

**BEFORE THE NATIONAL GREEN TRIBUNAL**

EXECUTION APPLICATION NO 41 OF 2023

(EARLIER MA NO 16 OF 2023)

IN

ORIGINAL APPLICATION NO 94 OF 2021

**IN THE MATTER OF**

HAIDER ALI

...APPLICANT

VERSUS

UNION OF INDIA AND OTHERS

...RESPONDENTS

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NEW DELHI

FILED ON 11 AUG 2024

ADITYA VERMA

ENROLMENT NO: D/3454/2009

ADVOCATE FOR RESPONDENT NO 23

B5/52, BASEMENT, SAFDARJUNG

ENCLAVE NEW DELHI – 110029

ENROLMENT NO: D/3454/2009

M: 9650285260, 8285333807

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**REPLY ON BEHALF OF RESPONDENT NO 23 (TAMIL NADU  
CRICKET ASSOCIATION – M A CHIDAMBARAM STADIUM)**

1. The present reply is being filed on behalf of Respondent No 23 (MA Chidambaram Stadium, C/o the Tamil Nadu Cricket Association) in response to the aforesaid Execution Application No 41 of 2023 (originally filed as a Contempt Case being MA No 16 of 2023). It is a matter of record that the answering Respondent was not arrayed as party / alleged contemnor in the Contempt Case as originally filed but has only been impleaded in the present Execution Application by directions of this Hon'ble Tribunal.

2. That, the Order dated 15 April 2021 passed by this Hon'ble Tribunal in OA NO 94 of 2021, which is at the heart of the present proceedings, *inter alia* stated as follows (emphasis supplied):

a) “...*there can be no dispute with the proposition that conservation of water is dire need of the environment. Every effort is required to save potable water for drinking. Cricket or other such grounds may be maintained, as far as possible, from the STP of high quality having no pathogens and offensive components. Also rain water harvesting and storage of such water may be ensured*”.

b) Accordingly, this Hon'ble Tribunal directed Respondent No 1 to hold a joint meeting with Respondent No 2, 6 and 7 and consider the issue of regulating extraction of ground water for maintenance of cricket grounds, in particular:-

“(i) ***prohibiting use of ground water for maintenance of the play grounds at least during the time no match is being actually played and exploring utilization of STP treated water.***

(ii) *ensuring that effective rainwater harvesting and water storage/recharging systems are installed in all playgrounds to save the ground water;*

*(iii) laying down mandatory requirement of engagement of an environmental expert for every cricket stadium for ensuring compliance with the environmental norms*

*(iv) using every sport event with the programme of awareness for environment protection, using a part of profit from commercial activities as a mandatory obligation. The decisions taken in the meeting may be followed up by appropriate statutory orders”*

3. It is submitted that in the context of the present case, the objective of the Order dated 15 April 2021 (read with notification dated 24 September 2020 (S.O. 3289[E]) titled, ‘*Guidelines to Regulate and Control Ground Water Extraction in India*’ (the “**MoJS Guidelines**”), as amended by notification dated 29 March 2023 (S.O. 1509[E], published by Respondent No 1), in essence, is that ground water extracted from the stadium premises ought not to be utilised for maintenance of the play grounds (i.e., the ‘green belt’) at the stadium comprising the pitches, the outfield, and the playing surface / the grass thereon as a whole.

4. That, the answering Respondent submits that not only is it fully compliant with the aforesaid Order / notifications in both letter and spirit, it also in compliance with the observations of this Hon'ble Tribunal as regards installation of a Sewage Treatment Plant ("STP") as well as Rainwater Harvesting ("RWH") facilities. It is evident from Respondent No 1's action taken / status report dated 4 August 2023 as well as the CGWA's letter dated 2 August 2023 (at Pg 178, Annexure XVII of Respondent No 1's reply dated 4 August 2023) that the MA Chidambaram Stadium, Chennai is '*partially compliant*' as regards '*RWH and STP / treated water*' (as also reflected in the table at Para 4 of this Hon'ble Tribunal's Order dated 13 September 2023). Thus, without prejudice to the submissions above, the answering Respondent is in compliance with the stipulations as regards STP and RWH. By way of abundant caution, the details / specifications of the STP and RWH installed by the answering Respondent are mentioned below:

- a) SEWAGE TREATMENT PLANT (STP): In compliance with the directions of this Hon'ble Tribunal and Respondent No 1, the answering Respondent explored the possibility of utilizing STP treated water. As a result, a 'Sequential Batch Reactor' STP has

been installed within the premises of the MA Chidambaram Stadium, at a cost of approximately Rs 1.85 crores, with a recurring monthly operational cost of approximately Rs 2.5 lakhs. Recent photographs of the STP facilities are at **Annexure R-1**. These STP facilities are fed by dedicated sewage pipelines directly from the pumping stations of the Chennai Metropolitan Water Supply and Sewage Board (“**CMWSSB**”). It is submitted that the answering Respondent had already informed CGWA about the installation of the STP on 19 September 2023 (*vide* Annexure XVIII, Pg 374 of Respondent No 1’s action taken / status report dated 1 December 2023). It is submitted that as such the capacity of the STP facility is sufficient to provide for the greenbelt water requirements of the MA Chidambaram Stadium.

