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**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE AT
CHENNAI
ORIGINAL APPLICATION No. 145 of 2025 (SZ)**

IN THE MATTER OF: -

Shri. Charan Bhat.....Applicant

-V/s-

The Archaeological Survey of India & Ors... Respondents

COUNTER AFFIDAVIT ON BEHALF OF THE 1st RESPONDENT

I, Konudula Rama Krishna Reddy S/o K. C. Venkata Reddy, aged about 52 years, working in the Archaeological Survey of India as Superintending Archaeologist in the office of the Archaeological Survey of India, Hampi Circle located at Hospet, Vijayanagara district, do hereby solemnly affirm and state as follows:

1. I am filing this affidavit on behalf of the Respondent No.1, and I am duly authorized on this behalf, and I am conversant with the facts of the case as borne out from available official records.
2. I humbly submit that the instant O.A. No. 145 of 2025 filed by the applicant lacks merit and is not supported by true and correct facts.
3. At the outset, I deny all the averments made in the application and save those that are specifically admitted herein. I am duly authorized to file this Counter Affidavit on behalf of the Respondent No.1 in this Application.
4. I humbly submit that liberty is further craved in making further submissions or filing additional affidavit as may be required in the facts of the case subsequently or as may be directed by this

Bj. no. 1
No of Com. ML


अधीक्षक पुरातत्वविद्
Superintending Archaeologist
भारतीय पुरातत्व सर्वेक्षण
Archaeological Survey of India
हम्पी मंडल / Hampi Circle
होसापेटे / Hosapete

Hon'ble Tribunal.

Preliminary Submission: -

5. I submit that the National Green Tribunal, Southern Zone, Chennai, has filed an O. A. No. 145 of 2025 by Charan Bhat V/s the ASI & Ors. The applicant submits that multiple authorities have failed in discharging their statutory duties. resulting in severe environmental degradation in Hampi and its adjoining heritage and religious sites. and tourist sites.

6. I submit that the NGT, Chennai, has impleaded the ASI as also one of the parties and directed to submit the response/ comments in the form of an affidavit at least one week before the next hearing, which is scheduled for 06.01.2026.

7. I humbly submit that the Archaeological Survey of India (ASI), as the nodal agency for the protection of monuments of national importance declared under the Ancient Monuments and Archaeological Sites and Remains Act 1958. Further, ASI undertakes conservation, preservation and regular maintenance of these monuments including the Hampi World Heritage Site. This includes regular maintenance, structural conservation, minor repairs, cleanliness, site management, providing tourist amenities and creating public awareness regarding our rich cultural Heritage.

8. I humbly submit that Hampi, a World Heritage Site, is bestowed with the choicest landscape by nature, which is more highlighted and ended by the architectural manifestations of mankind from time immemorial, amply demonstrating that the rugged, enchanting nature could be well harnessed for the betterment of mankind.

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No of Cols. M/L

29/12/24
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9. I humbly submit that this magnificent, rich cultural heritage of Karnataka was befittingly declared a "World Heritage Site" by UNESCO in 1986, for its exceptional interest and Universal value. ASI formed a separate Circle and named as "Hampi Mini-Circle" on 5th September 2014 for proper maintenance, conservation and preservation of the monument. Recently, on 27th August 2020, the Hampi Mini-Circle was upgraded as a full-fledged Circle with the addition of monuments situated in 05 adjoining districts within its jurisdiction, after bifurcating them from Dharwad Circle. Now, the Hampi Circle, is running as an independent Circle looking after 95 Protected Monuments spread in 7 districts, i.e., Bidar, K alaburagi, Yadagir, Koppal, Raichur, Ballari and Vijayanagara.

10. I submit that the ASI, Hampi Circle, has been further divided into 07 Sub-circles for its smooth functioning, proper administration and to address conservation and preservation of all protected monuments under the jurisdiction of Hampi Circle.

11. I submit that for better administration as well as conservation, preservation and maintenance of all monuments at Hampi ASI, has formulated/established two Sub-circles i.e., Hampi Sub-circle and Kamalapura Sub-circle. The Kamalapura Sub-circle is headed by a Senior Conservation Assistant and supported two Conservation Assistant, nine Multi Task Staff, sixteen Temporary Status manpower, and seventy-nine 1/30 status labourers. All these work force are currently taking care of the monuments including cleanliness of 34 Centrally Protected Monuments under jurisdiction of the Kamalapura Sub-circle.

