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

IN

ORIGINAL APPLICATION NO. 606 OF 2018

IN THE MATTER OF:

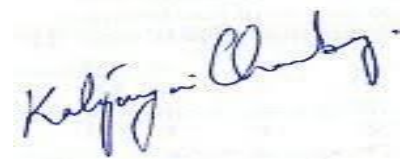
**COMPLIANCE OF MUNICIPAL SOLID WASTE MANAGEMENT RULES, 2016
AND OTHER ENVIRONMENTAL ISSUES**

INDEX

S.no.	Contents	Page No.
1.	Observation note by the Amicus Curiae to Status Report/ Compliance Affidavit filed by the Respondent Union Territory of Chandigarh	

Dated: 21.04.2026

New Delhi



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

The present submissions are being made in the context of the affidavit filed by the Union Territory of Chandigarh, in compliance with the directions of this Hon'ble Tribunal in Original Application No. 606/2018, concerning the implementation of statutory obligations under the Solid Waste Management Rules, 2016 and allied environmental laws.

The affidavit, while asserting substantial compliance, reflects the following critical issues:

- i. Significant gaps in waste accounting.
- ii. Inefficiencies in processing, particularly in composting and RDF utilisation
- iii. Presence of heavy metals in compost, raising environmental and public health concerns
- iv. Continued discharge of sewage into stormwater drains, contradicting compliance claims
- v. Operational irregularities in STPs, including over-capacity functioning and pending approvals
- vi. Lack of transparency in financial utilisation under the ring-fenced account
- vii. Potential environmental risks from co-disposal of multiple waste streams in landfill

These issues indicate prima facie non-compliance and warrant further scrutiny.

**OBSERVATIONS AND COMPLIANCE ANALYSIS OF AFFIDAVIT FILED BY UNION
TERRITORY OF CHANDIGARH, (APRIL 26)**

Issue	Observation from Affidavit dated 14.04.2026
<p>Solid waste (pg. 1475, Annex B)</p>	<ol style="list-style-type: none"> 1. Average MSW generation- 500 TPD 2. Treatment systems: <ol style="list-style-type: none"> a) 3 MRFs- 75 tonnes/ shift b) WTE @ 5 TPD - receives 1 TPD Mandi waste (0.018 inert/ mixed waste residue disposed to landfill) c) 200 TPD RDF plant (pg. 1461)- total 109 TPD is sent to RDF plant, out of which 82 TPD of combustible waste is sent to paper and cement industries, remaining 2 TPD in landfill site. Where is the remaining 25 TPD RDF disposed. d) 300 TPD Compost plant (pg. 1461)- out of total 286 TPD bio- degradable waste generated, 190 TPD is sent to compost plant, 7 TPD compost is produced, approx. 17 TPD inert is sent to landfill site. e) Compost test report- (pg. 1483) Cr & Cadmium, lead, nickel are high (although within prescribed range but cumulative impact of such hazardous waste must be considered) f) Mixed waste processing- 100 TPD (70 TPD is generated) g) Bio- methanation plant- 5 TPD h) Coconut shell shredder- 10 TPD i) Cloth, mattress shredder- 10 TPD j) Non- recyclable- 8TPD k) Inert- 27 TPD l) 62 TPD Horticulture waste processing plant- the plant receives 96 TPD (remaining waste is processed through land composting- therefore no gap) m) Sanitary waste- 1 TPD (disposed through incinerator) 3. Challans in 3 months- 2869 challans 4. 100 % door to door collection claimed
<p>Legacy waste (pg. 1478)</p>	<ol style="list-style-type: none"> 1. Total legacy waste till 19.09.25- was 55000 MT (across 45 acres, pg. 1472) 2. Present legacy waste- 6100 MT 3. Bio- remediation will be completed by the end of April 2026

	<ol style="list-style-type: none"> 4. Bio-soil is used to fill low lying areas in sec 47 and 50 at Mullanpur, Punjab 5. 1934 MT inert & others- disposed of in sanitary landfill 6. Out of 45 acres of dumping land- 20 acres has been cleared. (pg. 1472-73) On this 20 acres of land a 300 TPD wet waste and mixed waste processing plant has been set up. Another 16.72 acres (from remaining 25 acres) has been capped and covered. Remaining 8.28 acres is currently being utilised as sanitary landfill site. 7. 8.28 acres Landfill receives- <ol style="list-style-type: none"> a) 2 TPD of RDF residue b) 17 TPD of compost inert (with hazardous metals) c) 0.018 TPD inert & residue from WTE d) 1934 MT of landfill inert
<p>Liquid waste (pg. 1465)</p>	<ol style="list-style-type: none"> 1. Sewage generated (approx..)- 232 MLD 2. Total 8 STPs with installed capacity- 253.5 MLD 3. 8 STP's utilisation capacity- 230.62 MLD 4. Raipur Kalan STP installed capacity is 22.5 MLD but it's utilisation capacity is 24.36 MLD 5. Storm water drains- Sukhna choe, N choe, Patiala ki rao and Faidan choe. Faidan choe receives sewage. It merges with N -Choe and finally drains into River Ghaggar. Faida Choe (pg. 1571) the BOD indicates bacterial contamination. 6. Sukhna Choe data shows astonishingly high FC/FC and also BOD (pg. 1568) 7. N-Choe water analysis report (pg. 1569)- hazardously high FC/TC, significantly high BOD 8. Patiala ki Rao (pg. 1570) the BOD is alarmingly high alongwith the FC/TC 9. 100% household connections of sewer networks (241171 households) 10. 'Consent to Operate' pending for 135 MLD STP at Diggan.
<p>Ring fenced account</p>	<ol style="list-style-type: none"> 1. Account opening date- 04.11.24 2. Amount utilised- 202.86 Cr.

