

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI – 110001
IN
ORIGINAL APPLICATION NO. 174 OF 2025

IN THE MATTER OF:

RAJEEV SURI

APPLICANT

VERSUS

MUNICIPAL CORPORATION DELHI & ORS.

RESPONDENTS

INDEX

N.D.O.H-27.02.2026

| Sno. | <u>PARTICULARS</u> | Pg. No. |
|-------------|---|----------------|
| 1. | Rejoinder on behalf of Petitioner to Reply Affidavit dated 24.10.2025 filed by Respondent No. 2 GNCTD | 2-5 |

FILED BY:



APPLICANT

PARTY-IN-PERSON

Place: New Delhi

Dated: 24.02.2026

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**REJOINDER AFFIDAVIT BY PETITIONER IN RESPONSE TO REPLY
AFFIDAVIT FILED BY RESPONDENT NO. 2 GOVERNMENT OF DELHI
{GNCTD} DATED 24.10.2025**

I, Rajeev Suri, S/o Late Shri R. L. Suri, aged about 68 years, residing at D-68 Defence Colony, New Delhi-110024, do hereby solemnly affirm and sincerely state as follows:

- A. I state that I am the Petitioner in the above-mentioned Original Application and am competent to depose to the contents of this Affidavit.
- B. I state that I am conversant with the records and facts of the case, and am competent to file this Rejoinder Affidavit in response to the Affidavit filed by the Respondent No.2 GNCTD;
- C. I state that I have read and understood the contents of the Affidavit filed by the Respondent No.2 GNCTD, I deny all the averments made therein which are not consistent with the records of the case and contrary to the facts and grounds stated in the Writ Petition.

D. I state that this Rejoinder Affidavit brings on record, specific rebuttals to the irrelevant material / facts / statements / contentions / averments made by the



Respondent No.2 GNCTD in their Reply Affidavit. I state that nothing in this Rejoinder Affidavit may be deemed to be admitted for want of specific traverse or unless and until the same is specifically admitted hereunder.

A. OBJECTIONS TO RESPONDENT'S REPLY AFFIDAVIT:

1. From the very outset, Respondent No. 2 GNCTD states the matter relating to 22 drains which have been placed under the Irrigation and Flood Control Department GNCTD for purposes of remediation. However, owing to the absence of skill, technology and above all, a singularly lack of interest, IF&CD declined to take up desilting of two covered drains, one being the Kushak Drain in Defence Colony.
2. Pertinently, Respondent GNCTD carves out an ownership conundrum wherein they claim the Defence Colony Drain is not Kushak Drain, which is a complete misrepresentation of facts.
3. To the extent above, the immediate need to remediate the ecological degraded drain was overlooked by all concerned authorities leading to the 2024 flooding disaster.
4. The Reply Affidavit being addressed in this Rejoinder, Respondent GNCTD fails to appreciate that all drains in the geographical area of Delhi are under the ownership of land owing authorities within NCT of Delhi, hence the role of GNCTD is automatically ignited, since the overall management of Delhi falls under the jurisdiction of Delhi Government. Further, planning of the entire drainage system in NCT Delhi is over seen the Delhi Government and by financial and administrative interventions; notably the Drainage Master Plan of Delhi is prepared taking into account the three river basins, is the master document in the drainage planning process, all of which are under the territory of GNCTD.
5. Respondent GNCTD however seems narrowly focused on the 22 drains that have been handed over to I&FCD and seems oblivious of the 18000 kms of drains. There are 1300 drains in Delhi into which thousand small storm drains flow into; most of SWD are carrying untreated wastewater/sewage/ effluents, since 50% of Delhi remains unsewered, and sewerage lines do not exist/ being laid/yet to be laid; discharge polluted wastewater into SWD's.



6. The Respondents Reply Affidavit is a perfunctory response to the Original Application, which fails to appreciate the depth and scope of the Original Application under consideration. Hence Respondent GNCTD attempting to escape responsibility by filing a vague, ineffective Reply that addresses none of the contentions in the OA, is part of the problem of deep neglect of SWD;'s in Delhi.
7. Despite the matter being *a substantial question relating to the environment*, no real concerted attention is being given by the answering Respondent GNCTD to this crisis situation of the SWD's in Delhi; leading to suffering of the people and a loss of lives & property. For this very reason, Respondent GNCTD should have seriously applied their mind while framing their Reply Affidavit given that the Original Application has a vast sweep of contentions and issues raised in the Application
8. Since the Reply Affidavit has no relevance to the Original Application, it is being read as a document of no significance. It is perfunctory, indistinct, nebulous and vague in nature, and their narrow focus gives the impression of that Respondent GNCTD is not on top of the situation to remediate SWD's of NCT Delhi.

B. OBJECTIONS PARA WISE TO RESPONDENT'S REPLY AFFIDAVIT:

- 1) Para 1 of the Reply Affidavit: requires no response.
- 2) Para 2 of the Reply Affidavit: requires no response.
- 3) Para 3 of the Reply Affidavit: Is an incorrect statement and hence is rejected as being without appropriate knowledge.
- 4) Para 4, 5 & 6 of the Reply Affidavit: are a matter of record and require no comments.
- 5) Para 7 of the Reply Affidavit: is incorrect and is rejected outright.




DEPONENT

VERIFICATION

I, the above-named Deponent hereby verify that the contents of this Rejoinder Affidavit to the Reply Affidavit dated 24.10.2025 filed by the Respondent No. 2 GNCTD, is true to my knowledge, based on the records of the case and legal advice which I believe to be true.

Dated: 24.02.2026

Place: New Delhi


DEPONENT

IDENTIFIED BY AADHAAR NO. 3135 2036 8069

I Identify the Executant Deponent who has Signed in my Presence



ATTESTED

NOTARY PUBLIC
DELHI (India)
24 FEB 2026

NOTARY REGISTER ENTRY
SR. No. 2336...DTD. 24/02/2026
TITLE OF DOCUMENT... Affidavit
DOCUMENT CONTAIN... 04...PAGES
NOTARY PUBLIC DELHI GOVT. OF INDIA

Re OA 174/ 2025 Rejoinder Affidavits

1 message

Rajeev Suri <cbms.rajeev@gmail.com>

Tue, Feb 24, 2026 at 3:32 PM

To: "Deeksha.kakar@scladi.com" <Deeksha.kakar@scladi.com>, priyanka swami <advpriyankaswami@gmail.com>, "pujakalra09@gmail.com" <pujakalra09@gmail.com>, secy-mowr@nic.in, jmalawoffices@gmail.com, MoUHA Secretary <secyurban@nic.in>

Bcc: Rajeev Suri <cbms.rajeev@gmail.com>

Hello,

Kindly find attached herewith Rejoinder Affidavits on behalf of the Petitioner, in the matter OA 174/2025 *Rajeev Suri v MCD & Ors*

Next DOH 27.02.2026

Faithfully,

Rajeev Suri
D 68 Defence Colony,
New Delhi 110024
Date: 24.02.2026
M: 9810304580

5 attachments

-  **NGT OA 174 25 REJOINDER to R 1 MCD Reply Affidavit.pdf**
609K
-  **NGT OA 174 2025 REJOIN to Status Report R 2 DPCC.pdf**
239K
-  **NGT OA 174 25 RES 3 DJB reply to Status Report.pdf**
570K
-  **NGT OA174 2025 REJOINDER to R2 GNCTD.pdf**
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