

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

(in O.A. 861 of 2022)

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Date: 28-07-2025
Place: Ludhiana

Er. Kapil Dev
(Petitioner No. 2)
(Petitioner in Person)

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

(In O.A. No. 861 of 2022)

In the matter of:

Kuldeep Singh Khaira & ors. Applicants

vs.

State of Punjab & ors. .. Respondents

Rejoinder by Applicants to the reply dated 26-03-2025 submitted by Respondent No. 5 Sh. Sandeep Singh Mangat, Executive Engineer, Sidhwan Canal Division, Ludhiana as well as false information repeatedly submitted by MCL before this Hon'ble Tribunal.

Hon'ble sir,

Most respectfully showeth

The Applicants humbly submit as under:

1. That the Respondent No. 5 has submitted in the reply at Para No. 6 that 14303.16 Cum of debris and garbage was removed and the same was transported by GSM Infra Buildcon LLP to the solid waste management site at Jamalpur at Ludhiana. It is pertinent to humbly submit here that the reply submitted by Respondent No. 5 is vague and misleading for the reasons as under:
 - i. Only garbage is received at Jamalpur site i.e. Primary Dump and demolition waste i.e. debris are not collected/dumped there.
 - ii. As per calculations, the quantity of waste (14303.16 Cum) claimed to be shifted by Respondent No. 5 comes out to be not less than 11400 MT. The receipt by MCL Approved Concessionaire (running page No. 276) doesn't reflect total

number of tippers received along with total weight of unsegregated garbage (and debris as claimed to be dumped by Respondent No. 5) at Tajpur Bioremediation site.

- iii. As already submitted by Applicants vide objections dated 26-03-2025, most of the garbage by Respondent No. 5 was buried under the bed of Sidhwan Canal unscientifically and it is clear from the Photograph No. 6 at Page no. 243. The video made by one vigilant citizen depicting burying of garbage at this location before start of construction of bridge is produced herewith at google link as under:

https://drive.google.com/file/d/1-YpuSN6hG_xyEW3CaDmHCsjaNHyWmxgb/view?usp=sharing

- iv. The garbage buried under the bed of canal was again visible after discharge of water in Sidhwan Canal was again stopped by Respondent No. 5 and it is clear from photographs dated 26-02-2025 produced by Applicants at running page No. 245.

2. That this Hon'ble Tribunal pleased to direct the Respondents for processing of garbage but shifting of garbage to Tajpur Dump has increased the legacy waste and condition at the Primary Dump has worsened as no garbage is being processed at site. **The garbage is dumped along roads without any boundary wall along the road at primary dump.** One news Published in Dainik Bhaskar pertaining to **Ludhiana ranked 2 amongst dirtiest cities of Ludhiana** as well as hell like situation at Primary Dump is produced herewith as **Annexure P-11.**

REGARDING FALSE INFORMATION SUBMITTED BY THE COMMISSIONER, MUNICIPAL CORPORATION LUDHIANA

3. That the Respondent Commissioner, MCL in his reply dated 10-03-2024 (Point No. 3 - running page No. 119) has submitted that the **Chain Link fence has been installed** to prevent throwing of garbage in Sidhwan Canal by public whereas **such reply by Respondent No.**

6 is false and submitted deliberately with intent to run away from duty of door to door garbage in Janta Nagar, Shimla Puri area as MCL still has informal sector to collect the domestic garbage. It is pertinent to humbly submit here that the **chain Link has never been installed at most critical points** i.e. from encroachments area of Gill Bridge to Lohara Bridge (towards Janta Nagar i.e. right side of downstream) as well as Dugri Bridge, Gill Bridge & Lohara Bridge as most of the garbage in Sidhwan Canal is dumped at this stretch and it is evident from Photographs produced at running page No. 241-244.

