

**BEFORE THE NATIONAL GREEN TRIBUNAL (SZ)
AT CHENNAI
O.A No. 157 of 2025**

S.Lakshmiammal

....Applicant

-Vs.-

Union of India,
Rep by its Secretary,
MoEF&CC, New Delhi & Others

....Respondents

REPLY AFFIDAVIT FILED BY 1ST RESPONDENT (MoEF & CC)

Dated at Chennai this the 13th day of October 2025



Sai Srujan Tayi

Counsel for MoEF& CC/Respondent

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE AT CHENNAI
IN
O.A. No. 157 of 2025 (SZ)**

IN THE MATTER OF:

S. LAKSHMIAMMAL

..... APPLICANT

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**REPLY AFFIDAVIT ON BEHALF OF THE MINISTRY OF
ENVIRONMENT, FORESTS & CLIMATE CHANGE (RESPONDENT
NO. 1.**

1. I, Dr. S. Pradeep Kumar, S/o S. Sugumar, aged about 38 Years currently working as Scientist- 'B' in the Ministry of Environment, Forest and Climate Change (MoEF&CC), Regional Office, Chennai, solemnly affirm and declare the following That I, in the capacity of Scientist- 'B' in the Ministry of Environment, Forest and Climate Change, office at do hereby solemnly affirm and state as under: That I, in the capacity of in the Ministry of Environment, Forest and Climate Change, am fully conversant with facts of the case and competent to swear this affidavit on behalf of the answering Respondent No. 1.

Dr. S. Pradeep Kumar
Scientist 'B'
Government of India
Regional Office
Ministry of Environment, Forest and Climate Change,
Shastry Bhavan, Haddows Road, Nungambakkam,
Chennai - 600 006, Tamilnadu.


Dr.S.Pradeepkumar
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Ministry of Environment, Forest and Climate Change,
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2. That present matter has been filed against continued environmental degradation caused by the illegal encroachment and diversion of a government drainage canal situated in Survey no. 239/1, Santhavelur Village, Sriperumbudur Taluk.
3. That the answering Respondent is engaged in, *inter alia*, policy formulation for abatement, control and prevention of pollution, prescribing environmental standards, which are implemented through the Central Pollution Control Board (CPCB) and State Pollution Control Boards (SPCBs)/Pollution Control Committees (PCCs). The SPCBs/PCCs are required to enforce these standards and monitor the compliance by industries. Besides, the concerned State Pollution Control Board (SPCBs) are empowered to take all such measures as are deemed necessary or expedient for the purpose of protection and improving the quality of environment and prevention, controlling and abetting environmental pollution, including the water pollution as in the instant matter.
4. That Central Government has enacted Water (Prevention and Control of Pollution) Act, 1974, which specifically deals with issues related to control and abatement of pollution in water bodies including rivers. The

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implementation of the provisions of the Act is with the Central Pollution Control Board (CPCB) and concerned State Pollution Control Boards (SPCBs).

5. That water is a State subject and the major sources of water pollution – namely, point sources such as sewage and industrial effluents, and non-point sources such as solid waste, open defecation, agricultural run-off, dumping of dead bodies in water etc. fall under the civic, health and sanitation responsibilities of the State Government and/or municipalities/local bodies. The respective States/municipalities/local bodies, therefore, are having the primary responsibility in tackling these sources of pollution out of their budget and internal revenue generation. They are also responsible for setting-up proper facilities for collection and treatment of sewage being generated in various towns to ensure that untreated sewage does not fall into the rivers, lakes and canals thereby polluting them.

6. That, in view of the foregoing submission, it is most humbly prayed that this Hon'ble Tribunal may kindly pass such order(s) as may be deemed fit and proper in the facts and circumstances of the case.



DEPONENT

Dr.S.Pradeepkumar

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VERIFICATION:

Verified at Chennai on this 06th day of October 2025 that the contents of this reply affidavit based on official record(s) maintained and information available in the office are correct to my knowledge and belief. No part of it is false and nothing has been concealed there from.

**DEPONENT****Dr.S.Pradeepkumar**

Scientist 'B'

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Chennai - 600 006, Tamilnadu.****Dr.S.Pradeepkumar**

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