

In the Honble National Green Tribunal, Principle Bench, New Delhi

*OA No. 50/2024*

*Amandeep Kamboj Vs. State of Haryana & Ors*

**AMANDEEP KAMBOJ**

...

**APPLICANT**

**VERSUS**

**STATE OF HARYANA & ORS.**

...

**RESPONDENT**

**INDEX PAGE**

Sr.No.	Particular	Dated	Pages
1	Reply of Executive Officer Municipal Council, Sirsa	30/08/2024	2-5
2	Annexure R/1 --Agreement of RDF	30/01/2024	6-8
3	Annexure R/2 --Agreement of Soil Enriched Material/ Manure	31/01/2024	9-10
4	Annexure R/3--Certificates of RDF Collected	01/11/2023 & 01/05/2024	11-14

Place:- Sirsa

Dated: 30/08/2024

**BEFORE HON'BLE NATIONAL GREEN TRIBUNAL**

**PRINCIPAL BENCH, NEW DELHI**

**OA No. 50 of 2024**

**IN THE MATTER OF:**

**AMANDEEP KAMBOJ**

**...**

**APPLICANT**

**VERSUS**

**STATE OF HARYANA & ORS.**

**...**

**RESPONDENT**

**ADDITIONAL REPLY ON BEHALF OF MUNICIPAL  
CORPORATION, SIRSA**

**MOST RESPECTFULLY SHOWETH:**

1. That answering respondent has filed its reply dated 14.05.2024 contents of which are not being repeated herein for the sake of brevity.
2. By way of present additional reply, updated information is sought to be place on record regarding complete Door to Door Collection, Transportation, Processing & Disposal of the waste.
3. The area of collection is divided into two zones, Zone 1 & Zone 2. Zone -1 comprises of Sirsa ULB, Ellenabad ULB and Rania ULB. Zone 2 comprises of Mandi Dobwali ULB and Kalanwali ULB. In the present case the applicant has raised concerns regarding the sirsa city only and the answering respondent is responding towards the same only. The undersigned reserves its rights to file addition documents and submission with this permission of this Hon'ble Tribunal at the later stage during the pendency of the present original application.

4. That Door to Door collection has been started by Pooja Waste Management from 10/08/2023. Collection in the city is being done by Pooja Waste Management (Agency) through LCV's (Light Commercial Vehicles). Tata Ace=35, Tractor Trolley=09, Rickshaw Rehdi=07 against household of 43,420. Daily waste generation in Sirsa city is 120 TPD to 125 TPD. Overall Processing Capacity of Plant is 500 TPD (appx.) as given in the reports submitted by agency. Further agency has developed a Toll free no. i.e. 18002085654 for receiving the door to door complaints.

5. Transportation of waste from secondary points to Bakerinywali processing plant is done with the help of Tractor Trolleys and Big HYVA's. The weight of Solid Waste weighed at weigh machine available at plant and weigh slips are duly verified by sanitation branch.

6. Processing at Bakerinywali plant is done with help of trommel machines, manual labour available at plant on daily basis. Further the dry by products such as paper, cardboard, metal, clothes, plastic etc are stored at MRF facility available at site and from there it is being transported /sold by company at its own level.

7. Disposal of By Products such as paper, cardboard, metal, clothes, plastic stored at MRF facility is being done by company at its own level through Rag pickers. For picking the RDF Pooja waste management (Agency) has agreement with Earth Enviro Wastocare. **Annexure R-1.** Further two certificate has been submitted by the company for RDF disposal through Earth Enviro Wastocare dated 01/10/2023 & 01/05/2024 **Annexure R-2.** For Soil enriched Material agency has agreement with MD Biocoals Pvt Ltd. **Annexure R-3**

8. All the processes from collection to disposal is being done by the agency but following observations are also need to be improved:-

Although agency have agreement for RDF and is being disposed off through Earth Enviro Wastocare but work efficiency has to be improved because as per the physical verification of Bakerinywali Plant Sirsa by ULB officers time to time, we found that RDF recovered from waste is stored at site in huge quantity for that 20 % amount from each bill of agency is withheld from August 2023 to till bill of June 2024. appx. Amount 2.06 Crore.

