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**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

IN

Original Application No. 606/2018

(In Respect of State of Maharashtra)

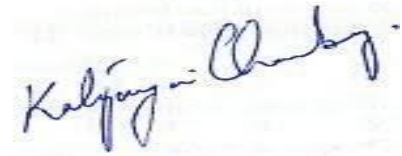
IN THE MATTER OF:

**COMPLIANCE OF MUNICIPAL SOLID WASTE MANAGEMENT RULES, 2016
AND OTHER ENVIRONMENTAL ISSUES**

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| 1. | Observation note by the Amicus Curie to Status Report/ Compliance Affidavit filed by the Respondent State of Maharashtra | |

Dated: 02.04.2026
New Delhi



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**BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
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IN THE MATTER OF:

**COMPLIANCE OF MUNICIPAL SOLID WASTE MANAGEMENT RULES, 2016
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OBSERVATION NOTE FOR THE STATUS REPORT FILED BY THE CHIEF SECRETARY TO GOVERNMENT, MUNICIPAL ADMINISTRATION AND WATER SUPPLY DEPARTMENT, GOVERNMENT OF MAHARASHTRA.

The present submission is filed in response to the status report placed on record concerning solid waste, legacy waste, and sewage management across the concerned Urban Local Bodies. While the report purports to indicate progress in certain areas, a closer examination reveals persistent systemic deficiencies, significant gaps in infrastructure, and a lack of effective implementation.

It is respectfully submitted that the data disclosed in the report itself demonstrates that waste processing remains grossly inadequate in comparison to the volume of waste generated. The submissions herein, therefore, seek to highlight these shortcomings and place on record the urgent need for time-bound, verifiable, and accountable measures.

The following is the observation note for the kind perusal of the Hon'ble Tribunal:

| TOPIC | AFFIDAVIT INFORMATION | OBSERVATION |
|-------------|---|---|
| ULB details | 1. Total population in the State- 12.93 crore (projected as per 2011 census) 2. Total ULBs- 411 | In general, the governance must include: a) Data- driven monitoring b) Accountability of municipalities c) Citizen's participation |

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| | | <p>Education at school and college level regarding segregation and disposal of waste.</p> <p>Environment education Judgment by the Hon'ble Supreme Court in M.C. Mehta v. Union of India [<i>Writ Petition (Civil) No. 860 of 1991; (1992) 1 SCC 358: AIR 1992 SC 382</i>]</p> |
| Solid Waste | <ol style="list-style-type: none"> 1. Total waste generation- 26,362 TPD 2. Total collected and transported- 26,362 TPD 3. Final disposal- SLF/ processing plant 4. Gap-(generation- processing in 363 ULBs) 5437.23 TPD (Timeline- Dec 2027) pg. 585 5. WTE plant- Plant capacity- 1729 TPD (intake of feed- 1050 TPD). Flyash used to make bricks, residue disposed at SLF (pg. 560) 6. District level verification committee formed under that chairmanship of Joint Commissioner (pg. 506, Annex, Govt Order) 7. Total funds committed: Rs. 25,376 Cr. 8. Funds for SWM approved- Rs. 4837.50 Cr. 9. City Sanitation Action Plan (CSAP) of Rs 7040.71 Crore (pg. 520) 10. City Solid Waste Action Plan (CSWAP) of Rs 6303.05 Crore for 411 ULBs. (pg. 519) 11. Implementation of solid waste management- the Government of Maharashtra has empanelled Five Agencies across Six divisions of Maharashtra State | <ol style="list-style-type: none"> 1. Method/ technology of Waste processing plants not provided. 2. Real-time monitoring system (GPS + GIS) is required for Solid and liquid waste management 3. The State can develop “online complaint Apps” for people to post violations. 4. Mandatory bulk waste generator enforcement. 5. Mandatory in- situ segregation of daily waste into 3 bins (wet waste, dry waste and sanitary waste) 6. There is no information regarding C& D waste. 7. There is no information on disposal of sanitary and other household bio medical waste. 8. Prevent any solid waste (mixed waste) dumping into water bodies and drains. 9. For plastic waste disposal- EPR may be strengthened with buy back centers and reverse logistics. 10. Absolute ban on low- value plastic (+ one-time plastic products) |

