

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI

EXECUTION APPLICATION NO. 41 OF 2023

IN

ORIGINAL APPLICATION NO. 94 OF 2021

IN THE MATTER OF:-

HAIDER ALI

APPLICANT

VERSUS

UNION OF INDIA &amp; ORS

RESPONDENTS

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Place: New Delhi  
Dated: 22.09.2025

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BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
Execution Application No. 41 /2023  
In  
Original Application No. 94 /2021



IN THE MATTER OF: -

Haider Ali

Applicant

Versus

Union of India & Ors.

Respondent(s)

REPLY AFFIDAVIT ON BEHALF OF THE RESPONDENT NO. 20 TO THE  
COMPLIANCE OF ORDER DATED 19.03.2025 AND 27.07.2025

I, Abhay Hadap, Secretary of the Mumbai Cricket Association, Office:3<sup>rd</sup>  
floor, Cricket Centre, Wankhede Stadium, Churchgate, Mumbai 400 020,  
do hereby solemnly affirm and state as under: -

1. That the aforesaid Execution Application has been filed by the  
applicant for issue of compliance of order of the Tribunal dated 15.04.2021  
passed in OA No. 94/2021 concerning the prohibition of use of ground water  
for maintenance of the play grounds, and utilization of STP treated water  
amongst other was involved.

2. That the Ld. Tribunal by order dated 19.03.2025 directed the  
respondents to file additional reply disclosing monthly and yearly use of  
quantity of water for irrigating the cricket grounds, proportion of STP  
treated water and fresh water. Direction of the Tribunal in the order dated  
19.03.2025 was as under:-

“5. Full details relating to use of STP treated water or fresh water  
by all the respondents have not come on record, therefore, we direct  
respondents/cricket stadiums to file additional reply within four  
weeks disclosing the monthly and yearly use of quantity of water for



irrigating the ground, proportion of STP treated and fresh water used for the same. Report will also disclose bifurcation of proportion of fresh water such as ground water, supply from the municipality/ULB or any other source etc. Along with this report, respondents/cricket stadiums will also disclose if despite the scarcity of fresh water they intend to continue to use fresh water for irrigation of the grounds and the status of RWHS installed in the stadiums.”

3. That in regard to Compliance Report on Water Usage and Environmental Measures at Wankhede Stadium, the Respondent submits the following comprehensive details regarding water consumption, usage sources, and environmental conservation measures undertaken at the Wankhede Stadium premises:

- a) **Water Consumption Quantification:** The stadium currently consumes an average of approximately 250 cubic meters (m<sup>3</sup>) of water per month, which translates to an average daily consumption of about 9 m<sup>3</sup> per day. This data is supported by municipal water meter readings and corresponding utility bills submitted herewith.
- b) **Compliance with Municipal Water Charges:** The Respondent regularly pays all applicable water consumption charges and the statutory sewage charges amounting to 70% of water charges to the Brihanmumbai Municipal Corporation (MCGM), affirming lawful procurement and usage of municipal water as per prescribed rates.
- c) **Exclusive Use of Treated Sewage Water for Ground Maintenance:** All sewage effluent generated on the stadium premises is treated in a fully functional Sewage Treatment Plant (STP) of 150 KLD capacity installed and operational on-site with logs of all activities maintained at all times. The treated water from the STP is exclusively utilised



for irrigation and maintenance of the lawns and grounds, effectively substituting any need for fresh municipal or groundwater for such purposes.

- d) **No Use of Municipal Freshwater or Groundwater for Turf Maintenance:** The stadium does not draw or use any municipal freshwater or groundwater for turf or lawn irrigation, strictly adhering to the prohibition issued by this Hon'ble Tribunal as per the directions dated 15.04.2021.
- e) **Utilisation of Rainwater Harvesting Systems and Ring Wells:** The stadium premises are equipped with two ring wells constructed as rainwater harvesting pits, certified by Envirotech India in 2017, having a combined capacity to accumulate approximately 90,000 litres per day in winter and 70,000 litres per day in summer, which has further been enhanced by the rainwater harvesting system installed in March 2017. The Respondent also proposes to install a third ring well to increase the capacity by an additional 50,000 litres per day. These ring wells serve as crucial infrastructure to recharge and store rainwater harvested on-site, further reducing dependence on external water sources.
- f) **Integrated Water Management and Waste Recycling:** In addition to the STP, the stadium has a fully functional organic waste converter of 2000 kg per day capacity facility installed and operational on-site with logs of all activities maintained at all times. Compost generated through organic waste conversion is utilised for lawn fertilisation and maintenance, underscoring our commitment to environmental sustainability and waste minimisation.



- g) Environmental Commitment and Operational Excellence: The Respondent is an environmentally conscious organisation striving for operational excellence with dedicated expert teams engaged in continuous monitoring and management of water usage, treatment, and conservation. This ensures compliance not only with the Tribunal's orders but also with broader environmental norms and sustainability goals.
- h) Regarding Application for Borewell Development: In connection with the pending application submitted to the Central Ground Water Board (CGWB) seeking permission to develop ringwells at the stadium premises, the Respondent respectfully places on record its intent to withdraw the said application. This decision is compelled by technical and environmental considerations, notably the high salinity levels detected in the groundwater at the proposed site, which is attributable to the stadium's geographical proximity to the sea and consequent seawater intrusion. The withdrawal is made to prevent unsustainable exploitation of saline water resources and to uphold the principles of environmental protection consistent with the directions of this Hon'ble Tribunal.
- i) Thus, the stadium's water demand for ground maintenance is met primarily through treated sewage water from the STP, Harvested rainwater stored in certified ring wells and reclaimed organic compost for soil and lawn health.
- j) No fresh groundwater or municipal freshwater is utilised for turf maintenance in any form.



4. In view of the above and in light of the detailed factual, technical, and legal compliance, the Respondent humbly submits that the existing water use and management practices at Wankhede Stadium are fully compliant with applicable environmental and regulatory norms, adequately balance operational necessities with resource conservation and align with the objectives of the Hon'ble Tribunal regarding sustainable water use and hence deserve to be permitted and regularised.

5. The Respondent further affirms willingness to cooperate fully with the Tribunal, MCGM, and CGWA by facilitating any inspections or submitting additional clarifications or data as required.



VERIFICATION

Verified at Mumbai on this 9<sup>th</sup> day of September, 2025 that the contents of my aforesaid affidavit are true and correct to my knowledge and belief. No part of it is false nor has anything material been concealed therefrom.

VERIFIED ORIGINAL P.O.A. / BOARD RESOLUTION / AUTHORITY LETTER Dt. 20/9/24

NOTARY & REGISTERED  
Sr. No. 25050 dt. 9/9/25



**BEFORE ME**  
*MK*  
**S. K. TAMBAWALLA**  
ADVOCATE, HIGH COURT  
B-23, Taheri Manzil  
Nesbit Road, Mazgaon  
Mumbai - 400 010 9/9/25

EXP. Dt.  
29.09.2029

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