

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 174 OF 2025**

IN THE MATTER OF:

RAJEEV SURI

APPLICANT

VERSUS

MUNICIPAL CORPORATION DELHI & ORS.

RESPONDENTS

S.No.	Particulars	Pg. No.
1.	Rejoinder on behalf of the Petitioner to Status Report by Respondent No.3 / Delhi Jal Board dated 09.12.2025	1-8

Date:23.02.2026

New Delhi



Petitioner – in – Person
D-68, Defence Colony,
New Delhi – 110024
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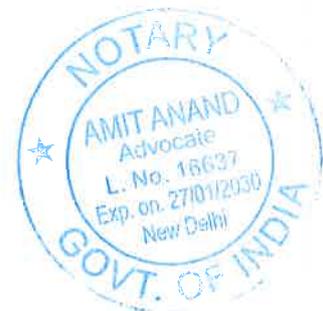
MUNICIPAL CORPORATION DELHI & ORS.

RESPONDENTS

**REJOINDER AFFIDAVIT FILED BY PETITIONER TO STATUS
REPORT BY RESPONDENT NO. 3 DELHI JAL BOARD DATED
09.12.2025**

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 Status Report filed by the Respondent No3 DJB;
- C. I state that I have read and understood the contents of the Status Report filed by the Respondent No. 3 DJB, 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 Original Application.



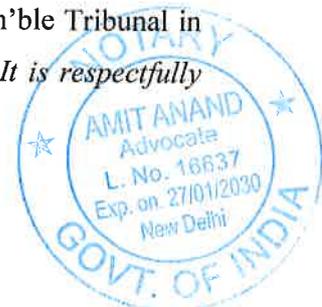
D. I state that this Rejoinder Affidavit brings on record, specific rebuttals to the irrelevant material / facts / statements / contentions / averments made by the Respondent No. 3 in their Status Report under Reply. I state that nothing in this Rejoinder Affidavit may be deemed to be admitted for want of specific traverse or unless and until the same is specifically admitted hereunder.

A. PRELIMINARY OBJECTIONS:

MISPLACED RELIANCE ON DATA PREPARED FOR SUBMISSIONS FOR OTHER PURPOSES / OTHER COURT APPEARANCES AND DOES NOT ADDRESS THE CONTENTIONS AND PRAYERS IN THIS ORIGINAL APPLICATION.

Status Report versus Counter Affidavit

1. Respondent No.3 has preferred addressing their reply as 'Status Report', instead of using the nomenclature 'Counter Affidavit'. There is no gainsaying there is a fundamental difference between a Status Report which is usually requested by the Hon'ble Courts to update the bench on current progress, action or developments regarding a particular matter; whereas a Counter Affidavit is a sworn document that rebuts, denies, contests or accepts the facts laid out in the Petition / Original Application to which the Respondent is replying.
2. The Status Report filed by the stated Respondent therefore is vague, nebulous and indistinct, which doesn't address the critical issues raised in the Original Application. The Status Report appears to be a rehashed/ recycled of material utilized elsewhere and hence is of little to no significance in the present O.A.
3. To explicate the contention raised above, an example Para 14 of their Status Report refers to "*....In compliance of the Hon'ble Tribunal Order, DJB submits a detailed status of its DSTP/SSTP infrastructure plan.....*"; whereas no such compliance has been sought by this Hon'ble Tribunal in this OA. Similarly, para 16 of the Status Report states "*It is respectfully*



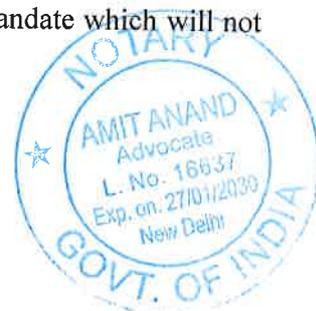
submitted that DJB has diligently complied with the Hon'ble Tribunal's order dated 20.08.20225, and has taken all feasible and time bound measures to prevent the entry of untreated sewage into 43 identified storm water drains.....”.

Besides the unforgivable neglect by Respondent MCD in relation to the Defence Colony drain, they have failed to consider the wide sweep in the Original Application which looks at restoring the health of Storm Water Drains of Delhi. The very fact that Respondent MCD has not addressed the critical aspects of SWD's in Delhi, shows a singular lack of interest, ability and vision on how to manage the SWD's in their jurisdictional boundaries. To this extent, the prayers in OA 174/2025 relating to Respondent MCD are being reproduced herewith, which have not been specifically denied or countered by Respondent MCD, thereby laying the field open to this Hon'ble Tribunal passing orders to implement the prayers in OA 174/2025.

B. OBJECTIONS PARAWISE OF STATUS REPORT

1. Para No.1 & 2 of the Status Report: require no reply being a matter of record.
2. Para No. 3 of the Status Report: is an overweening statement with no facts or evidence to validate the claim, and hence is rejected as vainglorious statement of no significance.
3. Para No.4 of the Status Report: stating DJB has surveyed inflows into Storm Water Drains and 43 locations identified locations given in Annexure-I in the Status Report. While surveys are necessary to establish pathways for the ecological restoration of SWD's, such cherry-picked ad-hoc survey relating to the Barapullah command area is just a placebo which fails to grasp the magnitude of the problem. According to the **Drainage Master Plan 2018**: “Storm drains of various agencies together form complete storm network in Barapullah catchment which is densely populated. A dense conduit network of length 1124.716 km carries the storm water to the outfalls.”