- b) RAIN WATER HARVESTING (“RWH”): In compliance with the mandatory requirement for RWH facilities laid down in the 2020 MOJS Guidelines (as amended by the 2023 Amendment Guidelines) as well as Rule 63 read with Annexure XXII of the Tamil Nadu Combined Development and Building Rules, 2019 and with a view to preserve and recharge ground water aquifers within the premises of the stadium, the answering Respondent has

installed a robust RWH system. The answering Respondent informed the CGWA of the details / specifications of the RWH facilities and capacity in its letter dated 12 July 2023. A copy of the letter dated 12 July 2023 from the answering Respondent to CGWA is at **Annexure R-2**.

5. As regards compliance with the requirement that no ground water from the stadium premises be used for watering the greenbelt, it is submitted that the answering Respondent is already compliant, and the noting in Respondent No 1's action taken / status report dated 4 August 2023 of that "*the stadium should obtain NOC from State Government, if rules require so*" has been done mechanically and without application of mind. This error apparent on the face of the record is repeated in Respondent No 1's action taken / status report dated 1 December 2023, where the only 'instance of earlier non-compliance' by the answering Respondent is on account of "*No NOC*". The position that the answering Respondent is compliant with the "no ground water" use criterion is evident from the following admitted facts:

- a) Even the inspection conducted by the Central Ground Water Agency (“CGWA”) / Respondent No 1 does not contain any allegation that ground water from the stadium premises *is being used for the purpose of maintenance of the playground* (vide table at Para 4 of this Hon’ble Tribunal’s Order dated 13 September 2023 read with Annexure XIII, Pg 123-124 of Respondent No 1’s Reply dated 4 August 2023).
- b) In fact, for its requirement of 38 kilolitres per day (“KLD”) for the main match play ground area, the reply dated 12 July 2023 (**Annexure R-2**) from the answering Respondent to the Show Cause Notice dated 27 June 2023 issued by CGWA (at Pg 238, Annexure III of Respondent No 1’s Reply dated 1 December 2023) adequately clarifies that ‘*This requirement is being sourced from CMWSSB and stored in our Sump for utilization*’ (i.e., not ground water extracted from the stadium premises). In other words, this water is sourced from agencies of the CMWSSB and not extracted from the stadium premises. In this regard, the reply dated 12 July 2023 also clarified that the answering Respondent ‘*had established pipeline connections with water meter for supply of water to our premises*’.

- c) This state of affairs is acknowledged by Respondent No 1 in its action taken / status report (Annexure XV, Pg 130 of Respondent No 1's reply dated 4 August 2023), where in the summary of the answering Respondent's reply to the SCN, it is stated that "*water supply for greenbelt requirement (38 KLD) is from CMWSSB, both in event and non-event days*". However, instead of noting that no NOC is required as the water is being sourced from CMWSSB and not the stadium premises, Respondent No 1 has erroneously stated that "*the stadium should obtain NOC from State Government, if rules require so*".
- d) The only reason why the answering Respondent has been purportedly placed in the '*partially compliant*' category is on account of the CGWA noting that '*the Inspection team reported 4 borewells*' (Pg 130, Annexure XV of Respondent No 1's reply dated 4 August 2023). This noting ignores the categorical statement of the answering Respondent in its reply dated 12 July 2023 that it is '*not utilizing the borewell*' for regular usage (i.e., for maintenance of green belt / playground). This error is also evident at Serial No 11 of the table at Para 5(ii) of Respondent No 1's action taken / status report dated 1 December 2023, where the only '*instance of earlier non-compliance*' by the answering

Respondent is on account of “*No NOC*”. At the risk of repetition, there is no finding by any inspection team that such borewells are being used / can be used for maintenance of the playground of the answering Respondent (and consequently no NOC is required in the present case).

- e) For the sake of completeness, with respect to the aforesaid borewells, it is a scientifically undisputed fact that due to its proximity to the sea, the deep aquifers beneath the premises of the stadium (accessible through such borewells) and the ground water contained therein is unfit for use to maintain the play grounds on account of its excessive salinity. As a result, there is no question of any ground water being extracted from borewells in the stadium premises by the answering Respondent in order to use it for maintenance of the play grounds.
- f) Consequently, in light of the above, even the question of applying for a No Objection Certificate (theoretically, to the State Ground Water Authority) to enable the answering Respondent to abstract / extract / use ground water from the stadium premises for maintenance of the play grounds does not arise.

