

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL AT PRINCIPAL  
BENCH AT NEW DELHI

O.A No. 16 of 2025

**IN THE MATTER OF:**

PUBLIC ACTION COMMITTEE & ORS ...APPLICANTS

VERSUS

UNION OF INDIA & ORS ...RESPONDENTS

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Place: Ludhiana  
Date: 22.10.2025

Er. Kapil Dev  
(Applicant No. 2 in person)  
EMAIL: [aroraengineers@gmail.com](mailto:aroraengineers@gmail.com)  
Mobile: 9872007872

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
AT PRINCIPAL BENCH, DELHI**

In O.A. No. 16 of 2025

In the matter of:

Public Action Committee & ors. .... Applicants

vs.

State of Punjab & ors. .. Respondents

**Submission of translated copy of two documents and present status of impugned location depicting deliberate act of Respondent No. 2, 3 & 4 by going against the Environmental laws and SWM rules 2016, thus resulting in continuous environmental damage.**

**The Applicants humbly submits as under:**

1. That vide rejoinder dated 01-08-2025, the Applicants had relied upon documents from reply of Respondents which were in vernacular (Punjabi Language) and vide orders dated 08-08-2025, this Hon'ble Tribunal pleased to direct the Applicant as under:

*Para 1. During the course of hearing, the Applicant has tried to rely upon certain documents in vernacular, therefore, he is permitted to place on record the legible translated copies of the documents he wants to rely upon in the matter.*

2. That the Petitioner respectfully submits this Petition along with translated copies of two relevant documents, placing on record the present status of the impugned location, which clearly demonstrates the deliberate and willful acts of Respondent No. 2, 3 and 4 in contravention of the Environmental Protection Act, 1986 and the Solid Waste Management Rules, 2016. The continuous illegal activities being carried out by the said Respondents are causing persistent damage to air, water and soil, thereby depriving the public at large of their fundamental right to live in a clean and healthy environment guaranteed under Article 21 of the Constitution of India. It is further submitted that the Respondents, despite repeated directions and knowledge of the law, have knowingly violated mandatory environmental norms, and thus their actions warrant urgent intervention and remedial directions from this Hon'ble Tribunal in the interest of justice, environment and public health.
3. That keeping in view the directions of this Hon'ble Tribunal, the Applicants are submitting the notary-attested translated copies of the Running Pages No. 75 and 112 (being the same document received as part of replies submitted by Respondent No. 2 and Respondent No. 3 respectively), marked as **Annexure P-11** for kind consideration of this Hon'ble Tribunal. It is respectfully submitted that the said documents clearly demonstrate that the impugned land in question, i.e., **Khasra No. 141/1**, as well as the adjoining land in **Khasra No. 141 Min**, owned by the Municipal Corporation, Sirhind, is **Gairmumkin Choe**, thereby establishing the factual position and the basis for the submissions made herein.

4. That besides the documents referred to above, the demarcation report of the Kanoongo (Revenue Officer), produced by the Respondent at Running Page No. 172 (submitted by Respondent No. 4), pertains to **Khasra No. 141 Min**, whereas the impugned site under consideration is situated at **Khasra No. 141/1**. It is respectfully submitted that the nature of the land owned by the Municipal Council, Sirhind (R- 3) , at **Khasra No. 141** is also **Gairmumkin Choe**, being part of the impugned natural water body. The notary-attested translated copy of Running Page No. 172 is produced herewith and marked as **Annexure P-12** for kind consideration of this Hon'ble Tribunal.
5. That it is respectfully submitted that despite full knowledge of all relevant facts, the present status of the impugned site remains unchanged, resulting in significant environmental damage, including contamination of the water body and the groundwater table. Four photographs, clicked on **25-10-2025**, depicting the actual and factual condition of the site, specifically showing garbage dumped on the land of **Choe**, are produced herewith and marked as **Annexure P-13** for kind consideration of this Hon'ble Tribunal.

Keeping in view of the above produced facts and earlier submissions, the Applicants humbly pray this Hon'ble Tribunal to pass the orders in the interest of justice, environment and public health.



Dated: 22-10-2025  
Place: Ludhiana

Er. Kapil Dev  
(Applicant No. 2)

TRUE TRANSLATION OF REVENUE DEPTT. COPY ORIGINAL IN PUNAJBI VERSION INTO ENGLISH VERSION.

