

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

APPEAL NO. 594 OF 2025

Rio-de-Goa Co-operative Housing Society ...Appellant

Versus

Goa State Pollution Control Board Goa
& Ors. ...Respondents

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Advocates for Respondent No. 2

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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Rio-de-Goa Co-operative
Housing Society

...Appellant

Versus

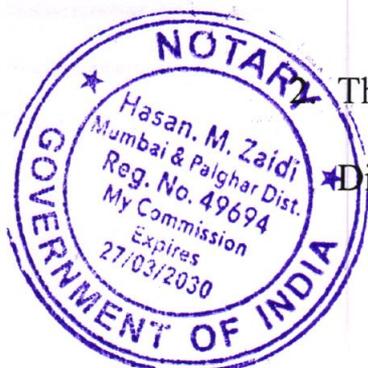
Goa State Pollution Control Board Goa
& Ors.

...Respondents

**AFFIDAVIT IN REPLY ON BEHALF OF RESPONDENT NO. 2
TO THE APPEAL:**

I, Rohit Kothari, aged 40 years, the Authorized Signatory of Respondent No. 2, having office address at E Block, Voltas Premises, T B Kadam Marg, Chinchpokli, Mumbai- 400033, do hereby solemnly affirm and state as under:

1. I am the Authorized Signatory of Respondent No. 2, having my address as mentioned above and I am competent, authorized, and able to depose the present Affidavit. I have perused and made myself conversant with the contents and record pertaining to the present Appeal and I am otherwise aware of the facts and circumstances of the present case from personal knowledge as also office records and thus, competent to depose the same.



The Appellant, by way of the present Appeal, is challenging the Directions dated 3rd September 2025 issued by Respondent No. 1,

Goa State Pollution Control Board (“GSPCB”) under Section 33A of the Water (Prevention and Control of Pollution) Act, 1974 (“Water Act”) *inter alia* directing to close/suspend the operations of Sewage Treatment Plant (“STP”) installed in the Appellant’s Society (*annexed as Annexure A-9/Pg.132 of the Appeal*).

3. It is submitted that Respondent No. 2 is the developer who has undertaken the construction of the Appellant Society’s said project and which has been handed over to the Appellant Society on 1st April 2023. There are no specific prayers sought as against Respondent No. 2 in the captioned Appeal and the present Respondent No. 2 is filing the present Reply for the limited purpose of bringing true and correct facts on record and to assist this Hon’ble Tribunal in the matter. I crave leave to file a further detailed affidavit/additional affidavit along with supporting documents if the circumstances so warrant.



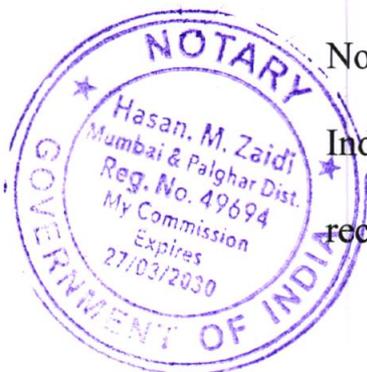
At the outset, I deny each and every averment made in the present Appeal which is contrary to and/or inconsistent with that which is stated in the present Affidavit and humbly submit that nothing contained in the Appeal shall be deemed to have been admitted by or on behalf of the Respondent No. 2, merely for want of specific

traverse. I clarify and submit that the averments made herein are in the alternative and without prejudice to one another.

BRIEF BACKGROUND OF PRESENT RESPONDENT NO. 2:

5. Tata Housing Development Company Limited (“THDCL”), i.e. Respondent No. 2, was established in 1984 and is a closely held public limited company and a subsidiary of Tata Sons Private Limited. Since 2006, Respondent No. 2 has evolved into one of the fastest growing real estate development companies in India. With primary business being development of properties in residential sectors, the company’s operations span across various aspects of real estate development of properties in residential sectors, the company’s operations span across various aspects of real estate development, such as land identification and acquisition, project planning, designing, marketing and sales, project execution and estate management.

6. Respondent No. 2 has taken up the cause of the environment by committing to develop certified green buildings, thus saving energy for the country. Some of its developments carried out by Respondent No. 2 are platinum and gold certified green developments by the Indian Green Building Council (IGBC). Respondent No. 2 has received various industry recognitions both in India and



internationally for its landmark projects and contribution to the real estate sector.

BRIEF FACTS:

7. In the year 2010, Respondent No. 3 purchased parcel of land admeasuring 19525 sq. mtrs. bearing Survey No. 215/1 situated at Village Sancoale, Taluka Mormugao, District South Goa (“**said Land**”) from the erstwhile owners vide Sale Deed dated 2nd August 2010 duly registered with the office of the Sub-Registrar of Mormugao under Serial No. S. No. 1461/10 and in view thereof, Respondent No. 3 became the lawful owner and possessed of the said Land having clear and marketable title to the said Land.

8. Thereafter, Respondent No. 3 was desirous of developing the said Land and constructing thereon a residential complex. On 25th July 2011, the Collector, South Goa District, Margao, Goa granted permission to use the said Land for residential purpose. On 12th April 2013, the Mormugao Planning and Development Authority, Vasco Da Gama (“**MPDA**”) granted development permission to the Respondent No. 3 for construction of residential complex. On 30th April 2013, the office of the Village Panchayat, Sancoale issued to Respondent No. 3 construction license no. 27/2013-14 granting license for carrying out construction on the said Land.

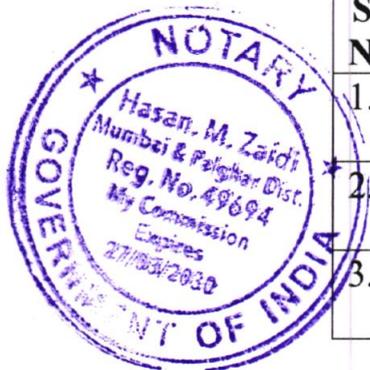


9. Respondent No. 3 decided to develop the said Land jointly with an experienced developer, being Respondent No. 2 and took up developing project under the name and style of Rio De Goa (Tata Housing Project) on the said Land (“**said project**”).

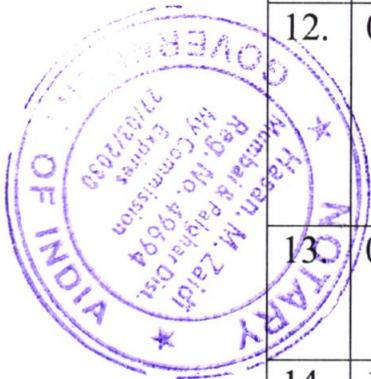
10. On 16th March 2015, a Joint Development Agreement (“**JDA**”) was executed between Respondent No. 2 and Respondent No. 3 for carrying out development of the said project as per terms and conditions set out therein which was duly registered with the office of the Civil Registrar cum Sub Registrar, Taluka Mormugao under serial no. 370 in Book-1 for the year 2015 (*annexed as Annexure A-1/Pg. 30 of the Appeal*).

11. Pursuant to the JDA, Respondent No. 2, in strict compliance with the extant statutory framework and applicable regulations, duly obtained all requisite development permissions, sanctions, and approvals from the competent authorities. A list of all permissions obtained for the said project are listed below for ease of reference:

Sr. No.	Date	Permissions
1.	12.04.2013	Development Permission from Mormugao Planning & Development Authority.
2.	30.04.2013	Construction License from Vilage Panchayat, Sancoale.
3.	27.05.2013	Provisional Fire NoC from Directorate of Fire & Emergency Services.



4.	07.05.2014	Consent to Establish (“CTE”) was issued by Respondent No. 1-GSPCB for the said project.
5.	15.09.2014	Environment Clearance issued by SEIAA, Goa.
6.	06.08.2015	Amendment to Environment Clearance granted by Goa State Environment Impact Assessment Authority.
7.	07.08.2015	Consent to Establish (“CTE”) was issued by Respondent No. 1-GSPCB for installation of STP for the said project.
8.	25.08.2015	Building Plan approval issued by Town Planner, Town & Country Planning Department, Govt. of Goa.
9.	28.08.2015	Technical Clearance was granted <i>vide</i> Order bearing TCP permission No. DH/5600/3/MTP/15/800 issued by the Town and Country Planning Department for carrying out construction of said project.
10.	08.09.2015	Amended Construction license bearing no. 20/2015-16 issued by office of the Village Panchayat Sancoale for (a) Construction of Residential Project (Revision); and (b) Change of use of (building/land).
11.	25.06.2019	Consent to Operate issued by Respondent No. 1-GSPCB for installation of STP for the said project.
12.	01.07.2019	Occupancy Certificate was issued under Ref. No. VP/S/2019-20/704 in respect of “Construction of Housing Project for the Building Block 1 to Building Block 14 of the said project.
13.	05.07.2019	Occupancy Certificate was issued under Ref. No. VP/S/2019-20/752 for Club House and Swimming Pool of the said project
14.	13.11.2020	Consent to Operate issued by GSPCB for operation of STP for the said project.
15.	22.12.2021	Renewal to Consent to Operate issued by GSPCB.
16.	04.10.2024	Renewal of Consent to Operate for the said project issued in supersession of CTO dated 22.12.2021.

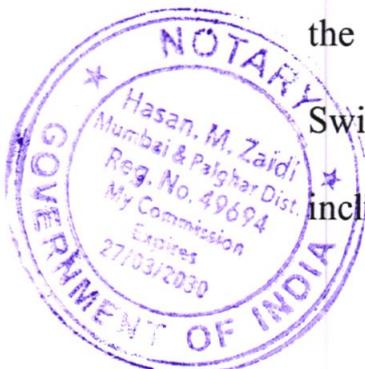


Pursuant thereto, and in accordance with the terms and conditions thereof, Respondent No. 2 has lawfully undertaken and completed the said project. I crave leave to refer and rely on the aforesaid documents as and when required.

12. Upon receipt of the Occupancy Certificate in respect of the buildings of the said project, Respondent No. 2 called upon and handed over possession of various flats, apartments, tenements, units, premises in the said Buildings to the respective allottees.

13. On 15th December 2022, Rio-de-Goa Co-operative Housing Society Ltd., the Appellant herein, was registered as a Co-operative Housing Society as per the provisions of the Goa Co-operative Housing Society Rules, 2003.

14. Thereafter, Respondent No. 2 has put the Appellant Society in possession of the said project, and the Appellant Society has accepted the possession and therewith the responsibility for its maintenance, repairs and upkeep since 1st April 2023. Since then, the Appellant Society is solely in possession and liable to maintain the said project including but not limited to the Club House, Swimming pool, common areas, equipment, plant and machinery including the sewage treatment plant and all other parts of the said



project at its own costs and responsibility. Hereto annexed and marked as "Exhibit-A" is a copy of handover letter dated 31st March 2023 of handover of society office key and Letter dated 29th March 2023 for handover of STP and related documents.

15. On 16th January 2024, Respondent No. 2 shared draft of the conveyance deed to the Appellant Society to be executed by Respondent No. 2 in favour of the Appellant Society. Thereafter, Respondent No. 2 sent several reminders to the Appellant Society to finalize the draft conveyance deed, however, the Appellant Society has not been forthcoming in order to finalize the draft and get the conveyance deed executed. Hereto annexed and marked as "Exhibit-B-colly" are copies of the several emails of Respondent No. 2 addressed to Appellant Society for finalization of the conveyance deed.

16. On 19th November 2024, Respondent No.2 addressed communication to Respondent No. 1-GSPCB intimating that the said project has been handed over to the Appellant Society as on 1st April 2023 and requested Respondent No. 1-GSPCB to update the correspondence name and address on its file for future correspondence. Hereto annexed and marked as "Exhibit-C" is a

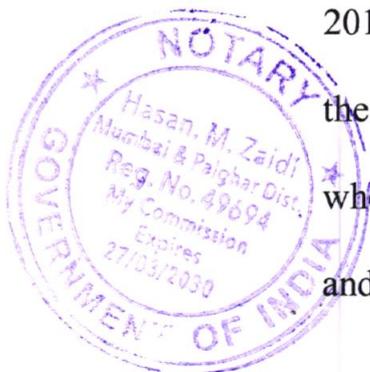


copy of email dated 19th November 2024 addressed by Respondent No. 2 to Respondent No. 1-GSPCB.