6. That, on 23 February 2024, a meeting was held between the representatives of the answering Respondent and CGWA regarding the consumption of water by Respondent No 23 as well as possible steps to ensure the sustainability of such use / consumption. Subsequently, in response to the points discussed in the aforesaid meeting, the answering Respondent sent a letter dated 8 March 2024 to CGWA, once again reiterating that ground water is not being extracted from within the stadium premises and fresh water is being sourced from the CMWSSB. A copy of the letter dated 8 March 2024 from the answering Respondent to the CGWA is at **Annexure R-3**.
  
7. That, contrary to the exaggerated averment at Para 12 of the Execution Application that '*at-least one lakh litre(s)*' of water is required for '*preparing the cricket stadium pitch for a single cricket match*', the actual requirement is 38 KLD for the main match playground. If the practice area and net facilities are included, the requirement is approximately 60 KLD.

8. That, in addition to installing an STP and RWH facilities, the answering Respondent has also explored alternate sources of drinking water. In this regard, the answering Respondent has also installed an 'Atmospheric Water Harvesting System', at a total cost of approximately Rs 30 lakhs, which converts atmospheric moisture (water vapour) into drinking water and is capable of producing up to 500 liters of water per day. Photographs of the said Atmospheric Water Harvesting System are at **Annexure R-4**. On 19 September 2023, the answering Respondent informed the CGWA that the aforesaid system would be commissioned in the 1<sup>st</sup> week of October 2023 (vide. Annexure XVIII, Pg 374 of Respondent No 1's action taken / status report dated 1 December 2023). It is submitted that Respondent No 23 has also commissioned an expansion of the aforesaid Atmospheric Water Harvesting System up to a capacity of 1500 liters per day, in order to meet the requirement of drinking water, which is expected to be complete by November 2024.
9. That, lastly, the answering Respondent has engaged the services of the following persons / experts / organisations as environmental consultants:

- (a) Dr Sekhar Raghavan (RWH consultant), a PhD in Physics from Madras university, who has previously been a member of a monitoring committee appointed by this Hon'ble Tribunal in OA No 166 of 2020, member of a committee for promoting use of RWH constituted by the Government of Tamil Nadu in 2001, and an RWH consultant to the Government of Delhi in 2015, and is the director of Rain Centre, an organisation which aims to familiarise the general public with RWH.
- (b) M/s Enpro Water Systems Pvt Ltd (STP consultant), represented by its director, Mr Raja K, an M Tech in Environmental Engineering from BITS, Pilani who has previously worked with Infosys for over 10 years as a water management consultant and also has a total of over 20 years of experience working in the field of waste water treatment, along with involvement in planning, designing and executing more than 25 STP projects across various locations in India.
- (c) M/s Red Sea Eco Solutions & Instruments Pvt Ltd (environment consultant), an organization accredited by the CGWA as Ground water professionals who are authorized to prepare Impact Assessment Reports, and also accredited as an Environmental Impact Assessment (EIA) Consultant Organization by the

National Accreditation Board for Education and Training, a statutory / constituent board of the Quality Council of India.

Therefore, in light of the above, it is submitted that the answering Respondent is an environmentally conscious organization which has proactively taken steps for protection of the environment, including preservation of ground water.

10. That, in light of the aforementioned facts and circumstances it is humbly submitted that the Execution Application against the answering Respondent may be dismissed / disposed of without any further direction, as the answering Respondent is compliant with the Order dated 15 April 2021 in all aspects. Given the nature of the present Execution Application, a para-wise reply from the answering Respondent is not required, however the answer Respondent craves leave to file a detailed / para-wise reply if directed by this Hon'ble Tribunal.

NEW DELHI  
FILED ON 11 AUGUST 2024

  
ADITYA VERMA  
ENROLMENT NO: D/3454/2009  
ADVOCATE FOR RESPONDENT NO 23  
B5/52, BASEMENT, SAFDARJUNG  
ENCLAVE NEW DELHI – 110029  
ENROLMENT NO: D/3454/2009  
M: 9650285260, 8285333807  
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**AFFIDAVIT**

I, K Shivakumar aged about 67 years, son of Mr K Krishnamurthy, having my office at No 5, Victoria Hostel Road, Chepauk, Chennai, Tamil Nadu – 600 005, do hereby solemnly affirm as follows:

1. That I am the Joint Secretary of Respondent No 23 herein (i.e., M A Chidambaram Stadium, C/o the Tamil Nadu Cricket Association), and I am conversant with the facts of the case based on the records maintained. Hence, I am competent to swear this affidavit.
2. That the accompanying Reply has been drafted as per my instructions. Its contents have been explained to me and I have understood the same. The contents of the Reply are true and correct to my knowledge based on the records of the case, and nothing material has been concealed therefrom. The annexures accompanying the Reply are true copies / true typed copies of their respective originals.