Copy of Jamabandi: 2016-17

Village-SIRHIND Hadbast No.125.

Tehsil -FATEHGARH SAHIBDistrict Fatehgarh Sahib.

1	2	3	4	5	6	7	8
Khewat No./Revenue Nambardar.	Khatoni No./Land Revenue	Name and particulars of owner	Name and particulars of cultivator	Source of irrigation	Murabba/ Khasra No.	Area & total of field with kind of land	Special Remarks
					54//18/2	2-3(0-10-97.50)	
					56//22/3	1-3(0-5-81.74)chahi 1-0(0-5-6.88)GM Plot 2-0(0-10-11.71)	
					56//23/1	1-16(0-0-10.5) (0-4(0-1-17)GM passage 2-0(0-12-39.35) 2-0(0-10-11.71)wasteland	
					56//25	0-9(0-2-27.64)GM passage	
					57//11/2	7-7(0-37-18.05)chahi	
					57//20	3-8(0-17-19.91)wasteland	
					57//21	8-0(0-40-46.86)wasteland	
					58//19/21	3-18(0-19-32.84)wasteland	
					141MIN	0-16(0-4-4.69)chahi	
					141/1MIN	248-1(12-44-66.13)GM choe 66-9(3-36-14.20)GM choe	Patwari has entered the record upto 7.6.2022 in office record.

(True Translation, I am Competent to Translate  
Punjabi/Hindi/Urdu/English)

NOTARY PUBLIC  
Distt. Fatehgarh Sahib

18/10/2025

Valid For  
Foreign Country  
Embassy  
& High Commission



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**English translation of Nishandehi/demarcation report original in Punjabi version.**

Today reached village Sirhind (12.5) Tehsil and Distt.Fatehgarh Sahib as per office Municipal council,Sirhind FGS office letter No. 608/J/Sh/2025 dated 27.2.2025 for Nishandehi/demarcation. Concerned officials/authorities were informed through Patwari. Patwari was present on the spot alongwith record. Nishandehi is entered vide No. Khasra 141 Min measuring 369K-1M as per jamabandi year 2021-22 khewat No. 885 in Municipal Council-Sirhind. No.Khasra 141 Min From Sirhind City to Sirhind Mandi situated on choe. East side is 86 karam. On spot there is M.R.F. shed on East side i.e. 175 feet(32) karam, North side- 565'(103 karam) and South side-634'(116 karam) were verified. On spot land of choe flow is 126'(23 karam) in width, on South side 963'(166 karam), South side -565'(103 karam).One temporary land of 11'(2 karam) is situated and garbage dump alongwith other passage in width on East side is 198'(36 karam), North side alongwith passage 957' (174 karam), South side -166 karam, West side is 90'(16 karam) total land measuring 24 kanal 0 marla is situated. All present were informed about demarcation and temporary marking were installed on the site. Report is being presented for further necessary action.