As per the shortcomings found at various levels of agency in Door to Door work, the answering respondent have charged penalty and total penalty from 10 August 2023 till 30 June 2024 is Rs 16,15,500/-

Sr. No.	Name of Municipality	Penalty	Amount Withheld	TDS	Withheld amount release
1	10-08-23 to 16-09-2023	207900	800000	111189	0
2	17-09-23 to 31-10-2023	179100	800000	210342	0
5	Nov 2023	95900	300000	180097	0
6	Dec 2023	191000	1711731	187173	1520000
7	Jan 2024	182000	1682614	171696	0
8	Feb 2024	144000	1646250	161745	0
9	March 2024	172600	1702547	166803	0
10	April 2024	117000	1784173	178394	0
11	May 2024	163000	1761734	179769	0
12	June 2024	163000	8473748	172932	0
	Total	1615500	20662797	1720140	1520000

In view of the submissions made herein above, it is prayed that present additional reply may be kindly taken on record.

  
 Executive Officer  
 Municipal Council, Sirsa

Date: 30.08.2024

Place: Sirsa

Non Judicial	 <b>Indian-Non Judicial Stamp Haryana Government</b> 		Date : 30/01/2024
Certificate No.	T0302024A424		Stamp Duty Paid : ₹ 101 <small>(Rs. One Hundred)</small>
GRN No.	112357235		Penalty : ₹ 0 <small>(Rs. Zero Only)</small>
<b>Seller / First Party Detail</b>			
Name :	Earth Enviro Wastocare		
H.No/Floor :	12	Sector/Ward :	X
City/Village :	Surat	District :	Surat
Phone :	99*****63	LandMark :	Xama society a k road nr dharam ng
		State :	Gujarat
<b>Buyer / Second Party Detail</b>			
Name :	Pooja Waste management Private limited		
H.No/Floor :	91sp	Sector/Ward :	4
City/Village :	Rohtak	District :	Rohtak
Phone :	98*****36	LandMark :	X
		State :	Haryana
Purpose :	FOR AGREEMENT		

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### **RDF SUPPLY AGREEMENT**

This Agreement ("Agreement") is entered into on 30<sup>th</sup> January 2024 but to be effective from 1st October, 2023 between the following parties:

Party A: Earth Enviro Wastocare a registered Partnership Firm incorporated under the provision of Indian Partnership Act-1932 having its registered office at 12, Xama Society, A.K Road NR DHARAM NAGAR SURAT GUJRAAT 395008 (hereinafter referred to as the "Purchaser")

Party B: Pooja Waste Management Private Limited. incorporated under the provision of Company Act-2013, having its registered address 91 SP, Sector-4 Rohtak, Haryana 124001(hereinafter referred to as the "Supplier")

WHEREAS, the Parties have engaged in discussions concerning the disposal of Combustible Material, specifically Refuse-Derived Fuel (RDF), supplied by Pooja Waste Management Private Limited.;

NOW, THEREFORE, the Parties hereby agree to the following terms and conditions ("T & C") governing the supply of RDF:

Scope of Agreement:

**i. Earth Enviro Wastocare's Responsibilities:**

Earth Enviro Wastocare shall dispose of the RDF material in accordance with the prevailing SWM Rules, 2016.

**ii. Purchase Commitment:**

Earth Enviro Wastocare agrees to purchase RDF from the Supplier throughout the year, as per their mutual understanding.

**iii. Disposal Location:**

Earth Enviro Wastocare shall be responsible for disposing of the RDF at their designated locations in Rajkot, Gujarat.

**iv. Co-processing Certificate:**

Earth Enviro Wastocare shall provide co-processing certificates as required.

