BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

Original Application No. 481/2024

IN THE MATTER OF:

News item titled "Major fire erupts at Delhi's Ghazipur landfill site smoke engulfs region" appearing in the Hindustan Times dated 21.04.2024.

SUBMISSION TO STATUS REPORT FILED BY THE RESPONDENT/ MUNICIPAL CORPORATION OF DELHI {MCD} IN COMPLIANCE OF THE ORDER DATED 05.01.26 PASSED BY THIS HON'BLE TRIBUNAL

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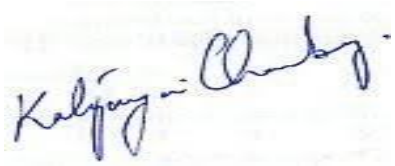
Dated: 06.04.2026
New Delhi



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SUBMISSION TO STATUS REPORT FILED BY THE RESPONDENT/ MUNICIPAL CORPORATION OF DELHI {MCD} IN COMPLIANCE OF THE ORDER DATED 10.07.25 PASSED BY THIS HON'BLE TRIBUNAL

The Hon'ble Tribunal, vide order dated 16.10.2025 in OA No. 481/2024, directed Court Commissioner to examine and submit comments on the Affidavit dated 10.10.25 filed on behalf of MCD . The effective para of the order is as follows:

> *"4. Learned Court Commissioner seeks a weeks' time to examine the status report and submit her comments on it…"*

In compliance of the above-mentioned order, the following observation alongwith suggestions is submitted for the kind perusal of the Hon'ble Tribunal

The MCD affidavit dated 10.10.2025 details the operational status, challenges, biomining progress, waste management practices, and compliance gaps at the Ghazipur sanitary landfill site, including daily waste inflows, processing shortfalls, temporary measures like C&D covering, leachate handling, and WTE plant deficiencies, as supplemented by later affidavits up to 30.12.2025.

I. Key observation from the affidavit dated 30.12.2025 by MCD are as follows:

MCD Affidavit dated 30.12.2025	Observation
Function of WTE 1. WTE Plant capacity- 12 MW 2. Waste storage capacity- 35000 MT 3. Para 8 indicates that the WTE was non-operational due to some " operational exigencies" as stated below: *"That the WtE plant ordinarily operates on a round-the-clock basis. However, owing to operational exigencies such as variation in waste quality and the requirement of routine maintenance and cleaning of pressure parts, temporary shutdowns of the plant are sometimes necessitated.* *12.That upon completion of the requisite maintenance works, the WtE plant resumed operations with effect from 05.12.2025, and the waste intake has since increased to approximately 900 tonnes per day (TPD)."*	The WTE has remained non- operational for unreasonable amount of time. **As per Affidavit of EE dated 30.12.25-** WTE was not operational from April 2025 till December 2025- adding approx. 900 TPD to the landfill**.**
Leachate plant Treatment capacity- 65 KLD	

II. Key observation from the affidavit dated 10.10.2025 by MCD are as follows:

MCD Affidavit dated 10.10.25	Observation
Para 2. 1. It is submitted that Ghazipur sanitary landfill site receives <u>2400 to 2600 MT of fresh waste every day</u>. Out of this the <u>WTE plant</u>	a) Fresh waste received- 2400-2600 MTD