Allegations qua Sewage Treatment Plant

17. The Appellant has alleged in the present appeal that there was failure on the part of Respondent No. 2 for deficiencies in installation and maintenance of the STP of the said project and that Respondent No. 2 is solely responsible for defending the STP installed by Respondent No. 2. It is submitted that the Appellant has made bald and vague allegations against Respondent No. 2 which is without any basis and ought to be dismissed as frivolous.

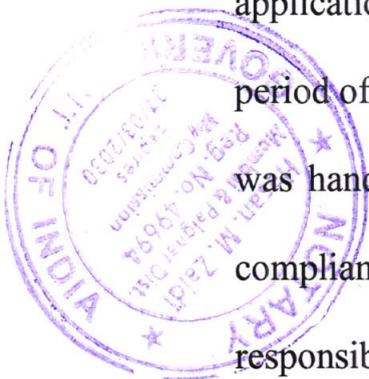
18. On 7th August 2015, Consent to Establish (“CTE”) was issued by Respondent No. 1-GSPCB for installation of STP for the said project (*annexed as Annexure A-3/Pg. 109 of the Appeal*). On 25th August 2015, building plan approval was issued by Town Planner, Town & Country Planning Department, Govt. of Goa. It is pertinent to note the location of the STP for the said project was installed as per the approved building plan dated 25th August 2015. On 15th September 2014 and 6th August 2015, Environment Clearance was issued for the said project by the Environment Department, Govt. of Goa wherein the installation of the STP was scrutinized and approved and thereafter, EC was granted.



19. On 25th June 2019, Consent to Operate (“CTO”) was issued by Respondent No. 1-GSPCB for operation of STP for the said project (*annexed as Annexure A-4/Pg. 116 of the Appeal*). On 13th November 2020, further Consent to Operate was issued by Respondent No. 1-GSPCB for operation of STP for the said project. On 22nd December 2021, renewal of CTO was issued by Respondent No. 1-GSPCB for the said project.

20. On 14th July 2022, Respondent No. 2 made an application for renewal of CTO to Respondent No. 1-GSPCB for the said project. During the pendency of the aforesaid application for renewal of CTO, one of the residents of the residential complex made a complaint regarding the operations of the STP. Subsequently, the said issue came to be resolved and on 4th October 2024, the application for renewal of CTO was accepted and extended by a period of 6 months from the date of its letter. Since, the said project was handed over to the Appellant Society on 1st April 2023, the compliance after the renewal of CTO dated 4th October 2024 is the responsibility of the Appellant Society.

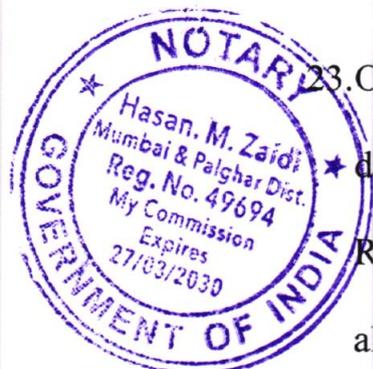
21. On 29th March 2023, a Show Cause Notice (“SCN”) was issued by Respondent No. 1-GSPCB to the said project on the basis of a



complaint made by Respondent No. 4. It is pertinent to note that Respondent No. 4 is not a member of the Appellant Society and does not reside in the said Society. On 5th May 2023, Respondent No. 2 replied to SCN dated 29th March 2023 received on 15th April 2023 giving an elaborate point-wise response along with supporting documents. Hereto annexed and marked as "**Exhibit-D**" is a copy of Reply dated 5th May 2023 without annexures.

22. On 27th October 2023, Respondent No. 2 received another SCN dated 23rd October 2023 issued by Respondent No. 1-GSPCB regarding shifting of the STP due to alleged release of foul smell. On 1st, 3rd & 22nd November 2023, Respondent No. 2 gave detailed response to the SCN dated 23rd October 2023 stating that the STP was installed as per the building approval plan dated 25th August 2015 after due scrutiny and approval by the Environment Department. Hereto annexed and marked as "**Exhibit-E**" is a copy of Reply to SCN along with Building approval plan dated 25th August 2015.

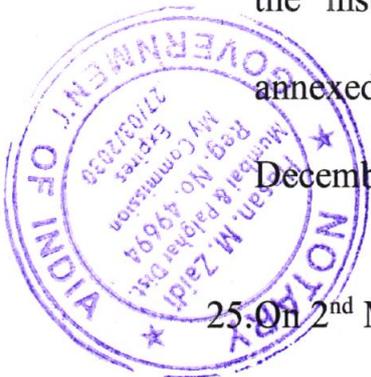
23. On 15th November 2024, Respondent No. 2 received two SCNs dated 12th November 2024 under Water Act and Air Act issued by Respondent No. 1-GSPCB to the said project for purported allegations against the functioning of the STP of the said project. On



19th November 2024, Respondent No. 2 duly replied to the said SCNs dated 12th November 2024 (received on 15th November 2024) giving their response along with supporting documents *inter alia* intimating to Respondent No. 1-GSPCB that the said project has been handed to the Appellant. On 28th November 2024, Respondent No. 2 also intimated the Appellant to take up the issue forward. Hereto annexed and marked as "Exhibit-F" is a copy of Reply to SCN dated 19th November 2024 "Exhibit-G" is a copy of email dated 28th November 2024 of Respondent No. 2 to the Appellant.

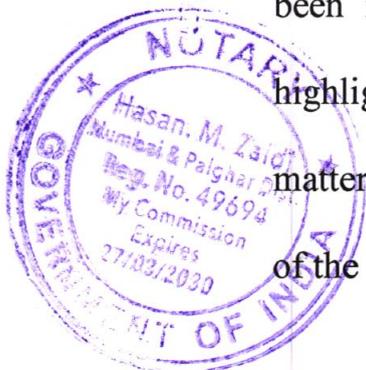
24. On 27th October 2024, Respondent No. 2 received a letter from one Mr. Arun Jaitley, a resident of the Appellant society and a relative of Respondent No. 4 with certain concerns about STP of the said project. On 27th December 2024, Respondent No. 2 gave a detailed reply to the said letter providing factual clarifications pertaining to the installation, functioning, and compliance of STP. Hereto annexed and marked as "Exhibit-H" is a copy of Letter dated 27th December 2024 issued by Respondent No. 2.

25. On 2nd May 2025, Respondent No. 2 received Directions dated 16th April 2025 issued by Respondent No. 1-GSPCB under Section 33A of the Water Act regarding the STP installed in the said project and directions to pay an amount of Rs. 1,73,25,000/- as environmental



compensation to Respondent No. 1-GSPCB. On 7th May 2025, Respondent No. 2 requested Respondent No. 1-GSPCB for time to give a reply to the said directions. On 26th May 2025, Respondent No. 2 duly responded to the Directions dated 16th April 2025 bringing the correct facts on record. Respondent No. 2, therefore, has continued to cooperate with Respondent No. 1-GSPCB by bringing true facts on record and at all points ensured environmental compliance and adherence to the directions of Respondent No.1-GSPCB. Hereto annexed and marked as "Exhibit-I" is a copy of Reply dated 26th May 2025 of Respondent No. 2.

26. It is also apposite to mention that there has been no complaints from any of the residents of the project while Respondent No. 2 was carrying out the construction of the said project and based on customer feedback received from the residents regarding the issue of foul smell from STP, most of the residents did not have any grievance related to the STP. Therefore, during the period when the STP of the said project was operated by Respondent No. 2, there has been no grievance or issues raised, except alleged grievances highlighted by one of the members/residents, being an isolated matter wherein his views were/are in stark departure from the views of the other residents.



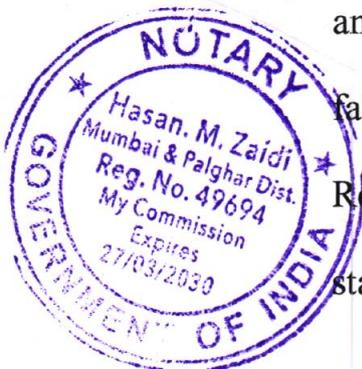
27. The installation of STP and associated infrastructure is a mandatory requirement under the applicable environment and construction laws. In the present case, the STP for the said project has been installed as per permissions granted, in accordance with law and after approval from the concerned authority. The location/capacity of the STP was also pre-approved by the Environment Department as well as the concerned Building Permission department. In compliance with all the requirements, Respondent No. 2 has completed the construction of the said project, including the installation and commissioning of STP, and having done so, the Occupation Certificate was issued for the said project.

28. It is reiterated that the management and day-to-day affairs and operations of the Project, including STP and other common facilities, have been handed over to the Appellant Society formed by the residents/allottees. The Appellant is in exclusive control of the common areas, services, and operations, including the STP, since 1st April 2023. Thus, all conditions related to STP and issuance of CTO, etc. are to be complied by the Appellant together with the regulatory compliances that are applicable to the operations of the STP.



29. It is pertinent to note that the Appellant has been deliberately avoiding and neglecting to execute the Conveyance Deed for the said project despite several reminders from Respondent No. 2 to finalize the same. Therefore, the formal conveyance of the land or common area of the said project is pending for the reasons solely attributable to the Appellant Society and the lack of a formal conveyance which is attributable to the Appellant Society cannot imply continued responsibility for operational issues, particularly when Respondent No.2 is not operating or maintaining STP or any other aspect of the said Project. The Appellant has also filed proceedings before National Consumer Disputes Redressal Committee (“NCDRC”) regarding certain issues of the said project including the issue of STP, wherein no reliefs have been granted and the same is presently pending.

30. In view of the aforesaid, it is abundantly clear that Respondent No. 2’s responsibility was limited to the design and initial commissioning of the STP in accordance with the sanctioned plans and applicable norms after handover, any operation related issues fall within the purview of the Appellant Society. It is submitted that Respondent No. 2 has not committed any breach of the applicable statutory provisions and, consequently, cannot be fastened with



liability for any alleged non-compliance of the directions contained in the impugned notices. Respondent No. 2 cannot be held responsible for any purported violation arising out of, or in relation to, the operation and maintenance of the STP, nor for any notice issued prior to, or in connection therewith.

31. Respondent No. 2 states that the present Respondent will not be dealing with the Appeal in seriatim more particularly since the entire bogey of allegations and contentions raise in the Appeal have been dealt with and answered in terms of the above. Respondent No. 2, however, expressly craves leave to file an additional Affidavit dealing with the Appeal in a paragraph-wise manner, if the circumstances so warrant.

32. In view of the above facts and circumstances, all allegations made by the Appellant as against Respondent No. 2 ought to be disregarded and dismissed as frivolous.

Solemnly affirmed at _____

Dated this 19th day of Feb, 2026

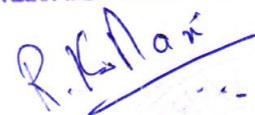


Advocates for Respondent No. 2



For TATA HOUSING DEVELOPMENT COMPANY LIMITED

Authorised Signatories



Respondent No. 2

Before me

VERIFICATION

I, Rohit Kothari, aged 40 years, Indian Inhabitant, the authorised signatory of Respondent No. 2, do hereby state that I have submitted this Affidavit on solemn affirmation and oath. I have verified that the facts are true to my personal knowledge. I have not suppressed any material fact known to me and relevant to this matter.

Date: 19 FEB 2026 /2026

Place: Mumbai

FOR TATA HOUSING DEVELOPMENT COMPANY LIMITED

Authorised Signatories *R. Kothari*

Deponent

Respondent No. 2



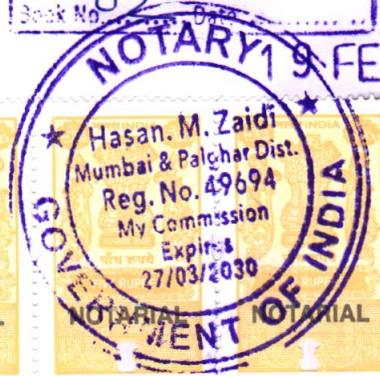
BEFORE ME

Hasan M. Zaidi

HASAN. M. ZAIDI
NOTARY
Government of India
Mumbai & Palghar Dist.