12. I submit that the Hampi Sub-circle is headed by a Senior Conservation Assistant and supported by two Conservation Assistant, three Multi Task Staff, fifteen Temporary Status manpower, eighty-three 1/30 Casual labourers. All these work force are currently working and engaged in the maintenance and

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cleanliness of 23 Centrally Protected Monuments under its jurisdiction.

13. I submit that the Group of monuments at Hampi are given status of World Heritage Site, which includes 57 monuments. The Kamalapura Sub-circle, which has 34 Centrally Protected Monuments within the World Heritage site, Hampi. 107 staff members are deployed for day-to-day maintenance and cleanliness of the surroundings of the monuments. The total area of the monuments is approximately 10 Sq Km, and the monuments are located in a scattered manner. The relevant cleanliness activities photos are enclosed for your reference

14. I submit that the Hampi Sub-circle, having 23 Centrally Protected Monuments within the World Heritage site, Hampi. 104 staff members are deployed for day-to-day maintenance and cleanliness of the surroundings of the monuments. The total area of the monuments is approximately 10 Sq Km, and the monuments are located in a scattered manner. The relevant cleanliness activities photos are enclosed for your reference.

15. I submit that the Group of Monuments at Hampi, covering a core area of 41.80 Sq. km., was notified by the State Government as a protected area under Notification No. ITY 137 KMV 84, dated 22.10.1988. Within this World Heritage Area, more than 600 monuments have been notified as State Protected Monuments by the Department of Archaeology, Heritage, and Museums, Government of Karnataka. Additionally, 57 Centrally Protected Monuments, declared as monuments of national importance, are maintained and preserved by the Archaeological Survey of India.

16. I submit that the Archaeological Survey of India, Hampi Circle, is continuously doing a cleanliness drive and awareness program for the visitors/tourists and has been requested to maintain the plastic-free zone at the Group of Monuments at Hampi, a World Heritage Site.

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No of com-ml

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17. I submit that the Archaeological Survey of India, Hampi Circle has been carrying out day-to-day maintenance, i.e., cleaning, removal of weeding, grass, collecting garbage and plastic from the monument are regularly. All the collected garbage, grass, and plastic are disposed of collectively by the staff of the Archaeological Survey of India, the staff of the Gram Panchayat, Hampi, and the labourers of Hampi World Heritage Management Authority at the solid waste management unit located at Kamalapura, maintained by the town municipal council, Kamalapura.

In view of the above, I respectfully submit that this Hon'ble Tribunal may be pleased to consider the facts and submissions, and O.A. No. 145 of 2025 may be dismissed in the interest of justice.

It is therefore prayed that this Hon'ble National Green Tribunal may be pleased to dismiss the above O.A. No. 145 of 2025 and thus render justice.

Solemnly affirmed this

BEFORE ME

the **29th day of December 2025** and

Signed his name in my presence, **ADVOCATE: HOSAPETE**

Attested

[Signature]
29/12/2025

Deputy Superintending Archaeologist
Archaeological Survey of India
Hampi Circle.

Pg. No. 5
No. of Docs. 1

[Signature] 29/12/2025
अधीक्षक पुरातत्वविद्
Superintending Archaeologist
भारतीय पुरातत्व सर्वेक्षण
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Achutadevaraya Temple at Venkatapura