4. That the Applicant submitted one representation dated 28-04-2025 to the Respondent No. 5 with subject matter as dumping of garbage on daily basis from Gill Bridge to Lohara Bridge due to missing chain link at impugned location along Sidhwan Canal within MCL Limits resulting in contamination of Canal Water, non-compliance of orders 20-02-2023 by failing to demarcate and notify “No Development Zone” on both sides of Sidhwan Canal as well as encroachment along Sidhwan Canal near Gill Bridge by migrant labours etc. The Respondent No. 5 sent one letter No. 3624-25/NGT dated 15-05-2025 to the Assistant Commissioner, Municipal Corporation Ludhiana by mentioning that the Chain Link is not in existence at the impugned location and it comes under the jurisdiction of MCL and Chain link be fixed at the location. The complaint dated 28-04-2025 filed by Applicants with R-5 and the translated Copy of letter No. 3624-25/NGT dated 15-05-2025 sent by R-5 to R-6 for missing Chain link along Sidhwan Canal and are produced herewith as **Annexure P-12 & Annexure P-13 respectively.**
5. That MCL in its earlier replies has submitted that the encroachments have been removed from location near Gill Bridge, whereas the encroachments have not been removed from the area for even a single day since filing of case by the Applicants & action taken by it was mere an eyewash just to click the photographs to produce before

this Hon'ble Tribunal. 10 Photographs clicked on 27-07-2025 with GPS location depicting the present encroachment, incomplete greenbelt, garbage staked along Sidhwan Canal as well as illegal fish market at impugned location of encroachment near Gill Bridge are produced herewith as **Annexure P-14**.

6. That the MCL had submitted in its reply dated 28-06-2024 that the development of greenbelt has started on 15-02-2024 and as per tender, it was to be completed in six months, however besides fixing interlocking tiles for passage, nothing is seen at ground level and wild vegetation is grown in the area. It is pertinent to humbly submit here that greenbelt was to be developed upto Gill Bridge but the condition of impugned location is evident from Annexure P-14 as above.
7. That due to complete failure in handling the solid waste, **Ludhiana has been declared second most dirtiest city of India in outcome of "Swachh Survekhsan" recently conducted by MoUHA.** It is pertinent to humbly submit here that Respondent MCL has been using the sentence at Para 3 of its every reply as "MCL is striving hard, with all efforts, to ensure that problems related to the management of solid waste are sorted out at the earliest in a time-bound manner". However the fact is, MCL has never obeyed the directions of this Hon'ble Tribunal in other cases like O.A. 317 of 2023, O.A. 793 of 2022, O.A. 209 of 2023 filed by Applicants and above all, despite 7 deaths due to fire at Primary dump, boundary wall at Primary Dump along Garbage is still missing which is an act of violation of directions of this Hon'ble Tribunal by Commissioner, MCL.
8. That earlier, MCL was claiming to started construction for installation of Static Compactor at Dana Mandi to collect garbage from impugned illegal dump but later, submitted that the garbage is being shifted to two other Static Compactors. **Such attitude of**

Respondent No. 6 has resulted in pathetic conditions in Ludhiana.

9. That it was duty of Irrigation Department to take action against MCL for failing to prevent dumping of garbage into Sidhwan Canal. However, after passing of more than 30 Months of filing this Original Application, both the departments are passing the bucks, resulting into contamination of Sidhwan Canal on daily basis as well as **major damage to roots of trees due to rodents** as a result of garbage laying along the Canal. Four Photographs depicting the present condition of stretch along Sidhwan Canal where Chain Link is missing are produced herewith as **Annexure P-15**. As already submitted, the stretch where chain link is missing is most critical area and therefore, the height of Chain Link may please be directed to be 3 Meters and dustbins may kindly be directed to be installed at this location.

10. That this Hon'ble Tribunal vide orders dated 22-08-2024 pleased to direct as under thus:

Para 2. In terms of the earlier direction of the Tribunal, report dated 29.06.2024 has been filed by Municipal Corporation, Ludhiana stating that a decision has been taken to collect and process the solid waste of the area concerned at two different nearby Compactor Transfer Stations situated at Dugri Bridge and Pratap Chowk and they are fully functional.