For THE TAMIL NADU CRICKET ASSOCIATION

  
 Hon. Joint Secretary

DEPONENT



  
**N. SRINIVASA RAGHAVAN**  
 ADVOCATE / NOTARY  
 No. 47/24, T.P. KOIL STREET,  
 TRIPPLICANE, CHENNAI - 600 005.  
 N.P. G.O. 28/2021  
 Enrollment No.: 520/1977  
 Mobile : 9444033039  
 Email: srinivasa.raghavan1977@gmail.com

**VERIFICATION**

Verified at Chennai on this the <sup>27</sup>25<sup>th</sup> day of July 2024, that the contents of the above affidavit are true and correct to my knowledge based on the records of the case and the information received. Nothing material has been concealed therefrom.

For THE TAMIL NADU CRICKET ASSOCIATION

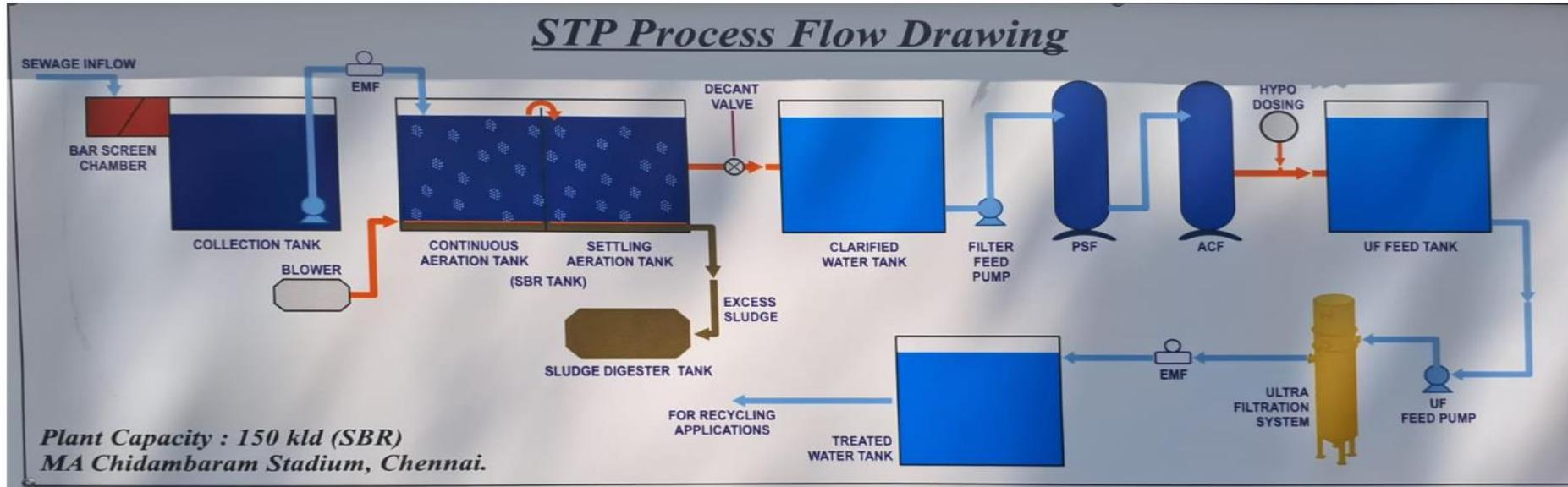
  
Hon. Joint Secretary

**DEPONENT**



  
**N. SRINIVASA RAGHAVAN**  
ADVOCATE / NOTARY  
No 47/24, T.P. KOIL STREET,  
TRIPPLICANE, CHENNAI - 600 005.  
N.P. G.O. 28/2021  
Enrollment No.: 520/1977  
Mobile: 9444033039  
E-mail: srinivasa\_raghavan@rediffmail.com

Photographs of STP

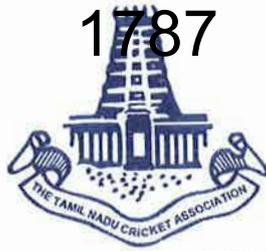


SEWAGE TREATMENT PLANT

True Copy



  
**True Copy**

**Annexure R2****THE TAMIL NADU CRICKET ASSOCIATION**

(AFFILIATED TO THE BOARD OF CONTROL FOR CRICKET IN INDIA)

M.A. CHIDAMBARAM STADIUM, VICTORIA HOSTEL ROAD, CHEPAUK, CHENNAI - 600 005.

Phone : 28544175 / 28514896. E-mail : [office@tnca.in](mailto:office@tnca.in)

*President :*  
**Dr. P Ashok Siganani**

*Hon. Secretary :*  
Shri. R I Palani

*Hon. Treasurer :*  
Shri. T J Srinivasaraj

*Vice-President :*  
Shri. Adam Sait

*Hon. Joint-Secretary :*  
Shri. K Shivakumar

*Hon. Asst-Secretary :*  
Dr. R N Baba

July 12, 2023

From  
The Hon.Jt.Secretary,  
The Tamil Nadu Cricket Association,  
Chepauk, Chennai- 600005  
Tamil Nadu

To  
The Member Secretary,  
Department of Water Resources, River Development & Ganga Rejuvenation  
Central Ground Water Authority,  
Ministry of Jal Sakthi  
18/11, Jam Nagar House,  
Man Singh Road,  
New Delhi – 110011

Sub : Reply for Show-Cause Notice File No: CGWA-21/31/2020-CGWA- 362 Dt. 27.06.2023.

