

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
EXECUTION APPLICATION NO. 20 of 2025
IN
O.A. NO. 678 of 2023
(Under Section 25 of the National Green Tribunal Act, 2010)

IN THE MATTER OF:

JRF RWA & ORS.

....APPLICANTS

VERSUS

GOVERNMENT OF NCT OF DELHI & ORS.

....RESPONDENTS

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Dated: 07.07.2025**Place: New Delhi****(Jangpura Extension Residents Forum RWA)****SPA HOLDER****THROUGH COUNSEL**

(Nipun Bhushan)

Advocates,

Bhushan & Associates,

i-34, GF, Jangpura Ext.,

New Delhi-110014

Mobile: 9958799788

Email: adv.nipunbhushan@gmail.com

Enrolment No.-D/8131/2022

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
EXECUTION APPLICATION NO. 20 of 2025
IN
O.A. NO. 678 of 2023
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IN THE MATTER OF:

JRF RWA & ORS.APPLICANTS
 VERSUS
 GOVERNMENT OF NCT OF DELHI & ORS.RESPONDENTS

AFFIDAVIT-CUM-REPLY TO R.NO. 1/ MCD'S ACTION TAKEN REPORT DT. 16.05.2025 AND TO PLACE ON RECORD PROOF OF FURTHER NON-COMPLIANCE BY R.NO. 1/ MCD TO THE HON'BLE TRIBUNAL'S DIRECTIONS FOR STOPPING DUMPING OF WASTE ISSUED VIDE ITS ORDER DT. 03.04.2025 IN E.A. 20 OF 2025 AND TO ITS ORDER DT. 25.02.2025 IN O.A. 678 OF 2023

I, Yogeshwar Mohan Mahajan, aged 70 years, S/o Late Sh. Som Nath Mahajan, R/o N-13, Jangpura Extension, Dist. South East, Delhi, do hereby solemnly declare and state as under:-

1. That I am the President of Applicant No. 1, i.e., '**Jangpura Extension Residents Forum RWA**' in the Execution Application titled above and being well conversant with the facts and circumstances of the case, I am competent to swear this Affidavit-cum-Reply.
2. That further, **Applicants 2-5 have authorized me**, to carry out the proceedings on their behalf before this Hon'ble Tribunal in the instant Execution Application. The authorization includes, *inter alia*, swearing this Affidavit-cum-Reply.

I further solemnly declare and state as under:

R.NO. 1/MCD IS DISOBEYING THIS HON'BLE TRIBUNAL'S STRICT DIRECTIONS AND ALSO BREACHING ITS OWN UNDERTAKING

- A. It must be noted that R.No. 1/MCD has been carelessly disobeying the direction issued to it by this Hon'ble Tribunal vide its Order dated 25.02.2025 in O.A. 678 of 2023 (marked as Annexure 1 in E.A. 20/2025) and has even been casually breaching its own undertaking as recorded in this Hon'ble Tribunal's Order dated 03.04.2025 in E.A. 20 of 2025 by wilfully refusing to stop the dumping of waste at the Block-H and Block-D dhalaos which were closed down by this Hon'ble Tribunal vide its Order dated 25.02.2025 in O.A. 678 of 2023.



Photos showing continued dumping of waste at the Block-H dhalao, even after the exceptional indulgence given by this Hon'ble Tribunal to R.No. 1/MCD is annexed herewith as Annexure 1 (colly) and those showing dumping at the Block-D dhalao have been annexed herewith as Annexure 2 (colly).

R.NO. 1/MCD IS EVEN BRACHING ITS OWN OFFICE ORDER DATED 08.05.2025

B. It is extremely vital to note that, in an attempt to mislead this Hon'ble Tribunal and to create a false perception amongst the public that everything is okay, R.No. 1/ MCD issued an office order on 08.05.2025 and put it across in the general public, claiming that from the said date, the MCD would be deploying its staff at the Block-H and Block-D dhalaos, ostensibly, in order to stop the routine illegal dumping of waste at the said dhalaos.

However, notwithstanding, the issuance of the aforementioned office notice and notwithstanding the tall claims of the MCD to stop illegal dumping, it is the MCD itself which continues to let the informal-sector waste-collectors dump waste at these dhalaos under the MCD's very watchful eye and possibly in collusion with the concerned MCD engineers within the MCD's Department of Environmental Management Services (DEMS) considering the fact that the concerned engineers have been provided with numerous reports by the residents of Applicant No. 1 colony but none of the said engineers has ever acted on those numerous reports. A photo of the said office notice issued by R.No 1/ MCD has been annexed herewith as **Annexure 3**.