19 FEB 2026

NOTED & REGISTERED
Sr. No. 1614 Page No. 109
Book No. 02



19 FEB 2026



Ref. no: LOA/008/West/2024-25

LETTER OF AUTHORITY

TO ALL TO WHOM THESE PRESENTS SHALL COME I, SANJAY DUTT, of Mumbai, Indian Inhabitant (hereinafter called "the Grantor"), Managing Director and Chief Executive Officer of TATA HOUSING DEVELOPMENT COMPANY LIMITED (hereinafter referred to as "the Company") registered under the provisions of the Companies Act, 1956 having its registered office at 'E' Block, Voltas Premises, T. B. Kadam Marg, Chinchpokli, Mumbai 400 033, SEND GREETINGS:

WHEREAS under a Power of Attorney dated 3rd May, 2018, the Company has inter alia authorized the Grantor, Mr. Sanjay Dutt, to appoint and substitute from time to time, any person or persons to act under or in the place of the said attorney in respect of all or any of the powers, authorities and matters stated therein.

AND WHEREAS by the said Power of Attorney dated 3rd May, 2018, Mr. Sanjay Dutt, in his capacity as the Attorney of the Company, is entitled to substitute and appoint from time to time any person or persons to act on and behalf of the Company in respect of all or any of the matters mentioned in the said Power of Attorney.

TATA HOUSING DEVELOPMENT COMPANY LIMITED

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CIN U45300MH1942PLC003573



AND WHEREAS the Grantor is desirous of appointing some fit and proper person to act as the Constituted Attorney of the Company for the purposes hereinafter mentioned.

In the aforesaid circumstances, the Company, through its Managing Director and Chief Executive Officer, Mr. Sanjay Dutt, do hereby nominates, constitutes, appoints and authorizes the following, severally:

1. Kamal Kant Sehgal (Vice President - Corporate Relations)
2. Sanjay Pratap Singh (Assistant Vice President – Project Management)
3. Anshul Gupta (Consultant – Legal)
4. Aadil Johar Sham (Senior Manager – Legal)
5. Drishti Dattani (Manager - Legal)
6. Rohit Kothari (Deputy General Manager - Sales & Marketing)
7. Saurabh Chadha (Assistant General Manager - Sales & Marketing)
8. Koushik Banerjee (Assistant General Manager - Project Management)

(Hereinafter referred to as "Authorized Representatives") to be the true and lawful Authorized Representatives of the Company in fact and at law and in the name and on behalf of the Company to represent the Company and to deal, correspond with and perform the following acts, deeds, matters and things namely:

1. To commence, carry on, prosecute and defend all suits, actions and proceedings, including civil suits, criminal actions/complaints, petitions, appeals before

TATA HOUSING DEVELOPMENT COMPANY LIMITED

E Block Voltas Premises T B Kadam Marg Chinchpokli Mumbai 400 033 India
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 CIN U45300MH1942PLC003573



appellate bodies or tribunals and all other legal proceedings (civil or criminal) that may be necessary to protect and enforce and defend the interests and rights of the Company.

2. To sign, declare, swear, affirm and file on behalf of the Company, the legal proceedings in all courts, tribunals and other judicial, quasi-judicial fora, any commission, tribunal and any other concerned authority (civil or criminal), all Vakalatnamas, plaints, suits, civil / criminal complaints, writ petitions, special leave petitions, written statements, revision applications, appeals, civil applications, interim applications, counter-claims, set offs, undertakings, declarations, affidavits, defences, submissions, applications, accounts and all other papers and proceedings as may be necessary and to give evidence in any court of law (civil and/or criminal) including but not limited to all RERA Authorities and all Adjudicating Officers, all RERA Appellate Tribunals, National Consumer Disputes Redressal Commission, Delhi, all Consumer Forums, all State Commissions of India, all High Courts of India, Hon'ble Supreme Court of India, all District Courts I Forums and Session Courts of India, all Chief Metropolitan Magistrates, all District Courts, any Judicial Court of India, any Forum and/or Commission, any Tribunals and any other judicial and quasi-judicial authorities including but not limited to Economics Offences Wing,

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 CIN U45300MH1942PLC003573



Crime Branch, All CM Grievances Cell and any other concerned Authorities in the exercise of the powers and authorities contained herein.

3. To make necessary application on behalf of the Company to the court (civil and / or criminal) for settlement of the disputes with the customers and or with any third party, executing the deed of settlement, deed of extinguishment with the customers of the Company and/ or with third party. Further, to sign all necessary letters/ application/ any deeds and documents for withdrawal of the legal proceedings filed by or against the Company and/or filing consent terms for settlement of the disputes/ withdrawal of legal proceedings filed by or against the Company.
4. To make necessary application on behalf of the Company to court (civil and/ or criminal) to withdraw any monies deposited in the court (as per the direction of the court) and accept and acknowledge the same on behalf of the Company.
5. To obtain and execute decrees / awards to receive money and or obtain possession of properties in execution of decrees / awards, provide receipts and discharge thereof as may be necessary in the exercise of authorities contained herein.
6. To sign, attest, verify and execute and to file and receive back all papers, applications, documents, affidavits, deeds, and all other instruments lawful, necessary or proper to carry into effects any of the authorities hereby given.

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CIN U45300MH1942PLC003573



7. To appoint and authorize advocates, solicitors, and other professionals and persons as may be required.

AND GENERALLY to do and perform or cause to be done and performed all acts, deeds, matters and things necessary or expedient in relation to the above as fully and effectually in all respects as the Company itself or the Grantor himself could do by law.

This Letter of Authority shall be valid with effect from the date of execution hereof and stand cancelled and revoked on termination of the services and/ or resignation and/ or transfer of the said Authorized Representatives.

Dated this 10th day of June 2025.

For Tata Housing Development Company Limited

Sanjay
Dutt Digitally signed
by Sanjay Dutt
Date: 2025.06.10
18:14:13 +05'30'

Mr. Sanjay Dutt

Managing Director & Chief Executive Officer

TATA HOUSING DEVELOPMENT COMPANY LIMITED

E Block Voltas Premises T B Kadam Marg Chinchpokli Mumbai 400 033 India
Tel 022 6661 4444 Fax 022 6661 4452 email thdcsec@tatarealty.in Website www.tatahousing.com
CIN U45300MH1942PLC003573

TATA HOUSING DEVELOPMENT COMPANY LIMITED

HANDOVER OF SOCIETY OFFICE KEY OF RIO DE GOA

Date: 31st Mar-23

Location: RIO DE GOA

This is to confirm that we have handed over Society Office key to society .Society shall be responsible starting 1st Apr-2023.

Authorized Signatory


JLL FM TEAM


THDC



HANDED OVER TO Rio
de Goa Society

*Furnishing will be completed tentatively
by 15th April 23 .*




TATA HOUSING DEVELOPMENT COMPANY LIMITED

HANDOVER OF STP FOR RIO DE GOA

Date: 29th Mar-23

Location: Rio de Goa

This is to confirm that we have handed over STP and related documents to society. Society shall be responsible starting 1st Apr-2023.

List of documents annexed:

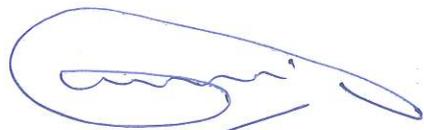
Authorized Signatory



JLL FM TEAM



THDC



HANDED OVER TO Rio de Goa Society

Observations shall be verified & resolved.

Subject to verification & snaglist rectification
11/4/2023

From: Ruchika Luha <ruchikaluha@tatarealty.in>
Sent: 15 July 2025 15:52
To: rdgsocietymanager@gmail.com; riodegoachsltd@gmail.com
Cc: Vikas Singh; Aadil Sham
Subject: FW: Draft Conveyance of Rio De Goa - 15.01.2024
Attachments: Deed of Conveyance - Goa - 15.01.2023.doc; Rio de Goa_ Annexures C- Building blocks_ 27-12-2023.pdf; Rio de Goa_ Annexures F- Said Land _ 10-1-2024.pdf; Annexure E - Rio-De-Goa-Registration Certificate-15.12.2022.pdf; Rio de Goa_ Annexures A- Larger Land_ 27-12-2023.pdf; Rio de Goa_ Annexures B- ODP portion_ 27-12-2023.pdf

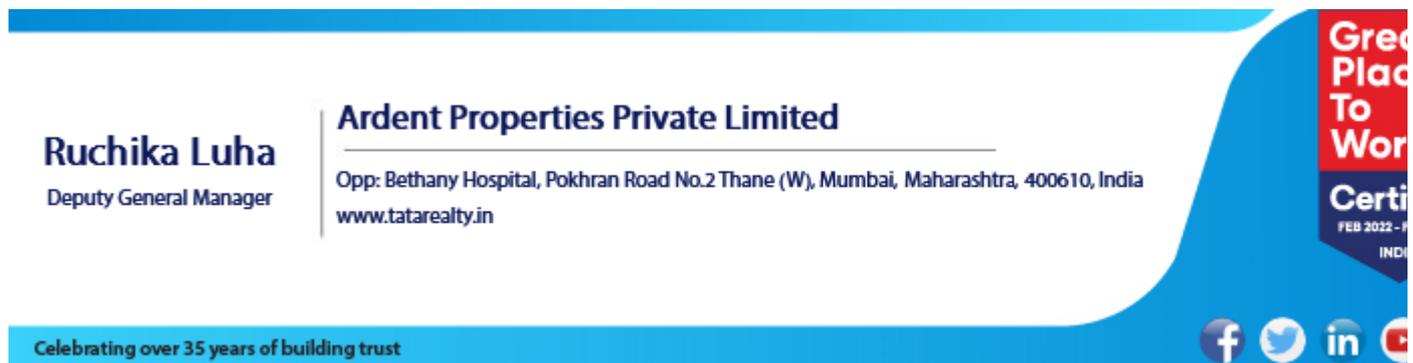
Importance: High

Dear Sirs / Ma`am,

Please find attach the draft conveyance along with the Annexure`s.

Request to kindly send over your queries at the earliest.

Regards,
Ruchika



Ruchika Luha
Deputy General Manager

Ardent Properties Private Limited
Opp: Bethany Hospital, Pokhran Road No.2 Thane (W), Mumbai, Maharashtra, 400610, India
www.tatarealty.in

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From: Ruchika Luha <ruchikaluha@tatarealty.in>
Sent: Monday, September 9, 2024 5:35 PM
To: rdgsocietymanager@gmail.com; riodegoachsltd@gmail.com
Cc: Sarosh Tata <saroshtata@tatarealty.in>; Vikas Singh <vikaskingsh@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: FW: Draft Conveyance of Rio De Goa - 15.01.2024
Importance: High

Dear Sirs / Ma`am,

Please find attach the draft conveyance along with the Annexure`s.

Request to kindly send over your queries at the earliest.

Regards,
Ruchika

Ruchika Luha
Deputy General Manager

Ardent Properties Private Limited

Opp: Bethany Hospital, Pokhran Road No.2 Thane (W), Mumbai, Maharashtra, 400610, India
www.tatarealty.in

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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: Thursday, August 29, 2024 12:19 PM
To: rdgsocietymanager@gmail.com; riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Vikas Singh <vikasksingh@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: FW: Draft Conveyance of Rio De Goa - 15.01.2024
Importance: High

Dear Sirs / Ma`am,

Please find attach the draft conveyance along with necessary annexures for your review.
As this document directly impacts your interests, we kindly await your feedback at the earliest.

Thank you for your prompt attention to this matter.

Thanks n Regards,
Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
Tel: +91 22 66070860 | www.tatarealty.in

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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: Thursday, August 1, 2024 12:22 PM
To: rdgsocietymanager@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Vikas Singh <vikasksingh@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: FW: Draft Conveyance of Rio De Goa - 15.01.2024
Importance: High

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
Tel: +91 22 66070860 | www.tatarealty.in

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Dear Sirs / Ma`am,

Please find attach the draft conveyance along with necessary annexures for your review.
As this document directly impacts your interests, we kindly request your careful consideration and feedback.

Thank you for your prompt attention to this matter.