Sir,

We are in receipt of your show-cause notice File No: CGWA-21/31/2020-CGWA- 362 Dt. 27.06.2023 with reference to the inspection of M.A. Chidambaram Stadium, Chennai Tamil Nadu by the officials of CGWB/other concerned departments. It has been mentioned that the stadium has 4 tube wells / borewells in its premises and is using ground water without valid NOC from the concerned state Ground Water Department.

In this context we humbly inform your good self office that Our water requirement classified as Non-Event days and Event Days. We would like to inform you our actual utilization of water during Non-Event days is 6to 9 KLD for domestic purpose and for greenbelt 38 KLD. This water is being sourced from CMWSSB through Tankers and stored in our UG Sump for Utilization. Actual requirement during Event Days for our stadium is 350 - 370 KLD for domestic purpose and for greenbelt 38 KLD. This water is being sourced from CMWSSB through tankers and stored in our UG sump for utilization. Now we had established pipeline connections with water meter for supply of water to our premises.

In our premises there are 2 existing open wells through which the water being utilized for domestic purpose average of 6 to 9 KLD and the Water sourced from CMWSSB utilized for greenbelt based on the requirements using sprinkler systems. We had complied with the requirements of Rain Water Harvesting system, established adequate rain water harvesting structures within our premises. The details of rain water harvesting provided below.

True Copy



## THE TAMIL NADU CRICKET ASSOCIATION

(AFFILIATED TO THE BOARD OF CONTROL FOR CRICKET IN INDIA)

M.A. CHIDAMBARAM STADIUM, VICTORIA HOSTEL ROAD, CHEPAUK, CHENNAI - 600 005.

Phone : 28544175 / 28514896. E-mail : [office@tnca.in](mailto:office@tnca.in)

*President :*  
**Dr. P Ashok Sigamani**

*Hon. Secretary :*  
Shri. R I Palani

*Hon. Treasurer :*  
Shri. T J Srinivasaraj

*Vice-President :*  
Shri. Adam Sait

*Hon. Joint-Secretary :*  
Shri. K Shivakumar

*Hon. Asst-Secretary :*  
Dr. R N Baba

### Rain Water Harvesting Structures :

S.No	Description	Quantity (KL)
<b>Rain Water Storage Sump</b>		
1	Volume of sump 81 KL – 3 Nos.	243
2	Volume of sump 12 KL – 1 No	12
3	Volume of sump 129 KL – 1 No	129
4	Volume of sump 210 KL – 2 Nos	420
5	Volume of sump 105 KL – 1 No.	105
	<b>Total</b>	<b>909</b>
<b>Open Well</b>		
1	Volume - Diameter 3.53m x 10m	95
2	Volume – Diameter 5.33m x 10m	220
	<b>Total</b>	<b>315</b>
<b>Percolation pits for Ground water recharge</b>		
1	Volume of percolation Pit 2.8 KL – 22 Nos.	61.60
	<b>Total</b>	<b>61.60</b>

We had obtained environmental clearance for expansion and modernization vide Letter No: SEIAA-TN/F.No. 8923/EC/8(a)/806/2022 Dt. 09.03.2022 and the conditions specified being complied. We are not utilizing the bore wells for our regular usage.

Since we are utilizing the water sources (Open well and CMWSSB) for drinking, domestic uses and greenbelt purposes we request your good self office not to initiate any penal actions. As a environment responsible organization we commit our self to adhere to the conditions as per the requirements periodically.

We request your good self office to guide us on the applicability of NOC by extracting ground water for domestic purpose in our premises.

Thanking you,

Yours truly

  
(K. Shivakumar)  
Hon. Jt. Secretary

12/7/23

  
True Copy



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Annexure R3

**THE TAMIL NADU CRICKET ASSOCIATION**

(AFFILIATED TO THE BOARD OF CONTROL FOR CRICKET IN INDIA)

M.A. CHIDAMBARAM STADIUM, 5, VICTORIA HOSTEL ROAD, CHEPAUK, CHENNAI - 600 005.

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*President*  
**Dr. P Ashok Sigamani**

*Hon. Secretary*  
Shri R I Palani

*Hon. Treasurer*  
Shri T J Srinivasaraj

*Vice President*  
Shri Adam Sait

*Hon. Joint Secretary*  
Shri K Shivakumar

*Hon. Asst. Secretary*  
Dr. R N Baba

08.03.2024

To,  
The Member Secretary,  
Department of Water Resources, River Development & Ganga Rejuvenation  
Central Ground Water Authority,  
Ministry of Jal Sakthi, 18/11, Jam Nagar House,  
Man Singh Road, New Delhi – 110011

***Sub: Reply for the meeting on NGT under the Chairmanship of Member CGWA on 23.02.2024 – Reg..***

Sir,

With reference to the meeting and discussion on NGT ( M.A. Chidambaram Stadium C/o. TNCA) under the Chairmanship of Member CGWA Dt.23.02.2024 in the subject matter for the points discussed.

