

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI**

Original Application No. 254 of 2025 (SZ)

BETWEEN

S. Suresh Babu,
Aged 37, Son of S. Venkata Raju
No.26, Rettembedu Road,
Gummidipoondi Court Opposite,
Gummidipoondi Taluk,
Tiruvallur District – 601 201.

...Applicant

-Versus-

1. The Tamilnadu Pollution Control Board,
Rep by its District Environmental Engineer,
No.88A, First Cross Road, SIPCOT Industrial Complex,
Gummidipoondi – 601 201 and 4 others.

...Respondents

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It is certified that the above-mentioned documents are the true copies of the original.

Dated at Chennai on this the 21st ay of June, 2026.



Counsel for 4th Respondent
Filed through
M/s. Abishek Murthy, Advocate,
Standing Counsel for SIPCOT.
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-Vs-

1. The Tamilnadu Pollution Control Board,
Rep by its District Environmental Engineer,
No.88A, First Cross Road, SIPCOT Industrial Complex,
Gummidipoondi – 601 201.
2. Public Works Department, Gummidipoondi,
Rep by its Executive Officer,
Araniyur Basin Division, WRO,
Chepauk, Chennai – 600 005.
3. Gummidipoondi Town Panchayat,
Rep by its Executive Officer,
1, Mettur Street, Gummidipoondi.
4. SIPCOT Industrial Complex,
Rep by its Project Director,
Gummidipoondi,
Tiruvallur District – 601 201.

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CORPORATION OF TAMILNADU LTD.,

Deputy General Manager (Legal)

5. The District Collector,
Thiruvallur District,
Master Plan Complex,
Tiruvallur – 602 001.

...Respondents

REPLY FILED ON BEHALF OF THE 4th RESPONDENT (SIPCOT)

I, Tmt. Pon Arul Thilagavathy, W/o. M. Rajasekar, aged about 54 years, presently working as Deputy General Manager (Legal), State Industries Promotion Corporation of Tamil Nadu Limited (SIPCOT), No.19-A, Rukmani Lakshmipathy Road, Egmore, Chennai – 600 008, being duly authorized and well acquainted with the facts of the case from the records available in the office, do hereby solemnly affirm and sincerely state as follows:

1. I am the 4th Respondent herein and am well acquainted with the facts and circumstances of the case from the records maintained by SIPCOT and hence competent to swear to this Reply.
2. I respectfully submit that the Applicant has filed the present Original Application alleging pollution and contamination of Thamarai Lake situated in Survey No. 584 measuring about 47 acres in Old Gummidipoondi Village and Survey No. 254 measuring about 5 acres and 76 cents in Pethikuppam Village, Tiruvallur District allegedly due to dumping of solid waste and discharge of industrial effluents into the lake. The Applicant has sought various directions against the Respondents including action against the alleged polluters and restoration of the lake.
3. I respectfully submit that the allegations made against SIPCOT are wholly unfounded, unsupported by any scientific evidence and liable to be rejected. The Applicant has failed to establish any nexus whatsoever between the alleged pollution of Thamarai Lake and the

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industries functioning within SIPCOT Industrial Complex, Gummidipoondi.

4. I respectfully state that the Respondents deny all the averments contained in the Original Application except those specifically admitted herein. Before adverting to the paragraph-wise reply, the brief facts relevant to the present proceedings are set out below for the kind consideration of this Hon'ble Tribunal.

BRIEF FACTS OF THE CASE:

5. SIPCOT Industrial Complex, Gummidipoondi was established pursuant to various Government Orders issued between 1981 and 1987 for industrial development in Tiruvallur District. Pursuant thereto, lands measuring about 1478.35 acres situated in New Gummidipoondi, Karumbukuppam, Pappankuppam, Sinthalakuppam, Pethikuppam and Old Gummidipoondi Villages were acquired and handed over to SIPCOT for establishing an industrial complex.
6. After taking possession of the lands, SIPCOT developed the industrial complex by providing infrastructure facilities such as roads, storm water drains, street lights, electricity and water supply facilities and allotted industrial plots to entrepreneurs on long-term lease basis. Out of the developed area, approximately 1191.32 acres have been allotted and around 246 industrial units are presently functioning.
7. Thamarai Lake is situated adjacent to the SIPCOT Industrial Complex and receives rainwater runoff from surrounding areas during monsoon periods. The lake is also connected to various natural drainage channels and storm water drains carrying rainwater from surrounding villages and public roads.

