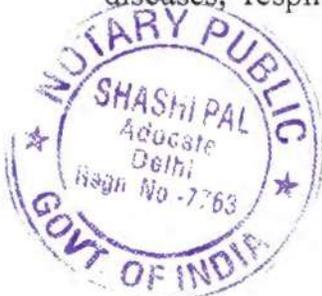
- a) Contents of Para 15–16 are denied. PNN claims dumping of only 8.75 lakh MT of inerts and bio-soil based on landowner consent. However, no khasra, khatauni details or mining permits were filed. Extraction of 10–25-meter-deep soil without permits amounts to illegal mining. The use of such lands for dumping waste, without environmental or zoning clearance, violates the SWM Rules and the Mines and Minerals Act, 1957. Moreover, since Nagar Nigam has also admitted to shifting soil/ inert/rejects amounting to around 20.3 lakh tons. Out of total 20 lakh tons which has been shifted, however detail for place of disposal has been given only for 8.75 lakh tons. Regarding balance quantity of 11.55 lakh tons there is no explanation for dumping. Respondent's has failed to furnish data for 11.55 lakh tons of dumping of soil & inerts.
4. Contents of 17–20 are denied. The affidavit suppresses data about fresh waste, particularly during the Kumbh Mela 2025 period. Over 1,20,000 MT of bio-degradable waste was unscientifically dumped, leading to release of ~6,000 MT methane and ~60,000 MT leachate. The windrow pad of 5,000 sqm was grossly inadequate to process the 3,05,000 MT of fresh MSW generated between June 2024–Feb 2025. M/s Ecostan in connivance of Nagar Nigam did not utilize 15,000 sq mtr of windrow pad at its disposal. Infact, even utilization of 5,000 sq mtr is not supported with evidence, some small heaps (totaling to around 2,000-2,500 MT of waste only, against minimum requirement of 20,000- 30,000 MT of waste on windrow pad) were created. Drone Photos for every month of Windrow Pad utilization is attached herewith as - **Annexure 4 Colly**.
5. Contents of Para 21–24 are denied. There is clear evidence of unprocessed RDF and bio-waste being dumped around riverbanks, especially within 200-300 meters of River Ganga. Drone footage, leachate spread, and official IGRS



*Neeraj Tiwari*

replies prove the same. These are grave violations of SWM Rules, 2016 and constitute criminal negligence under the Environment Protection Act. Drone Photographs are being attached herewith as Annexure 5 Colly.

6. Contents of Para 25–28 denied. No compost sale licenses and/or Compost sale data along with compost quality certificate or RDF disposal logs have been furnished. Bare statement without supporting documents evidencing the factual position will not be of any help to respondent's The expected yield of RDF and compost from 21.5 lakh MT legacy waste and 3 lakh MT of fresh waste is missing, leading to loss of resources and potential revenue.
7. Contents of Para 29–30 are denied. The allegation that Applicant is acting as a proxy for Hari Bhari Waste Valorization India Pvt. Ltd. is baseless and unsupported by evidence The Respondents' attempt to divert attention from these grave infractions by leveling allegations of malafide intent and fiduciary links with Hari Bhari is baseless, defamatory, and aimed solely at suppressing legitimate public interest scrutiny. The petition has been filed in larger public interest. The Applicant is a public-spirited citizen and socially active political figure pursuing this matter solely in the larger interest of environmental justice, public health, and accountability of public authorities and to expose systemic corruption and environmental harm caused by PNN's illegal acts and omissions.
8. That Due to unprocessed waste dumping and uncontrolled leachate runoff, nearby water bodies—particularly the Ganga and Yamuna rivers—have been contaminated, especially during the high footfall of the Kumbh. Air pollution from methane and RDF-related VOCs has escalated. The health of nearly 25,000 residents living within 1 km of dumping sites is at risk from waterborne diseases, respiratory ailments, and vector-borne illnesses. The cumulative



*Neeraj Tiwari*

health burden, based on conservative estimates, amounts to ₹25 crore annually, not including the one-time impact on ~40 crore Kumbh pilgrims.

9. Lastly, it is submitted that since this Hon'ble Tribunal vide its order dated 01.05.2024 in OA No. 1181/2024 had directed Applicant to verify the above facts and also file objection/rejoinder to the affidavit of the Commissioner, MC Prayagraj dated 23.04.2025, In light of the submissions Applicants humbly pray before this Hon'ble Tribunal to pass strict and stringent orders to ensure compliance

*Neeraj Tiwari*  
**NEERAJ TIWARI**  
Applicant

**Through**

*Place - New Delhi*  
*Dated - 25.11.2025*

**Vineet Kumar Singh & Ehraz Zafar**  
Advocates

Chamber No. 427-428,  
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.... Applicant

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.... Respondents

**AFFIDAVIT**

I, Neeraj Tiwari S/o Shri Om Narayan Tiwari, aged 32 years, do hereby solemnly affirm and declare as under:

1. That I am the Applicant in the Original Application No. 1181/2024 and being familiar with the facts and circumstances of the cases, I am competent and fully authorised to swear this Affidavit.
2. I say that the Rejoinder has been drafted under my instructions and as per disclosure of facts made by me. I further say that the contents thereof have been read over and explained to me in Hindi and I say that the contents thereof, except the legal averments made therein are true and correct to my



*Neeraj Tiwari*

knowledge and are derived from the records of the case. The legal averments made therein are true upon legal advice received and believed by me to be true.

3. I further say that the Annexures/Documents filed along-with the accompanying rejoinder are true copies of their respective originals/certified copies.
4. I say that the contents of the accompanying rejoinder are not being reproduced herein for the sake of brevity and the same may be read as part and parcel of this affidavit.

*Neeraj Tiwari*  
DEPONENT

Identify the deponent who  
is signed in my presence

VERIFICATION:

25 NOV 2025

verified at Delhi on this      day of November 2025 that the contents of the present affidavit are true and correct and nothing is concealed therefrom.



ATTESTED  
*Sh*  
NOTARY PUBLIC  
DELHI (INDIA)  
25 NOV 2025

*Neeraj Tiwari*  
DEPONENT

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
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**APPLICATION FOR CONDONATION OF DELAY IN FILING THE  
OBJECTIONS/REJOINER TO THE AFFIDAVIT DATED 23.04.2025**

MOST RESPECTFULLY SHOWETH:

1. That the Applicant had sought time before this Hon'ble Tribunal on 01.05.2025 to verify the factual assertions made in the affidavit dated 23.04.2025 filed by the Commissioner, Municipal Corporation, Prayagraj and to file objections/rejoinder thereto.
2. That pursuant to the said order, the matter was listed for further proceedings on 04.09.2025. However, there has been a delay in filing the objections/rejoinder owing to circumstances beyond the Applicant's control.



Neeraj Tiwari

3. That the delay was caused primarily due to the need for in-depth factual verification of the submissions made by the Respondents, particularly concerning the claimed 100% treatment of daily generated waste and the proposed timeline for remediation of legacy waste, which involved field-level inquiry, gathering of data, and corroboration from multiple stakeholders.
4. That during the said intervening period, the Applicant was also compelled to change legal counsel due to unavoidable professional constraints, which further contributed to the delay in preparation and finalization of the response.
5. That the delay in filing the objections/rejoinder is neither deliberate nor intentional, but occasioned due to the abovementioned genuine and bona fide reasons.
6. That no prejudice will be caused to the Respondents if the delay is condoned, whereas the Applicant shall suffer irreparable loss and injury if not permitted to bring on record a rejoinder to the affidavit, which contains critical assertions needing rebuttal.
7. That this Hon'ble Tribunal has always been liberal in condoning delays caused by justifiable reasons in the interest of substantial justice.



*Neeraj Tiwari*

## PRAYER

In view of the foregoing, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- a) Condone the delay in filing the objections/rejoinder to the affidavit dated 23.04.2025;
- b) Pass such other or further order(s) as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.

AND FOR THIS ACT OF KINDNESS, THE APPLICANT AS IN DUTY BOUND SHALL EVER PRAY.