at Ghazipur processes 700 to 1000 MT/Day. The balance is dumped at land fill site, at the limited space created through biomining, since vertical expansion is restricted. 2. Therefore around 300 MT/Day is presently diverted to Okhla processing facility, however the quantum of diversion is subject to the operational requirements of the Okhla plant, as sometimes the fulfilment of demand is not optimum through the designated zones for Okhla Plant. 3. That various Challenges were encountered such as no working spaces for trommel machines to operate, non-availability of specialized machines/technology and in experienced contractors for the said job. A volumetric assessment of the site was carried out in **July 2022** through drone survey, which was assessed approx. at 85 lakh metric tonne of legacy waste with mound height of about 65 metres. 4. Thereafter integrated contracts were awarded for biomining. Under the first contract awarded in November 2022, against a target of 30 lakh MT only 13.9 MT could be processed upto December 2024 leading to termination of the contract on 17.12.24 for non- Performance by the said agency. 5. That after this another contract was awarded to *M/s Alwazo solutions Pvt Ltd* on 07.03.25 for processing progress. Under present contract 6.60 lakh MT has been processed of 30 lakh MT (extendable by 15 lakh MT), which is currently in upto 31.08.2025 and is continuing the work as awarded. 6. As of August 2025, 32 1akh MT of legacy waste has been processed.	b) WTE Plant- 700-1000 MTD c) GAP- 1700 MTD d) Fresh waste dumped at landfill- 1700 MTD **As per Affidavit of EE dated 30.12.25-** WTE was not operational from April 2025 till December 2025- adding approx. 900 TPD to the landfill**.**
Para 3: The steps undertaken are: (i) The agency has been requested to increase the progress of work to achieve stipulated target of three months prior to finishing the targeted work. (ii) To expedite the bio mining of balance of legacy waste, the process of further tendering is in progress. The target to complete bio mining of legacy waste and achieve desired target is 2027 December. (iii) Setting up of another waste to energy plant of processing capacity 2000 MT of waste daily on the reclaimed portion of land. The destinations for transferring the Bio-mined/ segregated fractions are as follows:	1. Chronic delay in Biomining 2. Fresh waste being accumulated at the landfill site.

Inert: Low lying areas for development C&D: Low lying areas for development RDF: For use in factories, paper mills etc. authorized by UPPCB for using it as fuel. The factories are situated in Meerut, Muzaffarnagar(UP)	
Para 4: This activity enabled the **clearing of about *5* acres of land**, as submitted before this court. That it is further submitted that owing to the mismatch between the daily quantum of fresh waste received approx. 2400 to 2600 MT and present processing capacity of approx. 700 to 1000 MT daily there remains a gap of 1500 to 1600 MT per day which cannot be processed immediately. In order to manage this balance quantity, the same is accommodated by dispersing it over already existing pockets within the limited available space at Ghazipur site. This is done in a systematic manner by layering, compacting, and covering with C&D to minimize odour, leachate and fire risk and is also permissible under schedule-I clause-C (specification for sanitary land fill site) issued by MOEFCC GOI. This is temporary measure arising out of lack of additional land and processing facilities and the respondent MCD is actively engaged in expansion of, waste to energy plant and bio-mining operations to reduce this dependency.	
Para 5: That out of legacy waste being bio mined **approx. 5 acres** of land has been cleared. This space is not left vacant but is being utilized for operational requirements. The cleared land is used to set up infrastructural facilities such as sheds and platforms for operation of trommel machines. Storage area for refuse derived fuel (RDF), inert material/C&D recovered from biomining. The space for vehicles engaged in waste transport is also carved out. The cleared land is not wasted.	1. "reclaimed land" is being used for (waste) operational requirements. 2. No plan for soil and groundwater remediation mentioned.
Para 8: **Leachate Management**- at plant the leachate generated is being collected and re-used at SLF by sprinkling over it to settle the dust and for the bio-culture of fresh waste. Furthermore, MCD has constructed two leachate collection Tanks with a capacity of 50,000 Liters each. The leachate tanks were completed in December 2024. That presently proposal for operation and maintenance of LTP at Okhla is under process.	1. Leachate management appears to be inadequate

Para 9: **Inert and C&D** stacking at Dumpsite- All these materials are stacked at sites, which is thereafter disposed off at various locations as mentioned above in the tabular format. Some C&D material is also received from nearby zones/areas. The same is stacked at some location (near fresh dumping points) on the dump site. Since decomposition is a continuous process, there are chances of fire incidents, as waste sites matter produce methane gas due to anaerobic decomposition of organic, therefore C&D material is spread over the waste received to curtail the volatile gases which might erupt due to high temperature.	1. It has been admitted that C& D Waste is received and stacked at the landfill site. 2. However, the same is spread over the landfill to curtail fire produced due to Methane production. 3. Does C&D waste halt subsurface anaerobic processes generating methane? 4. What is the action plan for capturing methane through engineered gas collection system?
Para 11: Leachate flow through Kachha drains- it is submitted that the drain located near gate no 2 was a Pucca drain but with passage of time, the condition has deteriorated. To strengthen/ reconstruct the drain the proposal has been moved. There is another drain connected to leachate tank which is nearby fish market.	Although the problem has been identified, yet the solution is awaited and no definite timeline provided.
Para 12: Waste to energy plant at Ghazipur receives around 700 to 1000 MT/Day. The Nominal capacity is 1300 MT/Day, and operational capacity is 800 to 850 MT/day. To manage fluctuations in daily waste inflow and maintain continuous operation, the facility has been provided with a waste storage pit, which serves as a temporary holding area before waste is mechanically processed and fed into incineration. **Affidavit dated 30.12.25 by EE-** Paragraphs 5 to 12 of the affidavit, read with Annexure-A, amount to clear admissions that:	1. WTE Plant is utilised undercapacity/ deficient 2. These admissions demolish the contention that the WTE facility meaningfully mitigates waste accumulation at the Ghazipur landfill.