R.NO. 1/MCD IS BRAZENLY TRYING TO VITIATE THIS HON'BLE TRIBUNALS'S ORDER DATED 25.02.2025 IN O.A. 678 OF 2023 BY SETTING UP AN FCTS AT THE BLOCK-H AND BLOCK-D DHALAO EACH

C. It must be noted that R.No. 1/MCD has been tirelessly trying to vitiate/nullify this Hon'ble Tribunal's Order dated 25.02.2025 (as explained in E.A. 20/2025) by setting up an FCTS at the Block-H and Block-D dhalao each, despite the recommendation made by the Solid Waste Management Committee of 12 types of alternative uses for the closed dhalaos which are enumerated as follows:

1. **Merged with Parks**
2. Amul Booth
3. Attendance Shelter
4. Office
5. MRF
6. EV charging point
7. Senior Citizen Recreation
8. Telephone Power
9. Outsourced CSR
10. RP Cell
11. Library
12. FCTS



It is quite clear from the preceding list of alternative uses as enumerated by the Solid Waste Management Committee (published by the Department of Environment, GNCTD and the DPCC) that it is well within the scope of its recommended alternative uses to subsume the Block-H Dhalao into the park which it adjoins for the meaningful purpose of planting more trees and for even setting up aero-bins which would help in realizing the goal of 'utilization of wet waste at source' so that at least some Blocks of Jangpura Extension can become 'Zero-wet-waste'. This recommendation serves as an excellent substitute to the MCD's perverse plan of establishing an FCTS and the Block-H dhalao which will inevitably affect:

- *at least 40-50 families;*
- *at least 3000 school students of the two schools situated just metres away from the said dhalao;*
- *countless worshippers visiting the mandir and the langar hall situated just 30-40 meters away;*
- *countless members of the general public visiting the H-Block park which adjoins the Block-H Dhalao; and*
- *countless members of the general public who walk past this hazardous dhalao to get to their places of work etc.*

As for the Block-D Dhalao, the MCD's plan to establish an FCTS and its site will inevitably affect:

- *Also, at least 15-20 families; and*
- *countless worshippers visiting the two huge mandirs situated near the said dhalao.*

Thus, the *proposed installation of FCTS* at the locations of the aforementioned dhalaos in question *will perpetuate the existing suffering of the Applicants and of the other residents living near the said dhalaos* as R.No. 1/MCD's agreement with DDSIL (R.No. 3 in O.A. 678/2023) makes it mandatory for such an FCTS to have a provision that enables residents to dump their waste which will only serve to perpetuate the issue of illegal dumping of waste at the said locations.

A Bhushan
I identified the deponent who
has signed in my presence
D/8/31/2022

VERIFICATION



Yogeshwar

DEPONENT

I, the above named deponent, presently at New Delhi do hereby verify that all what is contained in my foregoing Affidavit-cum-Reply is true and correct to the best of my knowledge and belief.

07 JUL 2025

Verified and signed at New Delhi on this 7th day of July, 2025.

ATTESTED
NOTARY PUBLIC
(INDIA)

Yogeshwar

DEPONENT

07 JUL 2025

PICTURES SHOWING PILES OF MIXED MUNICIPAL SOLID WASTE DUMPED AT THE
BLOCK-H DHALAO DESPITE CLEAR TRIBUNAL DIRECTIONS AND MCD'S
UNDERTAKING TO THE CONTRARY

WASTE BEING HANDLED ILLEGALLY AT
BLOCK-H DHALAO IN THE PRESENCE OF
MCD STAFF DESPITE THE HON'BLE NGT'S
DIRECTIONS TO CLOSE THE DHALAO AND
TO ENSURE THAT THIS DOES NOT
HAPPEN

20th May 2025

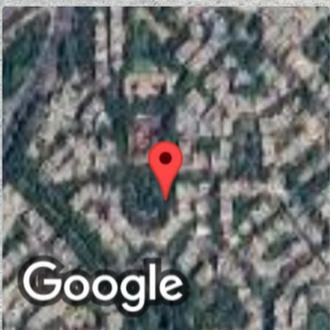


EVEN CHILDREN BEING ALLOWED TO ENGAGE IN ILLEGAL HANDLING OF WASTE BY MCD STAFF AT BLOCK-H DHALAO, IN VIOALTION OF NGT'S DIRECTIONS TO PREVENT THE SAME