Before cleaning the vegetation at Achutadevaraya Temple at Venkatapura



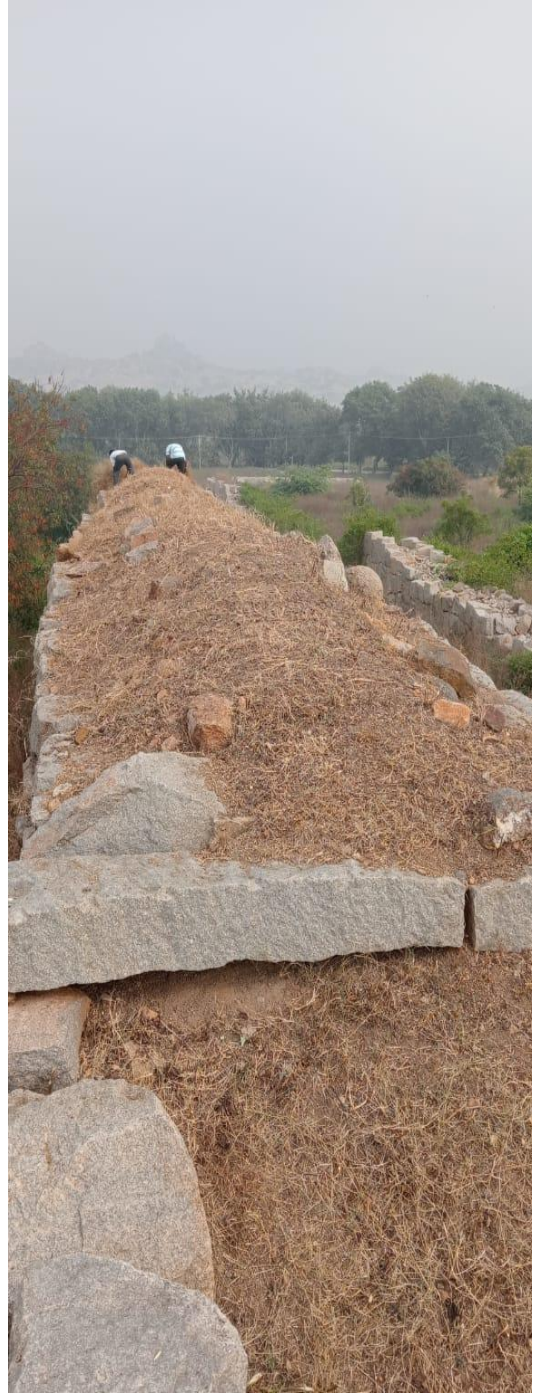
After cleaning the vegetation at Achutadevaraya Temple at Venkatapura



Before cleaning the vegetation at Achutadevaraya Temple at Venkatapura



After cleaning the vegetation at Achutadevaraya Temple at Venkatapura



After cleaning the vegetation at Achutadevaraya Temple at Venkatapura



During cleaning the vegetation at Achutadevaraya Temple at Venkatapura



After cleaning the vegetation at Achutadevaraya Temple at Venkatapura



During cleaning of the vegetation at Achutadevaraya Temple at Venkatapura



After cleaning the vegetation at Achutadevaraya Temple at Venkatapura



Before cleaning the vegetation at Achutadevaraya Temple at Venkatapura



After cleaning the vegetation at Achutadevaraya Temple at Venkatapura

Ananthashayana Temple at Ananthashayanagudi



Before/During cleaning the vegetation at Ananthashayana Temple at Ananthashayanagudi

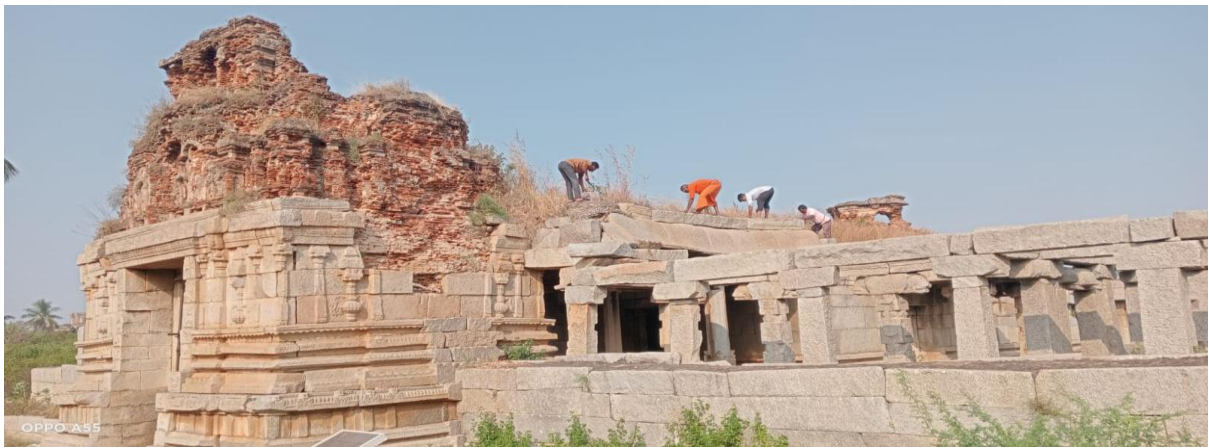


After cleaning the vegetation at Ananthashayana Temple at Ananthashayanagudi

Vishnu Temple at Kamalapura.