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8. SIPCOT has established a separate storm water drainage system within the industrial complex exclusively for carrying rainwater. No industrial unit is permitted to discharge untreated effluent or sewage into the storm water drains. The industries functioning within SIPCOT are regulated by the Tamil Nadu Pollution Control Board and are required to comply with all environmental norms and consent conditions.
9. It is respectfully submitted that the Applicant himself had addressed several representations to Government authorities as early as 2018, 2022 and 2023 complaining about dumping of municipal solid waste and failure of civic authorities to maintain Thamarai Lake. Significantly, in the said representations, the Applicant attributed the degradation of the lake primarily to garbage dumping by local bodies and failure of maintenance by the concerned authorities and not to discharge of industrial effluents by SIPCOT industries.
10. Upon receipt of complaints relating to pollution of Thamarai Lake, joint inspections were conducted by officials of SIPCOT and the Tamil Nadu Pollution Control Board between 14.11.2025 and 17.11.2025. During the inspections, industries, storm water drains, surrounding areas and possible discharge points were inspected. No discharge of industrial effluent from SIPCOT industries into Thamarai Lake was detected.
11. Subsequently, on complaints received through various sources including the Central Pollution Control Board and members of the public, further inspections were conducted by TNPCB, CPCB, SIPCOT and local authorities. During all such inspections, no evidence was found indicating discharge of industrial effluent from SIPCOT industries into Thamarai Lake.
12. The investigations revealed that illegal discharge of sewage by private septic tank operators into roadside storm water drains

connected to the lake and improper disposal of municipal solid waste were significant contributing factors affecting the lake ecosystem.

13. Acting upon the directions issued by the District Collector, Tiruvallur, SIPCOT has actively participated in several remedial and preventive measures including installation of CCTV cameras, enhanced surveillance, issuance of notices to industries, desilting of drains, prevention of entry of septic tank lorries into the industrial estate and formulation of short-term, medium-term and long-term action plans for restoration of the lake.
14. SIPCOT has also proposed restoration and rejuvenation of Thamarai Lake through Corporate Social Responsibility (CSR) funds and has coordinated with the Tamil Nadu Pollution Control Board and other stakeholders for long-term environmental protection measures.
15. The averments contained in Paragraphs 1 to 3 of the Application are matters of record. The allegations, in so far as they seek to attribute pollution of Thamarai Lake to SIPCOT industries, are specifically denied.
16. With regard to Paragraph 4 of the Application, it is submitted that no sewage or industrial effluent is discharged by SIPCOT through its storm water drains. The inspections conducted by SIPCOT and TNPCB did not reveal any industrial effluent discharge from SIPCOT industries into Thamarai Lake. It is respectfully submitted that illegal discharge of sewage by septic tank operators into public storm water drains has been identified as one of the major causes contributing to pollution of the lake.
17. With regard to Paragraph 5 of the Application, it is submitted that upon receipt of complaints, joint inspections were conducted by SIPCOT and TNPCB between 14.11.2025 and 17.11.2025. During

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the inspections, no discharge of industrial effluent into the lake was detected. Water samples were collected and forwarded for analysis as a precautionary measure.

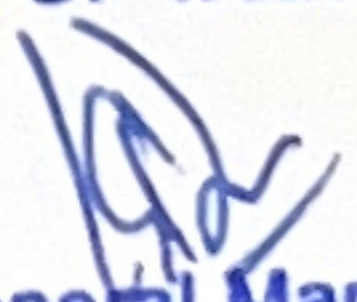
18. With regard to Paragraph 6 of the Application, the contents are denied except to the extent specifically admitted herein. The allegations against SIPCOT are unsupported by any scientific evidence.

19. With regard to Paragraph 7 of the Application, it is submitted that SIPCOT has established a dedicated storm water drainage network throughout the industrial estate. The storm water drains carry rainwater during monsoon periods and ultimately connect with natural drainage channels. No industrial effluent is permitted to enter the said drains.