We humbly inform your goodself office that the reply for the points discussed as mentioned below along with the photo evidences as annexures for your kind perusal. We are not extracting ground water for our Cricket stadium during Event & Non Event Days. We are sourcing water for our requirements from Chennai Metropolitan Supply and Sewerage Board (CMWSSB).

Also we had established dedicated sewage line with CMWSSB for obtaining raw sewage (60 KLD) and the same being treated in STP (150KLD Capacity) and the treated sewage water is utilized for Toilet flushing, Greenbelt & Ground usage.

We had established water conservation measures in our Cricket stadium by providing rain water collection sumps, Open wells and Rain water percolation trenches.

As an environment responsible organization we commit ourself to adhere to the conditions as per the requirements periodically.

We request your good self-office to guide us for further improvements on the water utilization in our premises.

Thanking You,

  
True Copy



Yours truly,

For THE TAMIL NADU CRICKET ASSOCIATION

  
Hon. Secretary

## Reply for Points Discussed :

Points Discussed	Status & Reply																
Status of NOC obtained from CGWA/SGWA	<p>We are not extracting ground water for our Cricket stadium. We are sourcing fresh water from Chennai Metropolitan Water Supply and Sewerage Board. (CMWSSB). Daily Fresh water requirements of 15 KLD met through CMWSSB supplies through water line which is used for domestic requirements. For any additional fresh water requirement it is sourced from CMWSSB.</p> <p>We had also installed Atmospheric Water harvesting system in our cricket stadium with capacity of 500 LPD which is utilized for Drinking purposes.</p> <p>We had enclosed one-month summary of water quantity along with receipt details for your kind perusal. Hence we had not obtained NOC from CGWA / SGWA for our Cricket stadium. Our Cricket Stadium had obtained Environmental Clearance in the Year 2022 for expansion &amp; modernization.</p> <p>The details of water requirement as follows. <b>During Non-Event Days</b> - Fresh Water consumption is 71.30 KLD. Domestic Use ( 9.95 KLD), Swimming Pool (1.50 KLD ) &amp; Greenbelt Use ( 59.85 KLD)</p> <p><b>During Event Days</b> - Fresh Water consumption is 472 KLD. Domestic Use (374.40 KLD), Floor Washing Use (36.40 KLD), Swimming Pool Top-up (1.50 KLD) &amp; Greenbelt Use (59.83 KLD)</p> <p>As commitment towards water conservation measures we had established dedicated pipeline and the same connected with CMWSSB Sewer line for obtaining raw sewage (60 KLD) from CMWSSB and the same being treated in our STP of 150 KLD capacity and the treated sewage water being utilized for Toilet flushing, Greenbelt and Ground usage.</p> <p>Photo Copy of Fresh Water sourcing from Chennai Metro Water supply &amp; Sewerage Board, enclosed as <b>Annexure - I</b></p>																
Status of EC imposed / received	No EC imposed for our Cricket Stadium.																
Current Status of Installation of Rain Water Harvesting.	<p>Our Cricket Stadium had established adequate Rain water harvesting structures and the details as follows. No. of Rain Water Harvesting Sumps – 6 Nos. ( Total Capacity 850.5KL )</p> <table border="1" data-bbox="715 1720 1348 2004"> <thead> <tr> <th>RWH Sump Location</th> <th>Capacity (KL)</th> </tr> </thead> <tbody> <tr> <td>Near A Stand</td> <td>81.0</td> </tr> <tr> <td>Near C Stand</td> <td>202.50</td> </tr> <tr> <td>Near E Stand</td> <td>81.0</td> </tr> <tr> <td>Near Substation Tower 4</td> <td>202.50</td> </tr> <tr> <td>Near Badminton Court</td> <td>202.50</td> </tr> <tr> <td>Near H Stand</td> <td>81.0</td> </tr> <tr> <td><b>Total</b></td> <td><b>850.50</b></td> </tr> </tbody> </table>	RWH Sump Location	Capacity (KL)	Near A Stand	81.0	Near C Stand	202.50	Near E Stand	81.0	Near Substation Tower 4	202.50	Near Badminton Court	202.50	Near H Stand	81.0	<b>Total</b>	<b>850.50</b>
RWH Sump Location	Capacity (KL)																
Near A Stand	81.0																
Near C Stand	202.50																
Near E Stand	81.0																
Near Substation Tower 4	202.50																
Near Badminton Court	202.50																
Near H Stand	81.0																
<b>Total</b>	<b>850.50</b>																