*Neeraj Tiwari*  
**NEERAJ TIWARI**  
**Applicant**

Through

*[Signature]*

**Vineet Kumar Singh & Ehraz Zafar**  
**Advocate**

Chamber No. 427-428,  
Tis Hazari Courts, Delhi -110054  
Cell No: +91 9350258686  
Email: vidhigya@gmail.com

*New Delhi*  
*Dated :- 25.11.2025*



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I, Neeraj Tiwari S/o Shri Om Narayan Tiwari, aged 32 years, do hereby solemnly affirm and declare as under:

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2. I say that the application for condonation has been drafted under my instructions and as per disclosure of facts made by me. I further say that the contents thereof have been read over and explained to me in Hindi and I say that the contents thereof, except the legal averments made therein are true



*Neeraj Tiwari*

and correct to my knowledge and are derived from the records of the case.

The legal averments made therein are true upon legal advice received and believed by me to be true

3. I say that the contents of the accompanying application are not being reproduced herein for the sake of brevity and the same may be read as part and parcel of this affidavit.

*Neeraj Tiwari*  
DEPONENT

**VERIFICATION:**

25 NOV 2025

verified at Delhi on this      day of November 2025 that the contents of the present affidavit are true and correct and nothing is concealed therefrom.

*Neeraj Tiwari*  
DEPONENT



ATTESTED  
*[Signature]*  
NOTARY PUBLIC  
DELHI (INDIA)  
25 NOV 2025



# ANNEXURE 1

*Neeraj Tiwari*

769

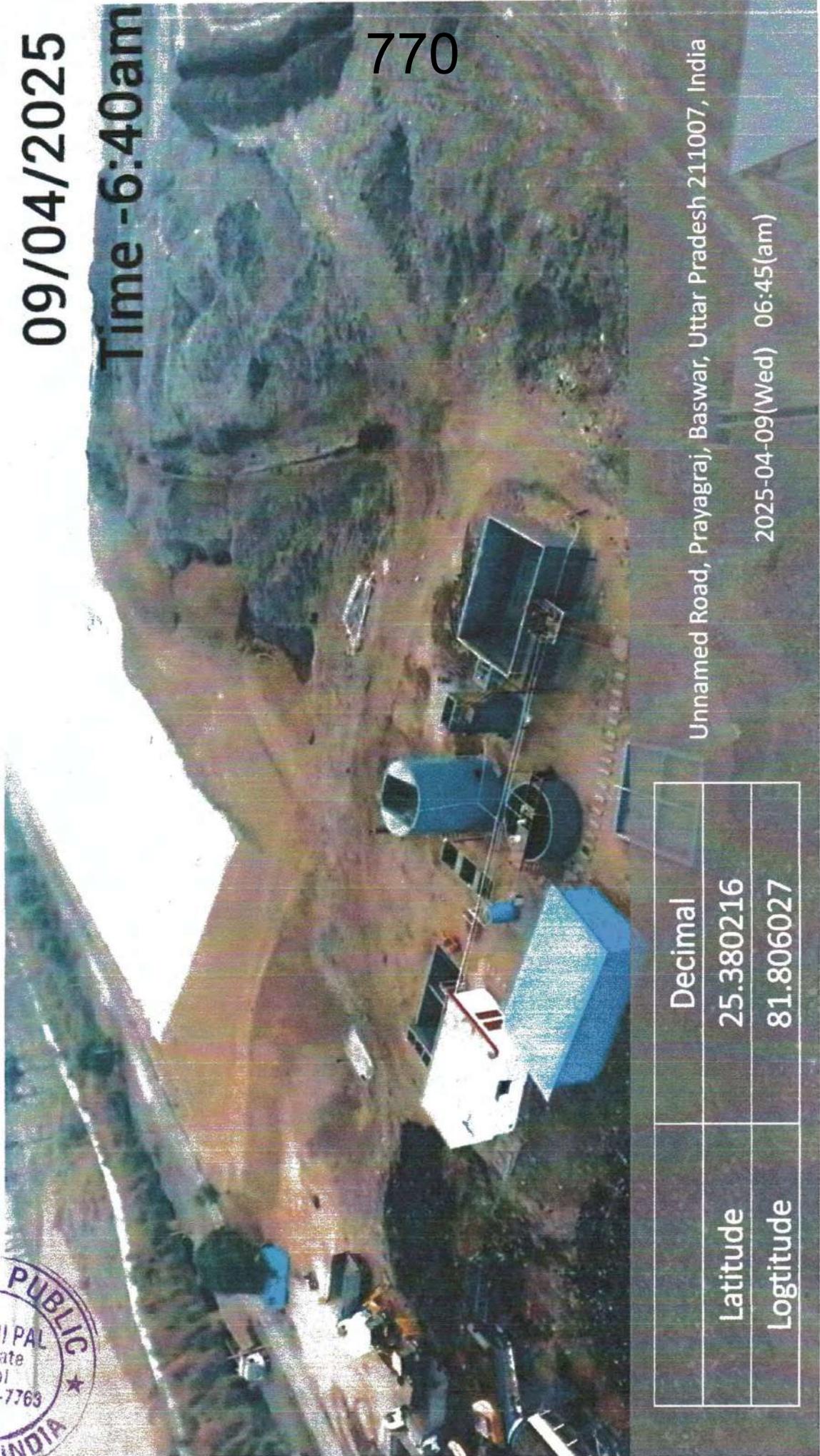
19



09/04/2025

Time - 6:40am

770



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Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-04-09(Wed) 06:45(am)

*Neeraj Siwari*

20



# ANNEXURE 2

*Neeraj Tiwari*

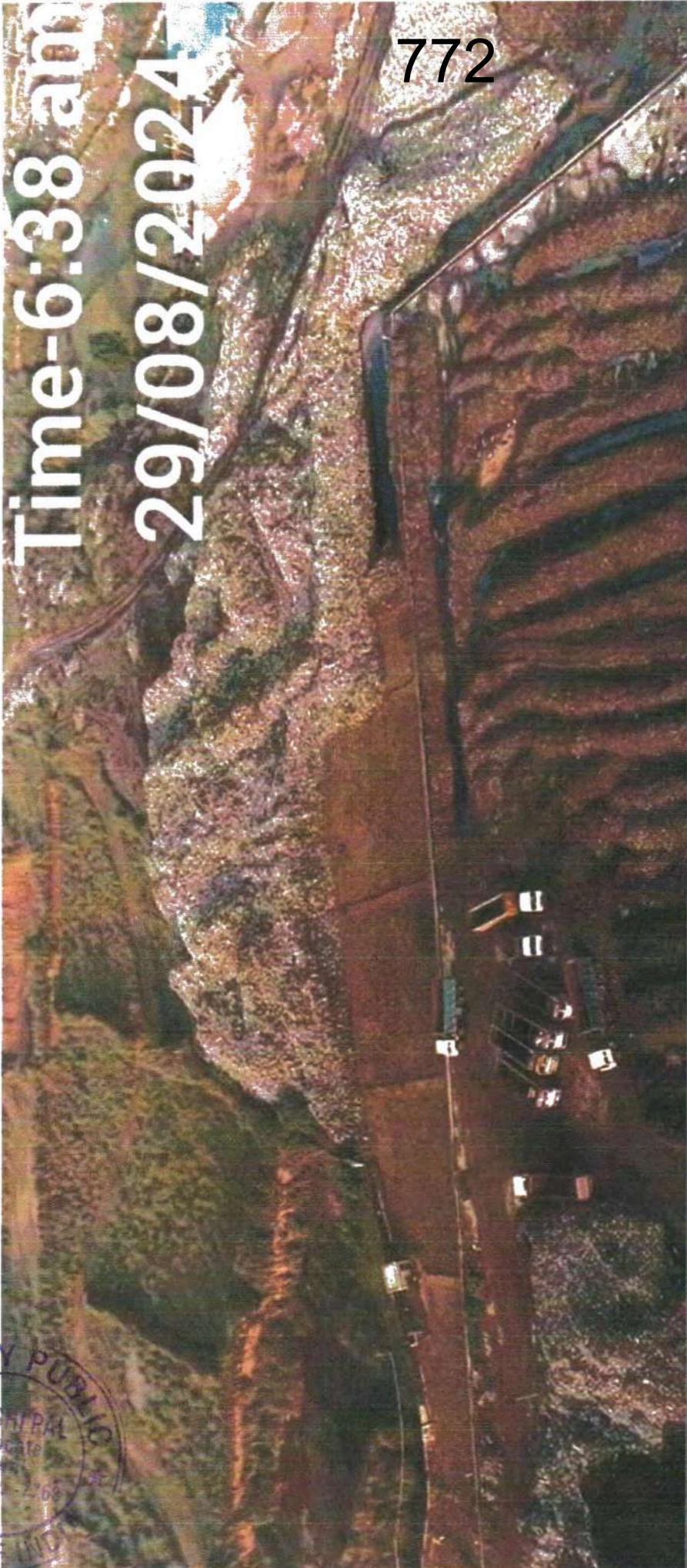
771

21



Time-6:38 am  
29/08/2024

772



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2024-08-29(Thu) 06:40(am)

