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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (PB)  
NEW DELHI**

**Original Application No. 108/2023**

**IN THE MATTER OF:**

Lokesh Khurana

...Applicant

*versus*

State of Uttar Pradesh & Ors

... Respondents

**REPLY ON BEHALF OF THE MUNICIPAL CORPORATION, MEERUT**


**MOST RESPECTFULLY SHOWETH:**

1. That the present matter is pending before the Hon'ble Tribunal and is next listed on 16.12.2024.
2. That in the present matter, previously an affidavit dated 04.09.2024 was filed by the Municipal Corporation and in continuation of the same, present status report is being filled for the kind perusal of the Hon'ble Tribunal as directed by the Hon'ble Tribunal to be submitted in the ordered format.
3. That in addition to the above, additional submission for the Legacy Waste and Fresh Waste Generation is craved to be made by the answering respondent, which is as under:

S.No	Headings and Descriptions	Status at Present	Future Plan	Time line
1	<p><b>Legacy Waste</b> As per the guidelines issued by the Central Pollution Control Board (CPCB), "Legacy Waste" refers to Municipal Solid Waste (MSW) that has been collected, stored, or disposed of over an extended period on barren land.</p> <p>This category of waste is characterized by its composition, which includes partially or fully decomposed biodegradable materials, plastic waste, textiles, metals, glass, and other substances.</p> <p>Legacy Waste is distinct from fresh municipal solid waste currently generated and managed by municipal corporations. A significant proportion of Legacy Waste comprises fine bio-soil, accounting for approximately 45-75% of the total weight.</p> <p>This is relevant to mention here that MNN has 2 legacy dumpsites i.e Lohia Nagar of 15 acres with remaining of 6.5 lakh MT of legacy and Mangatpuram with area of 10 acre where legacy wastes where the quantification is under process.</p>	<p>It is humbly submitted that the total quantity of legacy waste accumulated at the Lohianagar site was more than approximately 10 lakh metric tons, which has been amassed over a period exceeding 22-25 years.</p> <p>The Meerut Municipal Corporation has undertaken bioremediation activities, successfully processing approximately 4.5 lakh metric tons of the accumulated waste there at present as per the estimation 6.5 lakh of metric ton of legacy waste is being laid there.</p>	<p>The total quantity of legacy waste accumulated at the Lohianagar site is estimated to be approximately 6.5 lakh MT, accumulated over a period of more than 20 to 22 years.</p> <p>The bioremediation efforts aim to restore the ecological conditions of the site, reintroducing flora and fauna that were historically present in the region, in line with the environmental standards of the historical city of Meerut.</p> <p>Approximately 4.5 lakh metric tons of legacy waste has been removed from the site through the disposal of Refuse-Derived Fuel (RDF) material, bio-soil, and other residual materials, in an environmentally compliant manner, in accordance with the provisions of the Solid Waste Management Rules, 2016.</p> <p>The RDF material, which has a calorific value exceeding 1500 kcal/kg, has been disposed of in accordance with the RDF disposal guidelines specified under the Swachh Bharat Mission Guidelines 2.0, and supplied to the appropriate industries in the vicinity of the site.</p> <p>At present, a tendering process is underway to engage a suitable contractor to address the remaining legacy waste, with a view</p>	<p>The tender floating process, including technical and financial evaluation, issuance of the Letter of Acceptance (LOA), and work order finalization, is expected to be completed by the end of March 2025.</p>