Before cleaning the vegetation at the Vishnu Temple at Kamalapura



During the cleaning of the vegetation at the Vishnu Temple at Kamalapura



After cleaning the vegetation at the Vishnu Temple at Kamalapura

Chandikeshwara Temple at Krishnapura



Before cleaning the vegetation at Chandikeshwara Temple at Krishnapura



During cleaning the vegetation at Chandikeshwara Temple at Krishnapura



After cleaning the vegetation at Chandikeshwara Temple at Krishnapura

Prasanna Narasimha Temple at Krishnapura



Before cleaning the vegetation at Prasanna Narasimha Temple at Krishnapura



After cleaning the vegetation at Prasanna Narasimha Temple at Krishnapura

Virupaksha Temple and Bazar at Hampi



Before cleaning the garbage at Virupaksha Temple and Bazar at Hampi



After cleaning the garbage at Virupaksha Temple and Bazar at Hampi



Before cleaning the garbage at Virupaksha Temple and Bazar at Hampi



After cleaning the garbage at Virupaksha Temple and Bazar at Hampi



Before cleaning the garbage at Virupaksha Temple and Bazar at Hampi



After cleaning the garbage at Virupaksha Temple and Bazar at Hampi



Before cleaning the vegetation at Virupaksha Temple and Bazar at Hampi



After cleaning the vegetation at Virupaksha Temple and Bazar at Hampi



Before cleaning the vegetation at Virupaksha Temple and Bazar at Hampi



After cleaning the vegetation at Virupaksha Temple and Bazar at Hampi



Before cleaning the vegetation at the group of Jain Temples on the Hemakuta Hill at Hampi



After cleaning the vegetation at the group of Jain Temples on the Hemakuta Hill at Hampi



Before cleaning the vegetation at the group of Jain Temples on the Hemakuta Hill at Hampi



After cleaning the vegetation at the group of Jain Temples on the Hemakuta Hill at Hampi



Before cleaning the vegetation at the Bazar area of the Virupaksha Temple at Hampi



After cleaning the vegetation at the Bazar area of the Virupaksha Temple at Hampi

Kadalekalu Ganesha



Before cleaning the vegetation at the Kadalekalu Ganesha Temple at Hampi



After cleaning the vegetation at the Kadalekalu Ganesha Temple at Hampi



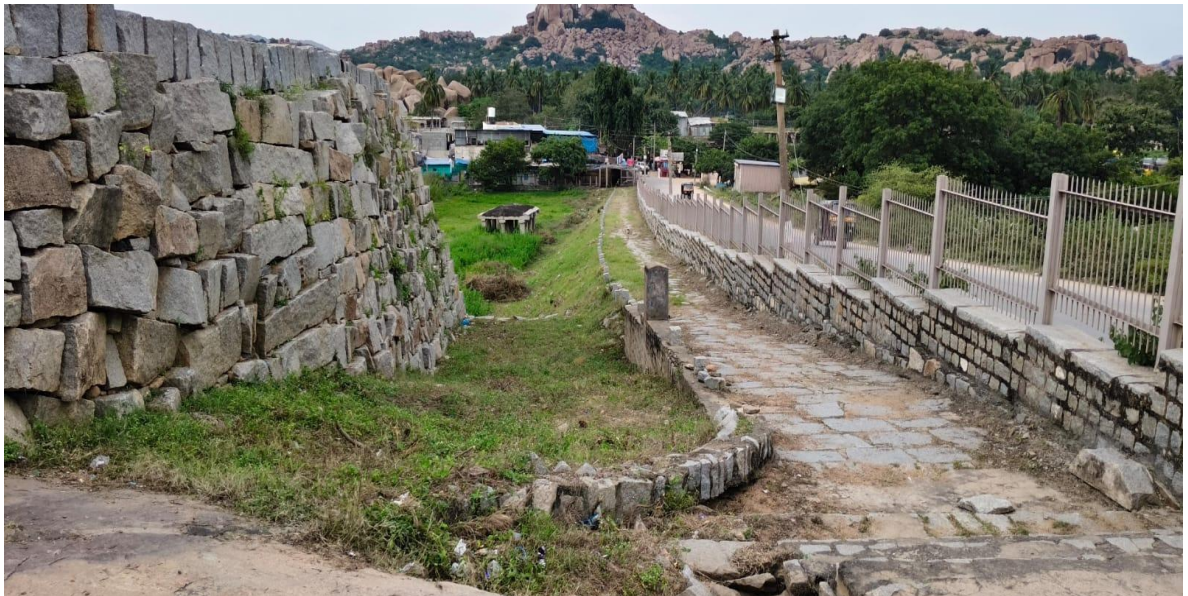
Before cleaning the vegetation at the Kadalekalu Ganesha Temple at Hampi