No.169 Field Kanungo  
Dated: 10.3.2025



Sd/ Kanungo  
dated 10.03.2025

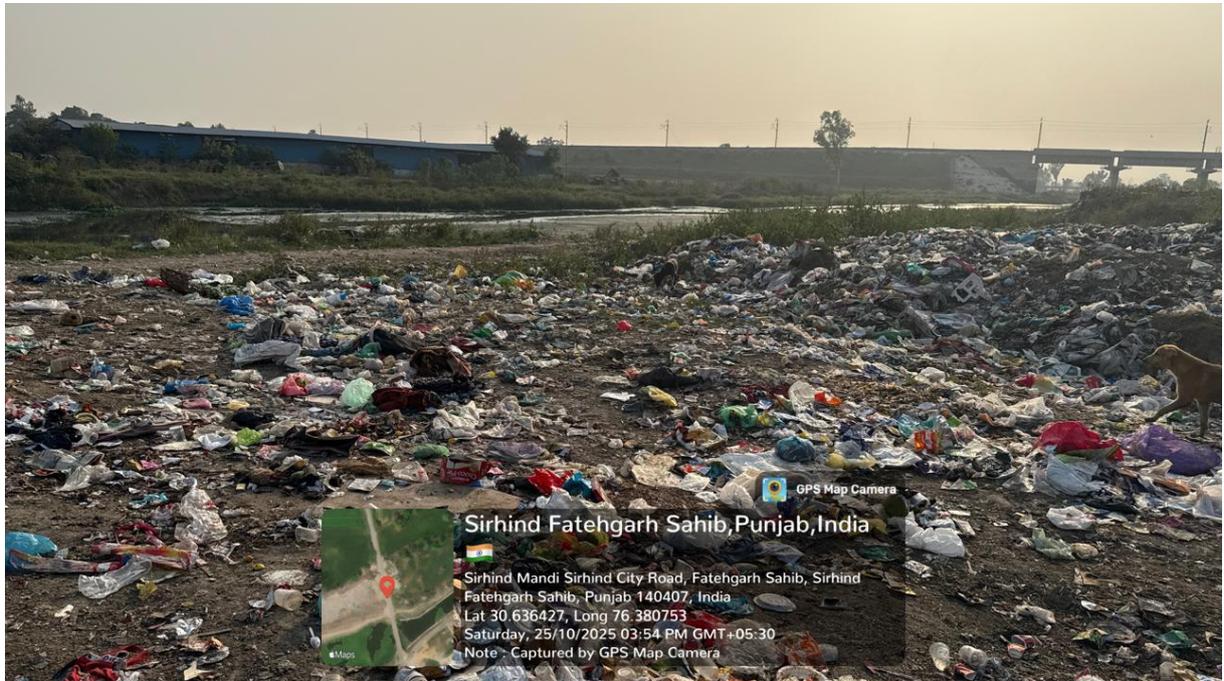


Attested As Identified  
**NOTARY PUBLIC**  
Distt. Fatehgarh Sahib (Pb) India

(True Translation, I am Competent to Translate  
Punjabi / Hindi / Urdu / English  
**NOTARY PUBLIC**  
Distt. Fatehgarh Sahib

18/10/2025

PRESENT STATUS OF IMPUGNED ILLEGAL DUMP SITE ON LAND OF NATURAL WATER BODY





BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

AT PRINCIPAL BENCH, NEW DELHI

(in O.A. No. 16 of 2025)

AFFIDAVIT

Public Action Committee & ors. .... Applicants

vs.

State of Punjab & ors. .... Respondents

Affidavit regarding Additional Submission by Er. Kapil Dev (aged 49 years) s/o Sh. Jagdish Chander, r/o #186-E, BRS Nagar, Ludhiana.

RESPECTFULLY SHOWETH:

I, the above mentioned deponent do hereby solemnly affirm and declare as under:-

- 1. That the deponent is Applicant No. 2 in the Original Application No. 16 of 2025 and is filing translated copies of two documents (from reply of Respondents) depicting facts regarding nature of land under impugned dump site for kind consideration by this Hon'ble Tribunal.
- 2. That to the best of my knowledge and belief, no material information has been concealed and is true to the best of my knowledge.

2502  
22-10-2025

Place: Ludhiana

Dated: 22.10.2025

*Certified that the affidavit has been read over & explained to the deponent who seemed directly to understand the same at the time marking thereof*

*[Signature]*  
DEPONENT

Verification:

Verified that the contents of para 1 to 2 of this affidavit are true and correct. No part of it is false, and nothing material has been kept concealed therefrom.

Place: Ludhiana

Dated: 22.10.2025

ATTESTED AS IDENTIFIED

*[Signature]* 22-10-2025

NOTARY-PUBLIC  
LUDHIANA (PB.)

*[Signature]*  
DEPONENT

*I know the Deponent/Executants personally and he/she has Signed/Thumb impression in my presence.*



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**Service of document in O.A. 16 of 2025**

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**Arora Engineers** <aroraengineers@gmail.com>

Sat, Oct 25, 2025 at 5:49 PM

To: cs@punjab.gov.in, dc.fth@punjab.gov.in, eomc.sir\_fgs@yahoo.co.in, ghairajinder@gmail.com, eedrainage2023@gmail.com, chairman.ptl.ppcb@punjab.gov.in, eerofgs.ppcb@punjab.gov.in

Dear sir

PFA copy of Submission by Applicant No. 2 as service of document in O.A. 16 of 2025.

Regards

Er. Kapil Dev  
Applicant No. 2  
O.A. 16 of 2025**Submission by Applicant in OA 16 of 2025.pdf**

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