Neeraj Tiwari



02/10/24

Time: 6:20 am

773



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Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-10-02(Wed) 06:30(am)

*Neeraj Tiwari*

22-A

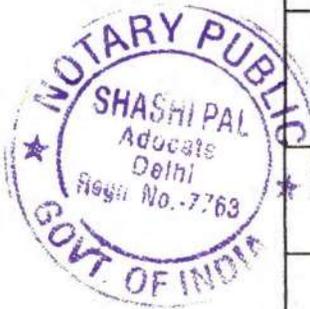


# ANNEXURE 3

*Neeraj Anwar*

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23



S.No.	Company	Transported From	Date	Certificate Reference No.	For Period	RDF	Cement Company	Vehicle list (Actual Weight in MT)	observation	Requirement
1	Ecotan	Ecogateway	08-May-22	PJL-P200/01	Nov22-Mar23	6,360.00	Prism Cement, Satna	Certificate is not valid	Date of issuance is earlier than date of receipt of material	E-Way Bill
2	Ecotan	Ecotan	02-Apr-24	NA	13-Jan24-3-Mar24	6,117.00	Prism Cement, Satna	None	Dubious- no name of authorized signatory	E-Way Bill
3	Ecotan	Ecotan	27-Feb-25	NA	Apr24-Jan25	8,862.00	Prism Cement, Satna	None	nor the reference no.	E-Way Bill
4	Ecotan	Ecotan	22-Nov-24	RMSWESPL/RDF/Noida/001	June24-Sep24	26,689.73	Rewa MSW Energy Solution, Rewa	Certificate is not valid	This certificate is not for Prayagraj	E-Way Bill
5	Ecotan	Ecotan	03-Jan-25	RMSWESPL/RDF/Noida/002	Oct24-Dec24	25,560.11	Rewa MSW Energy Solution, Rewa	None		E-Way Bill
6	Ecotan	Ecotan	28-Feb-25	RMSWESPL/RDF/Noida/003	Jan-25	7,469.01	Rewa MSW Energy Solution, Rewa	None		E-Way Bill
7	Ecotan	Ecogateway	07-May-23	Jabalpur/3242/Legacy/Prayag	July22-Mar23	6,535.00	Waste to Energy Plant, Jabalpur	None		E-Way Bill
8	Ecotan	Ecogateway	21-Nov-23	Ecogateway/IBL/Oct-23	Apr23-Oct23	4,783.86	Waste to Energy Plant, Jabalpur	412	incomplete data	E-Way Bill
9	Ecotan	Arya	01-Mar-25	Arya/IBL/MSW/Jan-25	Jan-25	1,856.38	Waste to Energy Plant, Jabalpur	837	incomplete data	E-Way Bill
10	Ecotan	Arya	01-Mar-25	Arya/IBL/MSW/Dec-24	Nov24-Dec24	3,035.34	Waste to Energy Plant, Jabalpur		however certificate is data is complete.	E-Way Bill
11	BVG	Ecogateway	10-Oct-22	Ecogateway/IBL/Oct-22	July22-Sep22	2,240.35	Waste to Energy Plant, Jabalpur	340	incomplete data	E-Way Bill
12	BVG	Ecogateway	10-Nov-22	Ecogateway/IBL/Oct-65	Oct22-Nov22	228.70	Waste to Energy Plant, Jabalpur	None		E-Way Bill
13	BVG	Ecogateway	30-Apr-23	Eco/Prg/01/22-23	Nov22-Mar23	7,000.00	Waste to Energy Plant, Jabalpur		vague certificate (Use of word approximately) with no vehicle data -not valid Certificate	E-Way Bill
14	BVG	Ecogateway	21-Nov-23	Ecogateway/IBL/Oct-23	Apr23-Oct23	7,888.96	Waste to Energy Plant, Jabalpur	383	incomplete data	E-Way Bill
15	BVG	Ecogateway	31-Mar-24	Ecogateway/IBL/Mar-24	Nov23-Mar24	12,615.12	Waste to Energy Plant, Jabalpur	388	incomplete data	E-Way Bill
16	BVG	Ecogateway	30-Jun-24	Ecogateway/IBL/JUN-24	Apr24-June24	777.85	Waste to Energy Plant, Jabalpur	387	incomplete data	E-Way Bill
17	BVG	Ecogateway	10-Jan-25	Ecogateway/IBL/JAN-24	July24-Jan25	8,401.44	Waste to Energy Plant, Jabalpur	409	incomplete data	E-Way Bill
18	NA	Ecogateway	05-Apr-24	NA	Nov23-Mar24	7,179.00	Prism Cement, Satna	Certificate is not valid	Zero data	E-Way Bill
19	BVG	Ecogateway	30-Jun-24	Ecogateway/IBL/Jun-24	Apr24-Jun24	2,060.42	Prism Cement, Satna	None	Zero data	E-Way Bill
20	NA	Ecogateway	31-Mar-24	RMSWESPL/RDF/EGW/23-24/Mar-24	Mar-24	1,688.11	Rewa MSW Energy Solution, Rewa	Certificate is not valid	Zero data	E-Way Bill
21	BVG	Ecogateway	30-Jun-24	Ecogateway/RWW/Jun-24	Apr24-Jun24	12,766.70	Rewa MSW Energy Solution, Rewa	None	Zero data	E-Way Bill
22	BVG	Ecogateway	31-Aug-24	Ecogateway/RWW/Aug-24	Jul24-Aug24	931.56	Rewa MSW Energy Solution, Rewa	None	Zero data	E-Way Bill
23	BVG	Ecogateway	09-Dec-24	RMSWESPL/RDF/Prayagraj/5e-Sep-24		53.92	Rewa MSW Energy Solution, Rewa	None	Zero data	E-Way Bill

Neeraj Tiwari



# ANNEXURE 4

*Neeraj Tiwari*

776

25

777



Unnamed Road, Prayagraj, Baswar, Uttar Pradesh, 211007

India

2024-06-01(Sat) 13:15(am)

Decimal

25.378666

81.806166

Latitude

Longitude



Neeraj Tiwari



26/06/2024

Time - 7:15 AM

778



Latitude	25.378811
Longitude	81.807371

Decimal

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-06-26(Wed) 07:15(am)

