

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL
BENCH AT NEW DELHI

ORIGINAL APPLICATION NO.348/2024

IN THE MATTER OF:

News Item titled “Bengaluru Stadium to get treated water supply for IPL Matches amid crisis” appearing in India Today dated 21.03.2024

...Appellant

ADDITIONAL AFFIDAVIT ON BEHALF OF RESPONDENT NO.4
KARNATAKA STATE CRICKET ASSOCIATION

Paper Book
(KINDLY SEE INSIDE FOR INDEX)

ADVOCATE FOR THE RESPONDENT: BALAJI SRINIVASAN

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL
BENCH AT NEW DELHI

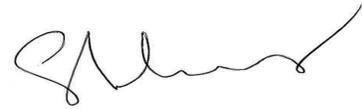
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INDEX

S. No	Particulars	Page No
1.	ADDITIONAL AFFIDAVIT ON BEHALF OF RESPONDENT NO.4 KARNATAKA STATE CRICKET ASSOCIATION	1 - 4
2.	Document No.1 A true copy No Objection Certificate dated 05-08-2024 issued by Karnataka Ground Water Authority	5 - 7



(BALAJI SRINIVASAN)
Advocate for Respondent No.4

Filed On:07.08.2025

**BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH,
NEW DELHI**

ORIGINAL APPLICATION NO. 348/2024

IN THE MATTER OF:

News Item titled "Bengaluru stadium to get treated water supply for IPL matches amid crisis" appearing in India Today dated 21.03.2024

**ADDITIONAL AFFIDAVIT ON BEHALF OF RESPONDENT NO. 4
KARNATAKA STATE CRICKET ASSOCIATION**

I, Shubhendu Ghosh s/o late Shri. Gopal Ranjan Ghosh, aged about 70 years, Chief Executive Officer – CEO, The Karnataka State Cricket Association, Bengaluru, M. Chinnaswamy Stadium, Cubbon Road, Bengaluru – 560 001, Karnataka, do hereby solemnly affirm and state on oath as follows:

1. I am the Chief Executive Officer of the Respondent No. 4 – Karnataka State Cricket Association (KSCA) in the above Original Application, and I am well conversant with the facts and circumstances of the case. I am competent and duly authorised to swear to this affidavit.
2. In compliance with the directions issued by this Hon'ble Tribunal vide Orders dated 19.03.2025 and 17.07.2025, the Respondent No. 4 is filing the present Additional Affidavit.
3. This Hon'ble Tribunal, vide Order dated 19.03.2025, directed the Respondent Cricket Associations to provide details of the usage of water for irrigation of the ground, including the source and proportion of fresh and treated water.

Shubhendu Ghosh



4. In compliance with the above directions, the information in respect of M. Chinnaswamy Stadium, Bengaluru as learnt from the Chief Curator, KSCA, is tabulated below:

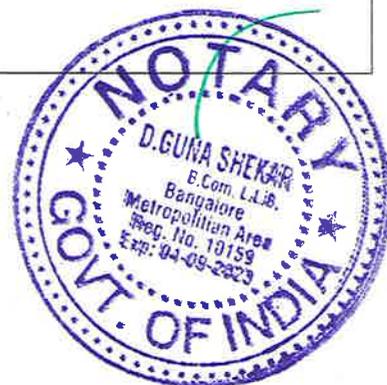
Sl.No.	Information Required	Remarks
1	Monthly Water Quantity required for ground irrigation	Summer Month :- A- Ground 2,250 KL B- Ground 1,500 KL Total 3,750 KL <hr/> Non Summer months A-Ground 1,500 KL B-Ground 750 KL Total 2,250 KL
2	Yearly Water Quantity required for ground irrigation	34,500 KL (3,750 x 5 summer months) + (2,250 x 7 non-summer months)
3	Proportion of STP Water used for Ground Irrigation	As the quantum of STP water is meagre due to scare / negligible inflow from the Municipal (BWSSB) sewer line, KSCA in order to meet the water requirements of the turf, purchases treated water from the BWSSB and uses only treated water from BWSSB for the watering the turf and the A & B grounds.
4	Proportion of Fresh Water used for Ground Irrigation	Fresh water not used for watering the ground.