a. The WTE plant, though designed for 1300 TPD waste intake and 12 MW generation, remained non-operational for extended periods spanning April to December 2025; b. There were repeated shutdowns due to fires in the boiler area and other operational failures; (pg. 724) c. The "annual maintenance" extended abnormally for nearly three months and the waste intake has since increased to approximately 900 tonnes per day (TPD)	
Para 12: WTE plant MSW/ RDF is burnt in high temperature furnace or incinerator to generate electricity. When this waste combusts, a fly ash/bottom ash is produced which is used for making fly ash bricks for which few purchasers are available in the market.	1. As per para wise reply dated 9/7/25 filed on behalf of the MCD. The following admission has been provided regarding fly ash utilisation: 2. Para 5 (19.6): clearly states that "*Yes, the same is used to cover the MSW and on the Approach road*." 3. It is also an admitted fact that the waste does contain heavy metals alongwith other hazardous and non hazardous items. *Para 5 (23)

III. SUCCESSFUL LEGACY WASTE REMEDIATION PROJECTS

India boasts numerous success stories of complete landfill remediation and zero-landfill urban models achieved through biomining, segregation, and circular economy principles like reuse, recycle, and recover. These proven examples from various states demonstrate scalable solutions that Delhi can replicate to transform sites like Ghazipur into productive green spaces.

These cases highlight full recovery of landfill sites via biomining and innovative reuse, contrasting Ghazipur's delays and offering replicable timelines, costs, and land uses.

S.No	Landfill site reclaimed	Process followed
a)	Greater Chennai Corporation — Biomining and Land Reclamation (Perungudi & Kodungaiyur)	Biomining+ windrow+ composting of legacy waste Final use- Eco-restoration + buffer green zones ***Pergundi*** landfill waste- has been turned into profitable business by recycle and reuse optimisation. For instance: Plastic- furniture Glass- bottles Metal- utensils Company: Blue Planet Environmental solutions
b)	Indore (Devguradia) Timeline- 2016 to 2019	Biomining + composting + RDF Area reclaimed- Approx. 100 acres Indore processed 15,00,000 MT across 100 acres at INR 450/MT, transforming the site into a city forest as part of SBM efforts. The project utilized biomining to recover land fully, complying with NGT orders. Final land use- Solar park (60 MW) + green belt The model adopted included pilot testing in 2016 with 0.5 lakh metric tonne remediation in phase I with a rental model. Followed by 1.5 lakh metric tonne with a contract model in 2017 (with machines and operators by contractor, for completing remediation and disposal by ULB) and then for 13 lakh tonnes with a rental model till 2019 in phase III.
c)	Alappuzha, Kerala – No-Landfill Urban Model	Waste Processing- 100% decentralized household composting 100% decentralized household composting

d)	Palsari town, Assam- "Zero Landfill Town"	Waste diverted- 98% Technology used- Segregation + composting + recycling Assam's first zero-landfill town
e)	Ambikapur, Chhattisgarh — Zero-Landfill City (100% Recovery)	Decentralized segregation, composting, recycling (no centralized landfill) Final Landuse- Public Sanitation Park • India's first zero waste city • Daily door to door segregation • Mandatory household segregation- strict two-bin segregation • 20 centers- decentralized waste processing • Waste is sorted into 60 categories- simplified visual system understandable to even non literate workers. • Model is based on climate resilience, gender inclusion, participatory approach and sustainable governance • Technology integration- GPS enabled waste collection, biometric attendance, digital waste tracking • Extensive training of stake holders- students, women, sanitation staff etc with the help of media and councilors • Women employment • Income generated- USD 8,35,000 from dry waste and USD 36890 from compost. • Status on landfill- converted into public park • *Ms. Ritu Sain- IAS officer and pioneer of the zero-waste "Ambikapur Model"* **https://cgi.princeton.edu/news/ambikapur-model-how-one-officers-leadership-pioneered-india's-zero-waste-movement