*Neeraj Tiwari*

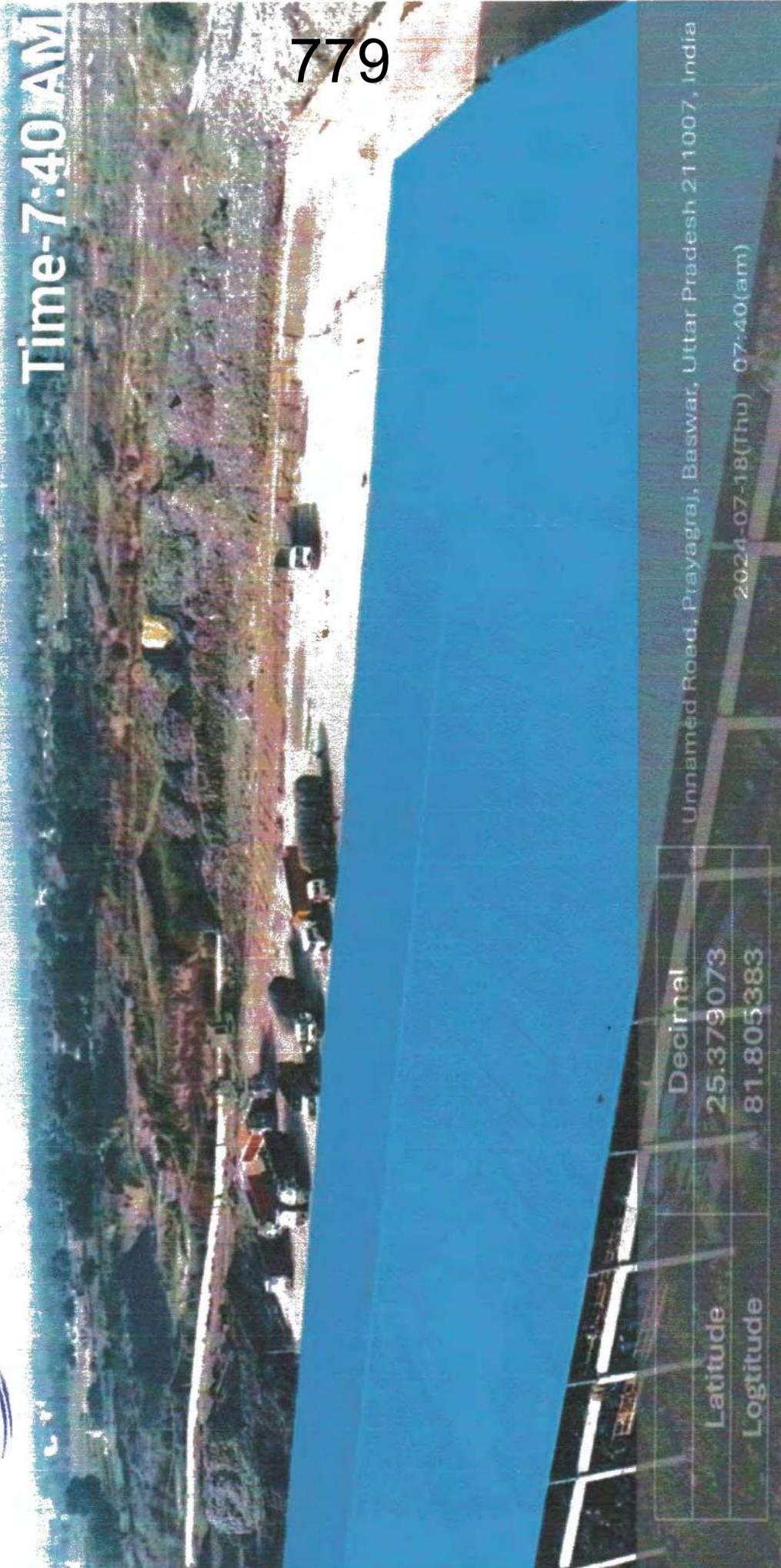
27



18/07/24

Time-7:40 AM

779



Latitude	Decirnal
Longitude	25.379073
	81.805383

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-07-18(Thu) 07:40(am)

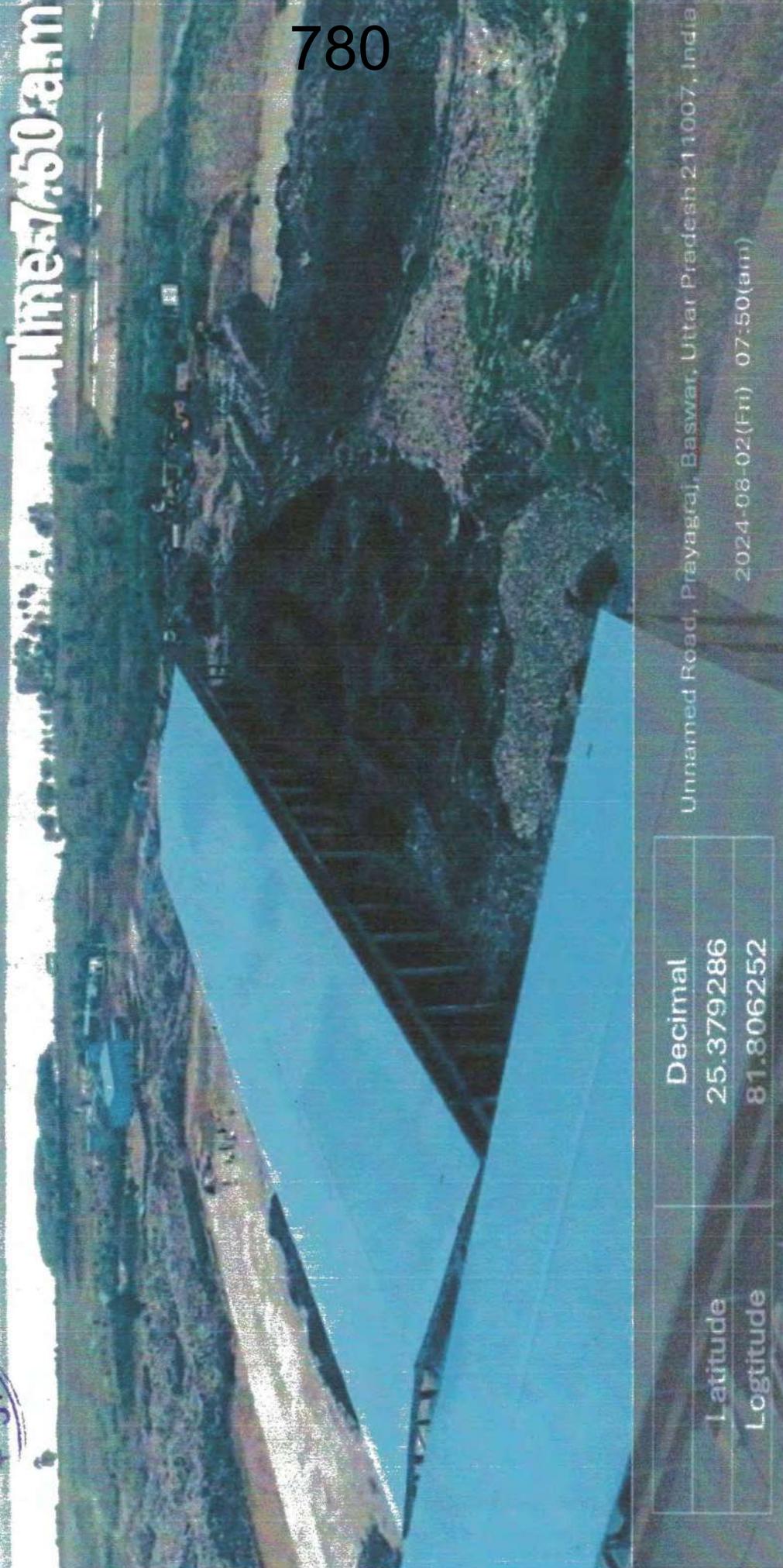
*Neeraj Tiwari*



02/08/2024

Time: 7:50 am

780



Latitude	Decimal
Longitude	25.379286
	81.806252

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-08-02(Fri) 07:50(am)