Thanks n Regards,
Sarosh Tata

From: Ruchika Luha <ruchikaluha@tatarealty.in>
Sent: Friday, July 12, 2024 11:03 AM
To: rdgsocietymanager@gmail.com
Cc: Sarosh Tata <saroshtata@tatarealty.in>
Subject: FW: Draft Conveyance of Rio De Goa - 15.01.2024
Importance: High

Dear Sirs / Ma`am,

Please find attach the draft conveyance along with the Annexure`s.

Request to kindly send over your queries at the earliest.

Regards,
Ruchika

Ruchika Luha
Deputy General Manager

Tata Housing Development Company Limited

Vidhyanagar Colony, Next to MES College, Dabolim, Mormugao, Goa, 403726
www.tatarealty.in

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From: Ruchika Luha
Sent: Friday, June 28, 2024 12:33 PM
To: Rio-De-Goa Society Manager <rdgsocietymanager@gmail.com>
Cc: Sarosh Tata <saroshtata@tatarealty.in>

274

Subject: FW: Draft Conveyance of Rio De Goa - 15.01.2024

Importance: High

Dear Sirs / Ma`am,

Please find attach the draft conveyance along with the Annexure`s.

Request to kindly send over your queries at the earliest.

Regards,

Ruchika

From: Sarosh Tata <saroshtata@tatarealty.in>

Sent: Tuesday, January 16, 2024 9:15 AM

To: riodegoachsltd@gmail.com

Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>

Subject: Draft Conveyance of Rio De Goa - 15.01.2024

Importance: High

Dear Sirs / Ma`am,

Please find attach the draft conveyance along with the Annexure`s.

Request to kindly send over your queries at the earliest.

Thanks n Regards,

Sarosh Tata

Sarosh Tata
Assistant Vice President

Tata Housing Development Company Limited

"E Block", Voltas Compound, T B Kadam Marg, , Mumbai, Maharashtra, 400033, India
Chinchpokli

Tel: +91 22 66070860 | www.tatarealty.in

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From: Ruchika Luha <ruchikaluha@tatarealty.in>
Sent: 02 May 2025 15:14
To: riodegoachsltd@gmail.com
Cc: Vikas Singh; Prakash Devadiga; Drishti Dattani
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 - Reminder 13

Dear Mr. Tiwari,

Reminder 14

Good Afternoon !!

You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.

This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Ruchika

Ruchika Luha
Deputy General Manager

Ardent Properties Private Limited

Opp: Bethany Hospital, Pokhran Road No.2 Thane (W), Mumbai, Maharashtra, 400610, India
www.tatarealty.in

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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: Monday, January 13, 2025 4:46 PM
To: riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>; Prakash Devadiga <PrakashDevadiga@tatarealty.in>
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 - Reminder 13
Importance: High

Dear Mr. Tiwari,

Reminder 13

Good Afternoon !!

You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.

276

This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited
Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: 17 December 2024 08:31 PM
To: riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>; Prakash Devadiga <PrakashDevadiga@tatarealty.in>
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 - Reminder 12
Importance: High

Dear Mr. Tiwari,

Reminder 12

Good Afternoon !!
You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.
This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited
Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: 09 December 2024 03:45 PM
To: riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 - Reminder 11
Importance: High

Dear Mr. Tiwari,

Reminder 11

Good Afternoon !!

You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.
This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Sarosh Tata



The footer banner features a blue background with white text. On the left, it says "Sarosh Tata Assistant Vice President". In the center, it reads "THDC Management Services Limited" followed by the address "Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India" and contact information "Tel: +91 22 66070860 | www.tatarealty.in". On the right, there is a red and white graphic with the text "Great Place To Work Certified" and "FEB 2022 - FEB 2023 INDIA". At the bottom right, there are social media icons for Facebook, Twitter, LinkedIn, and YouTube. A blue bar at the bottom left contains the text "Celebrating over 35 years of building trust".

From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: 28 November 2024 03:21 PM
To: riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 - Reminder 10
Importance: High

Dear Mr. Tiwari,

Reminder 10

Good Afternoon !!

You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.
This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
Tel: +91 22 66070860 | www.tatarealty.in

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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: 18 November 2024 02:59 PM
To: riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 - Reminder 9
Importance: High

Dear Mr. Tiwari,

Reminder 9

Good Afternoon !!

You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.
This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: 08 November 2024 02:56 PM
To: riodegoachsltd@gmail.com

Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 / Reply 05.02.2024 - Reminder 8
Importance: High

Dear Mr. Tiwari,

Reminder 8

Good Afternoon !!

You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.
This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Sarosh Tata



Sarosh Kersy Tata
Assistant Vice President

THDC Management Services Limited
Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
Tel: +91 22 66070860 | www.tatarealty.in

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From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: 29 October 2024 04:40 PM
To: riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 / Reply 05.02.2024 - Reminder 7
Importance: High

Dear Mr. Tiwari,

Good Afternoon !!

You are requested to extend your support and co-operation for timely conclusion of the Conveyance.

Please review the draft of conveyance deed and let us have your confirmation on the draft.
This will be a crucial first step in order for us to kickstart the official procedures.

We look forward to your prompt reply.

Regards
Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
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**TATA
VOLUNTEERING
WEEK 22**
— 5th September - 7th October 2024 —

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokl, Mumbai, Maharashtra, 400033, India
Tel: +91 22 66070860 | www.tatarealty.in

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From: Rio-De Goa CHS Ltd <riodegoachsltd@gmail.com>

Sent: 18 October 2024 03:32 PM

To: Sarosh Tata <saroshtata@tatarealty.in>

Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>

Subject: Re: Draft Conveyance of Rio De Goa - 15.01.2024 / Reply 05.02.2024

“External email. Open with Caution”

Dear Mr. Sarosh Tata,

Why do you call it 5th reminder sir when we have been responding to your email on the subject requesting you to please consider providing a clause in the proposed deed granting Society immunity against past period liabilities on matters such as STP, Fire protection etc. We reiterate that we are very keen to have the conveyance executed. I hope you will accept our very reasonable request so that the draft of the conveyance deed is finalized.

Thanks & regards,
S C Tiwari
Chairman

On behalf of Rio-De-Goa CHS Ltd.

The content of this email is intended for the person or entity to which it is addressed only. This email may contain confidential information. If you are not the person to whom this message is addressed, be aware that any use, reproduction, or distribution of this message is strictly prohibited. If you received this in error, please contact the sender and immediately delete this email and any attachments.

On Mon, Oct 14, 2024 at 11:10 AM Sarosh Tata <saroshtata@tatarealty.in> wrote:

Dear Mr. Tiwari,

Reminder Email 5.

I am writing to reiterate our previous request for your final comments on the conveyance draft.

As you are aware, we have been following up on this matter for several months now and the process has been unduly delayed due to internal complications from your end.

The conveyance of land and building is a separate and independent matter altogether.

We request you to extend your support and co-operation in completing the conveyance in favour of the Society at the earliest.

Please devote your attention in this direction and provide your feedback and confirmation on the draft conveyance deed shared with you earlier so that the process may be expedited.

Should you require any further clarification or wish to discuss the conveyance deed in detail, please do not hesitate to contact us at your convenience.

Thanks n Regards

Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokli, Mumbai, Maharashtra, 400033, India
Tel: +91 22 66070860 | www.tatarealty.in

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**TATA
VOLUNTEERING
WEEK 22**
5th September - 7th October 2024

From: Sarosh Tata <saroshtata@tatarealty.in>

Sent: 07 October 2024 03:17 PM

To: riodegoachsltd@gmail.com

Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>

Subject: RE: Draft Conveyance of Rio De Goa - 15.01.2024 / Reply 05.02.2024

Importance: High

Dear Mr. Tiwari,

Reminder Email 4.

Please be reminded that Tata Housing has completed the handover process of the entire property to the Society.

In this connection, your kind notice is drawn to the duly signed Settlement letter by the Secretary and the Treasurer.

Furthermore, please also be informed that all financial matter between Tata Housing and the society have been fully settled.

The water connection work has also been completed together with the necessary approvals and connection from the concern authorities.

Given the above, Tata Housing has completely exited the Rio De Goa site and fulfilled all responsibilities related to its operation and management.

The conveyance of land and building is a separate and independent matter altogether. We request you to extend your support and co-operation in completing the conveyance in favor of the Society at the earliest. Please devote your attention in this direction and provide your feedback and confirmation on the draft conveyance deed shared with you earlier so that the process may be expedited.

Should you require any further clarification or wish to discuss the conveyance deed in detail, please do not hesitate to contact us at your convenience.

Thank you for your co-operation.

Regards

Sarosh Tata

Sarosh Tata
Assistant Vice President

THDC Management Services Limited

Voltas House, E Block Dr. Babasaheb Ambedkar Road, Chinchpokli, Mumbai, Maharashtra, 400033, India
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**TATA
VOLUNTEERING
WEEK 22**
5th September - 7th October 2024

From: Sarosh Tata <saroshtata@tatarealty.in>
Sent: 05 February 2024 10:52 AM
To: riodegoachsltd@gmail.com
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: FW: Draft Conveyance of Rio De Goa - 15.01.2024 / Reply 05.02.2024
Importance: High

Dear Mr. Tiwari,

Please be reminded that Tata Housing has completed the handover process of the entire property to the Society.

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Furthermore, please also be informed that all financial matter between Tata Housing and the society have been fully settled.

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Should you require any further clarification or wish to discuss the conveyance deed in detail, please do not hesitate to contact us at your convenience.

Thank you for your co-operation.

Regards

Sarosh Tata

Sarosh Tata
Assistant Vice President

Tata Housing Development Company Limited

"E Block", Voltas Compound, T B Kadam Marg, , Mumbai, Maharashtra, 400033, India
Chinchpokli

Tel: +91 22 66070860 | www.tatarealty.in

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From: Rio-De Goa CHS Ltd <riodegoachsltd@gmail.com>
Sent: Tuesday, January 23, 2024 4:24 PM
To: Sarosh Tata <saroshtata@tatarealty.in>
Cc: Ruchika Luha <ruchikaluha@tatarealty.in>; Amit Poojari <amitpoojari@tatarealty.in>
Subject: Re: Draft Conveyance of Rio De Goa - 15.01.2024

“External email. Open with Caution”

Dear Mr Sarosh Tata,

-Thanks for your mail which was discussed in the meeting of the Provisional Management Committee held on 21.01. 2024. Basus discussion in that meeting I request you to please take all action pending at your end as regards handover of documents and physical handover. The process of financial handover has just commenced and we need to seek confirmation of the data sent by you from each apartment owner and take other steps to satisfy ourselves about the working sent by you.

You have not yet completed the essential obligation of obtaining adequate water supply connection in relation to 639 apartments. Further the owners of Rio-De-Goa need to be indemnified by you as regards pollution control, fire-fighting and pest control. etc.

In short, we request you to kindly complete expeditiously all pending matters at your end, and allow us to examine to our satisfaction the financial statements sent by you. Thereafter we may take up Conveyance deed at an opportune time at the earliest.

Thanks & regards,

Yours sincerely,

S C Tiwari

Chairman

Rio-De-Goa CHS Ltd.

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On Tue, Jan 16, 2024 at 9:15 AM Sarosh Tata <saroshtata@tatarealty.in> wrote:

Dear Sirs / Ma`am,

Please find attach the draft conveyance along with the Annexure`s.

Request to kindly send over your queries at the earliest.

Thanks n Regards,

Sarosh Tata

Sarosh Tata
Assistant Vice President

Tata Housing Development Company Limited

"E Block", Voltas Compound, T B Kadam Marg, , Mumbai, Maharashtra, 400033, India
Chinchpokli

Tel: +91 22 66070860 | www.tatarealty.in

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From: Ruchika Luha <ruchikaluha@tatarealty.in>
Sent: 19 November 2024 12:16
To: mail.gspcb@gov.in
Cc: Sarosh Tata
Subject: RE: Directions under section 33(A) and 31(A)

To,
The Member Secretary
Goa State Pollution Control Board,
Near Pilerne Industrail Estate,
Opp. Saligao Seminary,
Saligao -Bardez Goa -403511

Subject: Request for noting change of correspondence address and entity name.