			to executing the work at competitive rates and within the prescribed timeline. Although an initial tender had been finalized, modifications to the scope of work have necessitated a revision, and accordingly, the contract for the work may be reallocated to qualified bidders within a short duration to ensure compliance with the relevant regulatory requirements and timelines.	
2	<p><b>Fresh Waste</b></p> <p>With respect to the generation of fresh waste in the city of Meerut, it is estimated at approximately 650 to 700 metric tonnes per day (TPD). Considering that Meerut is classified as a Tier-2 city with a significant slum population, the waste generation estimate aligns with the guidelines issued by the Ministry of Housing and Urban Affairs (MoHUA) and the Central Public Health and Environmental Engineering Organization (CPHEEO), which suggest an average per capita waste generation rate of approximately 0.3 to 0.4 kilograms per day considering the lower side of calculation.</p> <p>Given the city's population of approximately 1.5 million, this waste generation estimate of 650 to 700 metric tonnes per day is consistent with the demographic profile and correlates with the data maintained by the Meerut Municipal Corporation.</p>	<p><b>1. Infrastructure for Waste Management:</b> The Meerut Nagar Nigam has established robust infrastructure for managing municipal solid waste generated within its jurisdiction. This includes vehicles designated for the primary collection and secondary transportation of waste, ensuring compliance with Rule 15 of the Solid Waste Management Rules, 2016, which mandates proper segregation of waste at the source.</p> <p><b>2. Outsourcing of Primary Collection:</b> The task of primary collection of door-to-door waste in 73 wards has been outsourced to M/s BVG Waste Management, while MNN independently manages waste collection in 17 wards.</p>	<p><b>1. Active Monitoring and Strategic Initiatives:</b> The Meerut Nagar Nigam (MNN) is diligently monitoring the challenges associated with achieving maximum source segregation of waste and ensuring 100% door-to-door waste collection. To address these challenges, MNN is taking proactive measures, including the formal integration of informal sector workers (e.g., kabadiwalas) into the waste management system to enhance operational efficiency and coverage.</p> <p><b>2. Capacity Building Through IEC Activities:</b> MNN is set to launch intensive Information, Education, and Communication (IEC) campaigns aimed at raising citizen awareness and building community capacity for adopting and sustaining a well-organized</p>	The project is scheduled to commence by February 2025 and is expected to be completed within a construction period of 24 months.

		<p>For these operations, M/s BVG employs over 250 vehicles, and MNN deploys 75 vehicles. The segregation levels achieved at the source are in line with statutory requirements. This is substantiated by the Swachh Survekshan 2023 results, published on the official portal, which indicate the following performance metrics for MNN:</p> <ul style="list-style-type: none"> <li>○ <b>82% compliance</b> in door-to-door waste collection,</li> <li>○ <b>65% compliance</b> in source segregation.</li> </ul> <p><b>3. Dry Waste Management:</b> MNN processes approximately 220 metric tons per day (TPD) of dry waste through 10 operational Material Recovery Facilities (MRFs). The processed dry waste is subsequently transferred to authorized end-users in an environmentally sustainable manner. This ensures that approximately 42-45% of the daily generated waste is diverted before it get dumped anywhere reducing the emission of greenhouse gases</p>	<p>and efficient waste management system.</p> <p><b>3. Exploration of Opportunities for Improvement:</b> MNN has identified opportunities to enhance waste management in Meerut, including the implementation of advanced waste-to-energy projects. To this end, an agreement has been executed with the National Thermal Power Corporation (NTPC) for a project valued at ₹300 crores. The project involves the conversion of municipal waste into green charcoal, ensuring the environmentally sustainable disposal of the city's daily waste generation. The project is being executed on a fast-track basis to address waste management challenges effectively and expeditiously.</p> <p>These initiatives collectively aim to ensure sustainable waste management and compliance with statutory obligations while promoting environmental conservation within the jurisdiction of MNN.</p>	
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		<p>resulting from uncontrolled decomposition. There are several informal sectors those are working as an kabaddi system in the Corporation area to collect and dispose the dry waste to the end users or the recyclers in a very huge quantity covering almost maximum of dry waste .it is a justified with the CPCB guidelines and SBM 2.0. 1.4.5.9.MNN has about 10 material recovery centre to cater the recyclable and segregating about 45 different kinds of materials at MRFs.</p> <p><b>4. Wet Waste Management:</b> For the management of wet waste, MNN operates a composting facility at Gawdi. Utilizing windrow formation techniques and pit composting, the facility processes more than 420 TPD of wet waste daily with windrow heaps and pits.</p> <p>Additionally, bulk generators such as hotels, restaurants, marriage halls, and community centres are mandated to manage their wet waste on-site by converting it into compostable material for in-premises use.</p>		
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		<p>5. <b>Construction and Demolition (C&amp;D) Waste:</b> Construction and demolition waste generated within MNN's jurisdiction is transported to and temporarily stored at the Gawadi collection site, in compliance with construction and demolishing waste management rule protocols.</p> <p>6. <b>Domestic Hazardous and Biomedical Waste Management:</b> MNN has entered into an agreement with M/s Synergy Waste, located at Subharti University, for the scientific and environmentally compliant management of domestic hazardous waste and biomedical waste. This ensures adherence to prescribed disposal norms for hazardous waste streams.</p> <p>This comprehensive waste management framework underscores MNN's compliance with the Solid Waste Management Rules, 2016, and other applicable statutory guidelines.</p>		
3	<p><b>Leachate Waste</b> The leachate is effectively directed through a garland drain into a sump, from where it is extracted using suction pumps. Subsequently, the extracted leachate is transported for treatment at</p>			