Xxx xxx xxx

4. A separate reply has been filed by Water Resources Department of State of Punjab taking the stand that it is fully committed to comply with the provisions of the Northern India Canal & Drainage Act, 1873. Learned Counsel for Water Resources Department has submitted that responsibility of cleaning the canal is with the Water Resources Department and responsibility of keeping the banks of the canal encroachment free, clean and maintain is the responsibility of the Municipal Corporation, Ludhiana. In the

report, action which has been taken this year for cleaning the canal has not been disclosed but it has been stated that closure of the canal is likely in the month of October 24th and at that time, pending work of cleaning/removing the garbage lying in the bed of the canal will be taken up. **The Water Resources Department will disclose in the next report the complete details of the activity which has been undertaken in last two years for cleaning the canal** and also the time-bound manner in which in this year the entire stretch of canal passing through Ludhiana will be cleaned.

Para 5. Municipal Corporation, Ludhiana had earlier taken the stand that steps are being taken for developing green belt by both sides of the canal to prevent the encroachment, but, no progress report in this direction has been placed on the record.

Para 6. Commissioner, Municipal Corporation, Ludhiana has stated that encroachments by the side of canal have been removed and constant vigil is maintained to prevent the same in future.

From the above produced facts, it is clear that the cleaning of Canal Bed as claimed to be done by Respondent No. 5 is mere an eyewash as most of the garbage was dumped within under the bed of Sidhwan Canal unscientifically but later came out of soil after the flow of water in canal was stopped, thus the reply dated 26-03-2025 is liable to be set aside and appropriate action may kindly be initiated against Respondent No. 5. Further, MCL has submitted false reply regarding installation of Chain Link along Sidhwan Canal whereas there is no Chain Link at most critical stretch along Sidhwan Canal resulting into throwing of garbage by polluters on daily basis. Further from

above produced facts, it is clear that the MCL has deliberately submitted wrong information by way of affidavit that Chain Link has been installed to prevent throwing of garbage whereas it is missing at most critical stretch along Sidhwan Canal. Despite directions of this Hon'ble Tribunal, the greenbelt at Bank of Sidhwan Canal, which was supposed to be completed by 15-08-2024 is still incomplete and encroachments are still in existence at impugned location.

PRAYER

The Applicants humbly prays this Hon'ble Tribunal to consider the facts produced above and impose Environment Compensation on both R-5 as well as R-6 for their intent to mislead this Hon'ble Tribunal as well as for damaging the Environment. The Applicants further humbly prays this Hon'ble Tribunal to issue directions for complete the Chain Link from all missing points and install dustbin along both sides of Sidhwan Canal at appropriate places to prevent dumping of garbage in the canal and any other appropriate directions to the Respondents as deemed to be fit by this Hon'ble Tribunal.



Date: 28-07-2025

Place: Ludhiana

Er. Kapil Dev

(Petitioner No. 2)

(Petitioner in Person)



लुधियाना भास्कर 18-07-2025

लुधियाना, शुक्रवार 18 जुलाई, 2025

ये शर्म की बात है... स्वच्छता सर्वेक्षण में लुधियाना देश का दूसरा सबसे गंदा शहर घोषित



लुधियाना | शहरी स्वच्छता को लेकर किए गए सर्वेक्षण में लुधियाना का प्रदर्शन फिर खराब रहा है। 10 लाख से ज्यादा आबादी वाले 40 बड़े शहरों में लुधियाना 39वें स्थान पर रहा। यह सर्वेक्षण 8 कैटेगरी को आधार मानकर होता है। जैसे गीला-सूखा कचरा अलग करने की व्यवस्था होना आदि। शहर से निकलने वाले कचरे को प्रोसेसिंग शुरू नहीं कराया और वर्षों पुराने कूड़े के ढांगू बसकर रहे हैं। इससे जमीन दूषित हो रही है। इससे न सिर्फ पर्यावरण प्रदूषित हो रहा है, बल्कि भूजल भी दूषित हो रहा है। बात दें कि पिछले साल भी 46 बड़े शहरों को रैंकिंग जारी हुई थी, उसमें भी लुधियाना को रैंक 39 थी।

मशीनें खराब, टॉयलेट बंद; न कचरा उठाया, न ही जिम्मेदारी... इसलिए लगा शहर पर गंदगी का दाग

