

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,

SOUTHERN ZONE AT CHENNAI

Application No.125 of 2022

IN THE MATTER OF

KORATTUR LAKE PROTECTION PEOPLE'S MOVEMENT

...Applicant

VERSUS

State of Tamil Nadu,  
Represented by its Secretary to Government  
& Others

...Respondents

REPLY STATEMENT FILED ON BEHALF OF THE 10<sup>TH</sup> RESPONDENT

The 10<sup>th</sup> Respondent (M/Godrej & Boyce Mfg. Co. Ltd.,) humbly submits as follows:

1. The 10<sup>th</sup> Respondent is a company established under the laws of India and has its registered office at Pirojshanagar, Vikhroli, Mumbai-400079.
2. At the outset, all averments in the Memorandum of Application filed by the Applicant are denied as false, vexatious and baseless. None of the averment made therein shall be deemed to be admitted merely for want of specific denial or traverse.

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3. It is submitted that there is no specific allegation against the 10<sup>th</sup> Respondent but vague and wide allegations have been made by the Applicant against all Respondents including the 10<sup>th</sup> Respondent herein. Further, the allegations in the Memorandum of Application have been made without an iota of evidence and are bereft of any details whatsoever.
4. Before reverting to the allegations in the Memorandum of Application, the brief facts pertaining to the factory of the 10<sup>th</sup> Respondent are provided below for appreciation by this Hon'ble Tribunal.
5. The 10<sup>th</sup> Respondent Company herein has one of its manufacturing facilities situated in Ambattur, which has been operational in the year 2002 wherein it is engaged in the manufacture, marketing and after sales service of various products such as Industrial Storage systems comprising of racking, shelving, and mobile storage.
6. It is unequivocally stated that the said unit of the 10<sup>th</sup> Respondent at Ambattur does not discharge any untreated effluents and/or solid waste into the TNHB Korattur Lake as wrongly alleged in the present Application by the Appellant and such allegations have been made by the Appellant without any shred of evidence and such allegations are vague, bereft of any details and unsubstantiated by any documentary evidence.

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7. It is submitted that the Unit has obtained consent to operate in the year 2002 which was periodically renewed and the last renewal was on 21.04.2022, which is valid up to 31.03.2024 to carry out the following activities:

S.No.	Function	Capacity (Tonnes per Month)
1.	Multiflex System	400
2.	Heavy Duty System	800
3.	Long Span Storage System	180
4.	Drive In System	100
5.	Mezzanine	100
6.	Industrial Storage Systems	500

8. It is submitted that the said Unit has its own 125KLD Effluent Treatment Plant ("ETP") and 100KLD Sewerage Treatment Plant ("STP") to treat / recycle the effluents. Further, the said unit also has its own 1.7 lakh litres rain water harvesting sump connected to the public storm water drain. Therefore, it is reiterated that there is no discharge of untreated effluents and/or solid waste by the 10<sup>th</sup> Respondent into the TNHB Korattur Lake as falsely alleged by the Applicant.

9. The Unit also has a Reverse Osmosis system, Mechanical Evaporator and Solar Evaporation pan for the treatment of effluents generated from the manufacturing

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process. The RO permeate is reused in the manufacturing process and the RO rejects are evaporated through the Mechanical Evaporator followed by an elevated solar evaporation pan. The treated sewage through the in-house STP is utilized for gardening within the premises. The Unit is located in over 2.53 ha of land which is adequate to utilize the treated sewage on land for gardening.

10. Pursuant to the initial hearing in the present appeal, the officials of Tamil Nadu Pollution Control Board, the 6<sup>th</sup> Respondent herein, visited the 10<sup>th</sup> Respondent's Unit on 25.11.2022 and conducted a thorough inspection on all the facilities and processes therein. The ETP, STP, rain water harvesting sump and other facilities were inspected by the officials of TNPCB and were found to be satisfactory and it was observed that there is no discharge of untreated effluents and/or solid waste by the Unit into the TNHB Korattur Lake. Furthermore, the Unit is maintaining appropriate records as contemplated by law for the generation and disposal of sewage and effluent. Further, the Unit also has adequate air pollution and noise pollution control measures. The report of the TNPCB has affirmed that the 10<sup>th</sup> Respondent is not polluting the TNHB Korattur Lake in any manner whatsoever as alleged by the Applicant.
11. The Relevant portion of the Report dt.01.03.2023 filed by the TNPCB before this Hon'ble Tribunal is extracted below:

