

**Before the Hon'ble National Green Tribunal
Principal Bench,
Faridkot House, Copernicus Marg, New Delhi, 110001
(Under section 14, 15, 19 & 20 of NGT Act 2010)**

O.A. No. 613 of 2025

Kamal Anand & ors.

..... Petitioners

Vs.

State of Punjab & ors.

..... Respondents

respectfully sheweth:

**PRELIMINARY REJOINDER ON BEHALF OF THE APPLICANT TO THE
REPLY FILED BY RESPONDENT NO. 4 (EXECUTIVE OFFICER,
MUNICIPAL COUNCIL, SANGRUR)**

MOST RESPECTFULLY SHOWETH:

1. That the Applicant has perused the reply dated 20.02.2026 filed by Respondent No. 4, Sh. Ashwani Kumar, Executive Officer, Municipal Council, Sangrur. At the outset, the Applicant submits that the said reply is misleading, and a deliberate attempt to suppress the actual

state of environmental degradation in Sangrur from this Hon'ble Tribunal.

2. Rejoinder to Paragraph 3 regarding Geo-Tagged Photographs:

The Respondent No. 4 has conveniently placed on record geo-tagged photographs (dated 06.11.2025 to 14.11.2025 and on other dates) to claim that sites are clean. The Applicant submits that this was a cosmetic exercise conducted solely for litigation purposes.

- **Contradiction:** Annexures **C-1** and **C-2** dated 24.02.2026 (15:13 hrs) of the **Ranbir Club and Sabji Mandi sites**, which were claimed to be "clean" in Respondent's Annexures R-2/4 and R-2/5 show a complete reversal. The current state proves that cleaning is only done sporadically to capture photos for the Hon'ble Tribunal, while the ground reality remains hazardous.

3. Rejoinder to Claims regarding Ranbir College (Annexure R-

2/2): Respondent No. 4 claimed the site outside Ranbir College was "clean and clear" as of 19.02.2026. However, Annexure **C-3 & C-4** dated 24.02.2026 (15:03 hrs) shows at least 50 meters of the road covered in unsegregated Municipal Solid Waste (MSW). The foul smell and horrific state of affairs at this educational hub highlight the gross negligence of the Respondent.

4. **Proximity of Waste to Respondent No. 4's Office:** Annexures **C-5, C-6, and C-7** (dated 21.02.2026 to 24.02.2026) show massive waste accumulation just a "stone's throw" from the office of Respondent No. 4. If the Executive Officer cannot manage the waste at his own office doorstep, his claims of managing the entire city are patently false. This is a direct violation of the **Solid Waste Management Rules, 2016**.

5. **Rejoinder to Claims on Composite Pits (Para 6 of Reply):** Respondent No. 4 has stated on affidavit that 50 composite sites are functional. **This is a perjury and a mockery of the Tribunal.**

- **The Regulator's Report: The Status Report of Respondent No. 6 (Punjab Pollution Control Board) at page 8 clearly states that out of 71 pits checked, none were operational, except 4 which were merely filled with fresh waste.**
- **The Respondent No. 4 is making false statements on oath to escape personal liability that 50 composite pits are operational which is false and misleading and contradiction with the STATUS REPORT of Respondent NO. 6**

6. **Corroboration by Respondent No. 6 (PPCB Status Report):** The report by the Environmental Engineer (Sangrur Region) further nails the Respondent No. 4's lies:

- **Page 5, Sr. No. 2 & 3:** Waste being lifted in **uncovered tractor trolleys**; mixed and unsegregated waste stored on main roads; presence of stray animals.
- **Page 6, Sr. No. 4:** Adverse conditions at Banasar Garden, a public recreation spot.
- **Sr. No. 7:** Even the **District Administrative Complex (DAC)**, housing the office of Respondent No. 3 (Deputy Commissioner), is surrounded by unsegregated waste. This proves a total breakdown of the administrative machinery.

The Status Report by the Respondent No. 6 clearly depicts the sorry state of affairs regarding the implementation of the Municipal Solid Waste (Management and Handling) Rules 2016 in Sangrur City, Punjab.

7. **Legal and Human Impact:** The Respondent is in flagrant violation of the **Environment Protection Act, 1986** and **SWM Rules, 2016**. While the officials draw full salaries, the citizens suffer. In the Sabji Mandi area, waste overflows to the extent that residents cannot open their gates. The Applicant places reliance on the Hon'ble Supreme

Court's judgment in *Bhopal Municipal Corporation v. Dr. Subhash C. Pandey*, which expressed deep displeasure at such municipal failures.

PRAYER

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

1. Reject the misleading reply filed by Respondent No. 4.
2. Direct a personal appearance of Respondent No. 4 to explain the false statements made on affidavit regarding the functionality of composite pits.
3. Impose heavy costs/environmental compensation on the Respondent No. 4 Executive Officer, Sangrur in personal capacity for continued non-compliance.
4. Allow the Applicant to file a detailed, point-by-point Rejoinder after a further physical inspection of the landfill site and cross checking the other averments made by the respondent No. 4 and 6 in their replies.

Date: 24.02.2026

Applicants:



Kamal Anand
For Petitioners

Annexure C-1

**(Sabzi Mandi opp Adarsh School,
Sangrur 148001 Punjab)**



Annexure C-2
(Ranbir Club, Sangrur 148001 Punjab)



30.24367, 75.83931, 195.5m, 345°
24 Feb 2026 15:16:21

Annexure C-3
(Ranbir College Road, Sangrur 148001
Punjab)



30.23696, 75.84551, 189.2m, 48°
24 Feb 2026 15:03:38

Annexure C-4
(Ranbir College Road, Sangrur 148001
Punjab)



Annexure C-5
(Adjoining MC Office, Sangrur 148001
Punjab)



30.23684, 75.83807, 214.9m, 193°
24 Feb 2026 15:00:06

Annexure C-6

**(Adjoining MC Office, Sangrur 148001
Punjab)**



30.23684, 75.8381, 199.2m, 167°
23 Feb 2026 15:24:04

Annexure C-7
(Adjoining MC Office, Sangrur 148001
Punjab)