भास्कर एक्सपर्ट
डॉ. दत्तजी सिंह, रिटायर्ड इंजीनियर/पर्यावरण एक्सपर्ट

नाकामी क्यों? शहर को 12500 में से 5272 अंक मिले, यानी सफाई व्यवस्था सिर्फ कागजों में है

लुधियाना स्वच्छता सर्वेक्षण 2024 में लुधियाना शहर को कुल 12500 में से सिर्फ 5272 अंक मिले। इनमें से स्वच्छ सर्वेक्षण के 10,000 अंकों में लुधियाना को सिर्फ 5541.27 अंक और ग्राहक फ्री सिटी सर्विसेजेशन में महज 750 अंक हासिल हुए। यह साफ दिखता है कि शहर की सफाई व्यवस्था कागजों पर बनी रही, जमीनी हकीकत बहुत खराब रही। सबसे बड़ा कारण - डोर-टू-डोर कचरा कलेक्शन और सेग्रीगेशन की व्यवस्था कागस नहीं। भारतीयांक बकरा जैसे ब्याग स्टैंड, गदर, अपरसास और प्रमुख सड़कों पर गंदगी साफ देखी गई। नार्मल की प्रतिक्रिया से स्पष्ट है कि लोग अपने शहर की सफाई से अस्मूट हैं। वॉटर बॉडीज की सफाई, कचरे के निस्तारण और टॉयलेट्स की शासन जैसी कई कमियाँ ने रैंकिंग गिरा दी। यह रिपोर्ट गहराई से विश्लेषण करती है कि किन प्रमुख कमियों ने लुधियाना को देश के सबसे गंदे शहरों की सूची में धकेल दिया।



छाह-1: 20 साल से डंप हो रहा कचरा, प्रोसेसिंग नहीं... हर दिन शहर से 1100 मेट्रिक टन कचरा निकलता है। इसे ताजपुर रोड के पास डंप कर दिया जाता है। पिछले 20 साल से यहां कचरे के ढांगू बन चुके हैं। कोई प्रोसेसिंग नहीं हो रही। इससे पानी जहरिया और दूषित हो चुके हैं। 5 किमी तक बन्धू फैलते रहती हैं।

पहले एक कंपनी को प्रोसेसिंग का ठेका मिला था, लेकिन जांच नहीं हुई। टैंडर रद्द कर दिया गया। अब टुकड़ों में काम दिया गया है, लेकिन ठेका को परिणाम शून्य मिला। इसलिए सर्वेक्षण में 0 अंक दिए गए।
छाह-2: सफाई कर्मचारी दफ्तरो में, गलियों में नहीं... नियम के पास 5 हजार सफाई कर्मचारी हैं। इनमें से आधे से भी कम कर्मचारी वास्तु में सफाई करते हैं। बाकी अफसरी और नेताओं के घरों या दफ्तरो में निजी काम करते हैं। डोर-टू-डोर कचरा उठाने का ठेका निजी लोगों को दिया है। 95 वाडों में कहीं भी व्यवस्था खरी नहीं है। सड़कों के किनारे कूड़े के ढेर आम बात हैं। कॉलेक्टर या तो लगे नहीं या फिर खराब हैं। 2022 में एक कंपनी को सफाई का ठेका दिया था, लेकिन यह काम छोड़कर चली गई। इसके बाद से हालात और बिगड़ गए हैं।
छाह-3: गीला-सूखा कचरा अलग नहीं उठता... सिर्फ 6% घरों से ही गीला-सूखा कचरा अलग-अलग उठाया जा रहा है। क्योंकि निजी कलेक्टरों के पास अलग गाड़ी नहीं है। दूसरा, हेल्थ बॉच के अधिकारी कभी