**v. Cost of RDF:**

The cost of RDF supplied by Pooja Waste Management Private Limited. shall be zero (INR ZERO) throughout the duration of this Agreement.

**vi. No Claims:**

No claims shall be entertained against the supply of RDF.

**vii. Rejection Decision:**

The decision to accept or reject RDF shall be at the sole discretion of Earth Enviro Wastocare, and no claims shall be entertained against any rejection.

**viii. Dispute Resolution:**

In the event of a dispute, the applicable law shall be that of Rajkot, Gujarat.

**ix). Supply Duration:**

This sale/supply order shall remain valid for a period of 12 months (365 days in the English calendar) from the date of signing this Agreement.

IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as of the Effective Date i.e. 01<sup>st</sup> October, 2023.

**Earth Enviro Wastocare**



**Authorized Signatory**

**Pooja Waste Management Private Limited**

For Pooja Waste Management Pvt. Ltd.

*M. J. Nair*  
Director

**Authorized Signatory**

Non Judicial	 <b>Indian-Non Judicial Stamp Haryana Government</b> 		Date : 31/01/2024
Certificate No.	U0312024A185		Stamp Duty Paid : ₹ 101
GRN No.	112376929		Penalty : ₹ 0
<b>Seller / First Party Detail</b>			
Name:	Pooja Waste management Private limited		
H.No/Floor :	91sp	Sector/Ward : 4	LandMark : X
City/Village :	Rohtak	District : Rohtak	State : Haryana
Phone:	98*****00		
<b>Buyer / Second Party Detail</b>			
Name :	Md Biocoals Pvt ltd		
H.No/Floor :	0	Sector/Ward : 0	LandMark : Sahidanwali salarpur road
City/Village:	Salarpur	District : Sirsa	State : Haryana
Phone :	94*****74		
Purpose : FOR AGREEMENT			

The authenticity of this document can be verified by scanning this QRCode Through smart phone or on the website <https://egrashy.nic.in>

### **MANURE/SOIL ENRICH MATERIAL SUPPLY AGREEMENT**

This Agreement ("Agreement") is entered into on 31<sup>st</sup> January 2024 but to be effective from 1st October, 2023 between the following parties:

Party A: MD BIOCOALS PVT LTD a registered Partnership Firm incorporated under the provision of Indian Partnership Act-1932 having its registered office at Village Salarpur, Mohammadpur Salarpur, Sahidanwali, Salarpur, Sirsa-125075 (hereinafter referred to as the "Purchaser")

Party B: Pooja Waste Management Private Limited. incorporated under the provision of Company Act-2013, having its registered address 91 SP, Sector-4 Rohtak, Haryana 124001(hereinafter referred to as the "Supplier")

WHEREAS, the Parties have engaged in discussions concerning the disposal of Soil Enriched Material , supplied by Pooja Waste Management Private Limited.;

NOW, THEREFORE, the Parties hereby agree to the following terms and conditions ("T & C") governing the supply of RDF:

Scope of Agreement:

**i. MD Biocoals Pvt. Ltd. Responsibilities:**

MD Biocoals Pvt. Ltd shall dispose of the Soil Enrich Material in accordance with the prevailing SWM Rules, 2016.

**ii. Purchase Commitment:**

MD Biocoals Pvt. Ltd agrees to purchase soil enrich material from the supplier throughout the year, as per their mutual understanding.

**iii. Disposal Location:**

MD Biocoals Pvt. Ltd shall be responsible for use/ selling/ consumption of soil enrich material after picking it from Bakerinywali Plant Sirsa.

**iv. Cost of Soil Enrich Material :**

The Pooja Waste Management Private Limited will charge 300Rs /MT cost from MD Biocoals Pvt. Ltd for supplying Soil Enrich Material supplied throughout the duration of this Agreement.

**v). Supply Duration:**

This sale/supply order shall remain valid for a period of 12 months (365 days in the English calendar) from the date of signing this Agreement.

IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as of the Effective Date i.e. 01<sup>st</sup> October, 2023.

