

**BEFORE THE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH AT NEW DELHI**  
**ORIGINAL APPLICATION NO. 109 OF 2022**

**IN THE MATTER OF:-**

VIVEK KAMBOJ & ANR.

... APPLICANTS

VERSUS

UNION OF INDIA & ORS.

... RESPONDENTS

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THROUGH

**RITWICK DUTTA**

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**PLACE:** New Delhi

**DATE:** 26.05.2022

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**ADDITIONAL AFFIDAVIT**

I, Vivek Kamboj, aged about 50 years, S/o Y. P. Kamboj, R/o C-579, Sushant Lok-I, Gurugram, Haryana, presently at New Delhi, do hereby solemnly affirm and declare as under:

1. That the Applicant has filed above titled Original Application with respect to dumping of solid waste in forest areas of Aravalli and discharging leachate in surrounding areas of Bandhwari Landfill site in district Gurugram. This Hon'ble Tribunal has passed several directions to the Respondents in O.A. No. 514/2018 (earlier O.A. No. 451 of 2015), for compliance of Solid Waste Management Rules, 2016 and by order dated 07.04.2021 directed Chief Secretary of State of Haryana to personally monitor the compliances. The Hon'ble Tribunal by order dated 17.02.2022 directed the joint committee of State Pollution Control Board, Divisional Forest Officers and District Magistrates of Gurgaon and Faridabad to ascertain the factual position and furnish action taken report.
2. That the Applicant through this Additional Affidavit wants to apprise this Hon'ble Tribunal that the leachate is still continuing to be discharged to the nearby areas in the Aravalli. The fact about the discharge is reported on 25.05.2022 in national daily 'Times of India' titled as "Leachate? Black discharge enters Aravalis from landfill", in 'Hindustan Times' titled as "Leachate spillage in Aravallis worries green activists in Ggm" and in

*Wally*  
I, IDENTIFIED THE  
DEPONENT WHO HAS  
SIGNED IN MY PRESENCE

NOTARY PUBLIC APPOINTED BY GOVT. OF INDIA G. S. KHARBANDA	
Notary Reg. No. 785	26 MAY 2022
ATTESTED 9899422266	

'Navbharat Times' titled as "Aravalli Ke Johad Tak Fir Pahuncha Jehrila Paani". All these news report mention about pollution of the water body and the Aravalli because of leachate from Bandhwari Landfill.

A copy of the news report published in national daily 'Times of India' titled as "Leachate? Black discharge enters Aravalis from landfill", in 'Hindustan Times' titled as "Leachate spillage in Aravallis worries green activists in Ggm" and in 'Navbharat Times' titled as "Aravalli Ke Johad Tak Fir Pahuncha Jehrila Paani" dated 25.05.2022 is annexed herewith and marked as **ANNEXURE A/1 (Colly)**.

3. That the Forest Department has also wrote a letter dated 11.08.2020 to Municipal Corporation, Gurgaon about pollution of the Aravalli forest area because of the discharge of leachate, which is affecting the wildlife. However, no action has been taken by the Forest Department to stop the flow of the leachate. The copy of letter dated 11.08.2020 is already part of record as Annexure A/4 (at page 46).
4. That the State Pollution Control Board of Haryana has issued show cause notice dated 29.12.2021 to Municipal Corporation, Gurgaon mentioning about the finding about the pollution from Bandhwari Landfill. The show cause also imposed environmental compensation of Rs. 2,10,00,000/-. However, no action has been taken by the Pollution Control Board and from the news report mentioned above the discharge of leachate is still continuing which is polluting the ground water in surrounding area.

A copy of the show cause notice dated 29.12.2021 issued by the State Pollution Control Board is annexed herewith and marked as **ANNEXURE A/2**.

5. It is submitted that even after several directions the Respondents including Municipal Corporation of Gurugram and Faridabad and Ecogreen Energy who is managing the municipal waste on behalf of Municipal Corporation,

