

1431

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 Status Report dated 10.12.2025 filed by Respondent No. 2 DPCC	2-5

FILED BY:



APPLICANT

PARTY-IN-PERSON

Place: New Delhi

Dated: 24.02.2026

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

**REJOINDER AFFIDAVIT FILED BY PETITIONER TO STATUS
REPORT BY RESPONDENT NO. 2 DELHI POLLUTION CONTROL
COMMITTEE {DPCC} GNCTD DATED 10.12.2025**

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 No.2 DPCC {GNCTD};
- C. I state that I have read and understood the contents of the Status Report filed by the Respondent No. 2 DPCC {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 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. 2 DPCC {GNCTD} 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. OBJECTIONS ON MERIT:

Status Report versus Counter Affidavit

1. Respondent No.2 DPCC {GNCTD} 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 highlights the Status of 22 drains that have been placed under Irrigation & Flood Control Department GNCTD. However, there are 1300 drains in Delhi a thousand small storm, drains flow into 22 main drains, which have now been handed over to Respondent No.2 I&FCD as a single authority to maintain and remediate SWD's. However, 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.
3. Delhi's stormwater drains, with a network length of more than 18,000 km, is managed by eight different government agencies that has inevitably led to inefficiencies and mismanagement. DPCC is in the unenviable position of dealing with various government agencies while preventing sewage and contaminate wastewater being discharged in the SWD's. Therefore, when DPCC considers its role to be tapping only these major drains, it seems to be very narrowly focused, without a vision on how to clean up the SWD drains of Delhi, considering three drainage basins Najafgarh, Barapullah,



and Trans-Yamuna; which are divided further into sub-basins all have to be rendered pollution free.

4. The Status Report doesn't address the critical issues raised in the Original Application and charts out its own course in the Status Report which has little bearing to the contentions raised in the Original Application. For example, referring to DPCC's own document as articulated in Roman Point III of the Original Application an analysis of GNCTD (DPCC) report "Progress in Rejuvenation of river Yamuna; against Action plans and Timelines" has been critiqued in the OA in Point Nos. 39 & 40 as substantial green washed.
5. Further another document by DPCC's "10th Meeting of the River Rejuvenation Committee High Level Committee" dated 23.07.2024 critiqued in Roman Point IV of the Original Application with respect to construction of 40 new DSTP's was found to be anomalous by this Hon'ble Tribunal as recorded in point Nos.41 to 43 of the Original Application
6. The fact that Respondent DPCC claims there is a gap of 11.11% in sewage treatment is viewed with scepticism, and the ground realities appear very different.
7. The Status Report t appears to be a rehashed/ recycled of material utilized elsewhere and hence is of little to no significance in the present O.A. To this extent, a quick view of the Prayers relating to DPCC is reproduced herewith:

PARAGRAPH WISE REPLY OF RESPONDENT'S STATUS REPORT.

- 1) Para 1 & 2 of the Status Report: is a matter of Record.
- 2) Para 3 of the Status Report is noted as a known fact, however this was not part of the contentions of the Original Application and has been place in the Status Report as an filler point, when no such contention was raised in the stated OA.
- 3) Para 4 & 5 of the Status Report: Contents are noted, however the ddata provide is unverified in the Status Report.



- 4) Para 6 of the Status Report: has been placed in the OA without a question / contention being raised, and it appears to have been placed as a copy paste from another document.
- 5) Para 7 & 7 of the Status Report: Contents are noted.
- 6) Para 8 of the Status Report: Is a matter of record and invites no comment.
- 7) Para 9 of the Status Report: requires no comment.


DEPONENT

VERIFICATION

I, the above-named Deponent hereby verify that the contents of this Rejoinder Affidavit to the Status Report dated 10.12.2025 filed by the Respondent No.2 DPCC {GNCTD}, 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

**I Identify the Executant Deponent
 who has Signed in my Presence**



ATTESTED

 NOTARY PUBLIC
 DELHI (India)

24 FEB 2026

NOTARY REGISTER ENTRY
 SR. No. 2335 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**
224K
-  **NGT OA 174 2025 REJOINDER TO CA R5 DDA.pdf**
1030K