A basin wise survey would be an effective way tackle the magnitude of SW Drain restoration, the survey however has a limited mandate which will not



have a significant bearing, while not relating to the contentions raised in the Original Application.

4. Para Nos.5 & 7 of the Status Report: announces the constitution of a Task Force and a mandate of their duties have been furnished; Para No 7 of the Status Report is a wish list '*initiated preparation of a detailed Action Plan The plan envisages laying of new sewer networks and establishment of DSTP*' is vague and nebulous
5. Para No. 6 of the Status Report: provides minutes first & second meeting of the constituted Task Force held on 3.10.2025 & 17.10.2025, however, specific details of the implementation of the decisions taken have yet to emerge. Further, no linkage of an interplay with the contentions raised in the Original Application and the Minutes has been drawn.
6. Para No.8 the Status Report: is missing in the Status Report.
7. Para No.9 of the Status Report: refers to correspondence with DDA regarding "43 drains"; is a matter of record for Respondent DJB, and is not pertinent to the OA in question, and hence serves no purpose in the Reply Document 'Status Report'.
8. Para No.10 of the Status Report: is an internal matter between Respondent DJB and Respondent DDA, hence serves no purpose in the Reply Document 'Status Report' of Respondent DJB.
9. Para No.11 of the Status Report: refers to '*paragraph 14 of the Hon'ble Tribunal order.....*' alluding to a cut and paste job from some other document placed here which has no relevance or serves purpose as relevant reply to the OA in question, and hence this reply is discarded as gross carelessness in preparing the Reply Document 'Status Report'.
10. Para No.12 of the Status Report: refers to 56 DSTPs; However Respondent DJB's attention is drawn to SECTION III and SECTION IV of the Original Application, which gathers information from the Report "*Progress of River Yamuna; against Action Plans and Timelines*" para numbers 39 to 45 of the OA, wherein report is analysed to be heavily window dressed, which was pointed out by this Hon'ble Tribunal as extracted and placed in para 41 of the Original Application. Consequently, the list appended in Para 12 of the Status Report is meaningless, as in does not reveal land allotment/ award of tender and other critical requirements to monitor progress and timelines. Hence the

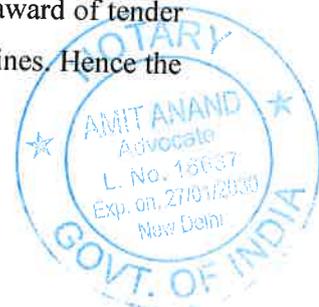
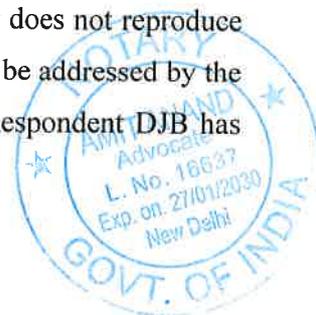


chart appended in para 12 provides no relevant information, and is discarded as valueless information.

11. Para No.12 of the Status Report: is a mere expression of intention with some intent in the future, but nothing actionable in the present, and is best described as bombastic claims, hence is discarded till verifiable documents/ data is provided by Respondent DJB.
12. Para 14 of the Status Report: is Respondent DJB's justification for the inordinate mess of Storm Water Drains, the health and well-being is principally their responsibility, consequently is a matter for them to deal with as an organisation, and hence invites no specific comments.
13. Para 15 of the Status Report: invites no comments
14. Para 16 of the Status Report: invites no comments

C. SCOPE AND DEPTH OF OA 174/2025

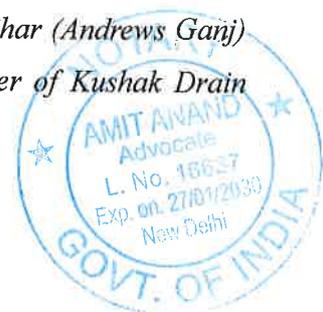
4. A perusal of the Original Application shows the depth and range of issues raised with respect to the Storm Water drains of Delhi. The 'Status Report' conspicuously is absent in addressing these issues; The various dimensions of the OA have been articulated under the following heads
 - I. Supreme Court MA 34792/2024 detailing the various aspects dealing with the travails of Drainage.
 - II. Drainage Master Plan 2018
 - III. Report by R-2 GNCTD February 2025 'Progress in Rejuvenation of River Yamuna; Action Plans & Timelines
 - IV. Report by R-2 GNCTD dt 23.07.2024, 10th Meeting of River Rejuvenation Committee H L C
 - V. Desilting & Remediation of SWD's
 - VI. Legal framework protecting water resources
 - VII. Orders/directions by this Hon'ble Tribunal
 - VIII. Grounds Prayers
5. For the sake of brevity and non necessity this Rejoinder does not reproduce the specific averments made in the OA which needed to be addressed by the Respondent, leading to the undeniable inference that Respondent DJB has



failed to pay heed or attention to the contents of the Original Application. The Status Report of Respondent DJB is inherently flawed as it seems to be addressing a third entity as there are no specific replies/ denials/ rebuttals of the contentions laid out in response to the Original Application under consideration. Hence attention is drawn to the prayers made out in the Original Application extracted and placed below.

