

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH AT NEW DELHI
EXECUTION APPLICATION NO. 29 OF 2025**

IN
O.A NO. 668 OF 2023

IN THE MATTER OF:

PRASHER DEV SHARMA

...APPLICANT

VERSUS

STATE OF PUNJAB & ORS

...RESPONDENTS

INDEX

S.No	Particulars	Pg.No
1.	Reply Affidavit on Behalf of Respondent No. 2 Executive Officer, Sukhdev Singh Randhawa Municipal Council (Mc), Jagraon, District-Ludhiana, Punjab	1-6
2.	Annexure – R2/1 Copy of Tender Remodelling and Renovation of Pond back side Bhadarkalli Mandir, Jagraon	7
3.	Annexure – R2/2 The Copy of photographs showing the work executed	8-87
4.	Annexure – R2/3 A work order worth Rs. 29.80 lac has been allotted for the remediation of approximately 7500 MT of the said waste dated 14.02.2025	88
5.	Annexure – R2/4 A Copy of Work Tender for the purpose of engaging a private company/contractor to undertake door-to-door collection, segregation, processing, and disposal of daily generated garbage/waste	89-98
6.	Proof of Service	99

Through

Date: 16.07.2025


PRASHANT MANCHANDA

COUNSEL FOR RESPONDENT NO.2
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Delhi – 110085
Prashantmanchanda.05@gmail.com
9971879203

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
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IN THE MATTER OF:

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**REPLY AFFIDAVIT ON BEHALF OF RESPONDENT NO. 2
EXECUTIVE OFFICER, SUKHDEV SINGH RANDHAWA MUNICIPAL
COUNCIL (MC), JAGRAON, DISTRICT-LUDHIANA, PUNJAB IN
RESPONSE TO THE EA 29 OF 2025 FILED BY THE APPLICANT**

MOST RESPECTFULLY SHOWETH:

I, Sukhdev Singh Randhawa having office at Municipal Council, Jagraon do hereby solemnly affirm and declare as under:

- 1) That the above-named deponent is currently posted as the Executive Officer, Municipal Council, Jagraon is thus well conversant with the facts of the present case, and is competent to depose by way of the present affidavit on behalf of the answering Respondents.
- 2) That the Respondent humbly submits that they have been diligently working towards the implementation of the requisite works as defined under the Municipal Solid Waste Management Rules, 2016, and have also undertaken various steps in compliance with the directions of this Hon'ble Court, as contained in the final order dated 19.09.2024 passed in



Original Application No. 668/2023, the relevant portion of which is reproduced below:-

25. *"In the circumstances, we direct respondent 2 to take all steps for compliance of SWM Rules, 2016 with regard to restoration of pond land including its cleaning, processing and disposal of legacy waste and dumping of fresh solid waste in accordance with SWM Rules, 2016 by 31.12.2024 and submit a compliance report with Registrar General by 15.01.2025.*

26. *We also direct PSPCB to verify compliance of SWM Rules, 2016 on the part of respondent 2, in the light of directions given herein above and submit its report by 30.01.2025.*

- 3) That the Respondent Authorities respectfully submit that they have been diligently working towards ensuring full compliance with the directions issued in the final order dated 19.09.2024, passed in Original Application No. 668/2023. The Respondent Authorities have initiated and are actively pursuing the requisite measures to implement the same in letter and spirit. The detailed steps taken in compliance with the said order are explained in the following paragraphs.

REGARDING CLEANING OF POND

- 4) That the tender and work order worth rupees 99.32 lac has been allotted for cleaning of pond site of Bhadarkali Mandir & the remediation work of the pond site near Bhadarkali Mandir is substantially complete, and most of the executable work has been completed successfully. The peripheral passage surrounding the pond has been constructed. The pond has been thoroughly cleaned after dewatering, and the legacy waste buried therein has been excavated and segregated for further remediation. A waste treatment plant, based on the Seechewal model, has been constructed within the pond area. Additionally, pucca compartments have been built to facilitate the treatment and cleaning of wet waste. Strict measures are



in place to ensure that no waste or garbage is permitted to enter the cleaned pond. A detailed record of the works executed at the pond site is maintained by the Municipal Council, Jagraon.

The copy of tenders for remodelling & renovation of pond back side of bhadrakali mandir is annexed as **Annexure R 2/1**

The copy of photo graphs showing work executed is annexed as **Annexure R 2/2**

- 5) That during the cleaning operations of the pond, a considerable amount of garbage, debris, and other waste materials lying buried for a long time was discovered beneath the pond bed. The portion of the waste that was excavatable was removed despite being in a muddy and waterlogged condition. This excavated waste has been temporarily stored at a location separate from the pond site.

As the waste is currently wet and unsuitable for immediate remediation, it is being allowed to dry so that it attains a remediable state. It is submitted that a separate tender process has already been completed for carrying out the remediation of the said excavated waste. The actual remediation work shall commence as soon as the waste dries to the required extent to enable effective processing. A work order worth Rs. 29.80 lac has been allotted for the remediation of approximately 7500 MT of the said waste, which shall commence once the waste is sufficiently dried.

A copy of work order dated 14/02/2025 is annexed hereby as **Annexure – R: 2/3**

- 6) That no fresh waste is being dumped at either the new or old dumping site located near Bhadarkali Mandir. The Municipal Council, Jagraon, is strictly ensuring compliance with this directive. All waste disposal activities are being carried out in accordance with the Solid Waste Management Rules, 2016, and the guidelines issued by the Punjab Pollution Control Board (PPCB). To strengthen monitoring, new CCTV cameras have been installed at the dumping site to capture real-time

Report



footage. Additionally, a gate has been installed at the site, which remains locked to prevent any unauthorized dumping.

It is further submitted that, except the waste/garbage excavated from the pond, no other waste is being brought to or deposited at the site. This waste is being collected solely for the purpose of remediation. Remediation machinery has already been deployed at the site, and a work order has been issued for this purpose. The remediation of the excavated waste is presently underway.

- 7) The excavated waste from the pond shall be remediated at the earliest possible opportunity. However, due to heavy rainfall during the monsoon season, the timeline for completion of the work has had to be extended. It is respectfully submitted that the unexpected pre-monsoon rains made the work more difficult, as we had to repeatedly drain the water from the pond and dry the excavated waste, which took extra time. The delay in complying with the directions of the Hon'ble National Green Tribunal is unintentional and has occurred due to circumstances beyond our control.

REGARDING REMEDIATION OF LEGACY WASTE

- 8) That the work of remediation of legacy waste was awarded by the Municipal Council, Jagraon, to a specialized and certified waste management agency, namely M/s Spreco Waste Management Solutions, which possesses the requisite expertise in handling and remediating legacy waste. The said agency was engaged for the remediation of approximately 20,000 metric tonnes (MT) of legacy waste. It is respectfully submitted that the agency has successfully completed the remediation of the said legacy waste.

MANAGEMENT OF DAILY GENERATED WASTE



- 9) That the Municipal Council, Jagraon is presently processing the daily generated waste in accordance with the prescribed guidelines and directives issued by the Government. In furtherance thereof, and in compliance with the Solid Waste Management Rules, the Municipal Council has invited tenders worth Rs. 370.21 lacs for the purpose of engaging a private company/contractor to undertake door-to-door collection, segregation, processing, and disposal of daily generated garbage/waste, as per the terms of the tender and the applicable statutory framework.