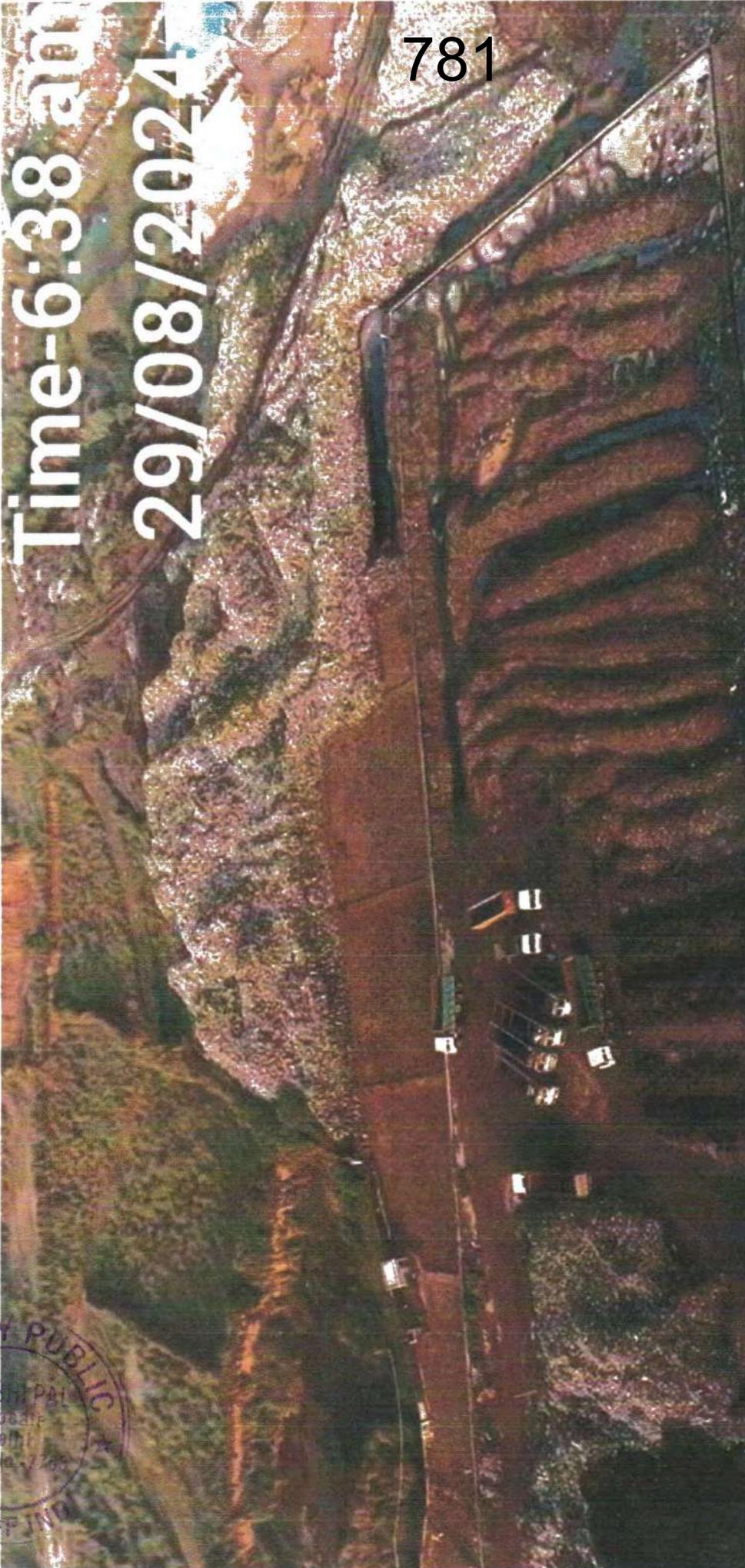
Neeraj Tiwari

29



Time-6:38 am  
29/08/2024

781



Latitude	Decimal
Longitude	25.379053
	81.805259

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-08-29(Thu) 06:38(am)

Neeraj Atwari

30



02/10/24

Time: 6:20 am

782



Latitude	Decimal
Longitude	25.378462
	81.805850

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-10-02(Wed) 06:20(am)

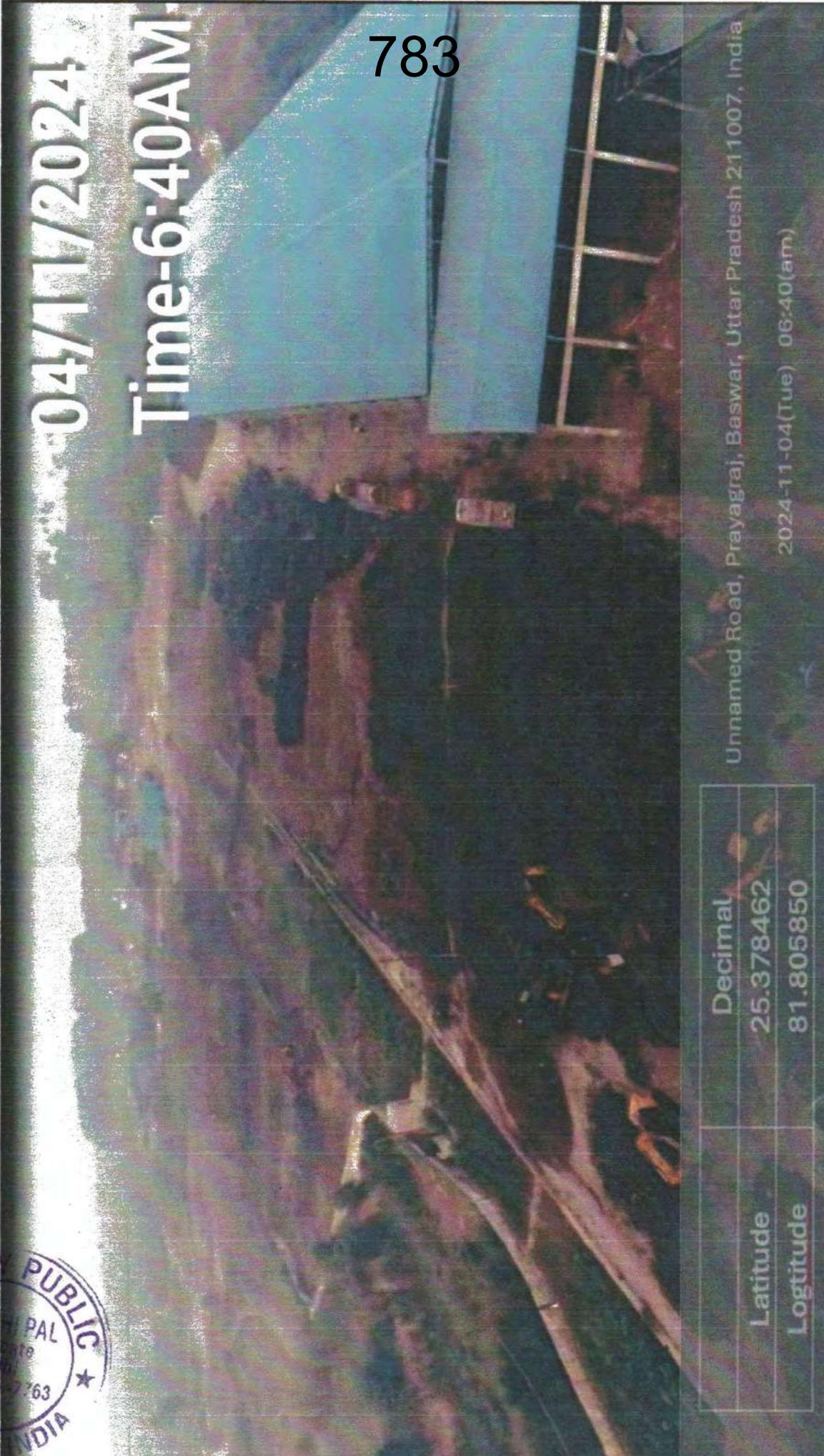
Neeraj Tiwari



04/11/2024

Time-6:40AM

783



Latitude	Decimal
Logtitude	25.378462
	81.805850

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-11-04(Tue) 06:40(am)

Neeraj Tiwari



# ANNEXURE 5

*Neeraj Tiwari*

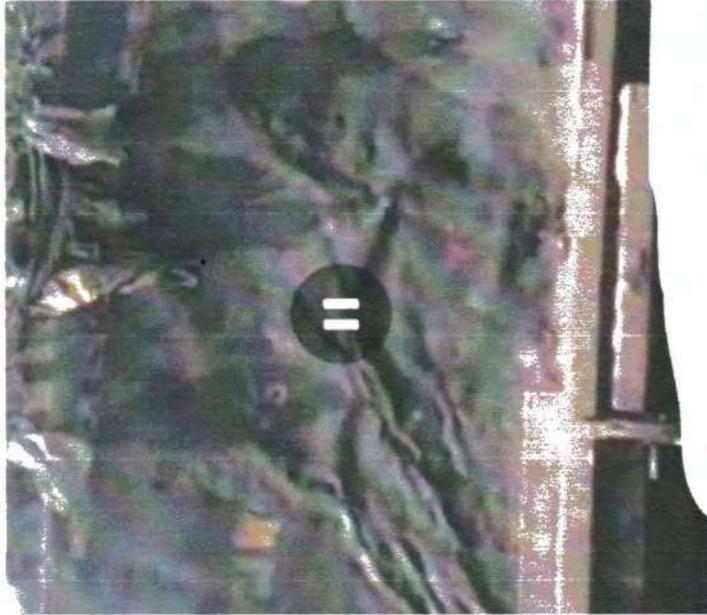
784

33

785



*Nooraj Tiwari*



NOTARY PUBLIC  
 SHASHI PAL  
 Adocate  
 Delhi  
 Regn No.-7763  
 GOVT OF INDIA



