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BEFORE THE NATIONAL GREEN TRIBUNAL

EXECUTION APPLICATION NO 41 OF 2023

(EARLIER MA NO 16 OF 2023)

IN

ORIGINAL APPLICATION NO 94 OF 2021

IN THE MATTER OF

HAIDER ALI

...APPLICANT

VERSUS

UNION OF INDIA AND OTHERS

...RESPONDENTS

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NEW DELHI
FILED ON 15 JAN 2026

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BEFORE THE NATIONAL GREEN TRIBUNAL
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HAIDER ALI **...APPLICANT**
VERSUS
UNION OF INDIA AND OTHERS **...RESPONDENTS**
SECOND ADDITIONAL REPLY ON BEHALF OF
RESPONDENT NO 23 (TAMIL NADU CRICKET
ASSOCIATION – M A CHIDAMBARAM STADIUM)

1. That this second additional reply is being filed in continuation of the additional reply dated 17 Jul 2025 which stated *inter alia* as follows:
 - a. *“However, subsequently, the answering Respondent has commenced a project for upgradation of the ground including excavation of the existing ground, killing the existing grass for weed control, change of the outfield from mud to sand, and eventually planting the grass on the ground (photographs at Annexure A, Pg 10). This project is expected to take several months, as a result of which no matches in the current domestic season, i.e. 2025-26, are scheduled to be held at the stadium. At present, there are no upcoming international matches that have been allocated to the stadium either. In light of these developments, it is likely that the daily, monthly, and yearly water usage requirements will change, and the relevant figures as mentioned in the order dated 19*

Mar 2025 will actually become known only once the project is completed.” (Para 4, Pg 3)

- b. *“As also disclosed in Annexure R3 of the reply dated 11 Aug 2024 regarding “Installation of STP”, it has been stated that “Our Cricket Stadium had installed STP - 150 KLD capacity to treat the sewage generation and the treated sewage utilized for Toilet Flushing & Greenbelt within our site.” The answering Respondent is also taking steps with the objective that the STP facility performs at the highest level of capacity utilisation that is technologically feasible. Further updates on this account are expected to be available in a few months around the time that the upgradation project of the ground is also completed.” (Para 5, Pg 4)*

2. As a consequence of the aforesaid works that were undertaken, there were no watering requirements for the main stadium from Jun to the first week of Nov. Although no matches have been hosted by the answering Respondent at the MA Chidambaram stadium since the additional reply dated 17 Jul 2025, the present additional reply is being filed to provide an update as to the present state of affairs. Based on the estimates presently available, the yearly, monthly, and daily quantities of water required are set out below. These estimates are subject to revision and may be updated once the actual water use and requirement

patterns are established over the course of the year. They account for an estimated forty-five match days during a year (i.e. days on which the main stadium is not watered), and an estimated twenty days during the north-east monsoon when natural rainfall suffices for the water requirements. In other words, the entire green belt is expected to require watering for approximately 300 days in a year. On each day where watering is required, the estimated quantity of water is 120 KLD for the entire green belt. On this basis, the estimated average yearly, monthly, and daily requirements are as follows:

- a. Yearly – $300 \text{ days} \times 120 \text{ KLD} = 36,000 \text{ KL}$ per year
 - b. Monthly – $36,000 \text{ KL} / 12 \text{ months} = 3,000 \text{ KL}$ per month
 - c. Daily – $36,000 \text{ KL} / 365 \text{ days} = 99 \text{ KLD}$
3. The STP facility, which has a maximum output of 150 KLD, has been functional and generates 100-120 KLD, which is sufficient for the requirements of the answering Respondent stadium. As stated above, the answering Respondent craves leave to provide further update during the course of the year, once it actually starts hosting matches. This second additional reply is being filed to further demonstrate the *bona fide* and steps taken by the answering Respondent in compliance with the directions of this Hon'ble Tribunal. Needless to say, the orders of this Hon'ble Tribunal dated 19 Mar 2025, 17 Jul 2025, and 13 Oct 2025

also reflect the consistent compliance by the answering Respondent in the present proceedings.

4. In view of the above, it is reiterated in terms of para 10 of the reply dated 11 Aug 2024 and para 8 of the additional reply dated 17 Jul 2025 that the Execution Application against the answering Respondent may be dismissed / disposed of without any further direction.

NEW DELHI
FILED ON 15 JAN 2026


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...RESPONDENTS

AFFIDAVIT

I, U Bhagwandas Rao aged about 60 years, son of U Prabhakar Rao, having my office at No 5, Victoria Hostel Road, Chepauk, Chennai, Tamil Nadu – 600 005, do hereby solemnly affirm as follows:

1. That I am the Honorary Secretary of Respondent No 23 herein (i.e., M A Chidambaram Stadium, C/o the Tamil Nadu Cricket Association), and I am conversant with the facts of the case based on the records maintained. Hence, I am competent to swear this affidavit.
2. That the accompanying additional reply has been drafted as per my instructions. Its contents have been explained to me and I have understood the same. The contents of the Reply are true and correct to my knowledge based on the records of the case, and nothing material has been concealed therefrom.

For THE TAMIL NADU CRICKET ASSOCIATION


Hon. Secretary



DEPONENT

VERIFICATION

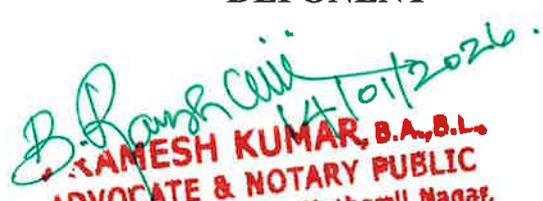
Verified at Chennai on this the 14th day of Jan 2026, that the contents of the above affidavit are true and correct to my knowledge based on the records of the case and the information received. Nothing material has been concealed therefrom.

For THE TAMIL NADU CRICKET ASSOCIATION


Hon. Secretary



DEPONENT


B. RAMESH KUMAR, B.A., B.L.
ADVOCATE & NOTARY PUBLIC
No. 6/777, 143rd Street, Muthamli Nagar,
Kodungaiyur, Chennai-600118.

2724

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**Proof of service**

Ravi Kumar <ravi@adiadvocate.com>

Haider Ali v Union of India - EA 41 of 2023: SECOND ADDITIONAL REPLY ON BEHALF OF RESPONDENT NO 23 (TAMIL NADU CRICKET ASSOCIATION – M A CHIDAMBARAM STADIUM)

1 message

Ravi Kumar <ravi@adiadvocate.com>

15 January 2026 at 17:46

To: sanobar ali Qureshi <sanobaraliqureshi@gmail.com>, egov-mowr@nic.in, secy-mowr@nic.in, gigicgeorge.adv42@yahoo.in

Cc: Aditya Verma <email@adiadvocate.com>, Parkhi Rai <parkhi@adiadvocate.com>

Dear All,

By way of advance service, I attach the second additional reply being filed on behalf of the Respondent No 23 (Tamil Nadu Cricket Association – M A Chidambaram Stadium) in the captioned matter before the Hon'ble National Green Tribunal, Principal Bench, New Delhi.

Regards,

Ravi Kumar

Registered Clerk: IC No 4671

Ph: 8285333807

For Mr Aditya Verma, Advocate on Record

**Additional reply 15 Jan 2026.pdf**

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