A Copy of Work Tender is annexed hereby as **Annexure -R2/4**

ENCROACHMENTS ON THE POND SITE

- 10) That the Municipal Council, Jagraon has initiated proceedings under the Punjab Public Premises and Land (Eviction and Rent Recovery) Act, 1973, by filing cases against 43 encroachers, seeking possession warrant orders. The said cases are presently pending and listed for hearing on 29th July 2025, awaiting a decision. Upon obtaining the possession warrants, the Municipal Council shall seek police assistance to facilitate the eviction process. Meanwhile, efforts are being made to resolve the matter amicably and remove the encroachments.
- 11) That the Municipal Council, Jagraon is currently facing a significant operational constraint due to the persistent vacancy of key technical and sanitation positions, including Municipal Engineer (ME), Assistant Municipal Engineer (AME), Junior Engineer (JE), Superintendent (Sanitation), and Sanitary Inspector, which have remained unfilled for an extended period. This shortage of essential personnel has contributed to the delays in the effective management and implementation of sanitation and waste management initiatives.
- 12) That in view of the above, it is most respectfully submitted that the Municipal Council, Jagraon, has taken substantial steps toward compliance



with the directions issued by this Hon'ble Tribunal and the applicable provisions of the Solid Waste Management Rules, 2016. The work pertaining to the cleaning of the pond, remediation of legacy waste, and management of daily generated waste is actively underway. All remaining activities shall be completed at the earliest and strictly in accordance with the timelines, guidelines, and directions issued by this Hon'ble Tribunal. The Respondent remains fully committed to fulfilling its statutory duties and ensuring environmental compliance in a time-bound and effective manner.

Certified that the affidavit has been read out to the deponent, explained to the deponent, and no one seemed directly to understand the contents at the time making thereof.

Date: **15 JUL 2025**

Place: *Jagraon*

Sukhdev Singh Randhawa
 Executive Officer
 Municipal Council
 Jagraon
 (Sukhdev Singh Randhawa)

*Certified that the deponent was administered oath/affirmation before me this 15th July 2025 at Jagraon who is personally known to me and identified as Jagraon by *Sukhdev Singh Randhawa* who is personally known to me.*

Attested As Identified

[Signature]
 BIKRAM SHARMA
 NOTARY PUBLIC
 JAGRAON (PUNJAB)

15 JUL 2025



Identified By

Municipal Council Jagraon, Local Govt. Deptt. Punjab

7

NOTICE INVITING E-TENDERS

eproc.punjab.gov.in

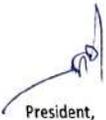
E-tender-MUNICIPAL COUNCIL JAGRAON/2023-24/ 2745

(A) Date and time schedule for e-tenders:-

Sr. No	Item	Date and time period
1	Start of Purchase of Online tender	18.10.2023 at 9:00 AM
4	Closing of Purchase of of Online tender	09.11.2023 AT 5:00 PM
5	Opening of Technical bid	10.11.2023 AT 11:00 AM
6	Opening of Financial bid	10.11.2023 AT 1:00 PM

Sr no.	Name	Amt (Rupees)	EMD CHARGE	TENDER CHARGE	TIME LIMIT (MONTH)
1	Remodelling and Renovation of Pond back side Bhadarkalli Mandir, Jagraon	99.32 Lac	2%	1000/-	4 Month

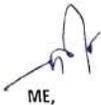
In case there is Govt. holiday, tenders will be opened the next working day. For participating in the above e-tendering process the contractors/agencies/ firms shall have to get themselves registered with www.eproc.punjab.gov.in and get user ID and password. Class-3 digital signature is mandatory to participate in the e-tendering. For any clarification/difficulty E-tendering process flow, please contact on IT help desk 0172-2970284, 0172-2791226 For terms & conditions please visit website, Corrigendum, Addendum/ Corrections if any will be posted on Website Only.



President,
Municipal Council,
Jagraon.



Executive officer,
Municipal Council,
Jagraon.



ME,
Municipal Council,
Jagraon.



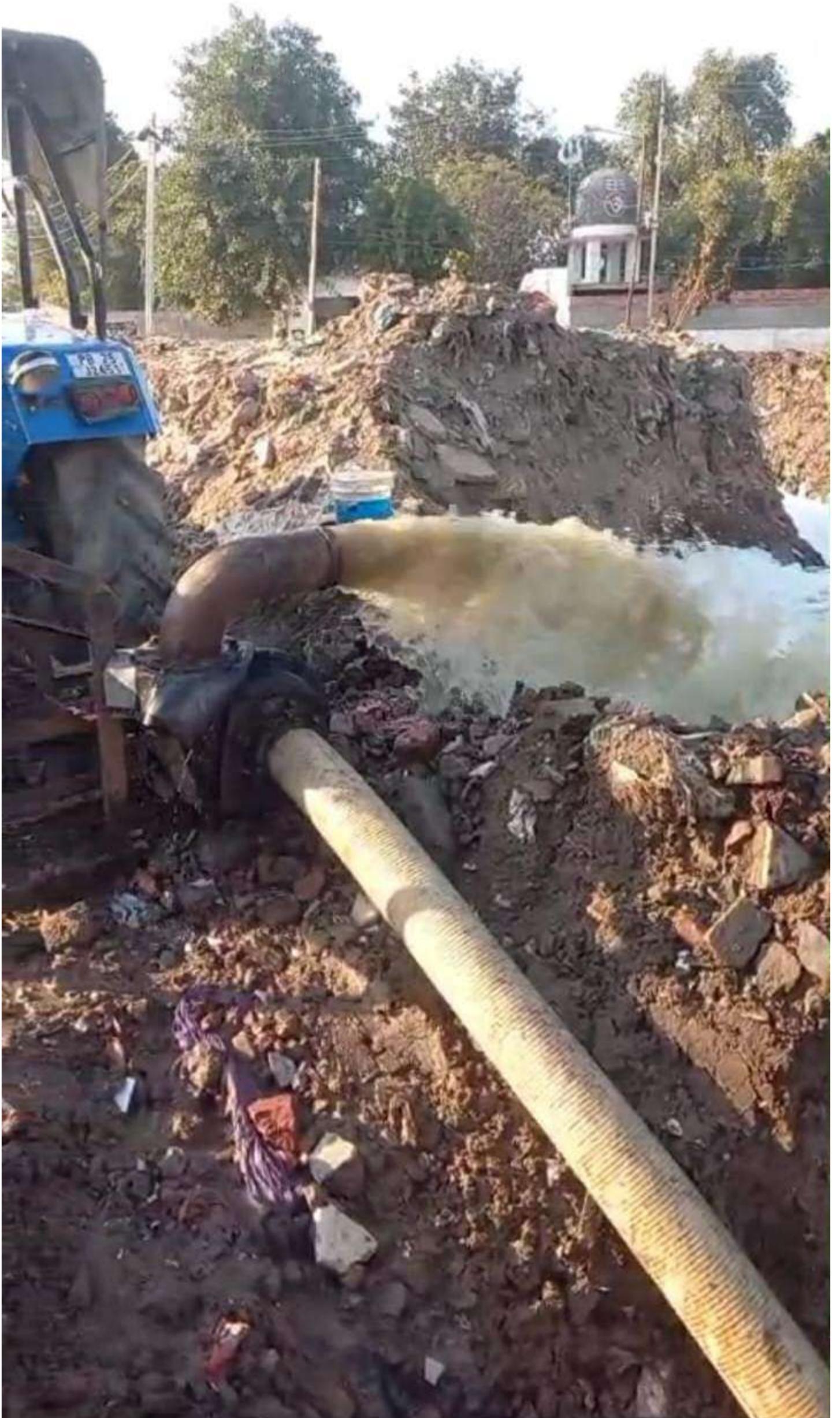
AME,
Municipal Council,
Jagraon.