After cleaning the vegetation at the Kadalekalu Ganesha Temple at Hampi



Before cleaning the vegetation at the Kadalekalu Ganesha Temple at Hampi



After cleaning the vegetation at the Kadalekalu Ganesha Temple at Hampi

Sasivekula Ganesa Temple at Krishnapura



Before cleaning the vegetation at the Sasivekalu Ganesha Temple at Krishnapura



During cleaning of the vegetation at the Sasivekalu Ganesha Temple at Krishnapura



After cleaning the vegetation at the Sasivekalu Ganesha Temple at Krishnapura

Sri Krishna Temple at Krishnapura



Before cleaning the vegetation at the Krishna Temple at Krishnapura



After cleaning the vegetation at the Krishna Temple at Krishnapura

Chandikeshwara Temple at Krishnapura



Before cleaning the vegetation at the Chandikeshwara Temple at Krishnapura



After cleaning the vegetation at the Chandikeshwara Temple at Krishnapura



Before cleaning the vegetation at the Chandikeshwara Temple at Krishnapura



After cleaning the vegetation at the Chandikeshwara Temple at Krishnapura



Before cleaning the vegetation at the Chandikeshwara Temple at Krishnapura



After cleaning the vegetation at the Chandikeshwara Temple at Krishnapura

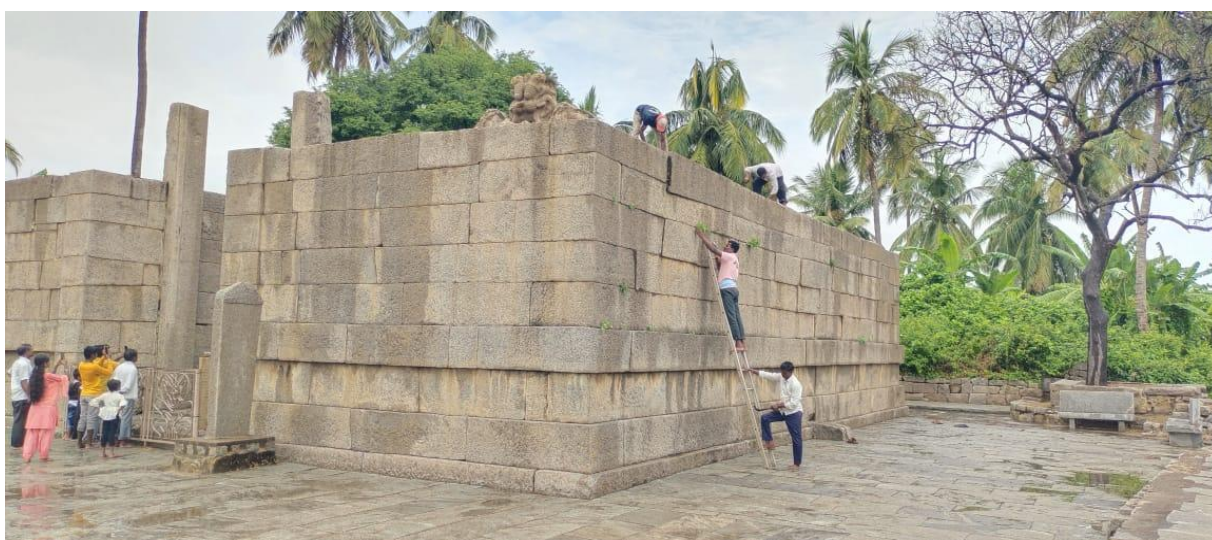
Narasimha Statue and Badavaalinga at Krishnapura



During cleaning of the vegetation at the Narasimha Statue at Krishnapura



During cleaning of the vegetation at the Narasimha Statue at Krishnapura



During cleaning of the vegetation at the Narasimha Statue at Krishnapura

Monolithic Bull



During cleaning of the vegetation at the Monolithic Bull at Hampi



After cleaning the vegetation at the Monolithic Bull at Hampi



During the cleaning of the vegetation at the Virupaksha Temple and Bazar at Hampi



After the cleaning of the vegetation at the Virupaksha Temple and Bazar at Hampi



Before the cleaning of the vegetation at the Virupaksha Temple and Bazar at Hampi



After the cleaning of the vegetation at the Virupaksha Temple and Bazar at Hampi



Before the cleaning of the vegetation at the Virupaksha Temple and Bazar at Hampi



After the cleaning of the vegetation at the Virupaksha Temple and Bazar at Hampi

Double-storey Mantapa at Hampi



During the cleaning of the vegetation at the premises of the double-storied Mantapa at Hampi