04/01/25

Time - 2:10 PM

786

Latitude	Decimal 25.378462
Longitude	81.805850

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-01-04(Sat) 02:10(pm)

*Neeraj Tiwari*



17/01/2025  
Time-1:40pm

787



Latitude	Decimal
Longitude	25.378462
	81.805850

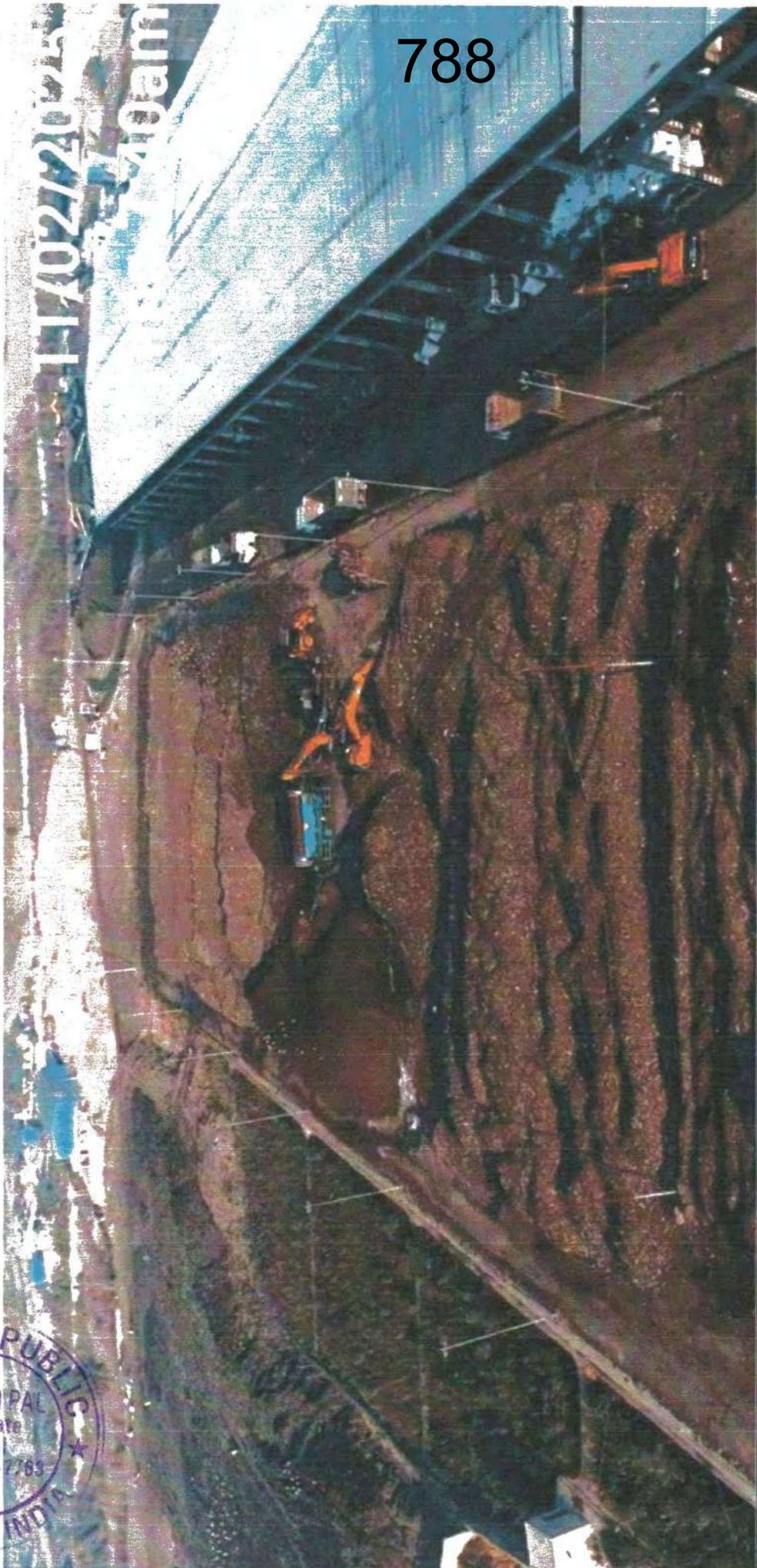
Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-01-17(Fri) 01:40(pm)

Neeraj Tiwari

11/02/2025  
07:40am

788



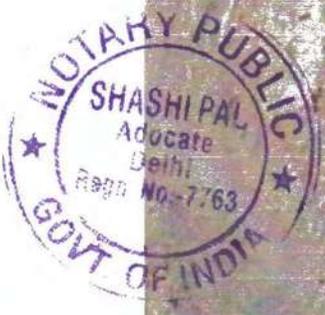
Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India  
2025-02-11(Tue) 07:40(am)

Latitude	Decimal
Longitude	25.378462
	81.805850

NOTARY PUBLIC  
SHASHIPAL  
Advocate  
Delhi  
Regn. No. - 7763  
GOVT OF INDIA

Neeraj Tiwari

37



06/03/2025  
Time-7:40am

789

Latitude	Decimal
Longitude	81.805850

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-03-06(Thu) 07:40(am)

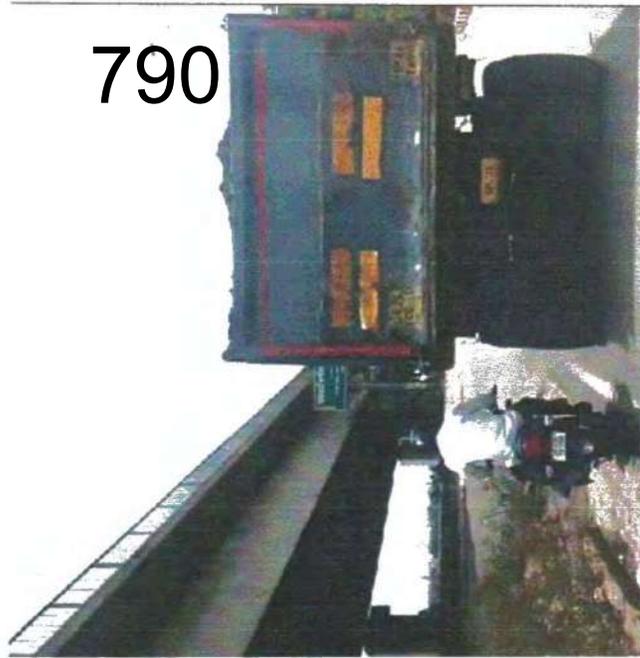
*Neeraj Tiwari*

38

790

39

*Neeraj Tiwari*



NOTARY PUBLIC  
 SHASHI PAI  
 Adocate  
 Delhi  
 Regd. No. - 7763  
 GOVT. OF INDIA