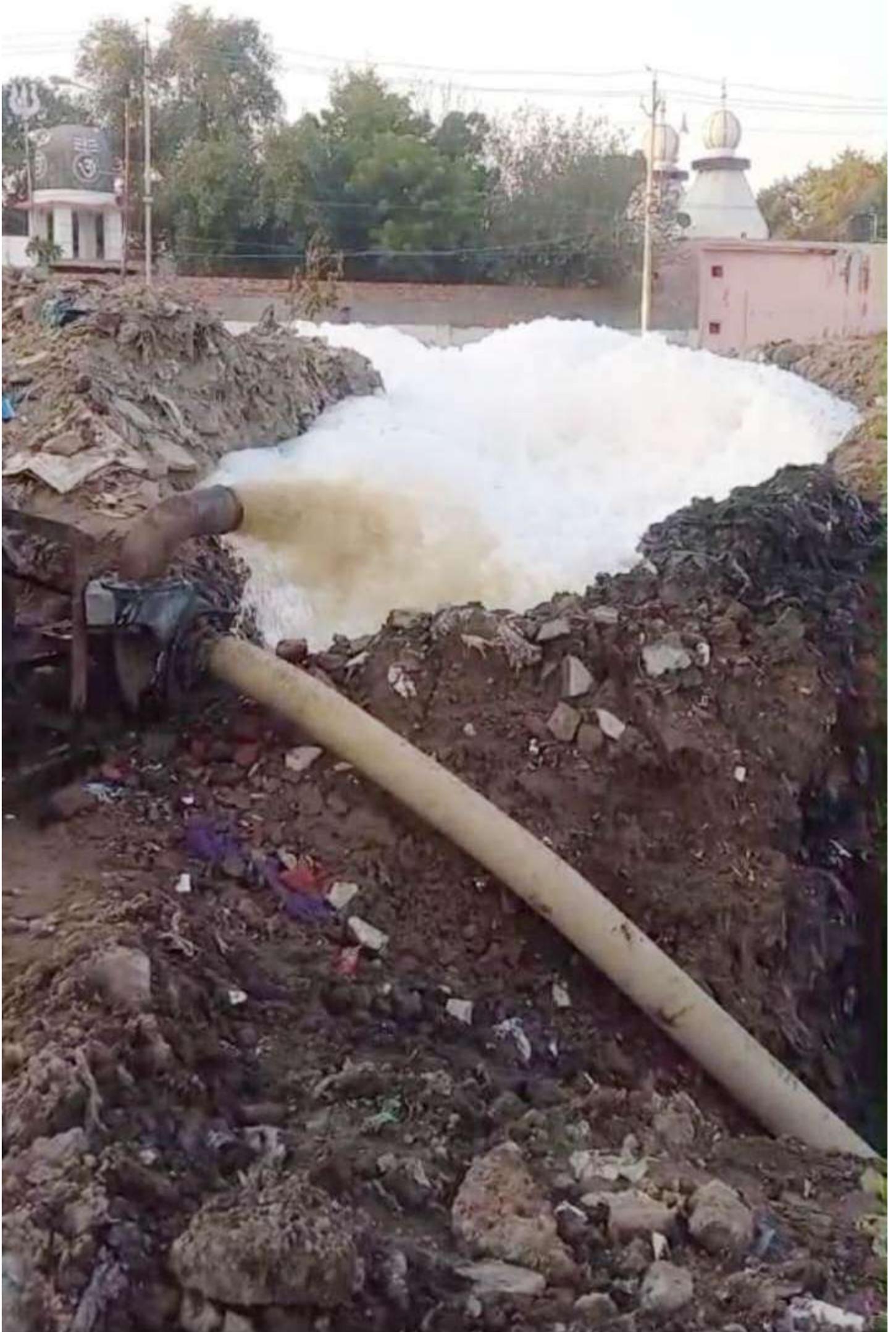


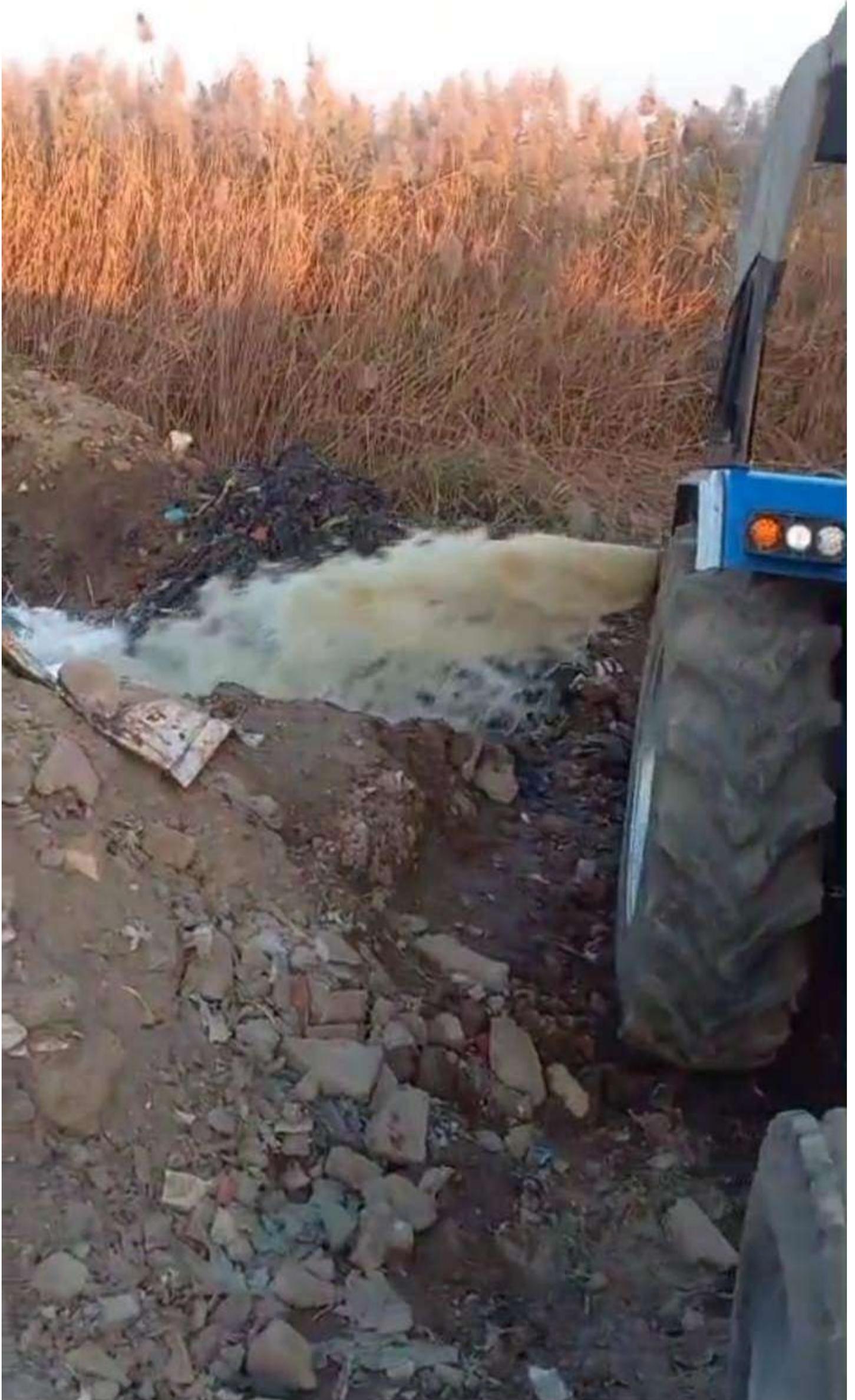
JE
Municipal Council
Jagraon.