मोहल्लों में जाकर जागरूकता नहीं फैलाते। 8.5 करोड़ की लागत से खरीदे गए 350 ई-रिक्शा गाबन हैं। घरों से मिला कचरा एक ही ढांगू में डीपिंग पॉइंट पर डाला जा रहा है। यह कारण रैंकिंग में भारी गिरावट की वजह बना।
छाह-4: वॉटर बॉडीज की सफाई में भारी गिरावट... पिछले साल लुधियाना की वॉटर बॉडीज की सफाई में 100% अंक मिले थे। लेकिन इस बार केवल 50% ही मिल पाए। युजु दरवाजा पर 650 करोड़ और सिखां नहर पर 6.20 करोड़ खर्च होने के बावजूद इनकी हालत खराब है। फेसिंग के बावजूद नालियों और नहरों में कचरा डंग हो रहा है। गंदगी की वजह से रैंकिंग में बड़ी गिरावट आई है।
छाह-5: पब्लिक टॉयलेट्स की बहाली पिछले साल लुधियाना को 73% अंक मिले थे, इस बार केवल 53%। स्मार्ट सिटी मिशन के तहत स्मार्ट टॉयलेट्स लगाए गए, लेकिन इनकी सफाई नहीं हो रही। कई टॉयलेट्स गोपीय बसकर रह गए हैं। कुछ पर ताले लगे हैं, कुछ बुरी हालत में हैं। रूएल टटार कैंटीनरी नहीं हुई है। सफाई के लिए कोई योजना नहीं बनाई गई।

अगर कहीं अफसर जिम्मेदार, ये लंबे समय से पदों पर जमे हैं... रैंकिंग गिरने के लिए सीधे तौर पर नियम के अधिकारी जिम्मेदार हैं। पिछले साल के मुकामले रैंकिंग का गिरना एक गंभीर संकेत है, और इसके लिए जिम्मेदारी तब की जाएगी। खास तौर पर हेल्थ बॉच में बड़े बदलाव किए जाएंगे। मुझे पता है कि कुछ अधिकारी पिछले लंबे समय से बड़े पदों पर जमे हैं, लेकिन शहर को बेहतरी के लिए उनका योगदान न के बराबर है। अब हम पूरी गंभीरता से सुधार की दिशा में आगे बढ़ रहे हैं। जहां-जहां कर्मियों रह गई हैं, उन्हें ठीक किया जाएगा।

April 28, 2025

The Executive Engineer cum Canal Officer
Sidhwan Canal Division,
Sirhind Canal Complex,
Urban Estate, Dugri
Ludhiana



Subject:

- i. Dumping of garbage in Sidhwan Canal on daily basis from Gill Bridge to Lohara Bridge (towards Shimlapuri/Janta Nagar Side Bank) due to missing Chain Link along Sidhwan Canal as well as from Dugri Bridge as well as Gill Bridge due to missing fence on both sides – area coming under Municipal Corporation Ludhiana resulting in continuous contamination of Canal Water.
- ii. Non-compliance of orders dated 20-02-2023 (Kuldeep Singh Khaira & ors. vs. State of Punjab & ors. in O.A. 861 of 2022) of NGT by Irrigation department by failing to demarcate and notify "No Development Zone" on both sides of Sidhwan Canal.
- iii. Encroachment along Sidhwan Canal near Gill Bridge by migrant labours by dumping their waste along Sidhwan Canal & open illegal fish market along Sidhwan Canal on every day in the evening hour – remains/waste of fish being discharged into Sidhwan Canal

Reference:

- i. Kuldeep Singh Khaira & ors. vs. State of Punjab & ors. in O.A. 861 of 2022
- ii. Notification dated 18-10-2018 issued by Department of Town & Country Planning pertaining to Zoning Regulations and Development Controls for Green Buffer Zone along Major & Minor Canals in Punjab.

Sir,

The undersigned complainant is Applicant No. 1 in O.A. 861 of 2022 (Kuldeep Singh Khaira & ors. vs. State of Punjab & ors.) in matter pertaining to contamination of Surface Water (Sidhwan Canal) due to garbage laying on bed of Sidhwan Canal with plea of removal of same and to prevent further damage to water-body for directions to MCL to fix Chain Link along Sidhwan Canal within MC limits of Ludhiana etc.. Besides matter raised & various submissions given by the Applicants in O.A. 861 of 2022 before Hon'ble Principal Bench of National Green Tribunal, the undersigned complainant wish to inform you as under:

Form-1
ID HRC RC
MO ACP Steno
Exec. Engr. Canal & Ground Water Div.
Ludhiana

1. That the Municipal Corporation Ludhiana has submitted before Hon'ble NGT that the work of Chain Link has been completed along Sidhwan Canal within MC limits of Ludhiana whereas no Chain Link has been installed/fixed from Gill Bridge to Lohara Bridge towards Shimlapuri Side Bank. It is well known fact that this stretch is most critical point as maximum garbage is dumped by nearby residents on daily basis, however, MCL has deliberately mentioned the wrong facts before Hon'ble Tribunal. Due to this missing Chain Link, the canal water is being contaminated on daily basis. Therefore, you are requested to impose Environmental Compensation on MCL as per Polluters Pay Principle and initiate proceedings against Municipal Commissioner of Ludhiana under the provisions of Waater Act of 1974.

2. That the Hon'ble Tribunal vide orders dated 20-02-2023 was pleased to direct your office to demarcate and notify "No Development Zone" on both sides of Sidhwan Canal. However, no such demarcation has been done by your office due to which the encroachment near Ishar Singh Nagar Bridge have not been removed till date. Further, a new project in the name of "Morgan Crossing" at GPS location (30.844586, 75.883798) is being developed within 30 meter of canal and such act is being done in active connivance of MCL. Further, there is major encroachment near Gill Bridge (30.867819, 75.857171) and illegal Market is run on daily basis during evening hours at this location resulting into contamination of Sidhwan canal water due to flush being dumped on daily basis by these encroachers.

3. That as per notification dated 18-10-2018 pertaining to Zoning Regulations and Development Controls for Master Plans in the State of Punjab issued by the Department of Town & Country Planning, Housing and Urban Development, Punjab, it is crystal clearly mention at Clause No. 2.5 of Annexure "A" as under:

2.5 ENVIRONMENTAL CONSIDERATIONS

Minimum 5 meters wide green strips on each side of minor water bodies / drains shall be maintained on the portion falling within the existing municipal limits and 10 meters on the portion falling outside the existing municipal limits. Other major water bodies like rivers/major canals, etc. shall have minimum 30 meters green strips on each side in the portion falling within as well as outside existing municipal limits. Realignment of water bodies shall be permissible wherever feasible, subject to the certification by the Drainage/Engineering Department to ensure free flow of stormwater. After any such realignment, the river mouth, the river bed and the green strip/buffer on either side shall be maintained at least to the minimum prescribed level. In these green strips, golf course, sports and recreational activities shall be permissible, with 2% ground coverage for construction of offices, booths serving snacks/milk booths, library etc.

Keeping in view of the above produced facts, you are requested to physically inspect the stretch from GPS location 30.867819, 75.857171 to 30.844586, 75.883798 and demarcate & notify the No Development Zone as directed by Hon'ble Tribunal and Notification dated 18-10-2018 (supra). You are further requested to issue directions to MCL to install Missing Chain Link along entire stretch of Sidhwan Canal as well as on both sides of bridges within MC limits of Ludhiana to prevent further dumping of garbage in Sidhwan Canal & fore removal of all types of encroachments within No Development Zone of Sidhwan Canal. You are also requested to take action against MCL under the provisions of Water Act of 1974 as well as Polluters Pay Principle.

Hope for immediate action.

Regards



Kuldeep Singh Khaira

(Applicant No. 1 in O.A. 861 of 2022)

#125, Ishar Nagar,

Ludhiana

Mobile: 9855544433

TRANSLATION OF PUNJABI INTO ENGLISH

ਜਲ ਸਰੋਤ ਵਿਭਾਗ, ਪੰਜਾਬ

Office of Executive Engineer Ludhiana Canal & Ground Water Division WRD, Ludhiana
ਦਫਤਰ ਕਾਰਜਕਾਰੀ ਇੰਜੀਨੀਅਰ, ਲੁਧਿਆਣਾ ਨਹਿਰ ਅਤੇ ਗਰਾਊਂਡ ਵਾਟਰ ਮੰਡਲ ਜਲ ਸਰੋਤ ਵਿਭਾਗ, ਲੁਧਿਆਣਾ

ਫੋਨ ਨੰਬਰ 0161-2520132

ਈ.ਮੇਲ.ਆਈ. ਡੀ.xensidhwancanal@gmail.com

ਨੰਬਰ 3624-25/ਐਨ.ਜੀ.ਟੀ.