We wish to bring to your kind attention that the society for Tata Housing`s Rio de Goa project has been formally registered as of 15.12.2022 under the name and style of **Rio-De-Goa Co-operative Housing Society Limited**. As of 01.04.2023 the society has taken responsibility of the entire property including its systems, such as the sewage treatment plant from Tata Housing.

The handover has been duly recorded in a handover letter signed by representative of the Society.

Given the change in responsibility, we respectfully request the Goa State Pollution Control Board to update the correspondence name and address on its file for future correspondence, as follows:

Entity name: Rio-De-Goa Co-operative Housing Society Limited
Correspondence address: Rio-De-Goa Co-operative Housing Society Limited, Near: M.E.S College, Vidya Nagar, Post Office: Zuari Nagar, District: South Goa, Goa - 403726.
Email address: riodegoachsltd@gmail.com

(Chairman / Secretary Name: Mr. Subhash Tiwari/Mr. Sriharsha)

Thank you for your attention and assistance in this matter.

Regards,
Ruchika

Ruchika Luha
Deputy General Manager

Ardent Properties Private Limited

Opp: Bethany Hospital, Pokhran Road No.2 Thane (W), Mumbai, Maharashtra, 400610, India
www.tatarealty.in

EXHIBIT-D

GOA PARADISE



TATA HOUSING

Date: 5-05-2023

To,
Member Secretary
Goa State Pollution Control Board,
Nr. Pilerne Industrial Estate,
Opp. Saligao Seminary,
Saligao - Bardez Goa - 403511

12/05/2023
Goa State Pollution Control Board
Opp. Saligao Seminary
Saligao Goa 403 511

Sub: Reply to directions issued under section (33A) read with section 25/26 of the Water (Prevention and Control of Pollution) Act, 1974 and under section 31(A) read with section 21 of the Air (Prevention and Control of Pollution Act), 1981.

Ref:

1. Consent bearing no.12/2021-PCB/907483/R0007209 Dated 22 December 2021.
2. Complaint received by Board, vide email dated 17 February 2023.
3. Show Cause Notice (SCN) bearing no. 2023/GSPCB/Letter/22933/Tech/26500 Dated 29 March 2023.

Respected Madam,

With reference to the above subject, we hereby acknowledge the receipt of the notice dated 29 March 2023, received by us on 15 April 2023 . Kindly treat this letter as our reply to your above referred Show Cause Notice.

As mentioned in the said notice, site inspection was conducted on 20 February 2023. To verify the allegations made by the complainant, we would hereby state and submit the following:

TATA HOUSING DEVELOPMENT COMPANY LIMITED

Regd. Office: "E" Block, Voltas Premises, T. B. Kadam Marg, Chinchpokli Mumbai - 400 033.
Tel. : 91 22 6661 4444 Fax : 91 22 6661 4452 E-mail : info@tatahousing.com Website : www.tatahousing.in

S. No	Observations by GPCB for the site visit conducted on 20 February 2023	Our reply
a.	The Rio de Goa is a residential complex consisting of 31 nos. studio apartment, 120 nos. single bedroom apartments, 466 nos. double bedroom apartments and 22 nos. triple bedroom apartment. There are total 14 nos. of towers (Building Apartments) named as T1, T2, T3, T4, TS, T6,T7, T8, T9, T10, T11, T12, T12A, T13.	Just an information
b.	It was informed by the representative of the complainant that all the towers of the complex are not in full occupancy.	As this Project is developed on the concept of second home and hence as on date, the occupancy level of all the towers are not completely occupied.
c.	It was informed that the flow meter at the inlet of the STP has not been provided. The flow meter at the STP outlet is provided	We would like to clarify that Installation of flow meter for STP treated and raw water line (inlet), toilet flushing, gardening and peripheral garden area has been provided at the unit level. Photographs of Same were submitted to GSPCB office vide letter dated 11 October 2021 bearing Daak no. 12428 . Hence, this information is improper and needs to be deleted.
d.	The recent data of the flow meter at the STP outlet was not provided. The data of the STP outlet maintained up to August 2022 was provided during inspection. The data states that the daily treated water is approx. 25 KLD.	We hereby submit the Recorded Data as per Flow meter at the STP outlet from Sept-2022 to 31 st March 2023 as Annexure I (from 01 st April 2023 STP plant has been handed over to the Society and plant is begin operated and data is maintained by the Society, hence Tata Housing Development Company Ltd is not involved in day-to-day operations).Please find

		enclosed the correspondence to the Society for handing over of STP from 1 April 2023.
e.	It was informed that the STP plant operates in three shifts. However, representative of the complainant claimed that the STP do not operate in three shifts.	STP is operated 24 hours (all 3 shifts as any haul is technically not possible. Our STP have secondary and tertiary treatment based on MBBR technology, consisting of bar screen, equalization tank, MBBR reactor and dual media filtration unit and tertiary ultra filtrations. To treat and achieve quality of the treated effluent we require to keep the aeration process running continuously for 24 hours and to do the same, we are operating our plant continuously in three shifts (each shift of 8 hours). If same is not done then Biomass will be dead and would float on surface which will be visible to eyes, and also the water will appear darkish/septic which is not the case as during inspection GPCB officer had inspected the STP tanks and same would have come to his observation. We deny and refute this information and state that since the commencement of STP, it is Operational in three shifts. We hereby enclose one month (Mar-23) data recording the shifts/attendance sheet of the Operators along with their names, as attached in Annexure II.
f.	The STP analysis report of treated water sample conducted by M/s Sadekar Enviro Engineers Pvt. Ltd. was provided at the time of inspection. The analysis report indicated that all the parameters were within the permissible limit.	We hereby confirm that testing is conducted of STP Inlet and Outlet samples on monthly basis. This is analysed by laboratory approved by ISO/OSHAS 45000:2018, accredited by National Board of

		calibration and Testing Laboratory and recognized by Ministry of Environment Forest and Climate Change MoEF.
g.	The treated water sample of the STP was taken for the analysis purpose and the reports of the treated water sample indicate that the BOD & fecal coliform parameters are exceeding the permissible limit.	As stated by us in point no. (e) and (f) above, the quality of treated water is monitored on regular basis and the samples of STP Inlet and STP Outlet treated water are collected every month and analysed by laboratory approved by ISO/OSHAS 45000:2018, accredited by National Board of calibration and Testing Laboratory and recognized by Ministry of Environment Forest and Climate Change MoEF. We are attaching herewith Reports for the months of Jan, Feb and March 2023 as Annexure III which states all the parameters are within the Boards permissible limit. Also, during Renewal of Consent to Operate, two times Site Inspection was conducted by Boards official on 22/07/2021 and 05/08/2022 during which samples were collected and tested in Boards Laboratory (Copies of FORM XII are attached as Annexure IV). The inspection report states that all the parameters were within the Permissible limit. We are attaching copy of inspection report uploaded on OCMMS as Annexure V . Kindly note that the STP is based on the MBBR Technology and the tertiary treatment comprises of filtration process using Pressure Sand Filter and Activated Carbon Filter along

		<p>with ozonation which helps in the disinfection process and in achieving the quality of Outlet sample as per the standards laid by the Board. We are Operating STP efficiently to achieve quality of the treated Water as per the standards prescribed by Goa State Pollution Control Board in Consent to Operate. The Plant is being operated continuously and maintained properly so that the wastes are treated to satisfy the standards set under the applicable pollution control laws.</p>
h.	<p>Strong foul smell was felt throughout the course of inspection.</p>	<p>We humbly refute this point. We state that during the course of inspection, our office representative was also present along with other staff members of Rio de Goa and Complainant wherein the latter has agreed in front of Board Officials that there was No foul smell on that day. We further state and submit to the board that we are determined to provide best service and are deeply committed to serving our residents, there is nothing more important than for us to ensure every resident has the very best experience with us and from time to time we take Residents feedback to know their experience. Further to prove our above commitments, we are submitting Feedback forms of our Residents (Jan to Mar-23) which clearly states that there is no Problem of Foul smell and Residents are totally satisfied</p>

		with the services we provide. Copy of Feedback Forms attached as Annexure VI.
i.	It was observed that there was no natural ventilation available at the STP area.	We would like to state that Natural Ventilation has been provided and in addition to that 2 exhaust fans are also installed as shown in inspection report pictures (Fig 2, Fig 3 and Fig 4). These pictures are also visible in the SCN which clearly shows that Exhaust fans (02 Nos) are installed inside the STP area whose outlet is at open terrace which has total height of 30m from the ground level for proper Ventilation. Copy of Inspection Report attached as Annexure VII.
j.	It was observed that the garbage bins were kept in the basement of tower 12 were filled with segregated waste.	We hereby state that we segregate the waste into Wet and Dry waste and separate bins are kept for the same and we also have allocated separate storage area and hence the observation made is improper.
k.	It was informed that the wet waste is being composted through owe and dry waste is handed over to the waste collector. However, no recent data of waste disposal was provided during the inspection	We hereby submit recently recorded data from Jan to Mar 2023 as Annexure VIII.

We would like to inform you that, we have already handed over the Residential Complex to the Society. Society has taken over the Operation and Maintenance of Residential Complex including the Sewage Treatment Plant as and on from date: 1st April 2023. So, for any further Information and Records starting from 1st April 2023 same are maintained by Society and we will not be in position to provide the same to you.

Further, we request the Board to consider the submissions made by us on the show cause notice issued considering the facts furnished and process the application for Renewal of Consent to Operate. We shall be happy to submit any further clarification as may be required by your good selves in near future.

Thanking You,

Yours Faithfully,

For, Tata Housing Development Company Ltd.



Authorized Signatory

From: Ruchika Luha <ruchikaluha@tatarealty.in>
Sent: 22 November 2023 11:06
To: ms-gspcb.goa@nic.in; chairman-gspcb.goa@nic.in; mail.gspcb@gov.in
Cc: Sarosh Tata; Santosh Mhadgut; Ruchika Luha
Subject: RE: Show Cause Notice (SCN) bearing no. 2024/GSPCB/OTHER/11880/Tech/15845 Dated 23 October 2023.
Attachments: GOA-STP drawings approved (002).pdf

Dear Sir,

In continuation to my email dated 1st Nov-23 to you on the Show Cause Notice (SCN) issued by your office dated 23 October 2023. We hereby further attach snapshot of the Building Plan approval dated 25 Aug 2015 issued by Town Planner, Town & Country Planning Dept., Govt. of Goa., wherein location of STP is shown on the plan. Please note that based on this approved plan, we have constructed STP for our Project.

Request you make a note of the same and oblige.

Regards

Ruchika



The footer banner features the Tata Realty logo on the left, identifying Ruchika Luha as Assistant General Manager. To the right, it displays the Tata Housing Development Company Limited logo and contact information: Vidhyanagar Colony, Next to MES College, Dabolim, Mormugao, Goa, 403726, and the website www.tatarealty.in. A blue ribbon on the right side of the banner contains the text 'Great Place To Work Certified' with a date range 'FEB 2022 - FEB 2023' and 'INDIA'. At the bottom left of the banner, it says 'Celebrating over 35 years of building trust'. On the bottom right, there are social media icons for Facebook, Twitter, LinkedIn, and YouTube.

From: Ruchika Luha
Sent: Wednesday, November 22, 2023 10:54 AM
To: ms-gspcb.goa@nic.in; chairman-gspcb.goa@nic.in; mail.gspcb@gov.in
Cc: Sarosh Tata ; Santosh Mhadgut ; Ruchika Luha
Subject: RE: Show Cause Notice (SCN) bearing no. 2024/GSPCB/OTHER/11880/Tech/15845 Dated 23 October 2023.

Dear Sir,

In continuation to my email dated 1st Nov-23 to you on the Show Cause Notice (SCN) issued by your office dated 23 October 2023. We hereby further attach snapshot of the Building Plan approval dated 25 Aug 2015 issued by Town Planner, Town & Country Planning Dept., Govt. of Goa., wherein location of STP is shown on the plan. Please note that based on this approved plan, we have constructed STP for our Project.

Request you make a note of the same and oblige.