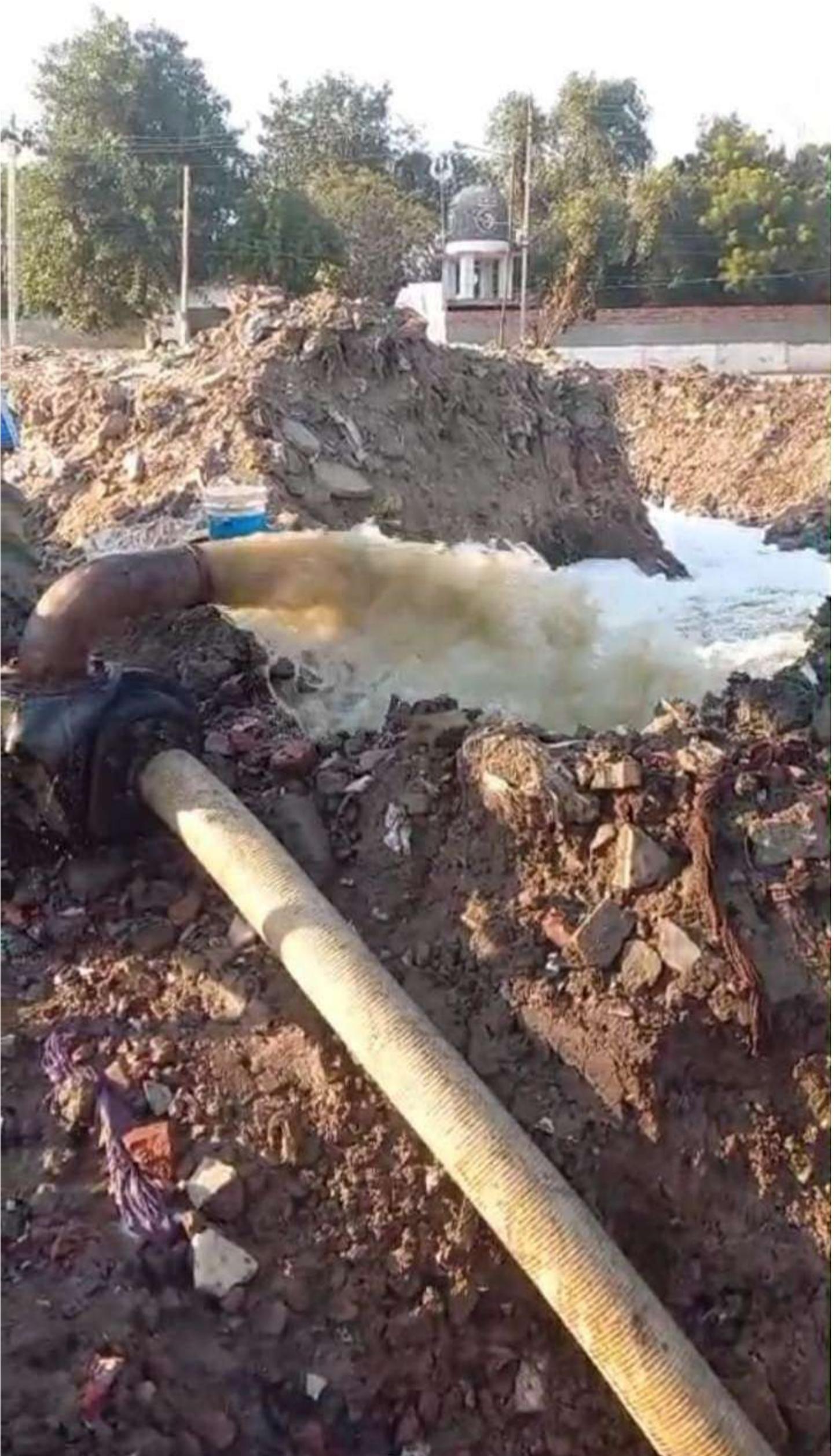




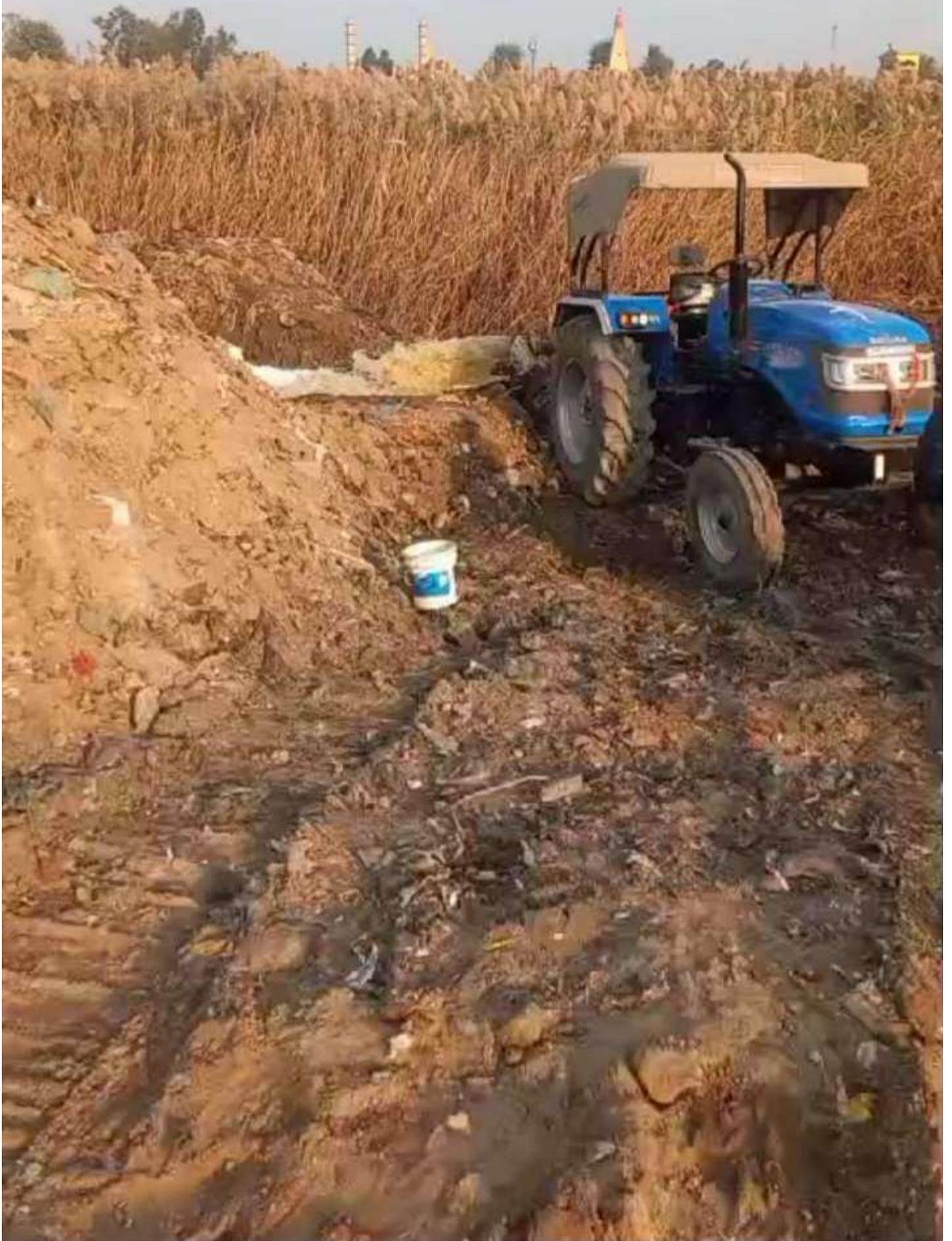
















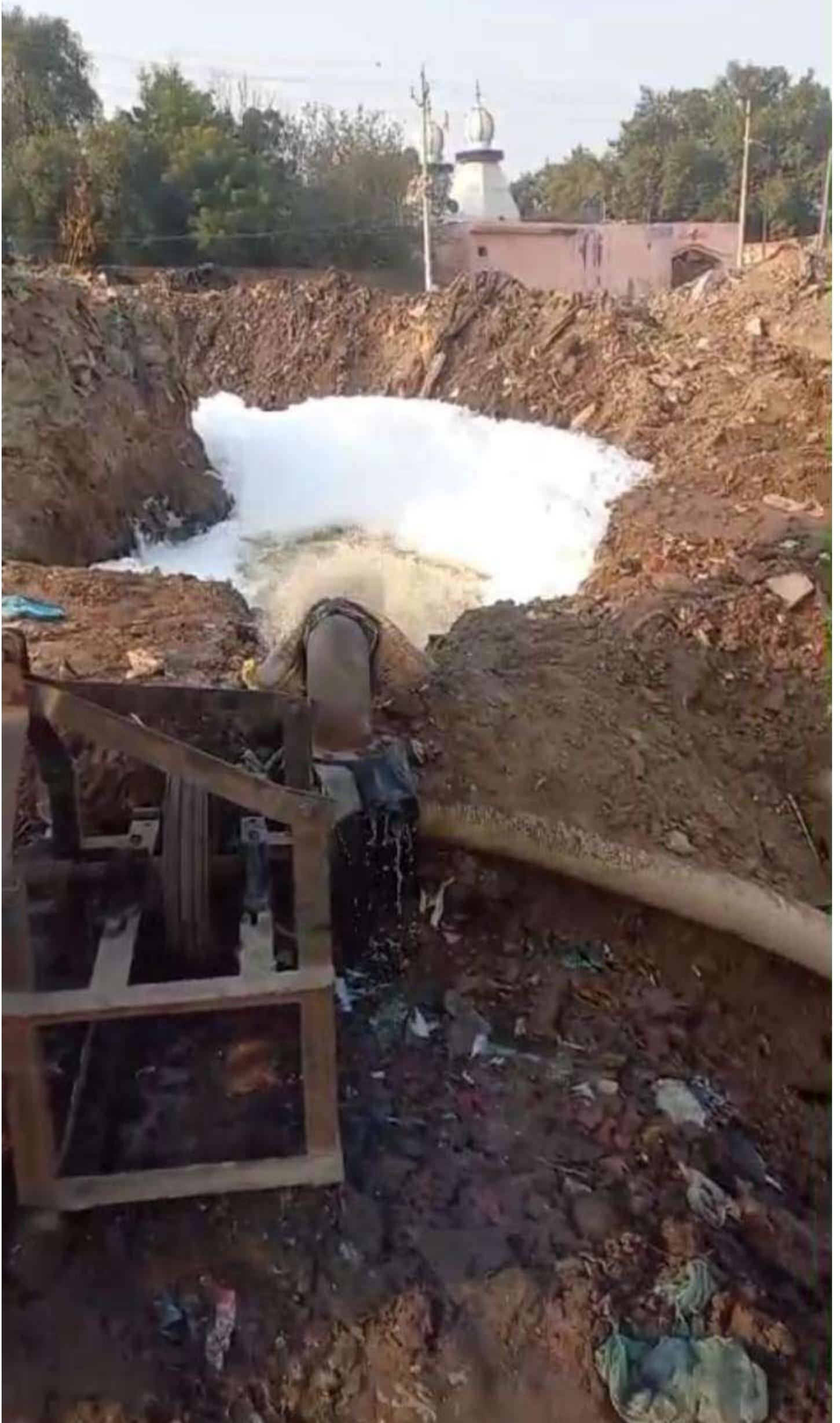