OBSERVATIONS ON BEHALF OF THE AMICUS CURIAE

Upon a detailed review, the affidavit reveals multiple inconsistencies, data gaps, and areas of insufficient disclosure in relation to statutory compliance under the Solid Waste Management Rules, 2016 and 2026 Rules.

These observations are respectfully placed before this Hon'ble Tribunal for appropriate consideration and directions.

I. SOLID WASTE MANAGEMENT

As per the affidavit (*Annexure B, p. 1475*), the average municipal solid waste (MSW) generation is stated to be 500 tonnes per day (TPD), with a claimed treatment capacity of 100%.

- i. The functioning and capacity of Material Recovery Facilities (MRFs), Waste-to-Energy (WTE) units, Refuse-Derived Fuel (RDF) plants, composting facilities, and other processing units raise several inconsistencies requiring clarification.
- ii. While 286 TPD of biodegradable waste is reported, only 190 TPD is processed at the compost plant, leaving approximately 96 TPD unaccounted for.
- iii. The RDF plant reportedly receives 109 TPD; however, only 82 TPD is utilized by cement and paper industries and 2 TPD is landfilled, leaving 25 TPD unexplained.
- iv. Compost output is disproportionately low (7 TPD) relative to input, and test reports indicate the presence of heavy metals such as chromium, cadmium, lead, and nickel, raising concerns regarding long-term cumulative environmental impact.
- v. The disposal mechanism for inert waste (27 TPD) and dairy waste has not been clearly specified.
- vi. The status and operational details of the Construction and Demolition (C&D) waste processing facility remain unclear.

II. LEGACY WASTE MANAGEMENT

- i. Legacy waste has reportedly reduced from 55,000 MT to 6,100 MT, with completion of bio-remediation anticipated by April 2026. (p. 1478):
- ii. Of the total 45 acres of dumping site, 20 acres have been reclaimed and repurposed, and 16.72 acres capped, while 8.28 acres continue to function as a sanitary landfill.

- iii. The landfill currently receives multiple waste streams, including RDF residue, compost inert containing heavy metals, WTE residue, and legacy inert waste.
- iv. The cumulative environmental impact of such concentrated disposal, particularly with hazardous constituents, warrants detailed scrutiny.
- v. The disposal pathway for C&D waste remains unspecified.

III. LIQUID WASTE MANAGEMENT

- i. Sewage generation of approximately 232 MLD, with treatment capacity marginally exceeding generation.
- ii. However, discrepancies exist, such as the *Raipur Kalan STP* operating beyond its installed capacity.
- iii. Despite claims that stormwater drains remain free of sewage discharge, it is acknowledged that Faidan Choe receives sewage and ultimately discharges into the Ghaggar River.
- iv. Further, water quality analysis reports reveal: Alarming high levels of fecal coliform (FC), total coliform (TC), and biochemical oxygen demand (BOD) across all 4 major storm water drains (i.e. Sukhna Choe, N Choe, Patiala ki rao and faidan choe), indicating significant pollution and potential public health risks.
- v. Additionally, the reason for the pending “*Consent to Operate*” for the 135 MLD STP at Diggian has not been clarified.

IV. RING FENCED ACCOUNT

- i. The ring-fenced account was opened on 04.11.2024, with an expenditure of ₹202.86 crores reported.
- ii. However, a detailed break-up and justification of expenditures has not been adequately provided.

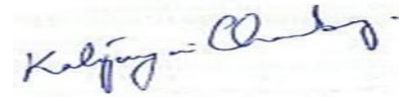
In light of the foregoing, it is respectfully submitted that the affidavit filed by the Union Territory of Chandigarh contains several inconsistencies, data gaps, and areas lacking clarity, particularly in relation to waste accounting, treatment efficacy, environmental safety, and regulatory compliance. These issues warrant further clarification and appropriate directions from this Hon’ble Tribunal.

1578

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

Dated: 21.04.2026

New Delhi

A handwritten signature in blue ink, appearing to read 'Katyayni - Chauhan'.

Through
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(advocate)
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