BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BRANCH, NEW DELHI
M.A. NO. 74 OF 2026 IN
EXECUTION APPLICATION NO. 23 OF 2023
IN
ORIGINAL APPLICATION NO. 75 OF 2023
(IA NO. 645 OF 2023)

IN THE MATTER OF:

JAISHREE BANSAL … APPLICANT

VERSUS

UTTAR PRADESH POLLUTION CONTROL BOARD & ORS. … RESPONDENT

INDEX

S. NO.	PARTICULARS	PAGE NO.
1.	AFFIDAVIT ON BEHALF OF MUNICIPAL COMMISSIONER, GHAZIABAD MUNICIPAL CORPORATION	1-9
2.	**ANNEXURE A-1**: A COPY OF THE LETTER DATED 18.11.2026 BY M/S GERON ENGINEERING PVT. LTD	10
3.	**ANNEXURE A-2**: A COPY OF PHOTOGRAPHS OF THE SITE TAKEN ON 18.11.2026 AT PIPE LINE ROAD, BHIKANPUR, MEERUT DIVISION	11-12
4.	**ANNEXURE A-3**: A COPY OF THE COMMUNICATION	13

FILED BY



MALAK BHATT
ADVOCATE FOR GHAZIABAD NAGAR NIGAM
C-2, THIRD FLOOR, NIZAMUDDIN EAST
NEW DELHI – 110013
M: +91-9650592002
E: malak@malakbhatt.com

DATE: 26.11.2026

BEFORE HON'BLE NATIONAL GREEN TRIBUNAL PRINCIPAL BRANCH, NEW DELHI
M.A. NO. 74 OF 2026 IN
EXECUTION APPLICATION NO. 23 OF 2023
IN
ORIGINAL APPLICATION NO. 75 OF 2023
(IA NO. 645 OF 2023)

IN THE MATTER OF:

JAISHREE BANSAL ... APPLICANT

VERSUS

UTTAR PRADESH POLLUTION CONTROL BOARD & ORS. ... RESPONDENT

AFFIDAVIT

I, Himanshu Nagpal, s/o Jitender Nagpal, aged about 30 years, working as Municipal Commissioner at Ghaziabad Nagar Nigam, presently in New Delhi, do hereby solemnly affirm and declare as under:

1. I am the Municipal Commissioner at Municipal Corporation of Ghaziabad and am fully conversant with the facts and circumstances of the present case and therefore competent to sign and depose the present Affidavit.

2. I state that it is the case of the Applicant that the garbage / solid waste has captured approx. 200 sq. feet of the applicant's private land at village Jagjeevanpur, Pargana Jalalabad, District Ghaziabad and leachates oozing out from the garbage has destroyed 1500 sq. feet of the Applicant's private land.

3. It is humbly submitted that during pendency of the present Execution Application, Ghaziabad Nagar Nigam had filed its Affidavit dated 06.04.2026 disclosing, inter

NOTARY PUBLIC
VINOD KR. TIWARI
Delhi High Court
Regn. No. 214/15/2020
Expiry Date
15/03/2030
GOVT. OF INDIA

alia, that approximately 70,000 MT of waste was then lying at the Pipeline Site, Jagjeevanpur, and that the target for processing the said waste and clearing the site was set for 30.06.2026. It is humbly submitted that the contents of the Affidavit dated 06.04.2026 are to be treated and read as forming part and parcel of the present Affidavit and are not repeated herein for the sake of brevity.

4. It is further submitted that, by way of a subsequent Affidavit dated 16.07.2026, GNN apprised this Ld. Tribunal that, as per the report dated 29.06.2026 of its contractor, M/s Geron Engineering Pvt. Ltd., approximately 10,000 MT of waste remained to be processed at the Pipeline Site, and, for the reasons set out therein, sought an extension of 2-3 months from 30.06.2026 for completion of the balance work. The contents of the said Affidavit are to be treated and read as forming part and parcel of the present Affidavit and are not repeated herein for the sake of brevity.

5. This Ld. Tribunal was pleased to grant further time of 4 weeks to GNN vide Order dated 15.10.2026 in MA No. 74 of 2026. Accordingly, the present Compliance Affidavit is being filed in compliance of the said order.