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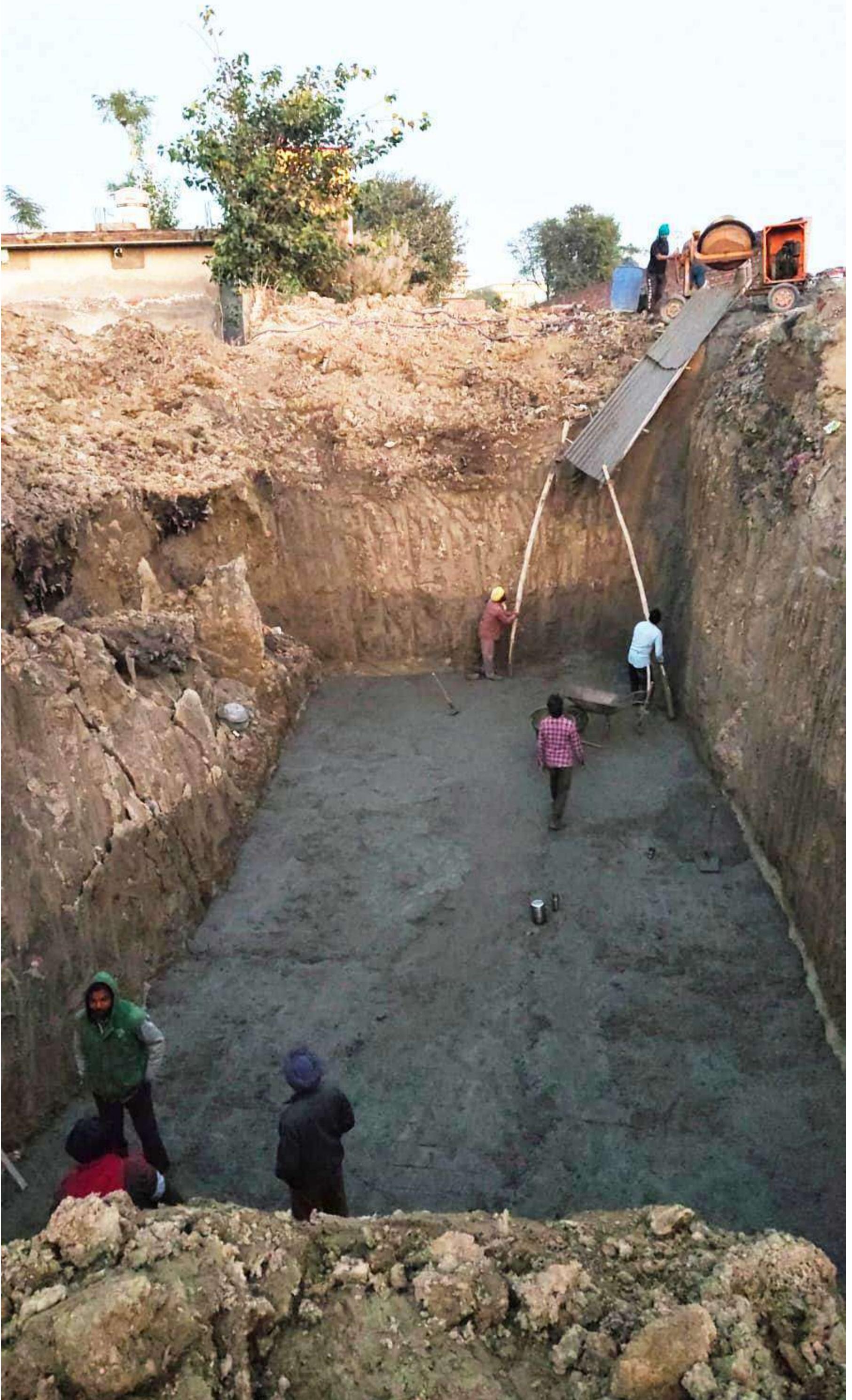