MD BIOCOALS PVT. LTD

Pooja Waste Management Private Limited



Authorized Signatory

For Pooja Waste Management Pvt. Ltd.

A handwritten signature in blue ink, appearing to read "M. Y. ...", with the word "Director" written below it.

Authorized Signatory



## RECYCLING CERTIFICATE

Certificate No. EEWC/2023-24/1510

Date: 01/11/2023

This is to certify that we have received the following quantities of 711.62 MT of Post Consumer RDF Plastic Packaging from POOJA WASTE MANAGEMENT PRIVATE LIMITED from DUMPING SITE Sirsa Bakriwali. During the period 01-10-2023 to 31-10-2023. We are a SPCB registered recycler with PWM registration no PR-23-GUJ-09- AAHFE2845A-22. We certify that the above mentioned material is in our secure custody at our Sr. No. 163/P, KSD Garbage Station, Nr. Aji Dam Chowkdi, By Pass Road, Tal: Lodhika, Dist: Rajkot, Gujarat – 360003 facility and the same will be recycled within 90 days as per SPCB norms under Plastic Waste Management Rules, 2016.

We further certify that the following mentioned quantity has not been accounted for /billed

Details of RDF received are as follows:

Sr. No.	Receipt Date	Vehicle No.	Challan/ LR No.	Types of Fuels	Qty. MT	Collection State	City
1	01/10/2023	HR67F0075	1111	RDF	22.21	HARYANA	SIRSA
2	02/10/2023	HR69C3459	1112	RDF	23.52	HARYANA	SIRSA
3	03/10/2023	HR45A9930	1113	RDF	21.76	HARYANA	SIRSA
4	04/10/2023	HR69B6353	1114	RDF	22.48	HARYANA	SIRSA
5	05/10/2023	HR67C1002	1115	RDF	23.37	HARYANA	SIRSA
6	06/10/2023	HR67B1945	1116	RDF	24.99	HARYANA	SIRSA
7	07/10/2023	HR67B8887	1117	RDF	23.80	HARYANA	SIRSA
8	08/10/2023	HR67B3567	1118	RDF	23.30	HARYANA	SIRSA
9	09/10/2023	HR67A6191	1119	RDF	23.01	HARYANA	SIRSA
10	10/10/2023	HR67A6192	1120	RDF	22.30	HARYANA	SIRSA
	11/10/2023	PB11CU6873	1121	RDF	21.91	HARYANA	SIRSA
	12/10/2023	PB65BB9392	1122	RDF	21.74	HARYANA	SIRSA



### Reg. Office:

12, Kshama Society, Nr. Dharamnagar,  
A.K.Road, Surat – 395008, Gujarat  
Mobile: +91 93744 28028

### Earth Enviro WastoCare

website: [www.zerowastebharat.com](http://www.zerowastebharat.com)  
email: [info@zerowastebharat.com](mailto:info@zerowastebharat.com)

### Recycling Centre

Rajyadhar Garbage Station,  
KSD Garbage Station,  
Rajkot (Gujarat)