6. I affirm that by way of this affidavit, I wish to apprise this Ld. Tribunal that the balance work has since been carried out and completed, and to place on record the compliance of the directions of this Ld. Tribunal, including the order dated 08.04.2026, together with the documentary evidence thereof.

NOTARY PUBLIC VINOD KR. TIWARI Delhi High Court Regn. No. 21416/2020 Expiry Date 15/03/2030 GOVT. OF INDIA

I. STATUS OF COMPLIANCE: COMPLETION OF PROCESSING OF WASTE AND CLEARANCE OF THE PIPELINE SITE

7. It is humbly submitted that the work of handling, storage, segregation, processing and scientific disposal of municipal solid waste at the Pipeline Site, Jagjeevanpur / Bhikanpur, Ghaziabad was being carried out by M/s Geron Engineering Pvt. Ltd. ['**the Contractor**'] under the terms of the tender. The waste was transported to the said site only up to 05.07.2025, and thereafter the Contractor was discharging the responsibility of processing and clearing the waste accumulated at the site.

8. By its letter dated 18.11.2026 (Ref. No. Geron/GNN/MSW/26-27/110) addressed to the Municipal Commissioner, Nagar Nigam Ghaziabad, issued in continuation of its earlier letter dated 02.11.2026 (Ref. No. Geron/GNN/MSW/26-27/105), the Contractor has informed GNN that, in compliance with the order of this Ld. Tribunal, the waste processing work at the Pipeline Site has been completed and the site has been cleared as on 31.10.2026, and that all fresh MSW received at the site has been processed and the land cleared. A copy of the said letter dated 18.11.2026 is annexed herewith and marked as **Annexure A-1**.

9. The Contractor has further informed that ground levelling and soil capping work is presently underway at the site. The photographs of the site taken on 18.11.2026

NOTARY PUBLIC VINOD KR. TIWARI Delhi High Court GOVT. OF INDIA

at Pipe Line Road, Bhikanpur, Meerut Division, enclosed with the said letter, are annexed herewith and marked as **Annexure A-2**.

10. The Contractor's letter was placed before the Zonal Sanitary Officer / City Health Officer / Additional Municipal Commissioner / Municipal Commissioner of GNN, and the site was inspected by the Zonal Sanitary Officer. In order to independently confirm the actual status of the waste clearance work and the vacation of the land by the Contractor, a proposal has been put up for a physical inspection and survey of the site through a competent third-party agency before any payment is released to the Contractor. A copy of the communication is annexed herewith and marked as **Annexure A-3**.

II. DISCLOSURE OF DETAILS ON WASTE GENERATION, ITS TREATMENT, PROCESSING AND AVAILABILITY OF FACILITIES

a. The aspects of waste generation are as follows:

Location	Waste to Compost Capacity (TPD)	Operations at Site	Timeline to complete	Current Status
Jagjivanpur Fresh Waste Processing	Installed Capacity: 3,200 TPD	(i) Site is operational from July 2023. (ii) Total fresh waste generated in Ghaziabad of approx. 1600-1800 TPD was sent to	The entire waste at the site has been processed and the site has been cleared as on 31.10.2026 (Annexure A-1). The target for processing the waste and	(i) Since July 2025, waste transportation to this site is closed and stopped. (ii) As per the Affidavit dated 06.04.2026, approximately 70,000 MT of waste was

NOTARY PUBLIC
VINOD KR. TIWARI
Delhi High Court
Regn. No. 21415/2020
Expiry Date
15/03/2030
GOVT. OF INDIA