*" c. With regard to the 10th respondent unit (M/s GODREJ & BOYCE MFG. CO. LTD.), it is located at S.F.No. 167, 170, 171, 173, 174/1, 176, 177, 178, 190/1B1A, 1B1B1, 1B1B2, 1B1B3, & 1B2,191 & 192/1/ Plot No 1, SIDCO Industrial Estate, Ambattur Village, Ambattur Taluk, Chennai District. The unit has obtained consent to*

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*operate vide proceedings dated 21/04/2022 valid upto 31.03.2024 to carry out 1.*

*Multiflex System 400 T/Month 2. Heavy Duty System 800 T/Month 3. Long Span Storage System 180 T/Month 4. Drive In System 100 T/Month 5. Mezzanine 100 T/Month 6. Industrial Storage Systems 5000 T/Month. The unit is generating 125.50 KLD of trade effluent and 50 KLD of sewage. The unit has provided Effluent treatment plant followed by R.O system, Mechanical Evaporator and Solar Evaporation pan for the treatment of trade effluent generated from the process. RO permeate reused in the process and RO rejects evaporated through Mechanical Evaporator followed by elevated solar evaporation pan. The unit has provided a sewage treatment plant for the treatment and disposal of sewage generated. The treated sewage is utilized for on land gardening within the premises. The unit has 2.53 ha of land which is adequate to utilize the treated sewage on land for gardening. The ROA of treated sewage samples collected from the unit reveals that all the parameters analyzed are within the standards prescribed by the Board. The unit is maintaining logbook for the generation and disposal of sewage and trade effluent. The unit has provided adequate air pollution and noise pollution control measures. There is no raw treated sewage/trade effluent is being discharged outside the premises / storm water canal as alleged in the complaint."*

12. It is submitted that the Applicant has enclosed several photographs to substantiate its false allegations. In this regard, it is submitted that in the said inspection by the TNPCB and the personal hearing held on 29.11.2022, it was demonstrated by the 10<sup>th</sup> Respondent that all storm water drainages within the 10<sup>th</sup> Respondent's Unit

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were interconnected and also connected to the rainwater harvest percolation pits. The excess water flows to the Unit's 1.7 lakh litres rain water harvesting sump at the northeast of the campus. It is only during extraordinary heavy rains and flooding of the entire community due to excess release of water from the Ambattur lake, which occurs on the rarest of the rare occasion, the water flows into the 10<sup>th</sup> Respondent's Unit through south side neighbouring companies, wherein the sump becomes full and the excess water from the sump overflows through an outlet at the North East of the campus into the public stormwater drain. The Unit as stated above, has their own 125KLD ETP and 100 KLD STP plant to treat / recycle the effluents. The photographs particularly at Pages 26 to 28 of the paperbook filed by the Applicant appear to have been taken outside the campus in the northern side, wherein the 10<sup>th</sup> Respondent has a concrete and intact compound wall protecting the campus from entry of the water. It is understood that the Ambattur Venkatapuram residential area drainage from other side of the railway track has a culvert underneath the railway track which is connected to this storm water drainage which is in the northern side of the campus abetting the 10<sup>th</sup> Respondent's compound wall. It may be necessary to examine whether the residential area is polluting the same. In any event, it is reiterated that the 10<sup>th</sup> Respondent does not discharge any water in the direction or area captured in the said photographs as falsely alleged by the Applicant and the 10<sup>th</sup> Respondent is not polluting the TNHB Korattur Lake in any manner as wrongly alleged by the Applicant.

13. The 10<sup>th</sup> Respondent vide letter dt.13.12.2022, undertook to implement the recommendations of TNPCB, to install necessary flow meter and establish a process for periodically checking the water quality at the sump. The 10<sup>th</sup> Respondent has also undertaken to keep all records pertaining to the excess water flowing out of the Unit into the public storm water drain. The 10<sup>th</sup> Respondent, is in compliance with

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all environmental laws in force and is taking steps to monitor the quality of water flowing into the storm water as a measure of abundant caution and is also in the process of implementing the recommendations of the TNPCB. It is submitted that Chennai Mettex Lab Private Limited, a government recognised testing agency, tested the water samples from the storm water drain from 02.12.2022 to 09.12.2022 and the report fortifies that the said Unit does not discharge untreated effluent or sewage into the TNHB Korattur Lake.