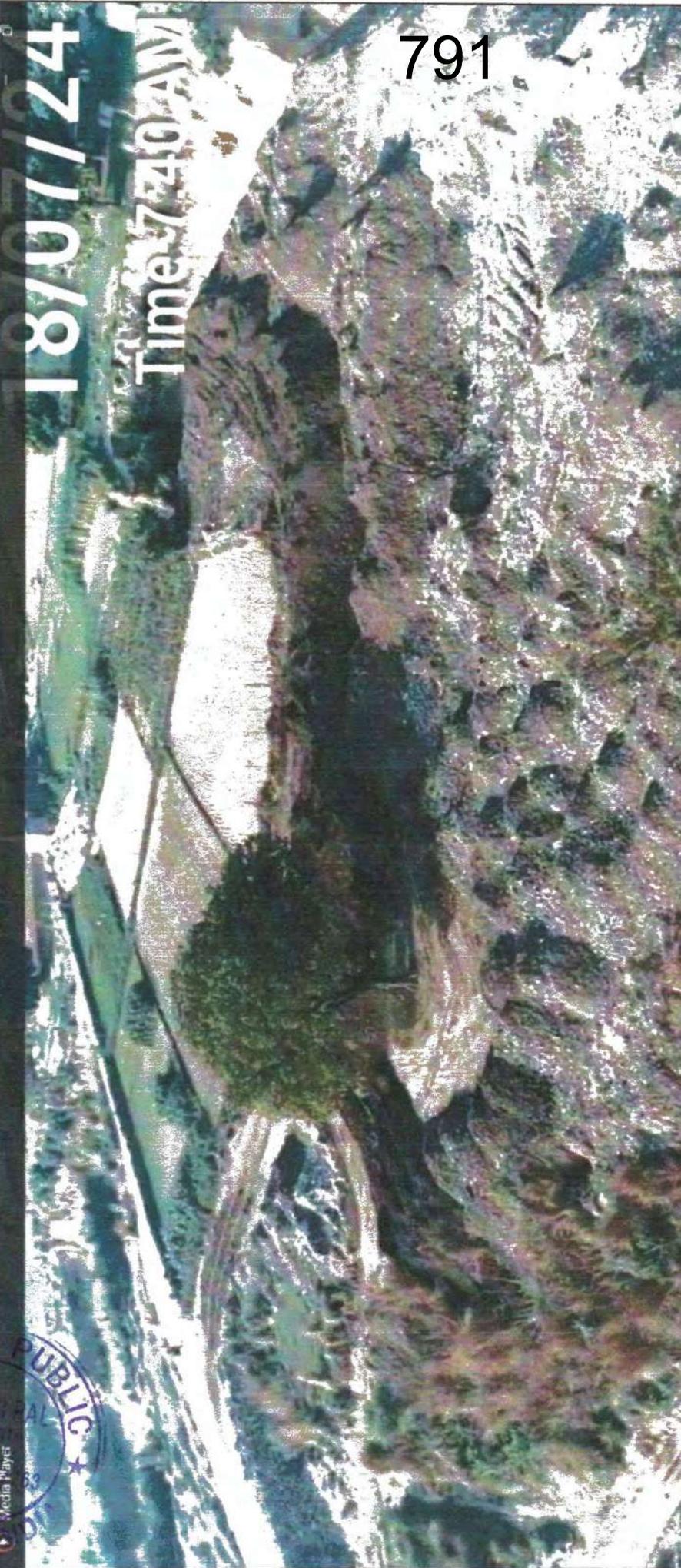
Amn SC, 2024 12 46:57  
 Android 13 (33000000) | Samsung India Electronics Pvt. Ltd.



18/07/24

Time: 7:40 AM

791



Latitude	Decimal
Longitude	25.376634
	81.806939

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-07-18(Thu) 07:40(am)

Neeraj Tiwari

40

792

06/03/2025

Time 7:40am



Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-03-06(Thu) 07:40(am)

Decimal	25.378457
Latitude	81.804767
Logitude	

NOTARY PUBLIC  
 SHASHI PAL  
 Advocate  
 Delhi  
 Regn No.-7763  
 GOVT OF INDIA

Neeraj Tiwari 41



06/03/2025

Time-7:40am

793

Latitude	Decimal
Longitude	25.376687
	81.806666

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-03-06(Thu) 07:40(am)

*Neeraj Tiwari*

42



02/10/24  
Time-6:20 am

794

Latitude	Decimal
Longitude	25.376300
	81.806424

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-10-02(Wed) 06:20(am)

*Neeraj Tiwari*

43

02/10/24

Time-6:20 am

795

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-10-02(Wed) 06:20(am)

Decimal	25.376251
Latitude	81.806435
Logitude	



*Neeraj Tiwari*

44



02/10/24  
Time-6:20 am

796



Decimal	25.377133
Latitude	81.807325
Logtitude	

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2024-10-02(Wed) 06:20(am)

*Neeraj Kumar*

45

17/01/2025  
Time-1:40pm

797

45A



	Decimal
Latitude	25.676581
Longitude	81.807132

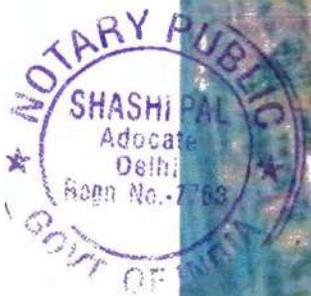
Unnamed Road, Prayagraj, Balwar, Uttar Pradesh, 211007, India  
2025-01-17 (Fri) 01:40 (pm)

Neerajitwar

798

46

Neeraj Awari



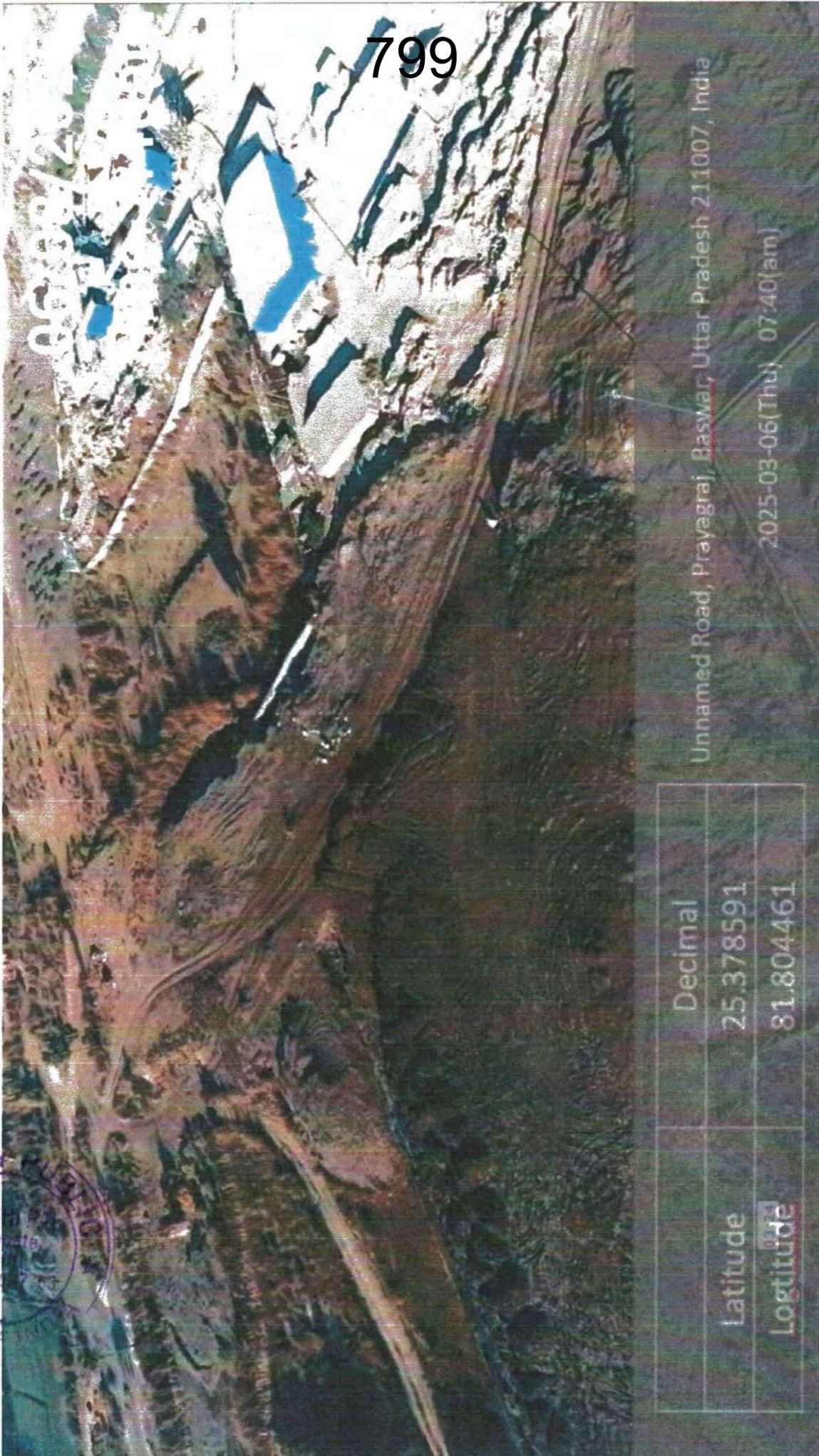
Decimal	25.378465
Latitude	81.804756
Longitude	

Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-02-11(Tue) 07:40(am)

799

47



Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-03-06(Thu) 07:40(am)

Decimal	25.378591
Latitude	81.804461
Longitude	

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 Ado  
 De  
 Regn No  
 GOVT OF

*Neeraj Tiwari*



11/02/2025

Time: 7:40 AM

800

	Decimal
Latitude	25.375750
Longitude	81.806354

Unnamed Road, Prayagraj, Saswar, Uttar Pradesh 211007, India

2025-02-11(Tue) 07:40(am)

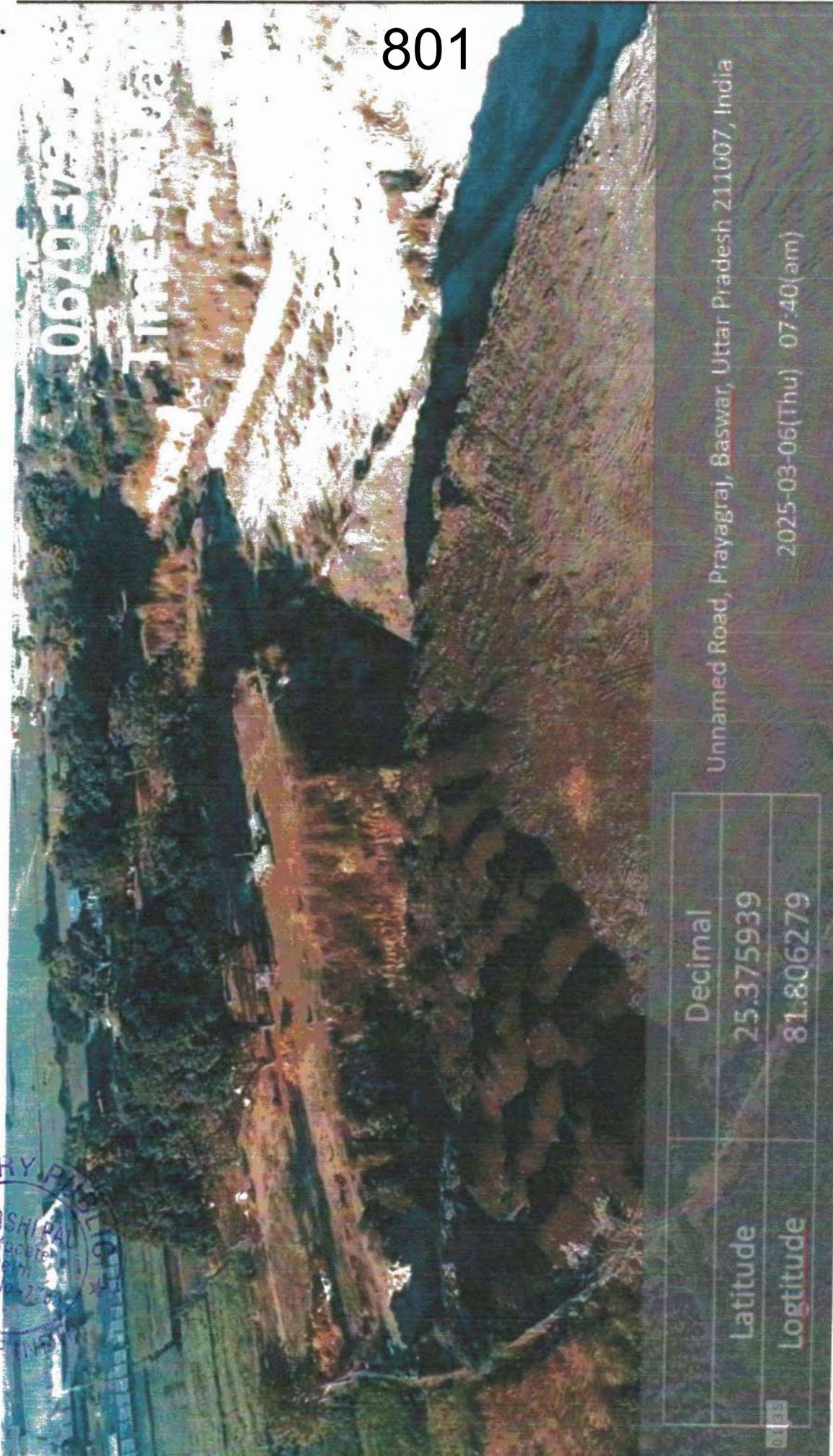
Neerajitwari

48

801

0670372

Time: 07:40



Unnamed Road, Prayagraj, Baswar, Uttar Pradesh 211007, India

2025-03-06(Thu) 07:40(am)

Latitude	25.375939	Decimal
Logtitude	81.806279	

Neeraj Tiwari

49

802

*Neeraj Tiwari*



Latitude	29.276091	Decimal
Longitude	80.805984	

Uttamkand, Poryagraj, Anwar, Uttar Pradesh 200711, India

2025-09-30 (Thu) 07:40 (am)

06/03/2025  
Time-7:40am

NOTARY PUBLIC  
 SHASHI KANT  
 Adoc  
 Delhi  
 Regn No. 788  
 GOVT OF INDIA



51.

IN THE COURT OF NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, N. DELHI

Suit/Appeal No. OA No. 1181 of 2024 JURISDICTION OF 2025  
In Re:-

NEERAJ TIWARI Plaintiff(s)/Petitioner(s)/Appellant(s)/Complainant(s)

VERSUS

STATE OF UTTAR PRADESH & ORS Defendant (s)/ Respondent(s) / Accused  
Know all to whom these Present shall come that  
I/we NEERAJ TIWARI S/O G.M. NARAYAN TIWARI

The above named applicant do hereby appoint

AMIT UPADHYAY VINEET K. SINGH BASANT LAL AKASH GUPTA KAVITA SINGH  
(D/1067/2003) (D/1031/2001) (D/725/2020) (D/9319/2021) (D/2909/1999)

CHAMBER NO.: 428-429, CIVIL WING, TIS HAZARI COURTS, DELHI - 54  
MOB. NO.: +91-9999906303. EMAIL: AUPADHYAY11@HOTMAIL.COM

(herein after called the advocate/s) to be my / our Advocate in the above - noted case authorize him:-  
To act, appear and plead in the above-noted case in this court or in any other court in which the same heard and also in the appellate court including High Court subject to payment of fees separately for each court.  
To sign file, verify and present pleadings, appeals cross-objection or petitions for executions or withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or prosecution of the said case in all its stages subjects to payment of fees for each stage.  
To file and take back documents, to admit and/or deny the documents of opposite party.  
To withdraw or compromise the said case or submit to arbitration any differences of disputes that may arise touching or in any manner relating to the said case.  
To take execution proceedings on paying separate fee.  
To deposit, draw and receive money, cheques, cash and grant receipts hereof and to do all other acts things which may be necessary to be done for the progress and in the course of the prosecution on the said case.  
To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on behalf.

And I/we undersigned to hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purpose.  
And I/we undertake that I/We or my/our duly authorized agent would appear in court on all hearings will inform the Advocate for appearance when the case is called.  
And I/We undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the case. The adjournment costs whenever ordered by the court shall be of the Advocate which he shall receive himself.  
And I/we undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the fee is settled. The fee settle is only for the above case and above Court. I/We hereby agree that once the fee is paid, I/We will not claim for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHERE OF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this 25th Day of NOV 2025 Accepted subject to the terms of the fees.

Advocate Client Client  
*(Signatures of Amit Upadhyay, Vineet K. Singh, Basant Lal, Akash Gupta, Kavita Singh)*  
Identify the Signature/Thumb Impression of Below Mentioned Person, Signed in My Presence. The Client.  
*(Signature of Neeraj Tiwari)*

