

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

(Under Sections 14 and 15 read with Section 18(1) of the NGT Act, 2010)

O.A. No. 293 of 2024

M. Venkatesan

....Applicant

v.

District Collector, Chengalpattu and Ors.

...Respondents

Memo filed on behalf of the Applicant

It is respectfully submitted as follows:

1. Vide order dated 28.11.2024, this Hon'ble Tribunal had directed the Respondents to enquire into the matter and remove the debris dumped at the subject Vannan Kulam within a period of four weeks and report compliance.
2. However, the Respondents failed to remove the debris within the timeline directed. To add insult to injury, the 5th Respondent also commenced the fresh dumping of sand and other materials at the subject site on 11.07.2025. Aggrieved by the above illegalities, the Applicant herein preferred I.A. No. 85 of 2025, seeking to punish the Respondents for the wilful violation and contempt of the order dated 28.11.2024 in O.A. No. 293 of 2024, which is pending before this Hon'ble Tribunal.
3. On 02.08.2025, it was noticed that two JCBs and a tractor were at the subject site. The Applicant hoped that this was a sign that the debris would be removed. However, the instead of removing the construction debris, sand and other materials, the JCBs compacted the dumped material into the ground.
4. In their report dated 10.10.2025, the 3rd Respondent TNPCB has stated that the 4th Respondent BDO vide letter dated 31.07.2025 had reported

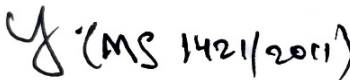
that the dumped waste had been removed, and the tank was "*left to its original position*". The report also states that the 3rd Respondent's officials inspected the kulam on 04.08.2025, and noticed that the "*dumped construction & demolition waste / debris along the boundary of the Vannan Kulam tank was removed and now the Vannan Kulam tank was left with its original state / original earthen bund*". These claims have been reiterated by the 1st Respondent in their status report dated 18.09.2025 (typed set date 11.04.2026).

5. As stated above, the dumped debris / material has merely been compressed into the ground and has not been cleared. Significantly, the 1st Respondent has also stated that the "*earthen pathway of 7 feet is levelled*", thereby admitting that the dumped debris was in fact compressed / compacted. Photographs taken on 15.04.2026 (today) are annexed with this memo.

It is therefore prayed that this Hon'ble Court may be pleased to take this memo on record, and pass such further orders in the interest of justice.

Dated at Chennai on this the 15th day of April, 2026

Through

 (MS 1421/2021)

A Yogeshwaran

Counsel for the Applicant