THEMATIC AREAS

Priorities/thrust areas for practice and innovation:	Cities
Source segregation:	Indore, Alappuzha, Panaji

Biodegradable waste management:	Mysuru, Vengurla, Bobbili
Material processing:	Bhopal, Surat, Jamshedpur, Dhenkanal
Plastic waste management:	Gangtok, Bicholim, Kumbakonam
C&D waste management:	North Delhi, Gurugram
Sanitary waste management:	Pune, Karad
Landfill:	Taliparamb, Chandrapur, Ambikapur
Technological innovation:	Bengaluru, Leh, Vijaywada, Keonjhar, Kakinada
Innovative model:	Paradeep, Thiruvananthapuram, Panchgani
E-waste:	Jamshedpur

*Source: CSE/ https://www.niti.gov.in/sites/default/files/2021-12/Waste-Wise-Cities.pdf

IV. SUGGESTIONS

(In addition to recommendations in report dated 29.03.2025, by Ld. Court Commissioner)

1. Based on the concept of *"Zero landfill towns/ ULB*s", Delhi must also adopt a zero landfill district/ ward system.

   It can conveniently be implemented as decentralised system. For instance:

Waste category	**Collection system**
Wet waste (compost units/ bio gas)	Daily
Polythene/ plastic aggregates and other packaging waste	Daily
Diapers and sanitary products	Daily
Oil (solidified at source)	Daily
Reusable/ recyclable dry waste (including wood, glass and metal)	Twice a week
Expired or discarded pharma products	Twice a week
Footwear and clothes	Twice a week
E waste	Once a week
C& D waste	Once a week
Non reusable high calorific waste	Once a week

The State must make arrangements for execution of **SWM Rule 4**:

*"…(2) No waste generator shall throw**,** burn or burry the solid waste generated by him, on streets, open public spaces outside his premises or in the drain or water bodies.*
*(5) Every street vendor shall keep suitable containers for storage of waste generated during the course of his activity such as food waste, disposable plates, cups, cans, wrappers, coconut shells, leftover food, vegetables, fruits, etc., and shall deposit such waste at waste storage depot or container or vehicle as notified by the local body**."***

2. Education of civic duties, waste segregation and disposal at school and college-
   Rule 6, (d) *local bodies; promote research and development in solid waste management sector and disseminate information to States*;
   Rule 15, (zg) *create public awareness through information, education and communication campaign and educate the waste generators on the following; namely:-*
   (i) not to litter;
   (ii) minimise generation of waste;
   (iii) reuse the waste to the extent possible;
   (iv) practice segregation of waste into bio–degradable, non-biodegradable (recyclable and combustible), sanitary waste and domestic hazardous wastes at source;
   (v) practice home composting, vermi-composting, bio-gas generation or community level composting;
   (vi) wrap securely used sanitary waste as and when generated in the pouches provided by the brand owners or a suitable wrapping as prescribed by the local body and place the same in the bin meant for non- biodegradable waste;
   (vii) storage of segregated waste at source in different bins;
   (viii) handover segregated waste to waste pickers, waste collectors, recyclers or waste collection agencies and
   (ix) pay monthly user fee or charges to waste collectors or local bodies or any other person authorised by the local body for sustainability of solid waste management.

3. Monsoon contingencies-
   a. Pre-monsoon: Stockpile covers, deepen leachate channels, install pumps/soak pits; cap active areas with geomembrane.
   b. During: Suspend excavation (depending on the rainfall received and monsoon patterns) , focus on windrow maintenance/stabilization indoors or covered; divert stormwater via peripheral drains.
   c. Post: Dewater site, test soil stability before resuming (1-2 weeks)

4. Independent third party verification of:

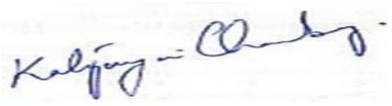
    - Volume reduction
    - Height reduction
    - Fire risk mitigation
    - Methane emissions

The Synopsis 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: 06.04.2026

New Delhi



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