Shubha Shekar



Sl.No.	Information Required	Remarks
5	Source of Fresh Water	<p>Municipality Supply: KSCA receives potable/ fresh water supply from BWSSB for drinking and cooking. KSCA has 300 staff members, 34 rooms, 120 dormitory beds, kitchens, party halls, restaurants. On average, KSCA caters to around 500 persons with an average consumption of fresh water from April 2023 to March 2024 of 80 KL per day.</p> <p>Borewells: KSCA has 4 borewells dug nearly 30 years ago. (Copy of the NOC enclosed)</p>
6	Source of Treated Water	<p>STP Plant: KSCA has an STP Plant of 200 KLD capacity installed; treated water is used for gardening and watering the ground. However, the STP Plant has not been utilised to its potential due to short supply of municipal sewage from BWSSB.</p> <p>Tertiary Treated Water Supply from BWSSB: KSCA purchased tertiary treated water from KSCA transported through tankers on need basis. The details have been furnished in KSCA's Reply dated 07.08.2024.</p>
7	Whether the stadium uses groundwater for watering the ground?	NO
8	Whether the stadium intends to continue using fresh water for irrigation?	NO
9	Status of Rain Water Harvesting Systems (RWHS) installed in the stadiums	<p>12 Rain Water Harvesting system (RWHS) are installed throughout the campus.</p> <p>The Rain Water removed by the Sub Air system is stored in a water tank and re-used for watering turf. In fact the A & B Grounds themselves are recharge pits.</p>

Shubhendra Patel



5. It is respectfully submitted that the KSCA is committed to sustainable water management practices, including maximising the use of treated water for ground maintenance, reducing reliance on potable water, and implementing rainwater harvesting measures.
6. **It is respectfully submitted that KSCA uses only treated water procured from BSWWB for watering the turf in A & B ground.**
7. This affidavit is filed in compliance with the orders of this Hon'ble Tribunal to place on record the relevant information concerning water usage for irrigation at the M. Chinnaswamy Stadium.



Shubendu Ghosh
DEPONENT

VERIFICATION

I, Shubendu Ghosh, do hereby verify that the contents of paragraphs 1 to 7 of the above affidavit are true and correct to my knowledge and belief, no part of it is false, and nothing material has been concealed therefrom.

Verified at BANGALORE on this 4th day of Aug, 2025.



Shubendu Ghosh
DEPONENT

SWORN TO BEFORE ME

GUNA SHEKAR, B.Com., LL
 Advocate & Notary Publ.c
 Govt. of India
 No. 10, K.R. Palya, Cox Town,
 Jeevanahalli, Bangalore-560 005
 Mobile : 9448074753, 8762414525

- 4 AUG 2025



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Karnataka Ground Water Authority

K.S.F.C Bhavan, Thimmaiah Road, Bengaluru- 560052, Karnataka.

E-mail: gwdkar@gmail.com, Ph No: 080-22268732

No: KGWAN1899572111

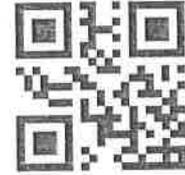
Dated : 05-08-2024

NO OBJECTION CERTIFICATE - FORM 3 A RULE(6)

Permission For Digging/Drilling A Well/ Borewell/ Extraction Of Groundwater For Industrial/ Commercial/ Entertainment Or Other Use

M/s Hon Secretary

M. Chinnaswamy stadium , cubbon road bangalore-560001



Above Person/Company is permitted for extraction of groundwater at below mentioned location(s):

SL NO.	LOCATION
1	Sy No.124, Chinnaswamy Stadium, Bangalore (North) taluk
2	Sy No.124, Chinnaswamy Stadium, Bangalore (North) taluk
3	Sy No.124, Chinnaswamy Stadium, Bangalore (North) taluk
4	Sy No.124, Chinnaswamy Stadium, Bangalore (North) taluk

From (4) Bore Wells For Entertainment Use, Subject To The Following Conditions :-

- ❖ The firm may abstract **20 m3/day** (not exceeding **7300 m3/year**) of groundwater through (4) bore wells only. No additional groundwater abstraction structures to be constructed for this purpose without prior approval of the KGWA.
- ❖ This NOC is valid for 2 years from the date of issue of this letter.
- ❖ As per the categorization of taluks, Bangalore (North) taluk in Bengaluru (Urban) district fall under Over Exploited taluk category. Hence, the Groundwater Abstraction/Restoration Charges to be paid is Rs. 120 per day.
- ❖ The Firm at its own cost shall install piezometer/s, at suitable locations and execute groundwater regime monitoring programme in and around the project area on regular basis in consultation with the Senior Geologist, District Groundwater Office, Groundwater Directorate, Bengaluru (Urban) District.