True Copy

	<p>No. of Open well – 2 Nos utilized for Rain water Harvesting.</p> <p>Rain Water Percolation trenches established along the ground boundaries for ground water recharge.</p> <p>Also we had appointed Consultant Mr.Shekar Raghavan for Rain water harvesting study and improvement.</p> <p>Layout of Rain Water Harvesting system along Photos of Open Wells , Rain Water percolation trenches enclosed as <b>Annexure - II.</b></p>
Installation of STP	<p>Our Cricket Stadium had installed STP – 150 KLD capacity to treat the sewage generation and the treated sewage utilized for Toilet Flushing &amp; Greenbelt within our site. <b>No. of Existing Trees in the greenbelt area: 529 Nos.</b></p> <p>We had enclosed the Photos of STP and Greenbelt as <b>Annexure - III</b></p>
Status of Engagement of environmental expert ensuring compliances with environmental norms.	<p>We had engaged Environmental Expert Prof. Dr. R. Nagendran &amp; we had engaged M/s. RedSea Eco Solutions &amp; Instruments (P) Ltd as consultant for ensuring compliances with environmental norms.</p>
Mass Awareness program / campaign launched by cricket stadium for environment protection	<p>We had initiated various Mass awareness program / campaign in our Cricket stadium.</p> <ol style="list-style-type: none"> <li>1. Display of Digital Display at Entry Points for Ban on Single Use plastics. Waste disposal in Use Me Solid waste Bins.</li> <li>2. Water Conservation Awareness during Match Days through Digital display at various locations in Cricket Stadium.</li> <li>3. Placards on water conservation on the following areas. <ul style="list-style-type: none"> <li>➤ Drinking water</li> <li>➤ Handwash</li> <li>➤ Urinals / Toilets</li> </ul> </li> <li>4. Installed low flow Aerated taps / fixtures to conserve water in our cricket stadium.</li> </ol> <p>Photos of the Mass awareness program / campaign enclosed as <b>Annexure - IV.</b></p>
Compliance status of Stadium where ground water is being regulated by SGWA	<p>Not applicable.</p> <p>Water Sourced from Chennai Metropolitan Water Supply and Sewerage Board. (CMWSSB)</p>