D. PRAYERS IN OA 174/2025 RELATING TO RESPONDENT MCD

- I. *Direct Respondent No. 3 DJB to immediately operationalise pumping station at Krishi Vihar, Andrews Gang (upstream of Defence Colony), to tap wastewater in the Drain and convey it through a laid pipeline to the Okhla STP, as planned during the various meeting held with the Yamuna Pollution Monitoring Committee. The stated pumping station was earlier defunct, has now been reconditioned by Respondent DJB, but has not been operationalised for tapping sewage/wastewater and conveying it to the Okhla STP.*
- II. *Once cleared, this process could be replicated for the other side. However, if the Krishi Vihar pumping station is operationalised, and no wastewater enter the covered drain, the entire drain can be dredged without flipping sides, by dividing it into sections and done in a time bound manner before the monsoons arrive.*
- III. *Direct Respondent No. 3 DJB to read meaning into Section 24 of The Delhi Water Board Act, 1998, 'Prohibition on use of stream or well for disposal of polluting matter, etc' and apply all legal remedies, civil or criminal and act against those who have aided and abetted the contamination of Storm Water by blatantly discharging "sewage effluent" "trade effluent" into "stream."*
- IV. *Direct Respondent 3 DJB to erect and establish a Sewage Treatment Plant (STP) in Defence Colony in keeping with the IIT Report; while operationalizing the pumping station at Krishi Vihar (Andrews Garj) as directed by the YPMC; to trap the wastewater of Kushak Drain*



upstream of Defence Colony and transport such trapped wastewater through a sewage pipeline to Sewage Treatment Plant (STP) at Okhla.

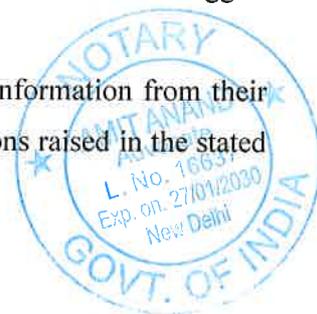
V. Direct Respondent No. 3 DJB to ensure Kushak Storm Water Drain (as other Storm Water Drains) do not carry sewage or wastewater after the proposed cut-off date December 2026; According to the February 2025 Action Plan Report, out of a total of 1799 unauthorised colonies, sewer lines have been laid/ commissioned in 1240 colonies whereas in 573 colonies, work is in progress with a completion timeline pushed forward to December 2026. Given the proclivity of the Respondent in to advancing completion dates, this crucial aspect needs intense monitoring to ensure no further deadline slippages take place, and by year end 2026 SWD's are free of conveying wastewater/ sewage. Hence plans, ways and means must be drawn out drain wise towards their ecological restoration.

VI. Divest Respondent No. 3 (DJB), of the overarching authority it currently holds over water, splitting it up into five divisions; (i) Fresh water resource management (ii) Filtration and Purification, (ii) Fresh Water Distribution (iii) Waste Water collection and treatment, (iv) Engineering and Projects (v) Commercial & billing.

CONCLUSION

There is no gainsaying that Respondent DJB is the main protagonist in the use of Storm Water Drains for carrying sewage, and hence cannot escape responsibility of their abject failure to address this crucial environmental issue. The Status Report submitted by Respondent DJB in place of a Counter Affidavit or Reply Affidavit is perfunctory, indistinct, nebulous and vague in nature, and displays the impression of lacking being on top of the situation and to suggest that remediation of SWD's is within their capability.

The Status Report has ostensibly applied cut and paste information from their other documents/ submissions. None of the real contentions raised in the stated



OA 174/2025 has been addressed by Respondent DJB, consequently must be deemed as accepted by the Respondent DJB, and this Hon'ble Tribunal may consider passing appropriate orders towards the implementation of its prayers as stated above.


DEPONENT

VERIFICATION

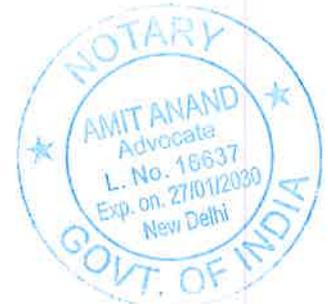
I, the above-named Deponent hereby verify that the contents of this Rejoinder Affidavit to the Status Report dated 09.12.2025 filed by the Respondent No.3 DJB, is true to my knowledge, based on the records of the case and legal advice which I believe to be true.

Dated: 23.02.2026

Place: New Delhi


DEPONENT

IDENTIFIED BY AADHAAR NO. 3135 2036 8069



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Rajeev Suri <cbms.rajeev@gmail.com>

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**
224K
-  **NGT OA 174 2025 REJOINDER TO CA R5 DDA.pdf**
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