14. Now reverting to the allegations in the Memorandum of Application filed by the Applicant.
15. The contents of Paragraphs 1 & 2 relate to the addresses of the Applicant and Respondents and requires no comment. The contents of Paragraph 3, str reliefs prayed for by the Appellant which are based on baseless allegations that are not supported by evidence insofar as the 10<sup>th</sup> Respondent is concerned and therefore the present Application is to be dismissed as against the 10<sup>th</sup> Respondent.
16. The contents of Paragraph 4(i) to 4(v), *inter alia* relates to facts and averments/allegations relating to other respondents and alleged illegal encroachment along the water body of which the 10<sup>th</sup> Respondent is not aware and the Appellant is put to strict proof of the same. The Unit of the 10<sup>th</sup> Respondent is neither encroaching upon any water body or government lands, and is fully owned by the 10<sup>th</sup> Respondent.
17. The contents of Paragraph 4(vi)are denied as false and baseless insofar as the same relates to the 10<sup>th</sup> Respondent. As stated above, no untreated effluent is discharged into the water body surrounding the 10<sup>th</sup> Respondent's Unit. The 10<sup>th</sup> Respondent's

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Unit has its own 125KLD Effluent ETP and 100 KLD STP to treat / recycle the effluents. Further, the said Unit also has its own 1.7 lakh litres rain water harvesting sump connected to the public storm water drain. The other averments made in Paragraph 4(vi) do not relate to the 10<sup>th</sup> Respondent and the Appellant is put to strict proof of the same.

18. The contents of Paragraph 4(vii) are denied as false and baseless insofar as it relates to the 10<sup>th</sup> Respondent and the Applicant is put to strict proof of the same. It is reiterated that the 10<sup>th</sup> Respondent is not polluting the TNHB Korattur Lake as falsely alleged by the Applicant.
19. The contents of Paragraphs 4(viii) to 4(x) are denied as false insofar as it relates to 10<sup>th</sup> Respondent. It is reiterated that the 10<sup>th</sup> Respondent is in compliance with all applicable laws including environmental laws. The 10<sup>th</sup> Respondent is operating its Unit diligently, without causing any harm to the flora and fauna. The 10<sup>th</sup> Respondent has the STP and ETP to treat waste and effluents produced by the Unit.
20. The contents of Paragraph 4(xi) are denied as false. The averment that the major portion of the lake is covered with Eichhornia Crassipes, Pistia etc., are denied as baseless and the Applicant is put to strict proof of the same. It is further submitted that the 10<sup>th</sup> Respondent does not pollute the TNHB Korattur lake as falsely alleged by the Applicant.
21. The contents of Paragraphs 4(xii) and 4(xiii) are denied as false insofar as it relates to the 10<sup>th</sup> Respondent and the Applicant is put to strict proof of the same. It is reiterated that the 10<sup>th</sup> Respondent does not pollute the TNHB Korattur lake as falsely alleged by the Applicant.

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22. The averments in grounds a & b, do not relate to the 10<sup>th</sup> Respondent and therefore requires no comment. Suffice it is to state that the Applicant is put to strict proof of the same.
23. The averments in ground c are vehemently denied insofar as it relates to the 10<sup>th</sup> Respondent. As stated above, the 10<sup>th</sup> Respondent has its STP and ETP to treat waste and effluents produced by the Unit and the 10<sup>th</sup> Respondent does not discharge untreated effluents or solid waste into the water body. Other scrap and waste produced are treated in accordance with law and scientific methods as enumerated above. It is submitted that since the subject matter of the present application relates to alleged untreated effluents and solid waste and their alleged discharge thereof into the TNHB Korattur Lake, it is not necessary to elaborate regarding the safe transportation of the wastes so produced. However, it is submitted that the 10<sup>th</sup> Respondent do not dump any waste, effluent or scraps into the TNHB Korattur Lake as falsely alleged by the Applicant.
24. Ground d, and the contents thereof are entirely denied. It is submitted that the Applicant has enclosed photographs to substantiate its false allegations. In this regard, it is submitted that in the said inspection by the TNPCB and the personal hearing held on 29.11.2022, it was demonstrated by the 10<sup>th</sup> Respondent that all storm water drainages within the 10<sup>th</sup> Respondent's Unit were interconnected and also connected to the rainwater harvest percolation pits. The excess water flows to the Unit's 1.7 lakh litres rain water harvesting sump at the northeast of the campus. It is only during extraordinary heavy rains and flooding of the entire community due to excess release of water from the Ambattur lake, which occurs on the rarest of the rare occasion, the water flows into the 10<sup>th</sup> Respondent's Unit through south