20. With regard to Paragraphs 8 and 9 of the Application, it is submitted that inspections conducted by CPCB, TNPCB, SIPCOT and municipal authorities did not reveal any evidence of industrial effluent discharge from SIPCOT industries into Thamarai Lake. Subsequent inspections undertaken in December 2025 also did not reveal any industrial effluent discharge. Accumulated silt and rainwater stagnation found in the connecting channels were immediately removed.

21. With regard to Paragraph 10 of the Application, it is submitted that investigations revealed illegal discharge of untreated sewage by certain septic tank operators. Action has already been initiated through the competent authorities and details of offending vehicles were forwarded to the Transport Authorities for appropriate action. Further, all industries within SIPCOT have been cautioned and directed not to discharge treated or untreated sewage into storm water drains and have been informed that strict action would be taken in the event of any violation.

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22. With regard to Paragraphs 11 to 13 of the Application, it is submitted that Gummidipoondi has witnessed substantial urban growth and presently lacks adequate underground sewerage infrastructure and scientific solid waste management facilities. The pollution affecting the lake is therefore attributable to multiple local factors including municipal solid waste disposal and illegal sewage discharge and cannot be attributed solely or primarily to SIPCOT industries.

23. With regard to Paragraphs 14 to 19 of the Application, it is submitted that SIPCOT has actively participated in all review meetings convened by the District Administration and has undertaken several preventive and remedial measures including surveillance, installation of CCTV cameras, prohibition of septic tank vehicles, desilting operations, environmental awareness among industries and formulation of immediate, medium-term and long-term action plans. SIPCOT has further undertaken to participate in restoration and rejuvenation activities of Thamarai Lake through CSR initiatives.

24. It is respectfully submitted that the Applicant has failed to produce any scientific study, laboratory report or technical evidence establishing discharge of industrial effluent from SIPCOT industries into Thamarai Lake. Mere allegations and assumptions cannot form the basis for fastening liability upon SIPCOT.

25. It is respectfully submitted that SIPCOT remains committed to environmental protection and has been extending full cooperation to TNPCB, CPCB, District Administration, Water Resources Department and local authorities in implementing measures for restoration and protection of Thamarai Lake.

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26. It is therefore submitted that the allegations levelled against SIPCOT are misconceived, unsupported by evidence and liable to be rejected.

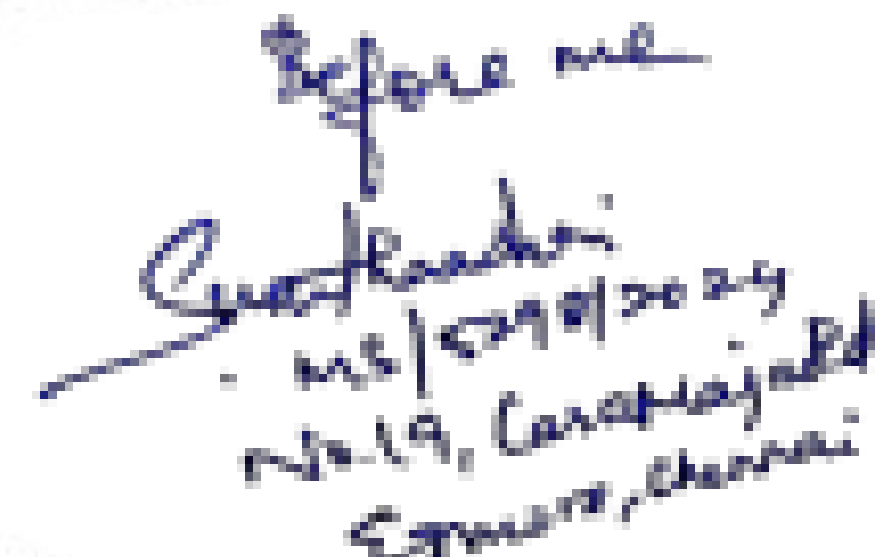
In the above circumstances, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to dismiss the Original Application and pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the circumstances of the case.

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DEPONENT

Solemnly affirmed on this —
day of June 2026 and signed
his name in my presence.


ADVOCATE: Chennai.