13	13/10/2023	HR67C9171	1123	RDF	24.36	HARYANA	SIRSA
14	14/10/2023	HR67C1177	1124	RDF	21.09	HARYANA	SIRSA
15	15/10/2023	HR67B5433	1125	RDF	22.50	HARYANA	SIRSA
16	16/10/2023	HR67B4421	1126	RDF	22.62	HARYANA	SIRSA
17	17/10/2023	HR67B5710	1127	RDF	23.66	HARYANA	SIRSA
18	18/10/2023	HR67B4673	1128	RDF	21.23	HARYANA	SIRSA
19	19/10/2023	PB05AB9213	1129	RDF	22.55	HARYANA	SIRSA
20	20/10/2023	HR46E6978	1130	RDF	22.25	HARYANA	SIRSA
21	21/10/2023	HR46D5479	1131	RDF	23.30	HARYANA	SIRSA
22	22/10/2023	HR46F2332	1132	RDF	21.32	HARYANA	SIRSA
23	23/10/2023	HR46F0817	1133	RDF	24.11	HARYANA	SIRSA
24	24/10/2023	HR69E7069	1134	RDF	23.46	HARYANA	SIRSA
25	25/10/2023	HR46D6013	1135	RDF	24.79	HARYANA	SIRSA
26	26/10/2023	HR39D4361	1136	RDF	22.56	HARYANA	SIRSA
27	27/10/2023	HR67C6674	1137	RDF	23.75	HARYANA	SIRSA
28	28/10/2023	HR67B0507	1138	RDF	24.00	HARYANA	SIRSA
29	29/10/2023	PB65BB9392	1139	RDF	22.12	HARYANA	SIRSA
30	30/10/2023	HR45A9930	1140	RDF	23.22	HARYANA	SIRSA
31	31/10/2023	HR67C1002	1141	RDF	24.34	HARYANA	SIRSA

FOR,  
EARTH ENVIRO WASTECARE  
(UNIT - RAJESH WORKS)

AUTHORIZED SIGNATORY  
(RAJESH)

DATE :- 01/11/2023

### Reg. Office:

12, Kshama Society, Nr. Dharamnagar,  
A.K.Road, Surat - 395008, Gujarat  
Mobile: +91 93744 28028

### Earth Enviro WastoCare

website: [www.zerowastebharat.com](http://www.zerowastebharat.com)  
email: [info@zerowastebharat.com](mailto:info@zerowastebharat.com)

### Recycling Centre

Raiyadhar Garbage Station,  
KSD Garbage Station,  
Rajkot (Gujarat)



## RECYCLING CERTIFICATE

Certificate No. EEWC/2024-25/07

Date: 01/05/2024

This is to certify that we have received the following quantities of 1028 MT of Post Consumer RDF Plastic Packaging from Pooja Waste Management Private Limited from Dumping Site Sirsa Bakriwali. During the period 01-01-2024 to 30-04-2024. We are a SPCB registered recycler with PWM registration no PR-23-GUJ-09-AAHFE2845A-22. We certify that the abovementioned material is in our secure custody at our Sr. No. 163/P, KSD Garbage Station, Nr. Aji Dam Chowkdi, By Pass Road, Tal: Lodhika, Dist: Rajkot, Gujarat – 360003 facility and the same will be recycled within 90 days as per SPCB norms under Plastic Waste Management Rules, 2016.

We further certify that the following mentioned quantity has not been accounted for /billed

Details of RDF received are as follows:

Sr. No.	Receipt Date	Vehicle No.	Challan/LR No.	Types of Fuels	Qty. MT	Collection State	City
1	01-01-2024	HR39D4361	1142	RDF	24.06	HARYANA	SIRSA
2	05-01-2024	HR45A9930	1143	RDF	24.72	HARYANA	SIRSA
3	12-01-2024	HR46D5479	1144	RDF	24.8	HARYANA	SIRSA
4	20-01-2024	HR46D6013	1145	RDF	26.29	HARYANA	SIRSA
5	31-01-2024	HR46E6978	1146	RDF	23.75	HARYANA	SIRSA
6	05-02-2024	HR46F0817	1147	RDF	25.61	HARYANA	SIRSA
7	10-02-2024	HR46F2332	1148	RDF	22.82	HARYANA	SIRSA
8	15-02-2024	HR67A6191	1149	RDF	24.51	HARYANA	SIRSA
9	17-02-2024	HR67A6192	1150	RDF	23.8	HARYANA	SIRSA
10	20-02-2024	HR67B0507	1151	RDF	25.5	HARYANA	SIRSA
11	25-02-2024	HR67B1945	1152	RDF	26.49	HARYANA	SIRSA
12	28-02-2024	HR67B3567	1153	RDF	24.8	HARYANA	SIRSA
13	01-03-2024	HR67B4421	1154	RDF	24.12	HARYANA	SIRSA
14	05-03-2024	HR67B4673	1155	RDF	22.73	HARYANA	SIRSA
15	10-03-2024	HR67B5433	1156	RDF	23.75	HARYANA	SIRSA
16	18-03-2024	HR67B5710	1157	RDF	25.16	HARYANA	SIRSA
17	25-03-2024	HR67B8887	1158	RDF	25.3	HARYANA	SIRSA
18	26-03-2024	HR67C1002	1159	RDF	25.84	HARYANA	SIRSA