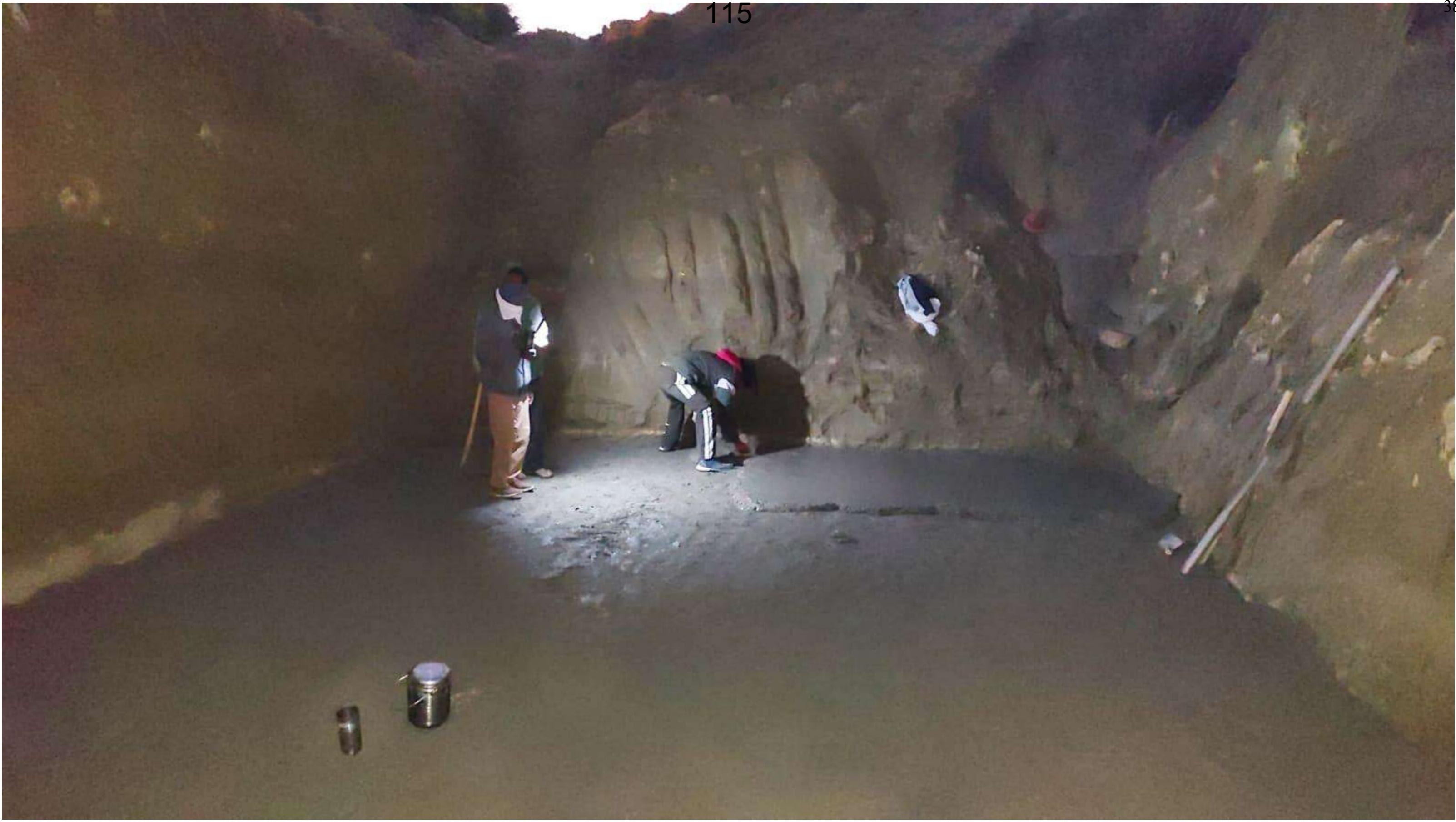
































































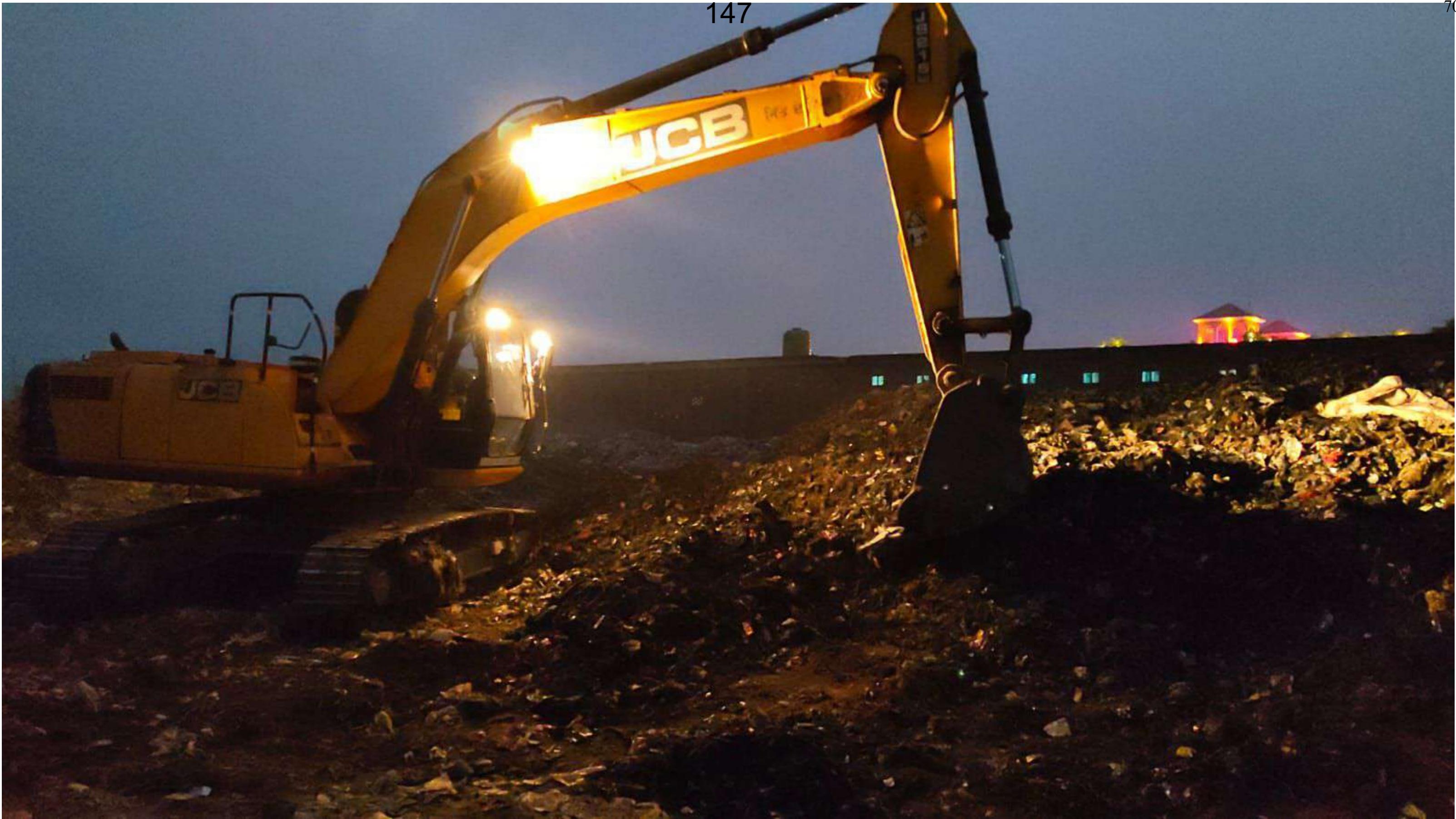




























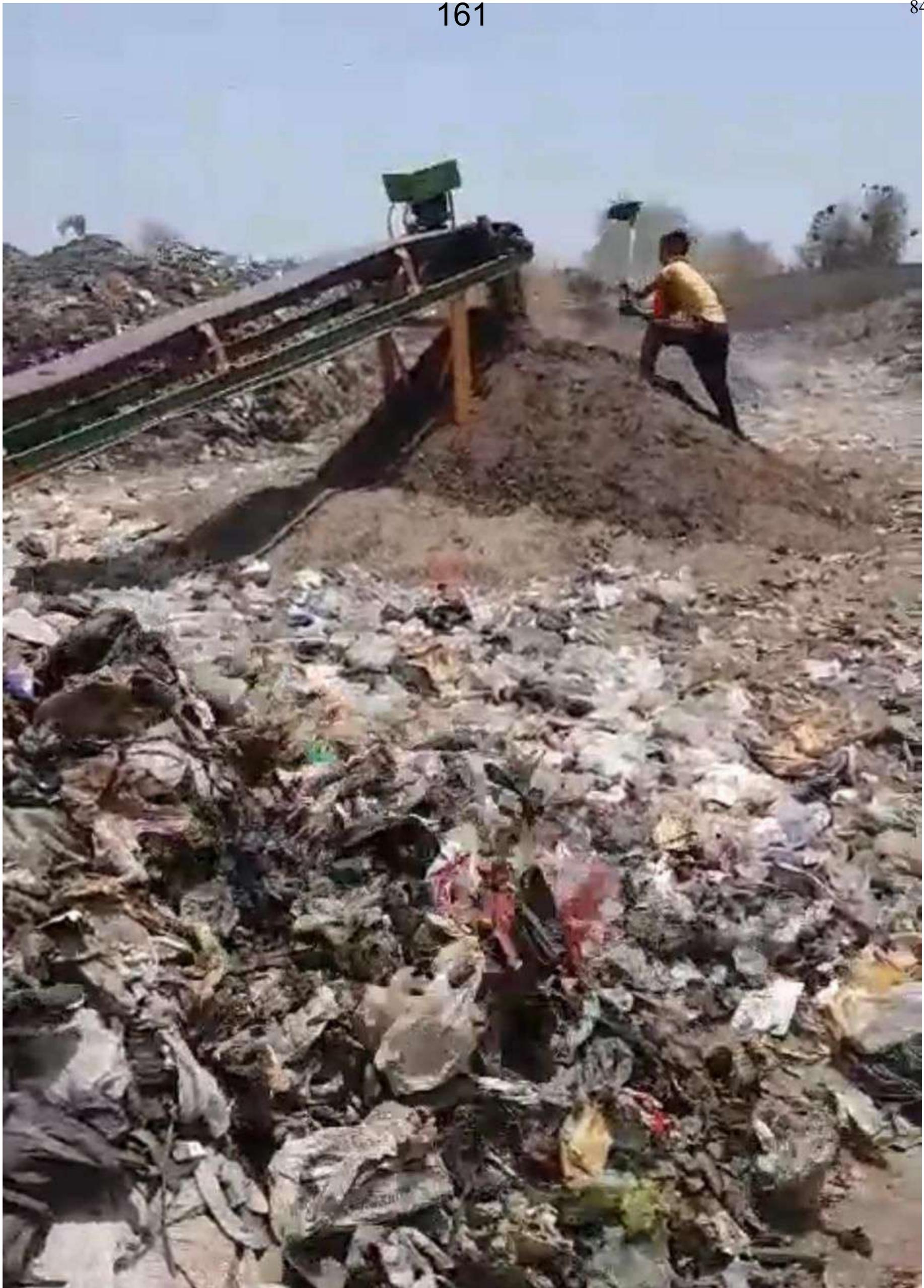


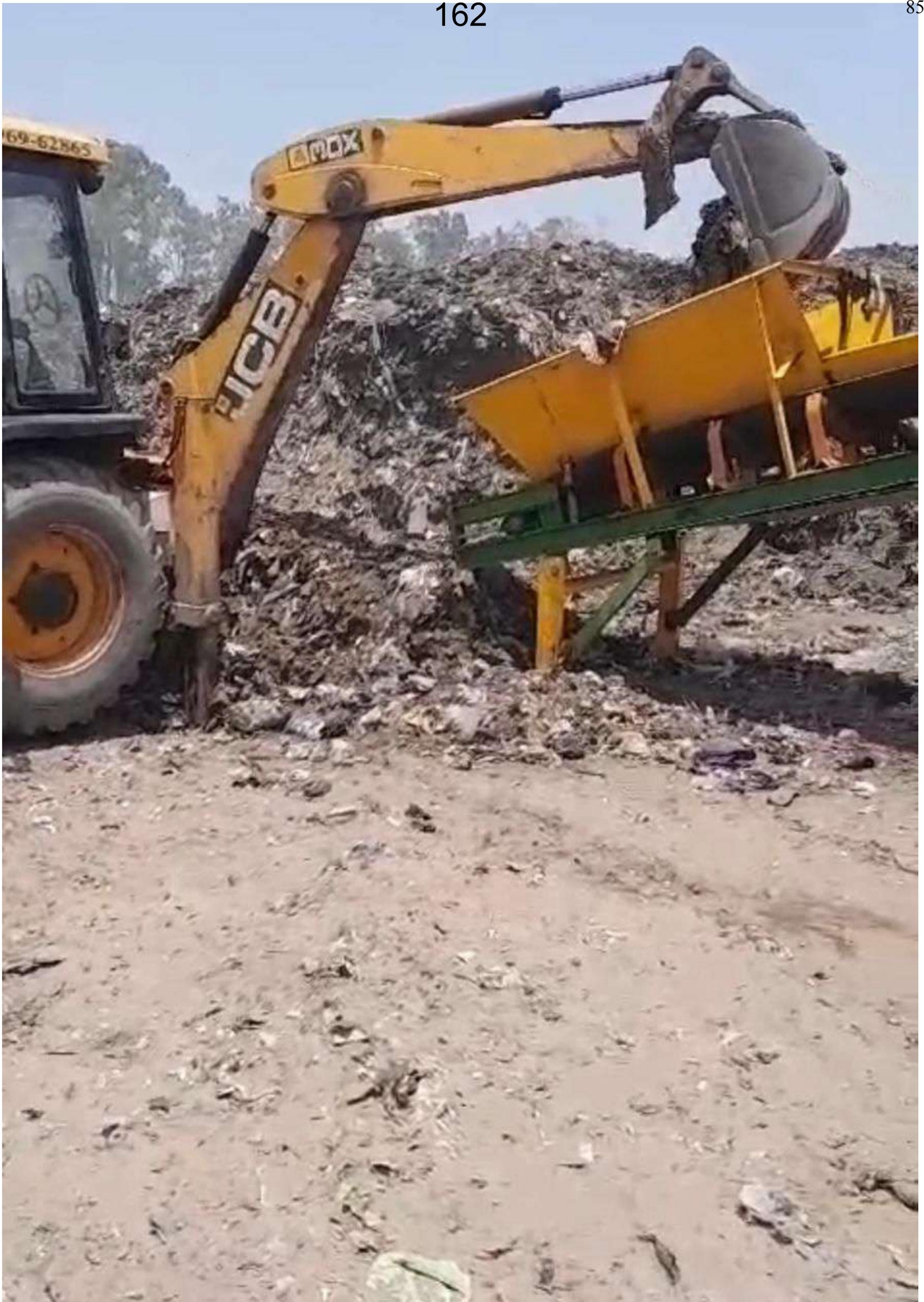


















DEPARTMENT OF LOCAL GOVERNMENT (LG)

Government of Punjab

Work Order

From

Executive Engineer
Municipal Council Jagraon

To

Harvinder Singh Chawla
Harvinder Singh Chawla

No : LG/24-25/PercentRate/1222

Dated : 14/02/2025

Sub : Remediation of legacy work at mc jagraon

Amount : ₹29,65,100.00/-

Ref : Your tender dated

Your tender for the above noted work has been accepted with the following terms and conditions as exhibited in the approved D.N.I.T.

Sr.No	Item Description	Quantity	Rate	Unit	Amount And Rate In (₹)
					Amount
1	Remediation of legacy work at mc jagraon	1.00	29,80,000.00	Sqft	29,80,000.00
					Below : 0.5%
Condition :					

The Time limit for the completion of work is 3 Months Including Monsoon , which shall be reckoned from the date of issue of this acceptance letter. You are requested to start the work at once the instructions of Executive Engineer and complete the same within stipulated time limit and also attend this office to sign your contract aggrement along with amounting to failing which no running payment shall be made.

Executive Engineer
Municipal Council Jagraon

Copy of the above is forwarded to the following for information and necessary action :-



**STANDARD BIDDING DOCUMENT
FOR