After the cleaning of the vegetation at the premises of the double-storied Mantapa at Hampi

Zanana Enclosure at Kamalapura



Before cleaning the vegetation at the premises of the Zanana Encloser at Kamalapura



After cleaning the vegetation at the premises of the Zanana Encloser at Kamalapura



After cleaning the vegetation at the premises of the Zanana Encloser at Kamalapura



Before cleaning the vegetation at the premises of the Zanana Encloser at Kamalapura



After cleaning the vegetation at the premises of the Zanana Encloser at Kamalapura



Before cleaning the vegetation at the Elephant Stable and the Guards' house at Kamalapura



After cleaning the vegetation at the Elephant Stable and the Guards' house at Kamalapura



After cleaning the vegetation at the Elephant Stable and the Guards' house at Kamalapura



After cleaning the vegetation on the premises of the Zanana Encloser near the Southeast watch Tower at Kamalapura

Hazararama temple at Kamalapura



Before cleaning the vegetation at Hazararama temple at Kamalapura



After cleaning the vegetation at Hazararama temple at Kamalapura

Royal Encloser Area at Kamalapura



Before cleaning the vegetation in the Royal Enclosure area at Kamalapura

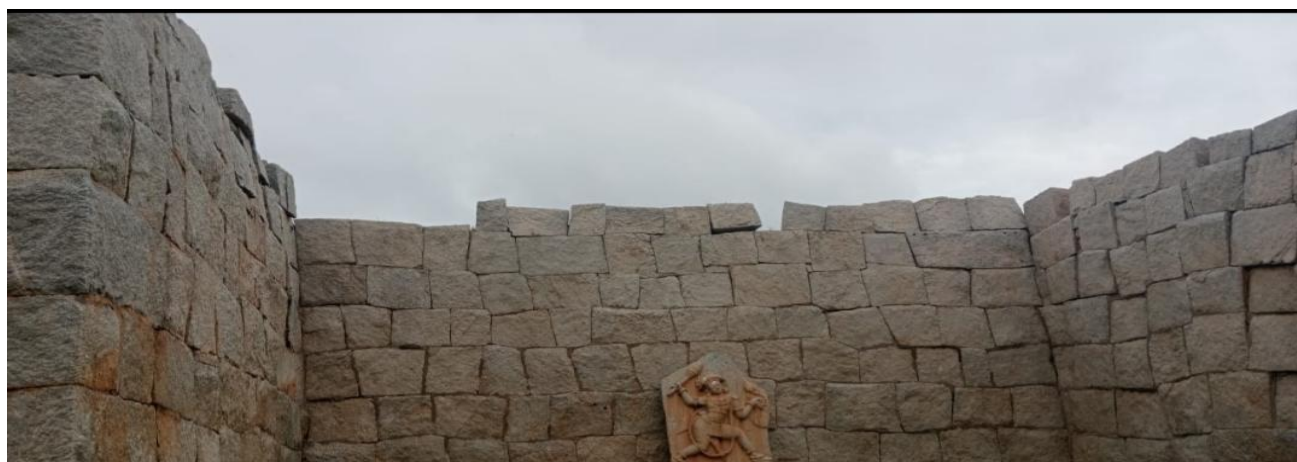


After cleaning the vegetation in the Royal Enclosure area at Kamalapura

Bhima's Gateway at Kamalapura



During cleaning of the vegetation on the walls of the Bhima's gateway at Kamalapura



After cleaning the vegetation on the walls of the Bhima's gateway at Kamalapura



Before cleaning the vegetation on the walls of the Bhima's gateway at Kamalapura



After cleaning the vegetation on the walls of the Bhima's gateway at Kamalapura

Queens Bath at Kamalapura



Before cleaning the vegetation at the Queens Bath at Kamalapura



During cleaning of the vegetation at the Queens Bath at Kamalapura



After cleaning the vegetation at the Queens Bath at Kamalapura

**IN THE NATIONAL GREEN
TRIBUNAL SOUTHERN ZONE AT
CHENNAI**

O.A No. 145 of 2025

Shri. Charan Bhat

.....Petitioner

-VS-

The Archaeological Survey of India
& others

.... Respondents

**COUNTER AFFIDAVIT FILED
BY THE 1ST RESPONDENT**

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DEPUTY SOLICITOR GENERAL
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MADRAS HIGH COURT (PB),
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CONTACT No.98402 60631
COUNSEL FOR 1st RESPONDENT