NO. OF PIEZOMETERS	MONITORING MECHANISM		
	MANUAL	DWLR	DWLR WITH TELEMETRY
1	1	0	0

- ❖ The well should not be used for drawing water for any other use other than applied for.
- ❖ The withdrawal of water should be better managed to avoid wastage of water
- ❖ The utilized water should be recycled and reused after necessary treatment
- ❖ The construction of rain water harvesting structures in the vicinity of the well/ bore well shall be as per the technical opinion of Senior Geologist, District Groundwater Office, Groundwater Directorate, **Bengaluru (Urban)** District.
- ❖ The utilization of water will be subject to the regulation from time to time based on the extraction of water from the well/bore well
- ❖ The pollution of groundwater resources should be avoided
- ❖ Water meter has to be installed and data on groundwater draft is to be maintained and submitted every month to the Authority concerned. The groundwater quality to be monitored twice in a year during pre-monsoon and post monsoon periods.
- ❖ **M/s Hon Secretary** shall, in consultation with the Senior Geologist, District Groundwater Office, Groundwater Directorate, **Bengaluru (Urban)** District, implement groundwater recharge measures for augmenting the groundwater resources of the area.
- ❖ The photographs of the recharge structures after completion of the same are to be furnished immediately to the Senior Geologist, District Groundwater Office, Groundwater Directorate, **Bengaluru (Urban)** District, for verification.
- ❖ The abstraction/restoration charges should be deposited to the Karnataka Groundwater Authority account in the form of DD / Cash.
- ❖ The groundwater monitoring data in respect of Point No. 4 & 12 to be submitted to Senior Geologist, District Groundwater Office, Groundwater Directorate, **Bengaluru (Urban)** District on regular basis at least once in a year.
- ❖ The permission is liable to be cancelled in case of non-compliance of any of the conditions as mentioned in Point No. 1 to 15.
- ❖ The Karnataka Groundwater (Regulation for Protection of Sources of Drinking Water) Act, 1999 should be followed scrupulously.
- ❖ This NOC is subject to prevailing Central/State Government rules /laws or Court orders related to construction of bore well/³groundwater withdrawal /construction of recharge or conservation structures /discharge of effluents or any such matter as applicable.
- ❖ This NOC does not absolve the applicant / proponent of his obligation / requirement to obtain other statutory and administrative clearances from other statutory and administrative authorities.

BANK ACCOUNT DETAILS ARE GIVEN BELOW

Bank	: CANARA BANK
Account Holder	: CHAIRMAN, KGWA
Account No	: 0788201052332
IFSC	: CNRB0000788
Account Type	: CURRENT ACCOUNT

- ❖ It is also informed that during the renewal of the NOC, depending upon the hydrogeological condition the category of the area and the site conditions, the quantity will vary from permitted quantity. The company should make alternate arrangements for the reducing quantity for sustaining their industrial activity by means of availing water through local bodies or using the urban waste water after proper treatment.
- ❖ The fee that will be levied by the government for the groundwater usage is applicable from the date such orders are issued by the government.
- ❖ The firm is bound to obey the directions of NGT/ court orders that are existing and that may be laid

NOC has been issued as per the proceedings drawn from the meeting held under the Chairmanship of Deputy Commissioner, District Groundwater Committee, Bengaluru (Urban) District on 25-07-2024..

To,

M/S Hon Secretary

M. Chinnaswamy Stadium , Cubbon Road Bangalore-560001



Copy For Information To,

1. The Secretary, Minor Irrigation and Groundwater Development Department
2. Regional Director, Central Groundwater Board, SWR.
3. The Deputy Commissioner, Bengaluru (Urban) District
4. Senior Geologist, District Groundwater Office, Groundwater Directorate, Bengaluru (Urban) District

Place : Bengaluru (Urban)

Date : 05-08-2024

(E-SIGN SIGNATURE)

**Signature of Designated Officer
Karnataka Groundwater Authority**

Signature valid

Digitally signed by
Date: 2024.08.05 16:01:33 IST
Reason: Digitally Signed

