

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONAL
BENCH, CHENNAI**

Original Application No. 210 of 2025

In the Matter of:

Suo-Moto – Three Men asphyxiated to death while fixing leak in the Barge Tank in Thoothukudi

...Applicant

Vs.

M/s. Ministry of Shipping, Ports & Waterways & 6 Ors.

...Respondents

AFFIDAVIT IN REPLY ON BEHALF OF RESPONDENT NO. 2

I, Sri Madan Pal Singh, aged about 55 years, Son of Shri Bishamber Dayal, the Regional Deputy General Manager In-Charge, (RDGM I/C, Chennai) M/s. The Shipping Corporation of India Ltd., a Company having Regional Office at Jawahar Building, No. 17, Rajaji Salai, Chennai – 600 001, do hereby state on solemn affirmation under oath as follows:

1. I humbly submit that the Respondent herein is a competent and authorized person to swear this affidavit on behalf of Respondent No. 2 - The Shipping Corporation of India Limited. The Shipping Corporation of India Limited shall be herein after referred to as "SCI" for the sake of brevity.
2. I humbly submit that SCI has received a notice dated 17th November, 2025 from this Hon'ble Tribunal in the above captioned matter, which was issued pursuant to the Suo Motu action taken by this Hon'ble Tribunal based on a news report concerning an unfortunate incident resulting in the death of three persons while carrying out welding inside the tank of a Barge at Thoothukudi, Old Port, Tamil Nadu on 17.09.2025.

MADAN PAL SINGH
REGIONAL DEPUTY GENERAL MANAGER, CHENNAI

**कृते भारतीय नौवहन निगम लिमिटेड
FOR THE SHIPPING CORPORATION OF INDIA LTD.**

**मदनपाल सिंह / MADAN PAL SINGH
क्षेत्रीय उप महा प्रबन्धक, चेन्नई
REGIONAL DEPUTY GENERAL MANAGER, CHENNAI**

3. I humbly submit that SCI has been impleaded as Respondent No. 2 in the present proceedings and summons were duly served upon SCI on 10.12.2025.
4. I humbly submit that immediately after receiving the notice, SCI conducted a comprehensive and thorough inquiry across all its departments and operations. The Applicant made extensive inquiries with various departments of SCI and consulted with relevant personnel and officials having knowledge of SCI fleet operations and management.
5. I humbly submit that based on the detailed inquiry and verification conducted, the deponent most respectfully submits that none of the vessels owned, operated, chartered or managed by SCI and its personnel were involved in the unfortunate incident that occurred at Thoothukudi Old Port on 17.09.2025 as reported in the news item published on The New Indian Express dated 18.09.2025.
6. That the barge in question, wherein the tragic incident occurred, does not belong to SCI, nor was it under the management, operation or control of SCI at the material time. The said vessel has no connection whatsoever with SCI.
7. That the deponent has also verified the records maintained by SCI regarding vessels calling at Thoothukudi old Port during the relevant period, and it is confirmed that no SCI vessel or SCI-managed vessel was present at Thoothukudi Old Port on or around 17.09.2025.
8. That in view of the aforesaid facts and circumstances, the deponent most respectfully submits that SCI is neither concerned with nor involved in the incident that forms the subject matter of the present Suo Motu proceedings.
9. That the deponent craves leave of this Hon'ble Tribunal to file a detailed and comprehensive reply, if required, at a later stage, and reserves the right to produce additional documents and evidence in support of the same.
10. That in light of the foregoing, it is most respectfully submitted that the present Suo-Motu proceedings against the Respondent No. 2, The Shipping Corporation of India Limited may be dismissed.

कृते भारतीय नौवहन निगम लिमिटेड
FOR THE SHIPPING CORPORATION OF INDIA LTD.


मदनपाल सिंह / MADAN PAL SINGH
क्षेत्रीय उप महा प्रबन्धक, चेन्नई
REGIONAL DEPUTY GENERAL MANAGER, CHENNAI

उपरोक्त पत्र को भेजने के लिए
THE SHIPPING CORPORATION OF INDIA LTD.

MADAN PAL SINGH
REGIONAL DEPUTY GENERAL MANAGER, CHENNAI

Therefore, in light of the facts and circumstances stated above, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to dismiss the present Suo-Motu proceedings as against the Respondent No. 2 and thus render justice.

Dated at Chennai on this the 01st day of April, 2026

कृते भारतीय नौवहन निगम लिमिटेड
For THE SHIPPING CORPORATION OF INDIA LTD.

मदनपाल सिंह / MADAN PAL SINGH
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REGIONAL DEPUTY GENERAL MANAGER, CHENNAI

2ndRESPONDENT

VERIFICATION

I, Sri Madan Pal Singh, working as The Regional Deputy General Manager In-Charge, (RDGM I/C, Chennai), The Shipping Corporation of India Ltd., a Company having Regional Office at Jawahar Building, No. 17, Rajaji Salai, Chennai – 600 001 the deponent above named, do hereby solemnly affirm and verify that the contents of paragraphs 1 to 10 of this Affidavit are true and correct to the best of my knowledge, information, and belief, and nothing material has been concealed therefrom.

Verified at Chennai on this day of 01st day of April 2026 कृते भारतीय नौवहन निगम लिमिटेड
For THE SHIPPING CORPORATION OF INDIA LTD.

Before Me :-
G. Janarthanan
(MS-2394/2015)
9381402020

मदनपाल सिंह / MADAN PAL SINGH
क्षेत्रीय उप महा प्रबन्धक, चेन्नई
REGIONAL DEPUTY GENERAL MANAGER, CHENNAI

DEPONENT

Authorized Signatory

The Shipping Corporation of India Limited