Regards

Ruchika

Ruchika Luha
Assistant General Manager

Tata Housing Development Company Limited

Vidhyanagar Colony, Next to MES College, Dabolim, Mormugao, Goa, 403726
www.tatarealty.in

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FEB 2022 - FEB 2023
INDIA

From: Ruchika Luha <ruchikaluha@tatarealty.in>

Sent: Friday, November 3, 2023 5:53 PM

To: ms-gspcb.goa@nic.in; chairman-gspcb.goa@nic.in; mail.gspcb@gov.in

Cc: Sarosh Tata <saroshtata@tatarealty.in>; Santosh Mhadgut <santoshmhadgut@tatarealty.in>

Subject: RE: Show Cause Notice (SCN) bearing no. 2024/GSPCB/OTHER/11880/Tech/15845 Dated 23 October 2023.

Dear Sir,

In continuation to my email dated 1st Nov-23 to you on the Show Cause Notice (SCN) issued by your office dated 23 October 2023. We hereby further attach snapshot of the Building Plan approval dated 25 Aug 2015 issued by Town Planner, Town & Country Planning Dept., Govt. of Goa., wherein location of STP is shown on the plan. Please note that based on this approved plan, we have constructed STP for our Project.

Request you make a note of the same and oblige.

Regards

Ruchika

Ruchika Luha
Assistant General Manager

Tata Housing Development Company Limited

Vidhyanagar Colony, Next to MES College, Dabolim, Mormugao, Goa, 403726
www.tatarealty.in

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INDIA

From: Ruchika Luha <ruchikaluha@tatarealty.in>

Sent: Wednesday, November 1, 2023 3:34 PM

To: ms-gspcb.goa@nic.in; chairman-gspcb.goa@nic.in; mail.gspcb@gov.in

Cc: Sarosh Tata <saroshtata@tatarealty.in>; Santosh Mhadgut <santoshmhadgut@tatarealty.in>

Subject: Show Cause Notice (SCN) bearing no. 2024/GSPCB/OTHER/11880/Tech/15845 Dated 23 October 2023.

To,
Member Secretary
Goa State Pollution Control Board,

Nr. Pilerne Industrial Estate,
Opp. Saligao Seminary,
Saligao - Bardez Goa - 403511

Sub: Reply to Show Cause Notice (SCN) issued under section 33(A) read with section 25 of the Water (Prevention and Control of Pollution) Act, 1974 and under section 31(A) read with section 21 of the Air (Prevention and Control of Pollution Act), 1981.

Ref: Show Cause Notice (SCN) bearing no. 2024/GSPCB/OTHER/11880/Tech/15845 Dated 23 October 2023.

Respected Madam,

With reference to the above subject, we are in receipt of the captioned show cause notice dated 23 October 2023, received by us through email on 27 October 2023. Kindly treat this letter as our reply to your above referred Show Cause Notice.

As mentioned in the said notice, to verify the claims made by the complainant, we would hereby state and submit the following:

1. Previous correspondence and response of Tata Housing Development Company Ltd., (hereinafter referred as "THDC")

In response to previous Show Cause Notice dated 29 March 2023, by its letter dated 05 May 2023, THDC has given an elaborate point-wise response along with supporting documents. We repeat and reiterate the contents thereof and the same shall be treated as incorporated in this letter by reference. For ease of reference, an acknowledged copy of the said letter dated 05 May 2023 issued by THDC is annexed to this letter and marked **Annexure "I"**.

2. Absence from attending personal hearing dated 7 June 2023 on the notice issued by Goa State Pollution Control Board (GPCB):

- a. Rio De Goa (Project), a Project developed by **THDC** was in receipt of a letter dated 29 May 2023 from GPCB by post on 3 June 2023 to attend the personal hearing on 7 June 2023 by 4 pm with regards to complain regarding foul smell from Sewerage Treatment Plant (STP) installed in the referred Project. Our office bearers have personally visited GPCB office on 6 June 2023 to meet the Chairman, GPCB seeking additional time of 2 weeks for the personal hearing, given the limited time available for concerned technical officials based at our Head Office in Mumbai to prepare and travel since this notice was served on a very short notice. Our duly acknowledged letter dated 6 June 2023 seeking reasonable extension is attached as **Annexure II**.
- b. Subsequently, our team patiently waited for communications from GPCB for attending the personal hearing till 4 September 2023 and visited your office on 5 September 2023. On our visit we met Mrs. Nandan Prabhudessai who assured that the intimation will be sent by GPCB for personal hearing. We also requested Mrs. Prabhudessai to give us 10 days prior intimation as our technical team will have to travel from Mumbai which was agreed by GPCB officers. We had also shared email id of the concerned team member from THDC office.
- c. Surprisingly, on 27 September 2023, Mr. Patil (Chairman) from GPCB office called us at 5 pm to ascertain the reason for not attending the personal hearing by THDC. To this, our office representative, Ms. Ruchika has informed GPCB that we have not received any intimation to attend the personal

hearing on the subject matter. Mr. Patil from GPCB office informed that THDC was intimidated through e-mail. Consequently, THDC officials visited GPCB office the very next day i.e., on 28 September 2023 to inquire about the reasons for non-receipt of emails. **It was found that the email id mentioned by GPCB officers (i.e., ruchikaluha@tatareality.in) was incorrect, whereas the correct email id is ruchikaluha@tatareality.in due, to which THDC has not received any intimation for hearing.** We further met Dr. Shamila Monteiro (Member Secretary, GPCB) and explained that THDC has not received any intimation for personal hearing scheduled on 27 September 2023 as the mail id mentioned was incorrect and requested GPCB to reschedule the said hearing. **However, our request for rescheduling the personal hearing was not accepted by GPCB and we were informed that GPCB has already taken a decision on the said matter without an opportunity of hearing and in the absence of THDC representatives and hence, our say on the subject matter was not recorded by GPCB in any manner and decision was passed without following basic principles of natural justice.** We would also like to inform your office that we have not received any courier or postal letter on conducting such hearing from GPCB office on the subject matter.

3. Action plan on shifting of STP due to release of foul smell:

It is pertinent to note that the Sewage treatment Plant (STP) was installed in accordance with prior approval from Competent Authority. Pursuant thereto the Occupation Certificate was issued on 1.07.2019 and Club House on 05.07.2019 by the Competent Authority. There has not been a single complain from any of the residents on the issues that are being now brought up at this stage for the reasons best known to them and / or to harass THDC.

We hereby attach as **Annexure III**, as customers feedback forms collected over a period of three months from January-March 2023 on the referred foul smell issue raised by the complainant. The attached feedback clearly states that there is no such foul smell imitating from the STP and the Residents are totally satisfied with the services we are providing.

It may be noted from the feedback forms that substantial part of the negative feedback has been given by the complainant, (his representative and their respective family members) as against a huge majority of residents that have asserted the absence of any foul smell emanating from the STP at any point of time.

That apart, it is important for all of us to note that STP is installed after due process of scrutiny & has been approved by Environment Department while granting Environment Clearance for the Project. The location / capacity of the said STP is pre-approved by Environment Department and Building permission department. In accordance to that THDC has completed the construction, received Occupation Certificate and given possession to customers.

4. Regular compliances and testing by THDC:

Since the commissioning of the STP, THDC has been regularly complying with the applicable guidelines in connection with the operation of STP. Monthly test reports were regularly obtained from Sadekar Enviro Engineers Pvt. Ltd. **There is not a single instance of deviation from the applicable guidelines indicating that the STP was being operated within the given compliance parameters on a regular basis.** Moreover, all the test reports have been submitted to the Board and was readily available for its scrutiny at all times. Needless to state that the reports submitted on behalf of THDC to the Board was found to be satisfactory and therefore, Consent for Establishment and Consent for Operation was issued by the Board from time to time. Given the consistent compliant history, **it will be acute injustice to THDC if the proposed punitive action is pressed further by the Board.**

5. Inadequate documents in support/ shortcoming in procedure

Without prejudice to our abovementioned contentions, we have not been provided with any test report showing the alleged deviations from permissible limits. In the absence of any analysis of samples purported to be collected from the inspection site, fair opportunity to present our case has not been provided. There is no material on record to show the alleged deviations from permissible limits. Even otherwise, given the unchallenged history of compliances maintained by THDC and further validated by successive monthly reports of an independent third party laboratory, there is no valid ground to take any punitive actions much less the actions for which cause is sought to be shown.

6. Handing over of Project to Society:

In addition to the above, please note that THDC has already handed over the affairs and management of the referred Project including the day-to-day operations of STP to the Rio-De-Goa Co-operative Housing Society Limited ("**Society**") with effect from 01 April 2023. Given the foregoing, all issues concerning the operations of the STP with effect from 01 April 2023 may kindly be taken up with the Society. We hereby attach letters executed by THDC with the Society on the handover of Society affairs as **Annexure IV**.

7. Given the above and previous explanations extended to your kind office in this regard, please appreciate that no situation arises for the levy of any penalty/ compensation as stated in the show cause notice dated 23 October 2023. Hence, it is humbly requested that the proposed action as set out in the Show Cause Notice bearing no. 2024/GSPCB/OTHER/11880/Tech/15845 Dated 23 October 2023 as against THDC may kindly be dropped in the interest of justice and fair play.
8. We hereby conclude our submission and request a meeting with yourself on the subject matter to present our case for a fair and comprehensive hearing.
9. Please inform us a suitable date for this meeting.
10. We look forward for meeting date from Goa State Pollution Control Board.

Yours truly,

For **Tata Housing Development Company Ltd.**

Encl.: As above

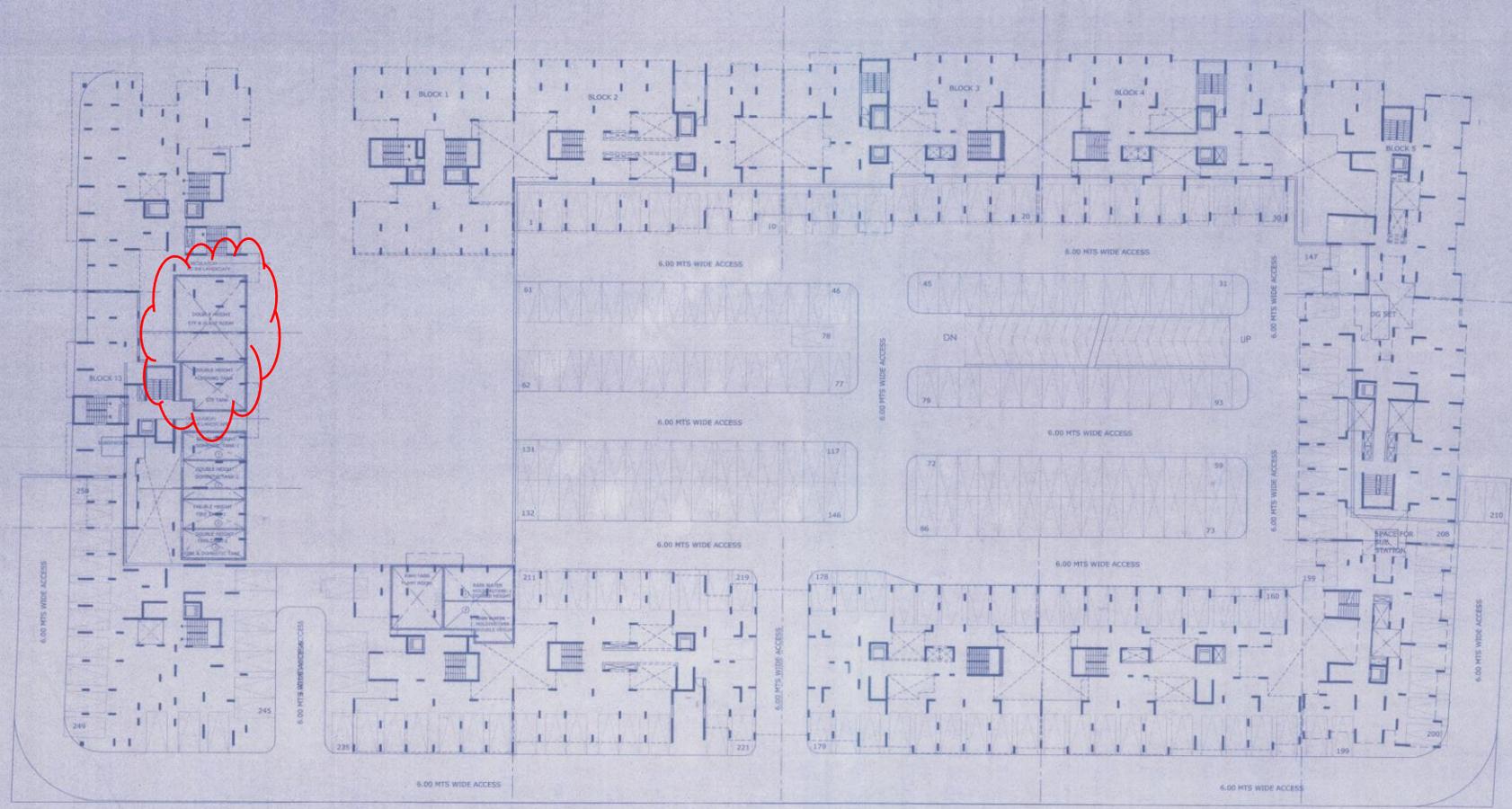
Ruchika Luha
Assistant General Manager

Tata Housing Development Company Limited
Vidhyanagar Colony, Next to MES College, Dabolim, Mormugao, Goa, 403726
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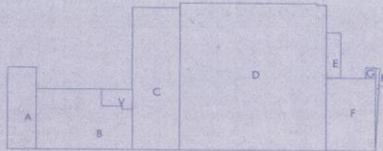
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UPPER BASEMENT / UPPER STILT / UPPER GROUND FLOOR PLAN
SCALE 1:200