25th May 2025



 **GPS Map Camera**



New Delhi, Delhi, India

31, Jangpura, Block G, Jungpura Extension, New Delhi, Delhi 110014, India

Lat 28.582461° Long 77.242286°

25/05/2025 12:42 PM GMT +05:30



**WASTE BEING DUMPED AT BLOCK-H
DHALAO ILLEGALLY IN VIOLATION OF
THE HON'BLE NGT'S DIRECTIONS AND
IN THE PRESENCE OF MCD STAFF
WHICH IS SUPPOSED TO PREVENT THE
SAME**

03rd June 2025



 **GPS Map Camera**

New Delhi, Delhi, India

H-10, Block H, Jungpura Extension, New Delhi, Delhi 110014, India

Lat 28.582349° Long 77.242258°

03/06/2025 02:12 PM GMT +05:30

WASTE BEING DUMPED ILLEGALLY AT
BLOCK-H DHALAO IN VIOLATION OF THE
HON'BLE NGT'S DIRECTIONS AND IN THE
PRESENCE OF MCD STAFF WHICH IS
SUPPOSED TO PREVENT THE SAME

06th June 2025

GPS Map Camera



Google

New Delhi, Delhi, India

H-10, Block H, Jungpura Extension, New Delhi,
Delhi 110014, India

Lat 28.582365° Long 77.242307°

06/06/2025 12:01 PM GMT +05:30

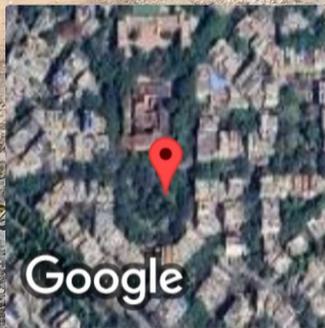
WASTE BEING DUMPED AT BLOCK-H
DHALAO ILLEGALLY IN VIOLATION OF
THE HON'BLE NGT'S DIRECTIONS AND IN
THE PRESENCE OF MCD STAFF WHICH
IS SUPPOSED TO PREVENT THE SAME

07th June 2025

दिल्ली नगर निगम
(नगर क्षेत्र)
(आवारा स्थान सुधारण)
सभी मामलों को सुधारा दिया जाता है कि इस कुड़ेदान में दिनांक
23-02-2025 से कड़ा डालना पुनः प्रतिबंधित कर दिया गया है।
कृपया इसको स्वयं पर न डालें (नहीं डालें) में MCD को JE
works (store) को पास स्थित माफ FCTS पर दिनांक 19-02-2025
से कड़ा डालें।
आपको सहयोग के लिए धन्यवाद
आभारपूर्वक
दिल्ली नगर निगम (नगर क्षेत्र)



GPS Map Camera



New Delhi, Delhi, India
H-10, Block H, Jungpura Extension, New Delhi,
Delhi 110014, India
Lat 28.582409° Long 77.242146°
07/06/2025 08:08 AM GMT +05:30

WASTE BEING DUMPED AT BLOCK-H
DHALAO ILLEGALLY IN VIOLATION OF THE
HON'BLE NGT'S DIRECTIONS AND IN THE
PRESENCE OF MCD STAFF WHICH IS
SUPPOSED TO PREVENT THE SAME

08th June 2025



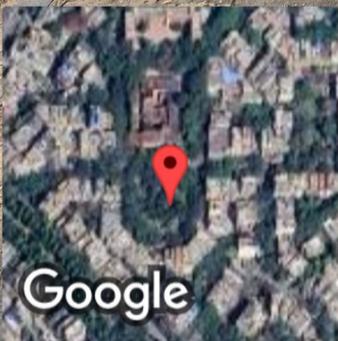
GPS Map Camera

New Delhi, Delhi, India

10, Block H, Jungpura Extension, New Delhi, Delhi
110014, India

Lat 28.582323° Long 77.242098°

08/06/2025 08:11 AM GMT +05:30



Google

PICTURES SHOWING PILES OF MIXED MUNICIPAL SOLID WASTE DUMPED AT THE BLOCK-D DHALAO DESPITE CLEAR TRIBUNAL DIRECTIONS AND MCD'S UNDERTAKING TO THE CONTRARY



