

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE**

Original Application No. 196/2024 (WZ)

Charan Bhatt

... Applicant

Versus

The Metropolitan Commissioner, MMRDA & Ors.

... Respondents

**REJOINDER TO THE REPLY AFFIDAVIT
FILED BY RESPONDENT NO. 2**



I, Charan Bhatt, the Applicant in O A no. 196/2024 before the Hon'ble National Green Tribunal, Western Zone Bench, Pune, most respectfully submit this Rejoinder to the reply affidavit filed by Respondent No. 2 Vasai Virar City Municipal Corporation (VCCMC), as under:

1. I say that this Original Application has been filed seeking directions for the formulation and implementation of a comprehensive policy for recycling, reusing, and conserving wastewater within the jurisdiction of VCCMC and across the State of Maharashtra, to effectively address the issue of water scarcity and ensure sustainable water management through proper guidelines, policy frameworks, and monitoring mechanisms.

2. I say that the Respondent No. 2 -VVCMC presently operates only one Sewage Treatment Plant (STP) with a treatment capacity of 30 MLD, and the treated effluent is discharged directly into a drain (nala) without any system for reuse or recovery. The said treated water could be recycled and reused for various non-potable purposes, including gardening, groundwater recharge, wetland restoration, construction, industrial operations, and road cleaning. Such reuse would significantly reduce dependence on natural freshwater sources and contribute to environmental protection and resource conservation.

3. I say that as per paragraph 7 of the reply affidavit filed by Respondent No. 2, it has been admitted that the reuse of treated water requires a Tertiary Treatment Plant (TTP). However due to high capital and operational costs, absence of a dedicated pipeline network, and limited industrial demand. Despite this, Respondent No. 2 has not submitted any study, survey, report, or technical assessment to substantiate these claims.

4. I say that this continued inaction in wastewater management demonstrates a serious policy and administrative failure on the part of the State Government of Maharashtra, which has not framed, notified, or enforced any comprehensive policy and



guidelines under the Environment (Protection) Act, 1986 and the Water (Prevention and Control of Pollution) Act, 1974 for the treatment, recycling, recovery, reuse, reclaim, and recovery of wastewater.

5. I say that the formulation of a State-level Wastewater Recycling and Reuse Policy is not merely a matter of governance preference but a statutory obligation of the State Government of Maharashtra under the provisions of the Environment (Protection) Act, 1986 and the Water (Prevention and Control of Pollution) Act, 1974.

5.1 Under Section 3 of the Environment (Protection) Act, 1986, the State and Central Government, through delegated powers, is duty-bound to take all necessary measures for the protection and improvement of the environment, including the prevention and control of water pollution and sustainable management of natural resources.

5.2 Under Section 17 of the Water (Prevention and Control of Pollution) Act, 1974, State and Central Government are obligated to plan comprehensive programmes for the prevention, control, and abatement of water pollution,



and to advise, coordinate, and direct local authorities in the treatment and disposal of sewage and trade effluents.

6. I say that the continued absence of a State-specific regulatory framework for the reuse and recycling of treated wastewater constitutes a clear dereliction of statutory duty on the part of the State Government and has left local bodies struggling to utilize treated water effectively. This failure has resulted in environmental degradation, wastage of treated water, and aggravated water scarcity, which could otherwise be mitigated through a well-planned and enforced reuse policy.

7. I say that a State-level Wastewater Recycling and Reuse Policy is of utmost necessity and urgency, as it would ensure the following benefits:

7.1 Environmental Benefits – Substantial reduction in pollution load on drains, rivers, and creeks; conservation of freshwater sources; enhancement of groundwater recharge; and mitigation of eutrophication and ecological degradation.

7.2 Urban Local Body (ULB) Benefits – Reduced expenditure on freshwater procurement; improved efficiency in STP operations; and generation of additional revenue



through the supply of treated water for construction, horticultural, and industrial use.

7.3 Rural and Agricultural Benefits – Reliable irrigation during droughts; reduction in groundwater extraction; enhancement of soil fertility through nutrient reuse; and improved agricultural productivity.

7.4 Hydrological Benefits – Improved aquifer recharge, reduced stress on river basins, and restoration of the local hydrological balance by integrating treated water into the natural water cycle.

7.5 Financial and Planning Advantages – Facilitation of Public–Private Partnerships (PPP); access to State and Central funding under AMRUT, Atal Bhujal Yojana, and Smart Cities Mission; and cost recovery through user charges for treated water.

7.6 Long-Term Sustainability – Fulfilment of national objectives on water conservation, circular economy, and pollution abatement, as envisaged in the National Water Policy, 2012 and the National Framework on Wastewater Reuse, 2020.



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8. I say that the absence of such a framework has led to continuous wastage of treated water, thereby burdening freshwater ecosystems and exacerbating water scarcity across the State. The failure of the State Government to establish a comprehensive and enforceable wastewater reuse policy under the Environment (Protection) Act, 1986 and the Water (Prevention and Control of Pollution) Act, 1974 amounts to non-compliance with statutory duties and defeats the objectives of pollution prevention and environmental protection envisaged under both enactments.

9. I say that it is therefore essential that the State Government of Maharashtra immediately frame, notify, and implement a comprehensive State Policy and guidelines on Wastewater Recycling and Reuse providing for mandatory reuse targets, incentives for ULBs and rural bodies, and financial mechanisms for establishing Tertiary Treatment Plants (TTPs) and reuse infrastructure.

Place: Nalasopara

Date: 29th Oct 2025



Charan Bhatt
Charan Bhatt
Applicant in Person

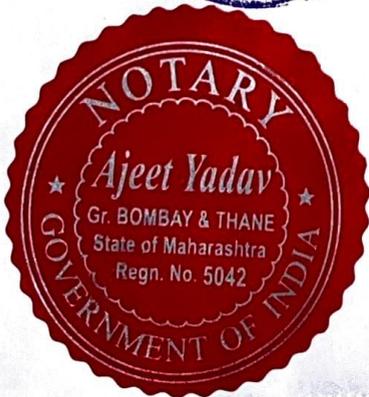
VERIFICATION

I, Charan Bhatt, the Applicant in the above-mentioned Original Application No. 196/2023, do hereby verify that the contents of the above rejoinder, from paragraphs 1 to 9, are true and correct to my personal knowledge and belief, and that nothing material has been concealed therefrom.

Verified at Nalasopara (East), District Palghar, Maharashtra, on this 29 day of Oct, 2025.



Charan Bhatt
Charan Bhatt
Applicant-in-Person



BEFORE ME
M. A. J.
AJEET S. YADAV
ADVOCATE & NOTARY
GOVT. OF INDIA
29-10-25

Regi. Sr. No.
3228/2025