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side neighbouring companies, wherein the sump becomes full and the excess water from the sump overflows through an outlet at the North East of the campus into the public stormwater drain. The Unit as stated above, has their own 125KLD ETP and 100 KLD STP plant to treat / recycle the effluents. The photographs particularly at Pages 26 to 28 of the paperbook filed by the Applicant appear to have been taken outside the campus in the northern side, wherein the 10<sup>th</sup> Respondent has a concrete and intact compound wall protecting the campus from entry of the water. It is understood that the Ambattur Venkatapuram residential area drainage from other side of the railway track has a culvert underneath the railway track which is connected to this storm water drainage which is in the northern side of the campus abetting the 10<sup>th</sup> Respondent's compound wall. It may be necessary to examine whether the residential area is polluting the same. In any event, it is reiterated that the 10<sup>th</sup> Respondent does not discharge any water in the direction or area captured in the said photographs as falsely alleged by the Applicant and the 10<sup>th</sup> Respondent is not polluting the TNHB Korattur Lake in any manner as wrongly alleged by the Applicant.

25. The contents in grounds e,f and g relating to the 10<sup>th</sup> Respondent are denied as false, baseless and vexatious. The 10<sup>th</sup> Respondent does not cause any harm to the biotic and abiotic life around its Unit or pollute the water body as falsely alleged by the Applicant. No untreated effluents or solid waste is discharged by the 10<sup>th</sup> Respondent into the TNHB Korattur Lake.
26. It is submitted that the 10<sup>th</sup> Respondent is an environment-friendly Unit and does not pollute the environment as falsely alleged by the Applicant. The water quality report of the storm water drain and the Report of the TNPCB dt.01.03.2023

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substantiates that the 10<sup>th</sup> Respondent is not polluting the TNHB Korattur Lake as falsely alleged by the Applicant.

In light of the above, it is humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the present Application No.125 of 2022 as against the 10<sup>th</sup> Respondent and thus render justice.

S. RAMASUBRAMANIAM & ASSOCIATES



PARTNER

COUNSEL FOR 10<sup>TH</sup> RESPONDENT

For GODREJ & BOYCE MFG. CO. LTD.



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10<sup>TH</sup> RESPONDENT

#### VERIFICATION

I, S Kumar , son/daughter/wife of Shri P Selvaraj , aged 51years, residing at No.806, 63<sup>rd</sup> Street, 10<sup>th</sup> Sector, KK Nagar, Chennai 600078 of the 10<sup>th</sup> Respondent, having office at No 1,SIDCO Industrial Estate ,Ambattur , Chennai-98 do hereby declare that whatever is stated in the above-mentioned paragraphs 1 to 26 are true to the best of my knowledge, information and belief.

Dated at Chennai on this 18th Day of April, 2023

For GODREJ & BOYCE MFG. CO. LTD.



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10<sup>th</sup> RESPONDENT

For GODREJ & BOYCE MFG. CO. LTD.

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**BEFORE THE HON'BLE NATIONAL  
GREEN TRIBUNAL,**

**SOUTHERN ZONE AT CHENNAI**

**Application No.125 of 2022**

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**VERSUS**

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& Others**

**..Respondents**

**REPLY STATEMENT FILED ON BEHALF  
OF THE 10<sup>TH</sup> RESPONDENT**

**S.RAMASUBRAMANIAM & ASSOCIATES**

**ROC NO.7351/2015**

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