WASTE BEING DUMPED AT BLOCK-D
DHALAO ILLEGALLY IN
VIOLATION OF THE HON'BLE
NGT'S DIRECTIONS AND IN THE
PRESENCE OF MCD STAFF WHICH
IS SUPPOSED TO PREVENT THE
SAME



16th June 2025



GPS Map Camera



New Delhi, Delhi, India

Mannu Marg, Jangpura Extension, New Delhi,
Delhi 110014, India

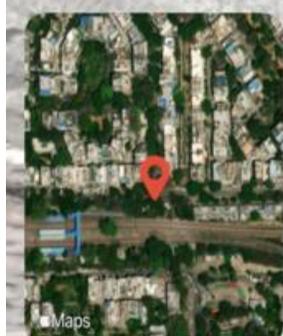
Lat 28.579487, Long 77.245408

06/16/2025 11:39 AM GMT+05:30

Note : Captured by GPS Map Camera

WASTE BEING DUMPED AT BLOCK-D
DHALAO ILLEGALLY IN VIOLATION
OF THE HON'BLE NGT'S
DIRECTIONS AND IN THE PRESENCE
OF MCD STAFF WHICH IS
SUPPOSED TO PREVENT THE SAME

19th June 2025



New Delhi, Delhi, India

Mannu Marg, Jangpura Extension, New Delhi,
Delhi 110014, India

Lat 28.579547, Long 77.245331

06/19/2025 08:15 AM GMT+05:30

Note : Captured by GPS Map Camera



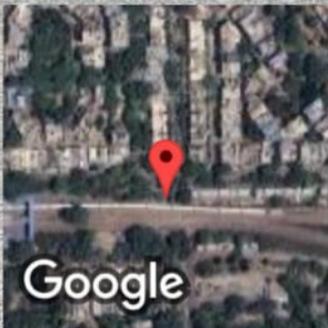
GPS Map Camera

WASTE BEING DUMPED AT BLOCK-D
DHALAO ILLEGALLY IN VIOLATION OF
THE HON'BLE NGT'S DIRECTIONS AND
IN THE PRESENCE OF MCD STAFF
WHICH IS SUPPOSED TO PREVENT
THE SAME

28th June 2025



GPS Map Camera



Google

New Delhi, Delhi, India

4, Jangpura, Block G, Jungpura Extension, Jal
Vihar, New Delhi, Delhi 110014, India

Lat 28.579462° Long 77.245609°

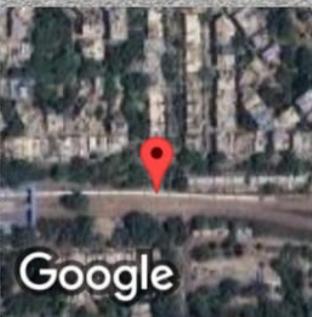
28/06/2025 10:15 AM GMT +05:30

WASTE BEING DUMPED AT BLOCK-D
DHALAO ILLEGALLY IN VIOLATION OF
THE HON'BLE NGT'S DIRECTIONS AND
IN THE PRESENCE OF MCD STAFF
WHICH IS SUPPOSED TO PREVENT
THE SAME

29th June 2025



GPS Map Camera



Google

New Delhi, Delhi, India

4, Jangpura, Block G, Jungpura Extension, Jal Vihar, New Delhi, Delhi 110014, India

Lat 28.579399° Long 77.245544°

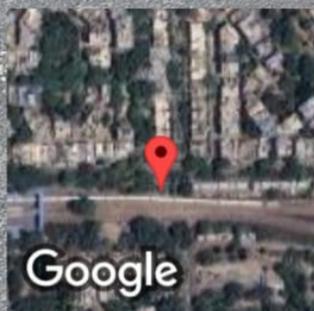
29/06/2025 12:09 PM GMT +05:30

WASTE BEING DUMPED AT BLOCK-D
DHALAO ILLEGALLY IN VIOLATION OF
THE HON'BLE NGT'S DIRECTIONS AND
IN THE PRESENCE OF MCD STAFF
WHICH IS SUPPOSED TO PREVENT
THE SAME