ਮਿਤੀ 15/5/25

To

Assistant Commisisoner
Municipal Corporation
Ludhiana

- ਵਿਸ਼ਾ:-
- Dumping of garbage in Sidhwan Canal on daily basis from Gill Bridge to Lohara Bridge (towards Shimlapuri/Janta Nagar Side Bank) due to missing Chain Link along Sidhwan Canal as well as from Dugri Bridge as well as Gill Bridge due to missing fence on both sides area coming under Municipal Corporation Ludhiana resulting in continuous contamination of Canal Water.
 - Non-compliance of orders dated 20-02-2023 (Kuldeep Singh Khaira & ors. vs. State of Punjab & ors. in O.A. 861 of 2022) of NGT by Irrigation department by failing to demarcate and notify "No Development Zone" on both sides of Sidhwan Canal.
 - Encroachment along Sidhwan Canal near Gill Bridge by migrant labours by dumping their waste along Sidhwan Canal & open illegal fish market along Sidhwan Canal on every day in the evening hour remains/waste of fish being discharged into Sidhwan Canal

A letter has been received from Sh. Kuldeep Singh Khaira, member Public Action Committee, Ludhiana regarding the subject matter, vide which he has written regarding O.A. 861 of 2022. It is mentioned in the letter than there is no Chain Link at this location. This comes under your jurisdiction. So chain link may be installed after considering it at your end.

The copy of letter is being send to you to take action in this regard and inform the Applicant directly and information be sent to this office too.

Attachment/ as above

-Sd-

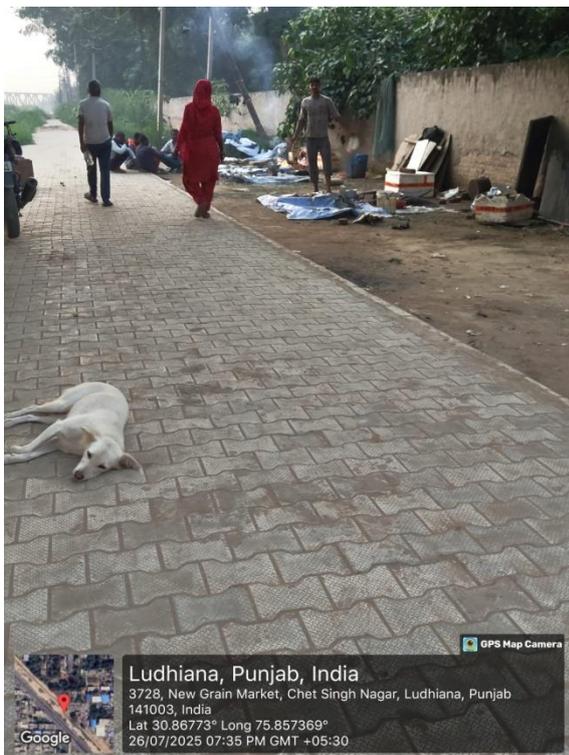
Executive Engineer
Ludhiana Canal & Ground Water Division
Water Resources Department, Ludhiana

Copy:-

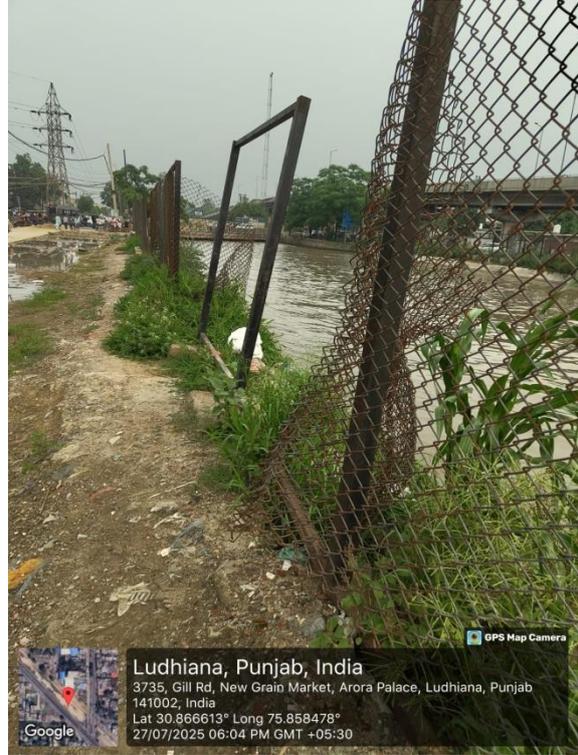
Sh. Kuldeep Singh Khaira s/o Sh. Ujagar Singh, r/o H. No. 125, Ishar Nagar, Ludhiana – for information