		the fire at site till 05.07.2025; since then, it is being sent to the new processing site at Dabarsi. (iii) MSW Processing Facilities at site: 8 Trommel Machines (Each having capacity of 300 TPD) + 1 Super Sonic Segregation Machine (Capacity: 2000 TPD) + 12 Pokelane + 5-8 Dumpers.	clearing the site was 30.06.2026. However, due to circumstances beyond the reasonable control of GNN and its contractor, the work could not be completed by the said date. Ground levelling and soil capping work at the site is underway.	lying at the site as on April 2026. (iii) As per the letter dated 18.11.2026 of the contractor, M/s Geron Engineering Pvt. Ltd. (Annexure A-1), the processing work is complete and the site has been cleared as on 31.10.2026. (iv) The fresh waste from 6th July 2025 is being transported to the new processing site at Dabarsi. The Consent to Establish (CTE) and Consent to Operate (CTO) are received.
Jagjivanpur / Bhikanpur Legacy Waste Site having 2.69 lac ton	1200 TPD	The legacy waste processing started from October 2023 and the entirety of legacy waste has been processed. The space created by processing of legacy waste was being used for processing of fresh MSW. However, that is		As per third party survey conducted by IIT Delhi, the legacy waste has been processed. **The land which was vacated from legacy waste was being used for storing and processing fresh MSW till 5th July 2025. However, this site has been**

NOTARY PUBLIC
VINOD KR. TIWARI
Delhi High Court
Regn. No. 21[illegible]/2020
Expiry Date
15/03/2030
GOVT. OF INDIA

		also stopped since July 2025.		**closed since July 2025.**

III. CIRCUMSTANCES DUE TO WHICH THE WORK COULD NOT BE COMPLETED BY 30.06.2026

11. It is humbly submitted that, despite continuous deployment of resources and diligent and sincere efforts on behalf of GNN and its Contractor, the work could not be completed within the timeline of 30.06.2026 on account of the following impediments and supervening circumstances beyond the reasonable control of GNN and its Contractor, as already stated in the earlier Affidavit seeking extension of time:

a. **Shortage of Labour on Account of the Assam and West Bengal Elections:** The Assam and West Bengal Assembly Elections held in April 2026 resulted in a substantial portion of the labour force engaged at the Pipeline Site, comprising predominantly of workers native to the said States, returning to their native places to participate in the electoral process, resulting in an acute and prolonged shortage of manpower which significantly and adversely affected the pace of execution of the work.

NOTARY PUBLIC
VINOD KR. TIWARI
Delhi High Court
Regn. No. 2 416/2020
Expiry Date
15/03/2030
GOVT. OF INDIA

b. **Irregular Supply of Fuel on Account of the Global Crisis:** The prevailing global and geopolitical situation disrupted the supply chain of diesel, pursuant to which the Oil Marketing Companies imposed restrictions on the supply of diesel, resulting in inadequate availability of fuel for generators, JCBs, Poclains, dumpers, transportation vehicles, and other heavy machinery

essential for execution of the work. GNN had assisted the Contractor, to the best of its abilities, in facilitating the issuance of diesel in drums by the concerned petrol pumps. As informed by the Contractor in its letter dated 18.11.2026, the irregular supply of fuel continued to affect the work.

c. **Local Disturbances Caused by Landowners and Villagers:** Since January 2026, local landowners and villagers in the vicinity of the Pipeline Site have, on repeated occasions, caused disturbances and obstructions at the site, resulting in interruptions in the execution of the work, this being an event beyond the reasonable control of GNN and its Contractor.

d. **Kanwar Yatra:** During the Kanwar Yatra, the movement of heavy vehicles, machinery, and manpower was considerably restricted on account of traffic diversions and administrative regulations imposed by the local administration, which further affected the pace of the work.

e. **Prolonged Monsoon:** The monsoon, which, as informed by the Contractor, prolonged until mid-October 2026, adversely affected excavation, screening, transportation, handling, and processing of waste at the site, this being a seasonal impediment beyond the control of GNN and its Contractor.

NOTARY PUBLIC
VINOD KR. TIWARI
Delhi High Court
Regn. No. 21416/2020
Expiry Date
15/12/2030
GOVT. OF INDIA

12. The aforesaid circumstances constituted unavoidable and supervening events beyond the reasonable control of GNN and its Contractor, and the delay is not due to any lack of diligence or bona fide efforts on behalf of GNN. The substantial and continuous progress at the site, from approximately 70,000 MT of waste

lying at the site as on April 2026 to complete processing and clearance of the site as on 31.10.2026, evinces that GNN remained vigilant and proactive in ensuring compliance with the directions of this Ld. Tribunal. The work at the site continued without any voluntary interruption, and additional resources were deployed by the Contractor and GNN to monitor and accelerate the progress of the work.