PROCUREMENT OF WORKS**

**Door to Door Collection, Segregation and
processing of Solid Waste in all city jagraon under
AMRUT 2.0**

**DNIT capital cost: Rs. 3,70,20,987 Lakh
And 02 Years' Operation & Maintenance**

Volume -1

General Requirements

MARCH 2025

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LIST OF IMPORTANT DATES

Website: <http://www.eproc.punjab.gov.in>
E-TENDER/MC JAGRAON/2025-26/1

List of Important Dates of Submission of Online Bids:-

1.	Name of Work: Door to Door Collection, Segregation and processing of Solid Waste in all city jagraon under DNIT capital cost: Rs. Rs. 370.20 Lakh A n d 05 Years' Operation & Maintenance	
2.	Completion Period	:
3.	Mode of submission of Tender	To be submitted on-line at http://www.eproc.punjab.gov.in
4.	Period & Time for download of Bidding Documents from E-procurement portal	From: Date : 09.07.2025 Time : 9.00 AM
		To: Date : 02.08.2025 Time : 5.00 PM
5.	Time, Date & Place of Pre-Bid Meeting	Date:
		Time:
		Place:
6.	Time & Date of online submission of Bids	From: Date: 09.07.2025 Time : 9:00 AM
		To: Date : 02.08.2025 Time : 5:00 PM
7.	Time & Date of opening of online Technical Bids	Date: 04.08.2025 Time: 11:00 AM
8.	Time & Date of opening of online Financial Bids	Date: 05.08.2025 Time: 11:00 AM
9.	Place of opening of online Bids	Address: Municipal council Jagraon
10.	Last Date of Bid validity	Date: 02.08.2025
11.	Officer Inviting Bids	Executive Officer, Municipal Council, Jagraon, District Ludhiana