UPPER BASEMENT / UPPER STILT PLAN
SCALE 1:300



A = 14.01 X 40.74	= 570.76
B = 47.02 X 29.80	= 1401.19
V = 15.09 X 8.23	= 124.19
B-V	= 8.00
	= 1269.00
C = 23.25 X 71.03	= 1651.44
D = 71.58 X 73.33	= 5248.96
E = 6.94 X 22.58	= 156.70
F = 24.15 X 36.26	= 875.67
G = 4.82 X 5.10	= 24.58
H = 1/2 X 2.09 X 4.12	= 4.30
TOTAL B.U.A	= 9801.41

TOTAL PARKING = 258 NOS

PLEASE CHECK WITH THE
MUNICIPALITY OFFICE
REGARDING THE PLANS.

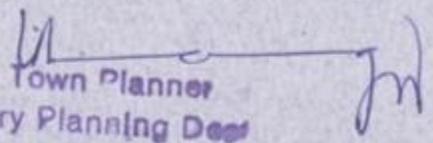


Medical Officer incharge
Primary Health Centre
Cortalim - Goa

PROPOSED RESIDENTIAL BUILDING & COMPOUND WALL
IN PLOT BEARING SV.NO.215/1 SITUATED AT VILLAGE
SANCOALE MORMUGAO- GOA. (REVISED PLAN)

CLIENT	ANAND CHANDRA BOSE	
DWG NO	SCALE	DRAWN BY
SD-02	AS INDICATED	ARCHITECT'S SIGNATURE
TITLE	SUBMISSION DRAWING	
DESIGNER	KUNDAN V. PRABHU	
ARCHITECT AND INTERIOR	ARCHITECT & INTERIOR DESIGNER	
DESIGNER	OWNER SIGNATURE	
YES (PLEASE TICK)	ALSO TICKED (FOR VOUCHER)	
DATE: 08/04/2024	SOURCE: GOA	
E-MAIL: kundansprabhu@gmail.com	No. 16, CAMPT 7500	

Please check letter NO. DH/5600/21
MTP/15/800 dated 25/08/2015
regarding the plans.


Associate Town Planner
Town & Country Planning Dept
Govt. of Goa.
Marmugao-Goa



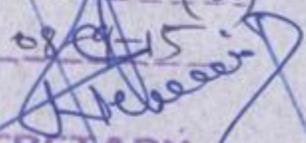
Village Panchayat Sancoale
Construction Licence
Approved
Vide Rec. No. 2(2)
Dated 08/09/15

SECRETARY
Village Panchayat
Sancoale - Goa

EXHIBIT-FDate: 19th November, 2024

To,
Member Secretary
Goa State Pollution Control Board,
Nr. Pilerne Industrial Estate,
Opp. Saligao Seminary,
Saligao - Bardez Goa - 403511

Gregal
 21/11/24
 Goa State Pollution Control Board
 Opp. Saligao Seminary
 Saligao Goa 403 511

Sub: Reply to Show Cause Notice issued under section 33(A) read with section 25 of the Water (Prevention and Control of Pollution) Act, 1974 ("Water Act") and under section 31(A) read with section 21 of the Air (Prevention and Control of Pollution Act), 1981 ("Air Act").

Ref:

1. Show Cause Notice bearing no. 12/2022-PCB/1276483/Leg/19407 dated 12th November, 2024 issued under the Water Act, and
2. Show Cause Notice bearing no. 1/25/24-PCB/leg/19408 dated 12th November, 2024 issued under the Air Act (collectively referred as "Show Cause Notices"/"SCN")

Respected Madam,

With reference to the above subject, we are in receipt of the captioned Show Cause Notices through email on 15th November, 2024. Kindly treat this letter as our reply to the Show Cause Notices.

A. General

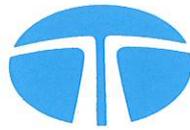
1. At the outset, kindly note that the entire affairs and management of the Residential Complex, including the control, management, supervision and monitoring of the day-to-day operations of the Sewage Treatment Plant ("**STP**") has been handed over to the Society with effect from 1st April, 2023. Hence, for any information or queries or general correspondence with regard to the operation of the STP, the proper person for correspondence and communication will be the office bearers of the Society.
2. Given the limited role of Tata Housing in the present matter, we are submitting a brief response to the SCN.

TATA HOUSING DEVELOPMENT COMPANY LTD.

CIN - U45300MH1942PLC003573

Regd. Office: "E" Block, Voltas Premises, T. B. Kadam Marg, Chinchpokli Mumbai - 400 033.

Tel. : 91 22 6661 4444 Fax : 91 22 6661 4452 E-mail : info@tatahousing.com Website : www.tatahousing.in



TATA

3. Tata Housing has constructed a residential complex on land situated at survey No. 215/1 of Sancoale village of Mormugao Taluka, South Goa District Goa, comprising of residential units of various configuration, popularly known as "Rio De Goa" ("**Residential Complex**").

B. Installation and commissioning of STP

5. Amongst other developments, the STP was installed after due process of scrutiny and has been approved by the Environment Department while granting Environment Clearance for the project. The location/ capacity of the STP is also pre-approved by the Environment Department as well as the concerned Building Permission department. In compliance with all the requirements, Tata Housing has completed the construction of the Residential Complex including the installation and commissioning of the STP and having done so, the occupation certificate has been issued.
6. The Consent to Operate and Authorization ("**CTO**") for the project was originally issued by the Goa State Pollution Control Board ("**Board**") vide its letter dated 13th November, 2020 bearing no. 12/2019-PCB/296403/R0002456 which was valid for a period of 06 (six) months.
7. Thereafter, vide its letter dated 22nd December, 2021 bearing no. 12/2021-PCB/907483/R0007209, the CTO came to be renewed for a further period of 06 (six) months from the date of issue of consent.

C. Renewal of CTO and compliances

8. An application for the renewal of CTO came to be submitted to the Board vide application no. OC MMS ID: 1276483 dated 14th July, 2022.
9. For the limited period when Tata Housing was overseeing the general maintenance of common areas and amenities in the residential complex, Tata Housing has been regularly complying with the applicable regulatory guidelines in connection with the operation of the STP. Details in this regard have already been submitted to the GSPCB in our past correspondences and the recurring submissions are available on files of the Board.

TATA HOUSING DEVELOPMENT COMPANY LTD.

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10. During the pendency of the application for renewal of CTO, one of the residents of the Residential Complex made a complaint to the Board about the operations of the STP. For the sake of brevity and considering that the issue already stands resolved, it is not necessary to go any further into the details of complaint.
11. In response, Tata Housing has made representations to the Board bringing out all relevant facts and also provided all relevant information and supporting documents for the consideration of the Board.
12. We have been informed that based on the submissions and considering all relevant factors, the Board has accepted the application for renewal of the CTO vide its letter dated 4th October 2024, thereby extending the consent to operate by a period of 06 (six) months from the date of its letter. We understand that the renewal of consent to operate and authorization has been issued subject to certain conditions, one of which provides for submission of a bank guarantee.

D. Handover to Society and consequent changes

13. As already submitted, the entire affairs and management of the residential complex, including the control, management, supervision and monitoring of the day-to-day operations of the sewage treatment plant has been handed over to the Society with effect from 1st April, 2023.
14. Hence, for any information or queries in connection with the STP, the proper person for correspondence and communication will be the Society and its office bearers. We will not be in a position to assist you on this matter any further. Kindly therefore record the change of correspondence address in your file, as follows:



Correspondence address:	Chairman/ Secretary, Rio De Goa Co-Operative Housing Society Limited, Near M.E.S College, Vidya Nagar, Post Office: Zuari Nagar, District: South Goa, Goa - 403726
Email address:	riodegoachsltd@gmail.com

15. We are marking a copy of this letter for the information of the Society with an advise to take immediate necessary steps in the interest of the residents of the complex.

For **Tata Housing Development Company Limited**

Authorized signatory

CC to:

Chairman/ Secretary,
Rio De Goa Co-Operative Housing Society Limited,
Near M.E.S College, Vidya Nagar,
Post Office: Zuari Nagar, District: South Goa,
Goa - 403726

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From: Ruchika Luha <ruchikaluha@tatarealty.in>
Sent: 28 November 2024 14:50
To: Rio-De-Goa Society Manager
Cc: Sarosh Tata
Subject: GSPCB Order for RDG Society
Attachments: printerrowi@tatarealty.in_20241123_162452.pdf

Dear Mr. Tiwari,

Greetings!

Please find attached letter submitted at GPCB office against the clause mentioned in the CTO renewal.

We would request society to take it up forward. The GPCB official has confirmed for a visit to site .Request you to connect with the GPCB official Mr. Siddhant Prabhudesai @ 8007878043.

Regards,
Ruchika

Ruchika Luha
Deputy General Manager

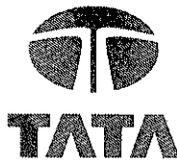
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INDIA

Date: 27th December, 2024

To,
Shri Aayush Jetley
Flat no. 801/804, Tower 12 A
Rio de Goa,
Goa 403726

Dear Mr. Jetley,

Subject: Grievances regarding Sewage Treatment Plant installed at Rio De Goa

Ref.: Your email dated October 27, 2024

We have noted the contents of renewal order issued by the GSPCB vide its letter bearing no. **12/2022-PCB/1276483/R0009753** dated October 04, 2024 ("**Renewal Order**"). Apparently, the application for renewal of the consent to operate has been allowed and consequently the consent to operate and authorization now stands extended by a period of 06 (six) months from the date of issue of the consent by GSPCB.

We have also considered the contents of your email. Regarding your concern about the Sewage Treatment Plant (STP) installation and operations, we would like to clarify the following points:

1. **Regulatory Compliance:**

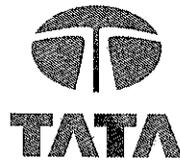
- a. Installation of sewage treatment plant and associated infrastructure is a mandatory requirement under the applicable environment and construction laws especially for the project of the size similar to Rio De Goa.
- b. The STP was installed after due process of scrutiny and has been approved by the Environment Department while granting Environment Clearance for the project. The location/ capacity of the STP is also pre-approved by the Environment Department as well as the concerned Building Permission department. In compliance with all the requirements, Tata Housing has completed the construction of the residential complex including the installation and commissioning of the STP and having done so, the occupation certificate has been issued.
- c. In summary, the necessary approvals for installation and commissioning of the STP has been taken from time to time and applicable regulations in this regard have been duly complied up to the period when the STP operations were taken over by the Society i.e. Rio-De-Goa Co-operative Housing Society Limited.

2. **Disclosures:**

- a. As stated above, the installation of the STP is a mandatory requirement as per existing environmental and construction laws. It is not an additional feature but a necessary component to ensure compliance with these regulations.
- b. The location of STP is duly approved and earmarked in the building plans which were available for inspection to all our buyers. Hence, there is no withholding of information in any form from any of our customers.