13. In view of the aforesaid facts and circumstances, it is humbly submitted that GNN has complied with the directions of this Ld. Tribunal by getting the entire waste at the Pipeline Site processed and the site cleared as on 31.10.2026. GNN prays that this Ld. Tribunal may kindly (i) take this Affidavit and its annexures on record as compliance; and (ii) pass such further order(s) as this Ld. Tribunal may deem fit in the interest of justice.

14. I state that everything stated above has been stated by me in my official capacity based on and derived from the official records maintained by the Ghaziabad Nagar Nigam in the official capacity and I state that nothing material has been concealed therefrom.

NOTARY PUBLIC
VINOD KR. TIWARI
Delhi High Court
Regn. No. 21416/2020
Expiry Date
15/03/2030
GOVT. OF INDIA

DEPONENT

VERIFICATION

I, the above-named deponent, do hereby solemnly verify that the contents of the aforesaid affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.

Verified at _____ on this 26 NOV 2026 day of November 2026.

DEPONENT

I identify the Deponent who has signed/put thumb impression in my presence

VERIFIED AT THE DEPONENT
Shri/Smt./Km..... ...R/o
S/o, W/o, D/o, Sh.....
Identified by Shri/Smt.....
has solemnly Attested before me at Delh
on 26 NOV 2026 Sl. No.....
that the contents of the affidavit which
have been read Over & explained to him/me
are true & correct to his/her knowledge.

NOTARY

NOTARY PUBLIC
VINOD KR. TIWARI
Delhi High Court
Regn. No. 21416/2020
Expiry Date
15/03/2030
GOVT OF INDIA

Geron Engineering Pvt. Ltd.
CIN No. : U45100HR2016PTC066430 GSTIN No. : 09AAGCG6521P1Z3
Works: C-121, B.S. Road Industrial Area, Ghaziabad, UP 201009.
Head Office : 143/1, IInd Floor, Pandav Nagar, NH-24,
(Landmark: Kia Showroom and Near Arena Maruti Suzuki Showroom.
Ghaziabad, Uttar Pradesh-201002.
Ph. : 0120-4565999, **E-mail** : info@geronengineering.com
Web : www.geronengineering.co.in

Annexure A-1

Geron/GNN/MSW/26-27/110 18-11-2026

To,
Municipal Commissioner
Nagar Nigam Ghaziabad
Ghaziabad UP 201001

Sub:- Completion Of MSW Processing at Pipeline Site Ghaziabad

Ref:- (i) Letter 4020/Health/2022-23 Dated/22-06-2022

(ii) Our letter dated 2nd November, 2026 vide Geron/GNN/MSW/26-27/105

Dear Sir,

This is in continuation with our letter dated 2nd November, 2026 vide Geron/GNN/MSW/26-27/105 for the work of Handling, Storage, Segregation, Processing and Scientific Disposal of Municipal Waste at MSW Processing Site Pipeline Ghaziabad, wherein as per the **Hon'ble National Green Tribunal (NGT) Order,** the waste processing work has been completed and the site has been cleared as on 31st October, 2026.

Although, we had put in extra resources to ensure that the site is cleared on time, the work was delayed due to various reasons, including irregular supply of fuel due to global crises, kawad yatra, and prolonged monsoon until mid October 2026.

However, all fresh MSW as received has been processed and land has been cleared. The ground leveling and soil capping work is underway.

The photographs of the site cleared are attached herewith for your kind reference.

This is for your kind information and necessary records.

Thanking you

For Geron Engineering Pvt Ltd.