INDEX

Section n	Name of Section	Page No.
0	Invitation for bids (IFB)	3-8
1	Instructions to bidders (ITB)	9-31
2	Qualification information	33-46
3	Conditions of contract i) General conditions of contract ii) Conditions of particular application	47 53-75 76-79
4	Contract Data	80-91
5	Technical conditions, specifications and requirements	92-95
6	Modal rules for the protection of health and sanitary arrangements for workers	96-103
7	Contractor's labour regulations	104-111
8	Form of bid	112-116
9	Bill of quantities	117-123
10	Securities and other forms	124-133
11	Drawings, site investigation data and other technical plans	134-135
12	Documents to be furnished by bidder	136-137

SECTION 0

**INVITATION FOR BIDS
(IFB)**

Contractor:
Date:

Executive Officer:
Date:

[Page left blank intentionally]

Contractor:
Date:

Executive Officer:
Date:

**Office of the Executive Officer,
Municipal Council, Jagraon Town
NOTICE INVITING ON-LINE BIDS**

Bid No.:

Date:

1. On behalf of Executive Officer Municipal Council of Jagraon Town, invites bids from eligible bidders for the Project/Work(s) detailed in the following table. The bidders may submit bids for any or all of the following Project/Work(s) :

Sr. No.	Name of Project/Work(s)	Bid Security/ Earnest Money (Rs. In Lakh)	Cost of document/ Tender Fee(Rs.)	Period of completion	Approx. Value of the Project/ Work(Rs. In Lakh)
1	2	3	4	5	6
	Door to Door Collection, Segregation and processing of Solid Waste in all city jagraon	7,42,000	Rs.2000 & Processing Fee 0.10% of DNIT cost + Taxes and max Rs 5000 + Taxes	24 months	Project value: Part A & B Percentage Rate Rs. 3,70,20,987 Lakh Part – C 2 Years' O&M cost – Percentage Rate

[col. 6 to be deleted for Lump sum Project/Works]

2. Important dates are as under :

(i)	Period of availability of Tender on-line* shall be	From Date 09.07.2025 To Date 02.07.2025 Time 5:00 PM
(ii)	Last date & time for on-line* submission of bids shall be	Date 02.08.2025 Time 5:00 PM
(iii)	Date & time of opening of Technical Bid	Date 04.08.2025 Time 11:00..AM
*For detailed terms and conditions, refer to web site http://www.eproc.punjab.gov.in		

SD/-
Signature of Executive Officer

Contractor:
Date:

Executive Officer:
Date:

(Note: - For Publication in Newspapers)

Contractor:
Date:

Executive Officer:
Date:

GOVERNMENT OF PUNJAB
Municipal Council, Jagraon
NOTICE INVITING ON-LINE BID

Bid No.:

Date:

1. On behalf of the : Executive Officer, Municipal Council , Jagraon Town invites bids from eligible bidders for the Project/Work(s) detailed in the following table. The bidders may submit bids for any or all of the following Project/Work(s) :

Sr. No.	Name of Project/Work(s)	Bid Security/ Earnest Money (Rs. In Lakh)	Cost of document/Tender Fee (Rs.)	Period of completion	Approx. Value of the Project/ Work(Rs. In Lakh)
1	2	3	4	5	6
	Door to Door Collection, Segregation and processing of Solid Waste in all city jagraon	7,42,000	Rs.2000 & Processing Fee 0.10% of DNIT cost + Taxes and max. Rs.5000 + Taxes	24 months	Project value: Part A & B Percentage Rate Rs. 3,70,20,987 Lakh Part – C 2 Years' O&M cost – Percentage Rate

[col. 6 to be deleted for Lump sum Project/Works]

2. Important dates are as under :

- (i) Period of availability of Tender on-line* shall be From Date 09.08.2025 To Date 02.08.2025 .Time 5:00 PM
- (ii) Last date & time for on-line* submission of bids shall be Date 02.08.2025 5:00 PM
- (iii) Date & time of opening of Technical Bid Date 04.08.2025.Time 11:00 AM

3. The Bidding Documents can be down loaded from website: <http://www.eproc.punjab.gov.in> The document downloaded from website should not be tempered, and if any such tempering is detected before or after the opening of bids, the bidder shall be debarred for a period of 6 months.
4. The bidders should have the necessary Portal enrolment with his/her own Digital Signature Certificate (DSC).
5. The bidders should keep checking the website for any **addenda/corrigenda** to the notice/bidding documents till the date of on-line submission of bids, and the bidder should incorporate the same in his bid documents.

Contractor:
Date:

Executive Officer:
Date:

6. The cost of the bidding documents (non-refundable) shall be paid online through Net Banking/NEFT/RTGS at portal <http://www.eproc.punjab.gov.in>.
7. Bid Security/Earnest Money Deposit (EMD) of the amount specified for the Project/Work(s) in the table above shall be paid online through Net Banking/NEFT/RTGS at portal

Contractor:
Date:

Executive Officer:
Date:

- <http://www.eproc.punjab.gov.in>.
8. Bid(s) must be submitted online through an e-portal <http://www.eproc.punjab.gov.in> before the time specified in the table above (as per server clock). The department does not take any responsibility for the delay caused due to non-availability of internet connection or network traffic jam etc. for online bids.
 9. Bid documents consisting of qualification information and eligibility criterion of bidders, plans, specifications, drawings, the bill of quantities of the various classes of work to be done and the set of terms & conditions of contract to be complied with by the Contractor can be seen on website <http://www.eproc.punjab.gov.in> and scanned copies of the required documents and information as per section-2 (Formats & Annexure) should be attached in the Technical Bid as prescribed in the SBD.
 10. Uploaded documents of valid successful bidders will be verified with the original before signing the agreement. The valid successful bidder has to provide the originals to the concerned authority on receipt of such letter, which will be sent through registered post/E-mail/courier.
 11. Standard Bidding Documents (SBD) is not to be uploaded by the bidder. The bidder has to only agree/disagree on the conditions in the SBD. The bidders who disagree on the conditions of SBD, cannot participate in the tender.
 12. Technical Bids will be opened on-line on the day & time as specified in the above table, in the presence of the bidders who wish to attend. If the office happens to be closed on the date of receipt of the bids as specified, the bids will be received and opened on the next working day at the same time and venue.
 13. Bid(s) once submitted online cannot be resubmitted or withdrawn.
 14. Conditional bids and the bids not meeting the qualifying criteria on the date of receipt of bids shall be summarily rejected.
 15. The undersigned has the right to accept or reject any or all bids without assigning any reason.

SD/-
Signature of Executive Officer

Contractor:
Date:

Executive Officer:
Date:

176



ashwani kaushik <kaushikashwani278@gmail.com>

Reply Affidavit by Respondent No. 2 in EA 29 of 2025 i.e. Prasher Dev Sharma vs State of Punjab

1 message

ashwani kaushik <kaushikashwani278@gmail.com>

Wed, Jul 16, 2025 at 11:14 AM

To: "Victorynation555@gmail.com" <Victorynation555@gmail.com>

Dear Sir,

Please find attached the Reply Affidavit filed on behalf of Respondent No. 2 i.e. Municipal Council, Jagraon in EA 29 of 2025

Kindly treat this as an advance service and acknowledge the receipt of the same.

This is for your record.

Best Regards

Ashwani Kaushik

Advocate

on behalf of

Mr. Prashant Manchanda

**Reply Affidavit on behalf of Respondent No. 2 in EA 29 of 2025 Prasher Dev Sharma vs State of****Punjab.pdf**

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