<p>the 72 MLD Sewage Treatment Plant (STP) owned by Meerut Nagar Nigam, located at Kamalpur, Meerut.</p> <p>Thus, the aforementioned processes and measures substantiate compliance with the justifications sought by the Hon'ble Tribunal.</p>			
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4. That the above information is humbly placed before the Hon'ble Tribunal for kind perusal. No material information is concealed herefrom and all information provided above is derived out of the official records maintained by the Meerut Municipal Corporation.



**(Nagar Swasthya Adikari)**  
Meerut Nagar Nigam

*Through Counsel*

**(VIBHAV MISHRA)**

Advocate

Ch No.221, CK Daphtary Lawyers' Chamber  
Tilak Lane, Supreme Court of India  
New Delhi-110001

**Place:** Delhi

**Date:** 12.12.2024



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**IN THE MATTER OF:**

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AFFIDAVIT

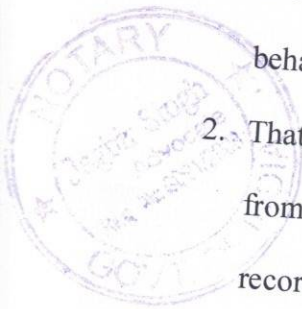
I, Dr. HARPAL SINGH, S/o SHRI CHETAN SINGH, AGED ABOUT 50 Yrs,  
PRESENTLY POSTED AS NAGAR SWASTHYA ADIKARI, MEERUT NAGAR  
NIGAM, WITH OFFICE AT MEERUT NAGAR NIGAM, MEERUT UTTAR  
PRADESH, PRESENTLY AT MEERUT, UTTAR PRADESH

I, the above-named deponent, do hereby solemnly affirm and depose on oath as  
under:

1. That the deponent is presently posted as the Nagar Swasthy Adikari, Meerut  
Nagar Nigam and is thus, well conversant with the facts and circumstances  
of the present case and is duly authorised to swear the present affidavit on  
behalf of the Meerut Nagar Nigam.
2. That the deponent affirms that the facts contained in the accompanying reply  
from paragraph 1 to 4 of the reply are true and correct from the official  
records maintained by the Meerut Nagar Nigam and no part of it is incorrect  
and false.



DEPONENT

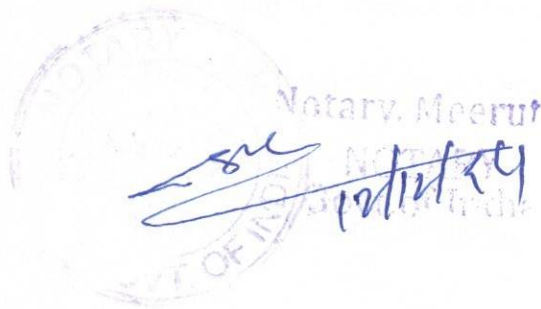


**VERIFICATION:**

Verified on this 12<sup>th</sup> Day of December, 2024 at Meerut that the contents of the above affidavit are true and correct to my knowledge derived out of records and no part of it is incorrect and nothing material has been concealed therefrom.



DEPONENT



Notary, Meerut  
12/12/24