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### Earth Enviro WastoCare

website: [www.zerowastebharat.com](http://www.zerowastebharat.com)  
email: [info@zerowastebharat.com](mailto:info@zerowastebharat.com)

### Recycling Centre

Raiyadhar Garbage Station,  
KSD Garbage Station,  
Rajkot (Gujarat)



19	27-03-2024	HR67C1177	1160	RDF	22.59	HARYANA	SIRSA
20	29-03-2024	HR67C6674	1161	RDF	25.25	HARYANA	SIRSA
21	30-03-2024	HR67C9171	1162	RDF	25.86	HARYANA	SIRSA
22	31-03-2024	HR67F0075	1163	RDF	23.71	HARYANA	SIRSA
23	01-04-2024	HR69B6353	1164	RDF	23.98	HARYANA	SIRSA
24	02-04-2024	HR69C3459	1165	RDF	25.02	HARYANA	SIRSA
25	10-04-2024	HR69E7069	1166	RDF	24.96	HARYANA	SIRSA
26	11-04-2024	PB05AB9213	1167	RDF	24.05	HARYANA	SIRSA
27	12-04-2024	PB11CU6873	1168	RDF	23.41	HARYANA	SIRSA
28	13-04-2024	PB65BB9392	1169	RDF	23.62	HARYANA	SIRSA
29	14-04-2024	HR39D4361	1170	RDF	24.35	HARYANA	SIRSA
30	15-04-2024	HR46D5479	1171	RDF	25.32	HARYANA	SIRSA
31	16-04-2024	HR46F0817	1172	RDF	25.35	HARYANA	SIRSA
32	17-04-2024	HR67A6191	1173	RDF	24.56	HARYANA	SIRSA
33	20-04-2024	HR67B1945	1174	RDF	25.25	HARYANA	SIRSA
34	20-04-2024	HR67B3567	1175	RDF	24.28	HARYANA	SIRSA
35	20-04-2024	HR45A9930	1176	RDF	24.25	HARYANA	SIRSA
36	21-04-2024	HR46D6013	1177	RDF	23.49	HARYANA	SIRSA
37	22-04-2024	HR46E6978	1178	RDF	24.25	HARYANA	SIRSA
38	25-04-2024	HR46F2332	1179	RDF	24.13	HARYANA	SIRSA
39	26-04-2024	HR67A6192	1180	RDF	25.02	HARYANA	SIRSA
40	28-04-2024	HR67B0507	1181	RDF	23.85	HARYANA	SIRSA
41	29-04-2024	HR67B4421	1182	RDF	23.95	HARYANA	SIRSA
42	30-04-2024	HR67B8887	1183	RDF	23.45	HARYANA	SIRSA

FOR,  
EARTH ENVIRO WASTECARE  
(UNIT : 2 RAJKOT WORKS)



AUTHORISED SIGNATORY  
(RAJESHBHAI)  
DATE :- 01/05/2024

**Reg. Office:**

12, Kshama Society, Nr. Dharamnagar,  
A.K.Road, Surat - 395008, Gujarat  
Mobile: +91 93744 28028

**Earth Enviro WastoCare**

website: [www.zerowastebharat.com](http://www.zerowastebharat.com)  
email: [info@zerowastebharat.com](mailto:info@zerowastebharat.com)

**Recycling Centre**

Raiyadhar Garbage Station,  
KSD Garbage Station,  
Rajkot (Gujarat)