

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

Execution Application No. 23/2023

In

M.A. No. 33 / 2023

In

Original Application No. 75/2023

**IN THE MATTER OF:**

JAISHREE BANSAL

... APPLICANT

VERSUS

MINISTRY OF ENVIRONMENT, FORESTS AND CLIMATE  
CHANGE AND OTHERS

... RESPONDENT(S)

**REJOINDER TO THE RESPONSE DATED 03.11.2025 OF THE  
UTTAR PRADESH POLLUTION CONTROL BOARD, ON  
BEHALF OF APPLICANT, JAISHREE BANSAL**

1. That time and again, the Respondent has given a timeline to process the waste at site in question, at Page No. 894 in clause vi. of the Response dated 03.11.2025, the Respondent categorically stated that waste (Approximately 2.40 Lakh MT) will be processed by March, 2026. It is most respectfully submitted that for each and every day after March, 2026, heavy costs may kindly be imposed upon the Respondent per day basis, till the completion of the task.
2. This is respectfully submitted that this Hon'ble Tribunal vide Order dated 26.04.2023 in M.A. No. 33/2023 in O.A. No. 75/2023 has specifically directed the Respondents i.e. The District Magistrate and Ghaziabad Nagar Nigam to take remedial measures as per law and to give their report to the Chief Secretary, UP within one month from today (i.e. from 26.04.2023 to 25.05.2023). The Applicant reiterate the contents of execution Application.
3. That the contents given in tabulated form in column bearing No. H, at Page No. 896 of the Response, are wrong and contradictory to the submissions and previous pleadings of the Respondents. It is submitted that leachate

was generated and flowing upon the land of the Applicant, the Applicant has apprised this Hon'ble Tribunal with the help of the actual photographs of the site wherein the leachate is visible as well as a Cow got stuck in the mud like waste on the mountain of garbage is visible, which are the part of record and the Order dated 04.11.2025 also mentions the same i.e. flowing of leachate.

4. That in response to contents of Para No. 5, 6 and 8, it is submitted that time and again, the Respondent is furnishing details of the new land/site for waste processing. However, it is submitted that the Affidavit is entirely silent whether the said site is in accordance with the provisions of law contained in the SWM Rules, 2016 otherwise multiplicity of litigation will be arise, as in the case of Dhabarsi, Ghaziabad and Galand, Hapur. The sites which are mentioned by the Respondent are not designated site for dumping/processing of the Solid Waste.
5. That in response to the contents of Para no. 8, it is submitted that the Respondent shall be accountable and liable for the penalty for non-compliance of the directions within the timeline submitted before this Hon'ble Tribunal. It is crystal clear that the respondents have given timelines since filing of the instant Execution Application.

Place: New Delhi

APPLICANT

Dated: 06.01.2026

Through



**KUNWAR MOHD ASAD**

**Counsel for the Applicant**

**K & CO Legals**

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