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To  
The Chairperson  
His Lordship Justice Prakash Shrivastava  
And His Companion Justices Of  
The Hon'ble National Green Tribunal  
Faridkot House, Copernicus Marg  
New Delhi-110001



**Subject: For appreciation of new evidence against R.No.2/MCD and its private Concessionaire, R.No.3/DDSIL obtained by the Applicants in O.A. 678/2023 titled "Jangpura Extension Residents Forum RWA & Ors. Vs. GNCTD & Ors."**

Respected Sirs,

I am Nipun Bhushan, the counsel representing the 9 Applicants in the aforementioned Original Application who have instituted the said O.A. against **multiple serious violations of Environmental law** being committed by the MCD and its private concessionaire in Jangpura Extension at its dhalaos. I consider it extremely important to bring to your lords' attention a video that has been obtained by Applicant No. 1/RWA of Jangpura Extension, wherein, **the staff of MCD itself can be seen and heard accusing the MCD and its private concessionaire, DDSIL of not discharging their legal duties under the Solid Waste Management Rules, 2016 and South Delhi Municipal Corporation Solid Waste Management Bye-Laws, 2017, something, which has been unwaveringly alleged even by the Applicants in the aforementioned O.A. since the first day of litigation in this matter.**

The said video (contained in the pen drive enclosed with this mail) is a **concrete proof** that corroborates all of the **allegations levelled against R.No.2/MCD and R.No.3/DDSIL by the Applicants** and this video also **completely belies the false assertions made by the MCD** in its report dated 12.01.2024 in pursuance to your lords' Order dated 03.11.2023 in the said O.A. What is worse is that the **MCD is not just violating Environmental laws mentioned above but is even subjecting its employees to inhumane treatment and unsanitary conditions thus violating their right to life guaranteed to them under Article 21 of the Constitution of India.** *The said video has been shot at the block-H Dhalaos.*

This truly regrettable situation has gone on for **almost a decade now** and the **residents living near the assailed dhalaos have suffered immeasurably** at the hands of the very agency (the MCD) whose very legal duty it is to prevent such suffering in the first place. This situation has to be brought to an end immediately **so that the families living around the dhalaos can live normal and environmentally safe lives which is a decent expectation for any human being.**

It must also be noted that the enclosed pen drive is being shared as part of the **Affidavit-Cum-Objection filed by the Applicants** in the said O.A. in pursuance to your lords' Order dated 18.01.2024.

209/24 Judl.  
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O.A. 678/2023  
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It is most sincerely begged that your lords appreciate the **immense and endless suffering** that the Applicants and all the other residents living near the said dhalaos have been enduring as a direct consequence of the illegal activities being carried out by the MCD and its negligent private concessionaire who have shown zero remorse for their actions and complete disrespect to the environmental laws of the country and to your lords' authority. It is also **prayed that your lords order the closure of these dhalaos and their replacement by public amenities** such as reading library, Amul milk booth etc. It is also **prayed that your lords not get these dhalaos replaced by an FCTS of MRF** (as has been indicated by the MCD in its aforementioned Report riddled with lies and falsehoods) which would **only prove to perpetuate the very suffering which the prayer for closure of dhalaos seeks to remediate.**

Yours Sincerely,

Advocate Nipun Bhushan (for the Applicants)

Enrolment No.-D/8131/2022