Ghaziabad

Authorised Signatory

Enclosure :- Photographs of the cleared site


18 Nov 2026 12:31:21 pm
Pipe Line Road
Bhikanpur
Meerut Division
Uttar Pradesh


18 Nov 2026 12:31:17 pm
Pipe Line Road
Bhikanpur
Meerut Division
Uttar Pradesh

ज़ोनल सेनेटरी ऑफिसर/नगर स्वास्थ्य अधिकारी/अपर नगर आयुक्त/नगर आयुक्त महोदय

कृपया पत्रावली में दाहिनी ओर संलग्न मैसर्स जिरोन इंजीनियरिंग प्रा0 लि0 के पत्र दिनांक 18.11.2026 का अवलोकन करने का कष्ट करें, जिसमें उनके द्वारा ग्राम भिक्कनपुर स्थित भूमि पर किये जा रहे ठोस अपशिष्ट के हैंडलिंग, प्रोसेसिंग एवं डिस्पोजल का कार्य दिनांक 31.10.2026 को पूर्ण कराये जाने तथा भूमि खाली कराये जाने से अवगत कराया गया है।

उपरोक्त में अवगत कराना है कि गाजियाबाद नगर निगम क्षेत्रांतर्गत उत्पन्न होने वाले ठोस अपशिष्ट के हैंडलिंग, प्रोसेसिंग एवं डिस्पोजल का कार्य निविदा की शर्तों के अंतर्गत मैसर्स जिरोन इंजीनियरिंग प्रा0 लि0 द्वारा ग्राम भिक्कनपुर स्थित भूमि पर किया जा रहा था। उक्त स्थल पर अपशिष्ट का परिवहन दिनांक 05 जुलाई, 2025 तक किया गया था, तत्पश्चात स्थल पर एकत्रित अपशिष्ट के निस्तारण का दायित्व फर्म द्वारा निर्वहन किया जा रहा था।

उक्त भूमि के संबंध में माननीय राष्ट्रीय हरित अधिकरण (NGT) में वाद विचाराधीन है, जिसके कारण पूर्व में भी फर्म को संबंधित भूमि खाली किए जाने हेतु मौखिक एवं लिखित नोटिस अर्थदंड सहित के माध्यम से निर्देशित किया जा चुका है।

इस संबंध में फर्म द्वारा अपने पत्र दिनांक 18.11.2026 के माध्यम से अवगत कराया गया है कि माननीय राष्ट्रीय हरित अधिकरण (NGT) के आदेशों के अनुपालन में उक्त स्थल पर एकत्रित समस्त ठोस अपशिष्ट का प्रोसेसिंग कार्य पूर्ण कर दिनांक 31.10.2026 तक भूमि को खाली करा दिया गया है। फर्म द्वारा यह भी अवगत कराया गया है कि कार्य के दौरान ईंधन की अनियमित आपूर्ति, कांवड़ यात्रा तथा अक्टूबर माह के मध्य तक मानसून के प्रभाव के कारण कार्य में विलंब हुआ। तथापि, फर्म द्वारा अतिरिक्त संसाधन लगाकर निर्धारित समयावधि में कार्य पूर्ण किया गया है। वर्तमान में स्थल पर ग्राउंड लेवलिंग एवं सॉयल कैपिंग (Soil Capping) का कार्य प्रगतिमान होना भी फर्म द्वारा अवगत कराया गया है। फर्म द्वारा स्थल खाली किए जाने के साक्ष्य स्वरूप फोटोग्राफ भी संलग्न किए गए हैं। उक्त कार्य का स्थलीय परीक्षण ज़ोनल सेनेटरी ऑफिसर द्वारा किया गया, जिनके द्वारा प्रस्तुत आख्या के अनुसार प्रकरण में यह आवश्यक प्रतीत होता है कि संबंधित भूमि पर फर्म द्वारा किए गए अपशिष्ट निस्तारण कार्य की वास्तविक स्थिति एवं भूमि खाली किए जाने की पुष्टि हेतु किसी दक्ष थर्ड पार्टी एजेंसी के माध्यम से स्थल का भौतिक निरीक्षण एवं सर्वे कराने उपरांत ही भुगतान की कार्यवाही किया जाना उचित होगा।

अतः उपरोक्तानुसार माननीय राष्ट्रीय हरित अधिकरण (NGT) में दाखिल किये जाने वाले शपथ पत्र के संबंध में आख्या आपके अवलोकनार्थ तथा उक्त भूमि का थर्ड पार्टी सर्वे कराए जाने की अनुमति प्रदान किये जाने हेतु आख्या सादर प्रस्तुत है।