ANNEXURE P-14

PRESENT STATUS OF SO CALLED GREENBELT DEVELOPED BY MCL – IMPUGNED AREA STILL ENCROACHED UPON BY MIGRANTS – RUNNING ILLEGAL FISH MARKET AND DUMPING GARBAGE ALONG SIDHWAN CANAL







ANNEXURE P-15

PRESENT CONDITION OF BANK OF SIDHWAN CANAL AT MISSING CHAIN LINK STRETCH

I.E. MOST CRITICAL STRETCH WHERE MAXIMUM GARBAGE IS THROWN IN THE CANAL DUE TO IMPROPER COLLECTION OF GARBAGE BY MCL THROUGH INFORMAL SECTOR



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH AT NEW DELHI

(In O.A No. 861 of 2022)

IN THE MATTER OF:

KULDEEP SINGH KHAIRA & ORS.

-APPLICANTS

VERSUS

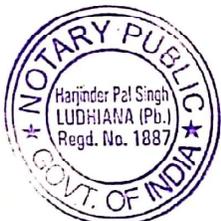
STATE OF PUNJAB & ORS

RESPONDENTS

AFFIDAVIT

I, Kapil Dev (aged 49 years) s/o Sh. Jagdish Chander, r/o 186-E, B.R.S. Nagar, Ludhiana do hereby Solemnly affirm and declare as under:

- 1. That I am one of the Applicants in the Original Application No. 861 of 2022.
- 2. That I am fully conversant with the present case and competent to swear to this affidavit.
- 3. That I have read the accompanying the Rejoinder from paragraphs 1 to 10 from pages 1 to 8 and have understood the contents thereof. The facts stated there in are true and correct to the best of my knowledge and nothing has been concealed there from.
- 4. That the Annexures are true copy of it' originals.



1748

28-07-2025

Certified that the affidavit S.P.A.No. 861 has been readover & explained to the deponent executant who seemed to understand same at the making thereof

VERIFICATION

Verified at Ludhiana on this 28th day of July 2025, I the above-named deponent, do hereby verify that the contents of the above affidavit are true and correct. No part of it is false and nothing material has been concealed there from.

[Handwritten Signature]
DEPONENT

[Handwritten Signature]
DEPONENT

I know the Deponent/Executants personally and he/she has Signed/Thumb impression in my presence

ATTESTED AS IDENTIFIED

28-07-2025

NOTARY PUBLIC LUDHIANA (PB)

28 JUL 2025

295



Kapil Arora <aroraengineers@gmail.com>

Service of documents - Rejoinder in O.A. 861 of 2022

Arora Engineers <aroraengineers@gmail.com>Mon, Jul 28, 2025 at 10:49
AM

To: Naginder Benipal <naginder.benipal@gmail.com>, commissionerml@gmail.com,
cs@punjab.gov.in, dc.ldh@punjab.gov.in, chairman.ptl.ppcb@punjab.gov.in, Xen
SidhwanCanal <xensidhwancanal@gmail.com>, ceeldh.ppcb@punjab.gov.in,
ceeludhiana@yahoo.com, gladaldh@yahoo.com

Dear sir

PFA copy of rejoinder dated 28-07-2025 in O.A. 861 of 2022 as service of documents.

Regards

Er. Kapil Dev
Petitioner No. 2
in O.A. 861 of 2022
Mob. 98720-07872,

**Rejoinder dated 28-07-2025 in OA 861 of 2022.pdf**
5801K