

BEFORE NATIONAL GREEN TRIBUNAL
SOUTHERN ZINE BENCH AT CHENNAI
ORIGINAL APPLICATION NO.55 OF 2022

IN THE MATTER OF:

Arige Veeraswamy

..Applicant

Versus

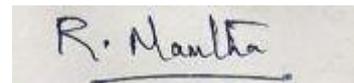
Telangana State Pollution Control Board,

..Respondent

Rep by its Member Secretary and others.

MEMO ON BEHALF OF APPLICANT

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Mamatha Ralla
Advocate for Applicant

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1. That this Hon'ble Tribunal vide its order dated 20/2/2024 directed the Applicant to furnish particulars of crop yield before alleged pollution and after the pollution. That the Applicant would like to furnish the yield as per the normal circumstances i.e., without pollution and post damage of ground water due to pollution caused by adjoining industries.
2. It is submitted that the Applicant and his family members used to cultivate Paddy, Cotton, Vegetables etc by using borewell

water. But subsequent to pollution, the ground water completely become polluted and become not suitable for agriculture. This fact was confirmed by the Agriculture Department in its report filed before this Hon'ble Tribunal in the present Application. That the yield used to get by the Applicant in his and his father land placed as under:

Year	Type of crop	Before pollution yield	After pollution yield	Price of crop Per. quintal	Loss of yield and Income
2007	Paddy	448 quintals (2seasons)	NA	Rs.980	NA
2008	Paddy		352quintals (2seasons)	Rs.1050	96q.X1050= 1,00,800
2009	Paddy		216quintals (2seasons)	Rs.1100	232qX1100= 2,55,200
2010	Paddy		80quintals (2seasons)	Rs.1160	368q.X1160= 4,26,880
2011-2023	Cotton		40 quintals	Rs.6,800 (2023 rate)	60 q.X6,800= 4,08,000. @12 yrs
TOTAL LOSS					Rs. 52,00,000 approx.

3. It is further submitted that the Agriculture Department through its Assistant Director has filed a report dated 28/04/2023 in the

application has also confirmed the loss caused to the Applicant due to polluted ground water. The Agriculture report states as under:

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The details of the crops raised by the farmer and the yield obtained during the last 5 years in the above survey numbers is detailed below

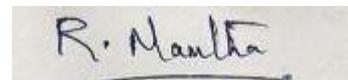
S.NO	Farmer Name	Sy.No	Extent in ac	crop Name	2018-2019Vanakalam		2019-2020Vanakalam		2020-2021vanakalam		2021-2022 Vanakalam		2022-2023Vanakalam	
					Extent	Yield qtls/ac	Extent	Yield qtls/ac	Extent	Yield qtls/ac	Extent	Yield qtls/ac	Extent	Yield qtls/ac
1	Pinniti Jagal reddy	407/e/2	2.12	Cotton	2.12	7	2.12	7	2.12	7	2.12	7	2.12	7
2	Anthula Anjamma	470/e	3.3	Cotton	3.3	7.5	3.3	7.5	3.3	7.5	3.3	7.5	3.3	7.5
3	Anthula Limgaswamy	472/D	3	Cotton	3	7	3	7	3	7	3	7	3	7
4	Sama Janardhan reddy	501/e	1.39	Cotton	1.39	7.5	1.39	7.5	1.39	7.5	1.39	7.5	1.39	7.5
5	Ange veeraswamy	80	2	Paddy	2	0	2	0	0	0	0.2	0	0	0
5	Ange veeraswamy	80	4	Cotton	2	7.5	2	7.5	4	6	3	7	3.3	7.5
6	Ange beeraiah	78/e	4.24	Cotton	4.24	7.5	4.24	7.5	4.24	7.5	4.24	7.5	4.24	7.5
7	Balke sathaiah	67/e	3.01	Cotton	3.01	7	3.01	7	3.01	7	3.01	7	3.01	7
8	Katta narasimha	64/e/5/1	0.26	Cotton	0.24	4	0.24	4	0.24	4	0.24	4	0.24	4
9	Jala mal' aiah	250/e/4/2	3.2	Cotton	2.3	7	2.3	7	2.3	7	2.3	7	3.2	7
				Paddy	0.2	18	0.2	18	0.29	18	0.29	18	0	18

4. It is further submitted that the report of Agriculture Department further clearly states that the ground water is not suitable for

Irrigation in normal circumstances. The Applicant prays that the Hon'ble Tribunal may refer the Report dated 28.4.2023 filed by Agriculture Department may consider.

5. It is clear that the Applicant undergone immense loss due to pollution caused by the industries. Hence the Hon'ble Tribunal may graciously grant relief sought by the Applicant as he is affected by pollution and this Hon'ble Tribunal vested with the power under Section 17 of NGT Act to grant compensation.
6. It is further prayed that the costs for the litigation and court fees may also recovered from the polluting units and other erring officials for causing loss to the Applicant.

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