

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

EXECUTION APPLICATION NO. 41/2023

IN

ORIGINAL APPLICATION NO. 94/2021

IN THE MATTER OF:

HAIDER ALI

...APPLICANT

VERSUS

UNION OF INDIA AND ORS.

...RESPONDENTS

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For:

Respondent No. 9

Saurashtra Cricket Association

THROUGH
SNJ AND PARTNERS

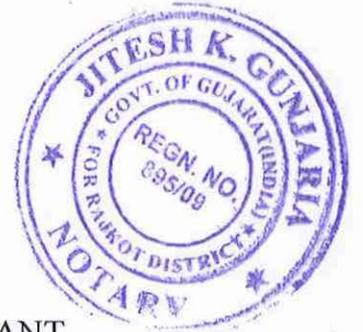
ADVOCATES FOR RESPONDENT NO. 09

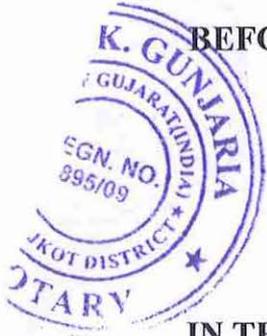
C-217, First Floor

Defence Colony, New Delhi-110024

New Delhi

Date 12.02.2026





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ADDITIONAL REPLY AFFIDAVIT ON BEHALF OF SAURASHTRA
CRICKET ASSOCIATION, RESPONDENT NO. 9

I, Mr. Himanshu Pravichandra S/o Mr. Pravichandra Laxmichandra Shah, aged 59 years, Honorary Secretary of Saurashtra Cricket Association, Niranjn Shah Stadium, Distt Rajkot, do hereby solemnly affirm and declare as under:

1. That I am presently working as Honorary Secretary of Saurashtra Cricket Association, Niranjn Shah Stadium, Distt Rajkot, and I am fully conversant with the facts and circumstances of the present case, and I am therefore competent and authorized to swear the present affidavit.
2. The reply of the Answering Respondent is as follows:
 - a. The stadium has natural rainwater recharge/ harvesting system since almost 2016, and wells and other areas get recharged with rainwater. The layout of the Stadium as well as natural rainwater recharge system help to utilize rainwater in the best possible ways.
 - b. The number of matches played at the stadium is much less compared to other Cricket Stadiums at Metropolitan cities. Also, capacity of the Stadium is approx. 27000, which is much less in comparison to other Cricket Stadiums situated at metropolitan cities. Considering this, the requirement of water for such activities is bare minimum. Also, the association has not provided the Stadium so far for any other major events where high footfall of public/spectators happen.

H.S.S.



- c. It is practically not possible to have Sewage Treatment Plant (STP) at the Stadium. This was well explained and discussed with inspection team. Neither enough sewage water is produced at the Stadium nor is there any sewage line passing nearby the Stadium. Even during higher footfalls during International Matches, which are not much frequent, not enough sewage water is produced which can make STP feasible at the Stadium.
- d. The Saurashtra Cricket Association (SCA) signed an MoU (Memorandum of Understanding) with the Rajkot Municipal Corporation (RMC) for supplying treated water to maintain the Niranjn Shah Cricket Stadium (Khandheri Stadium), wherein it has been decided that RMC will provide 1 lakh litres per day of treated water from the Madhapar STP, which will largely meet the stadium's water requirements for its ground and outfield.
- e. On 16.01.2024 the answering Respondent was granted the NOC vide NOC No. CGWA/NOC/INF/ORIG/2024/19777 for ground water abstraction w.e.f. 30.11.2023 to 29.11.2028.
- f. The city of Rajkot has decent rainfall generally in period of end of June to mid-September and season of Winter is from end of October till end of February or March. Considering this fact, usage of water is well balanced and optimized from available recharged rain water.
- g. Saurashtra Cricket Association care and pledge for better environment and the Association in last couple of years planted more than 4000 trees. Also, these planted trees are well maintained and being taken care jointly by Saurashtra Cricket Association and an NGO. Further, the association has installed and using good capacity Solar Power System at the Stadium. By good usage of rain recharge water, Solar power system, good tree plantation and all other good measures making the Stadium very Eco-Friendly Stadium.

3. Monthly and Yearly use of Fresh and RWHS Water for the Irrigation of Ground and Practice Areas:

The consolidated information regarding use of water is as follows:

Handwritten signature



Monthly Status				Yearly Status			
Use of water for irrigating the ground/green belt	Proportion of STP treated	Proportion of Fresh Water		Use of water for irrigating the ground/green belt	Proportion of STP treated	Proportion of Fresh Water	
		Ground Water	Supply from other sources			Ground Water	Supply from other sources
2046.00	208.30	1837.70	NIL	18377.00	625.00	18377.00	NIL

In the months of June to September, 2025: Rains and usage of Rain harvesting water.