30th June 2025

दिल्ली नगर निगम
(एनएनटी)
(अव्यवस्थापन विभाग)
एनएनटी को सूचित किया गया है कि इस स्थल पर अशुद्धि
19.06.2025 से सफाई प्रारंभ होगी। प्रतिक्रिया कर दिया गया है।
इस स्थल पर अशुद्धि (Waste) को MCD को जे
19.06.2025 को सफाई कर FCTS पर निर्देश 19.06.2025
से सफाई प्रारंभ
आपको सूचित कि दिए गए अनुसार
जम्हायदारी
दिल्ली नगर निगम (एनएनटी)

GPS Map Camera



Google

New Delhi, Delhi, India

4, Jangpura, Block G, Jungpura Extension, Jal
Vihar, New Delhi, Delhi 110014, India

Lat 28.579442° Long 77.245561°

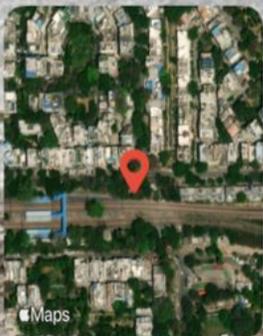
30/06/2025 10:59 AM GMT +05:30

WASTE BEING DUMPED AT BLOCK-D DHALAO ILLEGALLY IN VIOLATION OF THE HON'BLE NGT'S DIRECTIONS AND IN THE PRESENCE OF MCD STAFF WHICH IS SUPPOSED TO PREVENT THE SAME

04th July 2025



GPS Map Camera



New Delhi, Delhi, India

Hakikat Rai Road, Jangpura Extension, New Delhi, Delhi 110014, India

Lat 28.579445, Long 77.245239

07/04/2025 06:41 AM GMT+05:30

Note : Captured by GPS Map Camera

PICTURE OF MCD'S OFFICE ORDER DT. 08.05.2025

MUNICIPAL CORPORATION OF DELHI
DEPARTMENT OF ENVIRONMENT MANAGEMENT SERVICES
CENTRAL ZONE, LAJPAT NAGAR
NEW DELHI-110024

No. 123 /AC/DEMS/CNZ/2024-25

Dated 8/05/25

OFFICE ORDER

Since the Dhalaos of Jungpura Extension have been closed by the NGT, the following safai karamcharies are hereby deployed at D-Block and H-Block Dhalaos of jungpura Extention, Amar Colony as per below mentioned schedule for the purpose to stop unauthorized dumping of malba/garbage by the nearby/residents, with immediate effect, till further orders.

S.No.	Name and parentage of Safai Karamcharies	BMID No.	Timing	Shift
1.	Sh. Ashok Kumar S/o Sh. Balbir	51200529	06 AM to 02 PM	Ist Shift
2.	Sh. Madan S/o Sh. Rajbir	51200546	06 AM to 02 PM	Ist Shift
3.	Sh. Amit S/o Sh. Prem	51200518	02 PM to 10 PM	IInd Shift
4.	Sh. Rakesh S/o Sh. Ved Prakash	51200539	02 PM to 10 PM	IInd Shift


Assistant Commissioner
Central Zone/MCD

Copy to-

1. All Concerned Safai Karamcharies
2. SS Concerned
3. SI 146
4. O/c

Copy for kind information to:-
DC/Central Zone


TRUE COPY

TRUE COPY

PROOF OF SERVICE



Nipun Bhushan <adv.nipunbhushan@gmail.com>

Advance Service of Execution Application to be filed before the Hon'ble National Green Tribunal in O.A. 678/2023

Nipun Bhushan <adv.nipunbhushan@gmail.com>

Mon, Jul 7, 2025 at 9:36 PM

To: commissioner@mcd.nic.in, chdpcc@nic.in, psud@nic.in, pujakalra09@gmail.com

Dear Sir/Ma'am,

Please find attached a copy of the 3rd Additional Affidavit showing your incessant disobedience of law, of the Tribunal directions and breach of your own undertaking as well as of your own Office Order, being filed in E.A. 20/2025. Also note that since the said document's size is larger than 25mb, it is being sent as a google drive link.

Best Regards,



3rd Additional Affidavit E.A. 20 of 2025_Final .pdf



Nipun Bhushan
Advocate

Bhushan & Associates
Address: i-34, Ground Floor, Jangpura Ext., ND-14
Mobile: +91-9958799788
Email: adv.nipunbhushan@gmail.com

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[Quoted text hidden]