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CIN U45300MH1942PLC003573



3. **Installation and Commissioning:**

The STP has been installed and commissioned in strict accordance with all relevant approvals. Regular tests have been conducted, and all parameters have consistently been within permissible limits, ensuring the system operates efficiently and safely.

4. **Handover of STP to Society:**

As you are aware, the operations of STP has been taken over by the Society with effect from April 01, 2023. Therefore, it is imperative that the Society complies with the conditions of the Renewal Order together with the regulatory compliances that are applicable to the operations of the sewage treatment plant.

5. **Operational grievances:**

a. We do not concur with your allegations about air quality, foul odour or any kind of health hazards occurring due to the operations of the STP. We can say that for a fact for the period the STP was being operated by Tata Housing.

b. Infact, feedback was taken from residents of Tower 12A, most of who did not have any grievance related to the STP. It is intriguing that the grievances highlighted in the captioned email is one of its kind and an isolated matter wherein your views are in stark departure from the views of other residents.

c. Having stated the foregoing, it is also pertinent to note that in case the grievances pertain to the period following the date of takeover by the Society, we suggest that you take up this matter with the Society who we believe are best placed to look into your concerns.

6. **No violations:**

a. Given the above, it is amply clear that Tata Housing has not caused any breach and therefore cannot be held responsible for non-compliance.

b. As already stated, the installation, commissioning and operations of the STP till the date on which it was taken over by the Society, has been in accordance with applicable laws.

c. The reports filed before the concerned authority stands testimony to the fact that all applicable parameters are maintained within permissible limits.

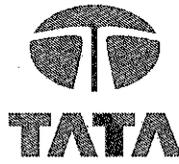
7. **General:**

a. In general, the email in reference contains generic and vague allegations. We do not agree with the allegations levelled against Tata Housing or any of its officers. All allegations made against Tata Housing and its officers are rejected as false and baseless. Lack of a specific denial shall not be construed admission or acceptance of any allegations made against us.

b. We also take this opportunity to correct your understanding about the Renewal Order issued by the GSPCB. Contrary to what is mentioned in your email, there is no mention of compulsory shifting of the STP from its current location to another place. The STP has been installed at the space earmarked for this purpose which is also reflected in the approved building plans. In any case, the conditions of the Renewal Order will be binding on the Society and is required to be complied by them.

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We hope the above response clarifies all your doubts and further exchange of communications on this issue should not be required. In case you have any further queries or concerns on this matter, we once again suggest that you reach out to the Society who are best placed to look into the matter.

Yours truly,
For **Tata Housing Development Company Limited**

A handwritten signature in black ink, appearing to be "S. K. Kulkarni", written over a horizontal line.

Authorized signatory

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Date: 26th May, 2025

To,
Mr. Sanjeev Joglekar
The Member Secretary,
Goa State Pollution Control Board

Subject: Reply to your Notice dated 16.04.2025 issuing directions u/s. 33A of the Water (Prevention and Control of Pollution) Act, 1957 regarding Sewage Treatment Plant installed at Rio De Goa

- Ref.:**
- (i) Email dated 07.05.2025 addressed on behalf of Tata Housing Development Company Limited
 - (ii) Certificate dated 04.10.2024 issued by Goa State Pollution Control Board renewing Consent to Operate and Authorization
 - (iii) Letter dated 27.12.2024 issued by Tata Housing Development Company Limited addressed to Mr. Aayush Jatley dealing with the grievances regarding Sewage Treatment Plant installed at Rio De Goa

Respected Sir,

We are in receipt of your Notice dated 16.04.2025 inter alia issuing directions u/s. 33A of the Water (Prevention and Control of Pollution) Act, 1957 regarding Sewage Treatment Plant installed at Rio De Goa thereby directing to shift the Sewage Treatment Plan (“STP”) at an appropriate location with further directions related thereto, direction to pay an amount of Rs.1,73,25,000/- as Environmental Compensation to the Board for the reasons mentioned therein [hereinafter to be referred to as “Notice” for convenience], and in reply thereto, we say and submit as under:

- 1) We received the aforesaid Notice on 2nd May 2025 (without Inspection Report dated 03.01.2025 and the analysis report which is mentioned as enclosed with the said Notice) at our Mumbai office as no staff of Tata Housing Development Company

TATA HOUSING DEVELOPMENT COMPANY LIMITED
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Limited is stationed at Goa. We reserve liberty to file additional or supplemental reply, as and when required.

At the outset, we deny the allegations leveled against us in totality, as the same are baseless, unwarranted, vague, without material particulars, and bad in law. By mere by reason of not dealing with any statements or allegations contained in the said Notice, we do not and shall not be deemed to admit the veracity thereof in any manner whatsoever.

We repeat and reiterate the contents, averments, submissions and contentions made by us in our correspondences addressed to your esteemed office and Society in connection with the STP, as if the same form part of this letter and deny whatever is contrary thereto and/or inconsistent therewith.

- 2) It appears that false and misleading representations/complaints are made to your office with an ulterior and dishonest motive of harassing us and your esteemed office is being used as an arm twisting method for procuring the issuance of the said Notice to pressurize us so that we succumb to the illegal and unlawful demands made by some disgruntled residents and/or Managing Committee of the Rio De Goa Cooperative Housing Society ("**Society**"), which will be evident from the correspondences and what is stated herein under.
- 3) It is pertinent to note that by our email dated 04.11.2024 addressed to your esteemed office, we requested for change of the ownership name from Tata Housing Development Company Limited to Society, as Society was registered as on 15.12.2022 and since 01.04.2023, the Society has taken responsibility of the Project and common areas, facilities, etc. from us, and have been managing its day to day affairs. Needless to state all the relevant documents pertaining to this transition were sent with our aforesaid email dated 04.11.2024. Thus, we have categorically requested your esteemed office to update the registered ownership name of Society in your records and it was further requested that all future correspondences regarding the property be directed to the **Society's official email id** [riodegoachsltd@gmail.com] and marked to **Chairman/Secretary** viz. Mr. Subhash Tiwari/Mr. Sriharsha, which was also provided vide our aforesaid email dated 04.11.2024. The printout of the email dated 04.11.2024 addressed to your esteemed office is marked and annexed as **Annexure-1**.

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4) In respect of the STP installation and operations, we would like to clarify the following points and place on record as under:

i. **Regulatory Compliance:**

- a. Installation of sewage treatment plant and associated infrastructure is a mandatory requirement under the applicable environment and construction laws especially for the project of the size similar to Rio De Goa.
- b. The STP was installed after due process of scrutiny and has been approved by the Environment Department while granting Environment Clearance for the project. The location/ capacity of the STP was also pre-approved by the Environment Department as well as the concerned Building Permission department. In compliance with all the requirements, Tata Housing Development Company Limited has completed the construction of the residential complex including the installation and commissioning of the STP and having done so, the Occupation Certificate has been issued.
- c. In summary, the necessary approvals for installation and commissioning of the STP has been taken from time to time and applicable regulations in this regard have been duly complied up to the period when the STP operations were taken over by the Society i.e. Rio-De-Goa Co-operative Housing Society Limited.
- d. The STP has been installed and commissioned in strict accordance with all relevant approvals. Regular tests have been conducted, and all parameters have consistently been within permissible limits, ensuring the system operates efficiently and safely.

ii. **Handover of Project & STP to Society:**

- a. The Management and day to day affairs and operations of the Project, including STP and other common facilities, have been handed over to the Society formed by the residents/allottees. The Society is in exclusive control of the common areas, services, and operations, including the STP, since 01.04.2023.

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- b. Thus, all conditions related to STP and issuance of CTO, etc. are to be complied by the Society together with the regulatory compliances that are applicable to the operations of the STP.
 - c. Thus, we emphatically deny that STP is presently operated by the Builder of Rio De Goa Project, as alleged in the said Notice.
 - d. In view of the aforesaid, as a Builder/Developer/Promoter, we, no longer have any control or role in the operation or maintenance of the STP as required under the applicable laws. The Society is the competent entity responsible for ensuring compliance with environmental norms, and addressing any issues related thereto viz. odour, discharge, etc.
- iii. **Operational grievances:**
- a. We do not concur with any of the allegations about air quality, foul odour, STP Treatment process escapes for the reasons or in the manner alleged therein or any kind of health hazards occurring due to the operations of the STP as alleged in the Notice or Inspection Report or Analysis Report. Needless to state that for the period, when the STP was being operated by Tata Housing Development Company Limited, there has been no grievances or issues raised.
 - b. In fact, feedback was taken from residents of Tower 12A, most of who did not have any grievance related to the STP, except alleged grievances highlighted by one of the member/resident (Mr. Jaitely), being an isolated matter wherein his views were/are in stark departure from the views of other residents.
 - c. Therefore, we suggested Mr. Jaitely that he takes up the matter of STP with the Society who are best placed to look into his concerns.
- iv. **Conveyance Notwithstanding – Functional Handover Complete:**
- a. While formal conveyance of the land or common areas is pending for the reasons solely attributable to the Society, as we have addressed numerous mails and reminders for executing Conveyance Deed; however, the Society has been deliberately avoiding and neglecting to execute Conveyance Deed with a malafide intention. Be that as it may, the pendency of the execution of Conveyance Deed cannot used as an excuse

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by the Society to comply with their obligations. The Society is trying to shift the burden upon us, despite the fact that the functional and operational handover has been duly completed on 01.04.2023. The lack of a formal conveyance cannot imply continued responsibility for operational issues, particularly when we are not even operating or maintaining STP or any other aspect of the said Society or Project.

- b. Our responsibility was limited to the design and initial commissioning of the STP in accordance with the sanctioned plans and applicable norms. Post-handover, any operation related issues falls within the purview of the present Managing Committee of the Society.

v. **No violations:**

- a. Given the above, it is amply clear that we have not caused any breach and therefore cannot be held responsible for alleged non-compliance of directions set out in the said Notice (including direction to pay an amount of Rs.1,73,25,000/- as Environmental Compensation to the Board) or any other Notice issued prior thereto or related thereto, as regards operations and maintenance of STP.
- b. As already stated, the installation, commissioning and operations of the STP till the date on which it was taken over by the Society, has been in accordance with applicable laws.
- c. The earlier reports filed before the concerned authority stands testimony to the fact that all applicable parameters are maintained within permissible limits, which negates the allegations levelled in the said Notice.

vi. **Request for re-direction of Notice:**

- a. In view of the aforesaid, we humbly request your esteemed office and the Hon'ble Board to direct the present Notice, including any inquiry or penalty imposed, to be directly addressed to Society, who are the appropriate authority to respond to the same and take necessary steps.

5) While, it is important to note that a renewal order was issued by the GSPCB vide its letter bearing no. **12/2022-PCB/1276483/R0009753** dated 04.10.2024. Thus, the

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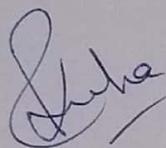
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application for renewal of the consent to operate was allowed and consequently the consent to operate and authorization was also extended by a period of 06 (six) months from the date of issue of the consent by GSPCB. And surprisingly, some disgruntled residents/members and Society have made repeated attempts to cast aspersions on the operations of STP for settling their personal scores with Tata Housing Development Company Limited.

- 6) We further say and submit that we have responded by our letter dated 19.11.2024 to the directions dated 12.11.2014 (including revocation of Consent Order and BG of Rs.32 Lakhs) issued by your esteemed office. It is not out of place to mention that we were neither informed about any site inspection which was conducted on 03.01.2025 nor any of our representative attended the inspection, therefore, we are not aware of the same and deny the contents thereof.
- 7) Thus, we humbly request your esteemed office to take note of the aforesaid and we hope the above response clarifies all the issues raised in the said Notice, and further exchange of communications on this issue should not be required. In case you have any further queries or concerns on this matter, we once again suggest that you reach out to the Society who are best placed to look into the matter.

Yours truly,

For, **Tata Housing Development Company Limited**



Authorized signatory

C.C.: To,

- (1) The Chairman/Secretary,
Rio De Goa CHSL
- (2) Mr. Madhukar Jaitley / Mr. Aayush Jaitley

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