| | | |
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| | <p>12. WTE: 1 plant commissioned at Pimpri Chinchwad @ 700 TPD capacity (4 WTE Plants at different stages of progress)</p> <p>13. Compressed bio- gas project- 1 commissioned at Kolhapur (10 projects underway)</p> | <p>11. The State may consider “Zero- landfill ULBs” Action Plan (Zero- waste wards, litter free zone, strict fines)</p> <p>12. Convert non- recyclables into energy</p> <p>13. Use of Smart waste bins wherever possible</p> |
| Legacy Waste | <p>1. Total quantity present- 4,09,76, 927 MT</p> <p>2. Total LWS- 334 (In Aug 2022 it was 333, a new LWS is added)</p> <p>3. Daily added- 5396 TPD</p> <p>4. Timeline LWS remediation- Dec 2028</p> | <p>1. Reduce landfill pressure and dependence</p> <p>2. Leachate collection and treatment (in- situ)</p> <p>3. Action plan for remediated LWS (including use of recovered land)</p> <p>4. Avoid any new waste reaching landfill/ dumpsite. Only processed inert waste maybe allowed (after exhausting all other reuse options)</p> <p>5. Public disclosure portal for Solid and liquid waste.</p> |
| Liquid Waste | <p>1. Total sewage generated- 9073 MLD (pg. 609/ 620)</p> <p>2. Household connections timeline- Jan 2032</p> <p>3. STP installed capacity- 7399 MLD (pg. 630)</p> <p>4. STP Utilized capacity- 5201 MLD</p> <p>5. GAP- 3872 MLD</p> <p>6. Timeline for new STP- Jan 2032</p> <p>7. Total drains- 78009 (in 378 ULBs, pg. 621)</p> <p>8. Type of drains- Mixed</p> <p>9. Final discharge- rivers/ water bodies</p> <p>**Some STPs are functioning at 100% capacity- eg. Pune (pt.359-360 at pg. 639, Kohlapur pt. 340, Nagpur pt. 250)</p> | <p>1. Huge gap between sewage generation and treatment. Owing to STPs operational mismatch and lower household connections.</p> <p>2. Untreated mixed effluents is being discharged (treated/ untreated) into rivers and water bodies, such practice must be stopped.</p> <p>3. What is the industrial effluent treatment system being followed in the State?</p> <p>4. De-centralized sewage treatment system could be considered (in select cases/ areas eg. Slums, small villages and towns etc.)</p> <p>5. Fix underutilized and over utilized STPs.</p> <p>6. Real-time monitoring (OECM portals, sensors, digital display boards etc)</p> |

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| Ring fenced account | <ol style="list-style-type: none"> 1. Date of Account- 2. Amount deposited- 3. Amount utilized- 4. Other details- | <ol style="list-style-type: none"> 1. Performance-linked grants to ULBs |
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There is persistent processing deficits, underutilization of treatment infrastructure, lack of scientific landfill facilities, inconsistencies in legacy waste data, and absence of transparent financial disclosures necessitate urgent corrective intervention.

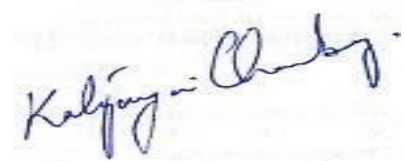
The progress reported is outweighed by continued gaps in processing capacity, accumulation of legacy waste, and lack of functional sewage treatment systems.

It is therefore prayed that appropriate directions be issued to ensure strict compliance, regular monitoring, and expeditious implementation of waste and sewage management measures.

The observation note is respectfully submitted for the kind perusal of the Hon'ble National Green Tribunal, Principal Bench, New Delhi.

AND FOR THIS ACT OF KINDNESS, THE ADVOCATE AS IN DUTY BOUND SHALL EVER BE GRATEFUL.

Dated: 02.04.2026
New Delhi



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