Ground water usage are for drinking, ground and miscellaneous purpose.

4. It is submitted that the answering applicant has complied with the directions of Hon'ble Tribunal. The answering applicant seeks leave of the Hon'ble tribunal to file additional reply and supplementary documents, at the later stage, if so required.
5. It is humbly prayed to Hon'ble Tribunal to kindly take the additional reply filed by the Saurashtra Cricket Association on record and consider the same while adjudicating the present matter.

H. Shub...

DEPONENT

VERIFICATION

I, the above named deponent, do hereby verify that the contents of the above affidavit are true and correct, and nothing material has been concealed therefrom nor, any part of it is false.

Verified at Rajkot on this 12th day of February, 2026

H. Shub...

DEPONENT

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...RESPONDENTS

AFFIDAVIT

I, Mr. Himanshu Pravichandra S/o Mr. Pravichandra Laxmichandra Shah, aged 59 years, Honorary Secretary of Saurashtra Cricket Association, Niranjn Shah Stadium, Distt Rajkot, do hereby solemnly affirm and declare as under:-

1. That I am the authorized representative of the Saurashtra Cricket Association in the aforesaid case and the accompanying additional Reply has been drafted under my instructions.
2. That I have gone through and understood the contents of the accompanying additional Reply, and state that the averments made therein are true and correct to my knowledge and legal submissions made therein are believed to be true and correct on legal advice received.
3. I further state that the contents of the accompanying additional Reply may be treated as a part of this affidavit, as if the same have been incorporated herein.



DEPONENT

VERIFICATION

I, the above named deponent, do hereby verify that the contents of the above affidavit are true and correct, and nothing material has been concealed therefrom nor, any part of it is false.

Verified at Rajkot on this 12th day of February, 2026

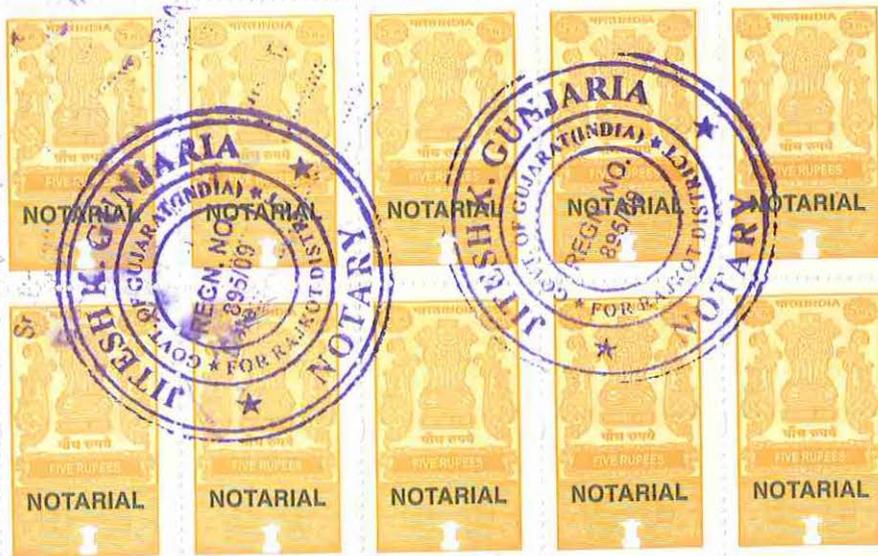
H.S.S.

DEPONENT

SOLEMNLY AFFIRMED

J
JITESH K. GUNJARIA
ADVOCATE & NOTARY
(GOVT. OF GUJARAT)
109, Star Chamber,
Harihar Chowk, RAJKOT

Page No. 31/26
Serial No. 911
Receipt No. 911
Date 12 FEB 2026



2731



Abhishek Kandwal <abhishekkandwal4@gmail.com>

Service of Additional Reply on behalf of Respondent No. 9, 17 and 26 in Haider Ali vs UOI & Ors.

1 message

Abhishek Kandwal <abhishekkandwal4@gmail.com>
To: gigicgeorge.adv42@yahoo.in

13 February 2026 at 13:45

Dear Sir,

Please find attached the additional reply being filed on behalf of Respondent No. 9, 17 and 26 in the captioned matter.

Regards

Abhishek Kandwal
SNJ AND PARTNERS
C-217, Block C, Defence Colony
NEW DELHI-110024
Mob. No. 7676453218

 Additional Reply Affidavit on behalf of Saurashtra
Cricket Association Respondant No. 9.pdf

 HPCA REPLY Respondant No. 26.pdf

 MPCA Reply Respondant No. 17.PDF