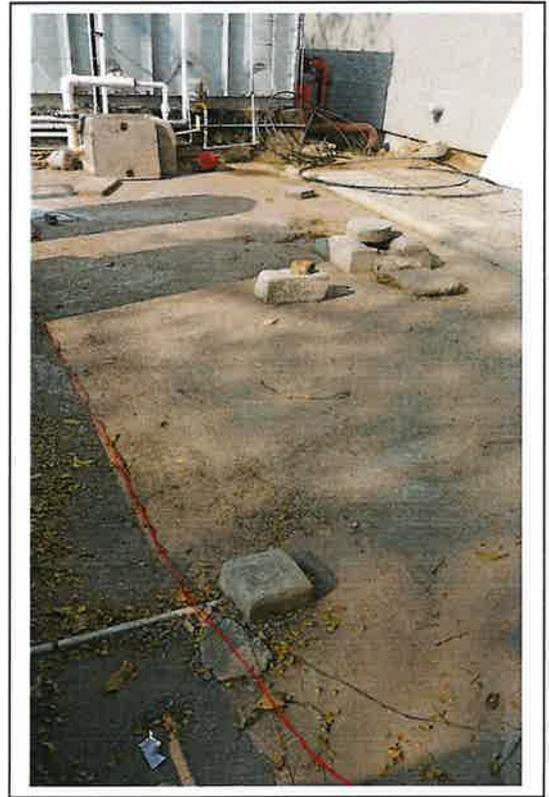
True Copy

Annexure – I

**Photo Copy of Fresh Water sourcing from Chennai Metro Water supply & Sewerage Board**



**INLET VALVE WITH METER**

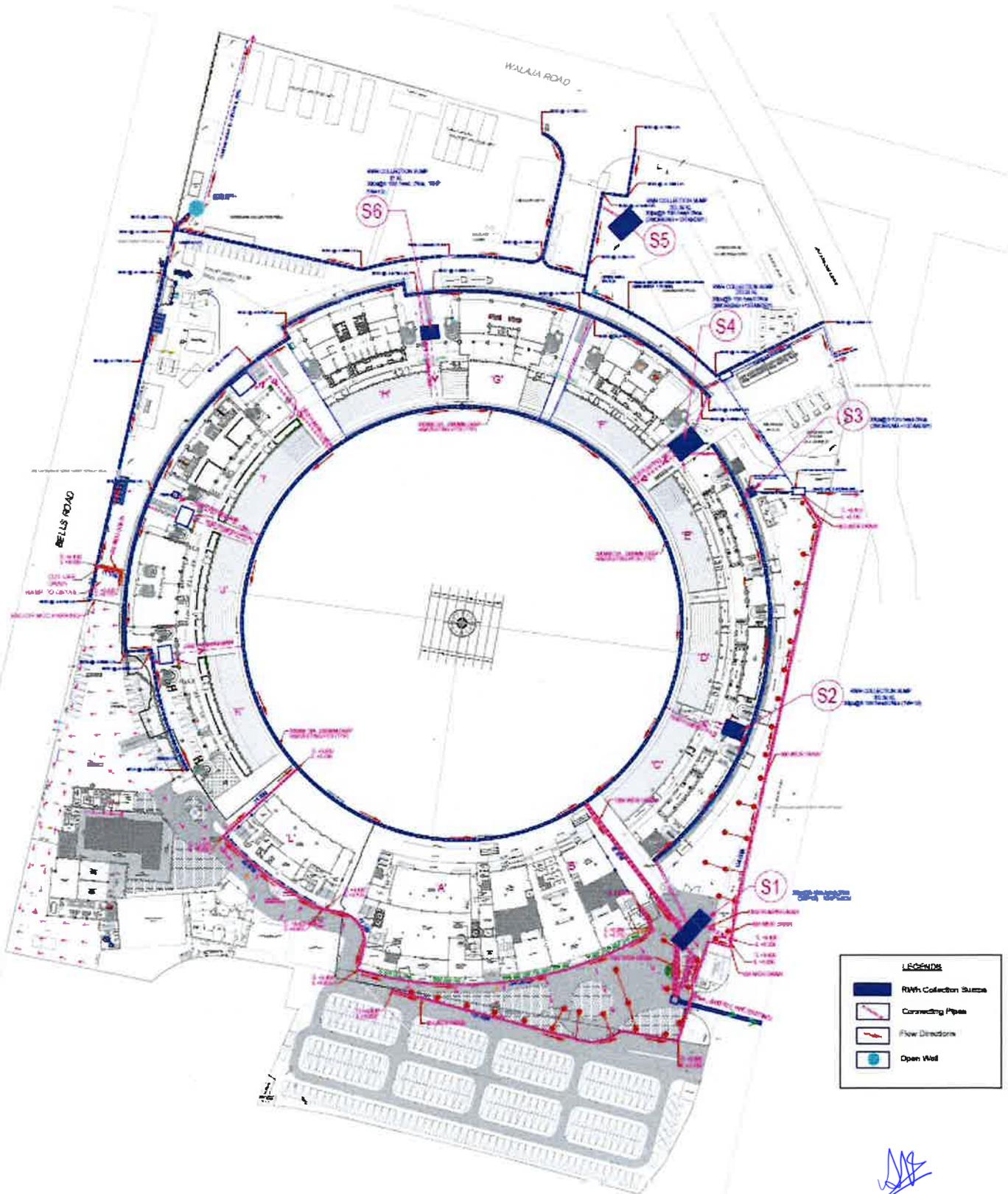


**WATER SUMP**



True Copy

### Annexure – II Layout of Rain Water Harvesting System,



**RAIN WATER HARVESTING SYSTEM LAYOUT**

*[Handwritten Signature]*  
True Copy

**Annexure - II**

**Photos of Rain Water Collection Sumps, Open Well, Rain water Percolation Trenches**



True Copy

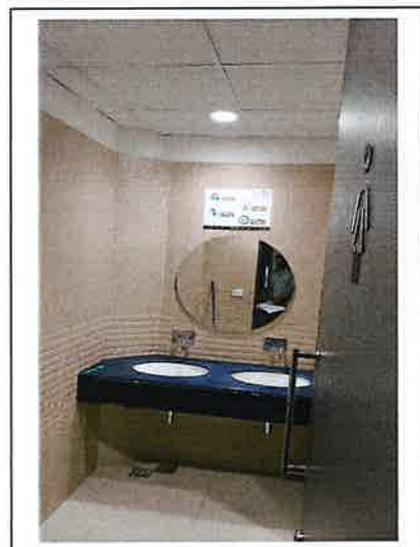
**Annexure – III**  
**Photos of STP and Greenbelt**



 **True Copy**

**Annexure – IV**

**Photos of Mass Awareness Program / Campaign for Environment Protection**



Annexure R4

**Photographs of Atmospheric Water Harvesting System**





1798  
**Proof of service**

**29**

Samar Singh <samar@adiadvocate.com>

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**Haider Ali v Union of India - EA 41 of 2023**

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**Samar Singh** <samar@adiadvocate.com>

9 August 2024 at 17:10

To: sanobar ali Qureshi <sanobaraliqureshi@gmail.com>, egov-mowr@nic.in, secy-mowr@nic.in

Cc: Aditya Verma <email@adiadvocate.com>, Ravi Kumar <ravi@adiadvocate.com>

Dear Sir,

By way of Service, I attach the Reply on behalf of the Tamil Nadu Cricket Association ("TNCA") / Respondent No 23 in the captioned matter before the Hon'ble National Green Tribunal, Principal Bench, New Delhi.

Regards,

Samar Singh, Advocate,  
Chambers of Aditya Verma, AoR  
Enrolment No: D/7201/2022  
B.A., LL.B. (Hons.), NLIU, Bhopal  
Ph: +91 9903423442

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 **Reply by TNCA - 9 Aug 2024.pdf**  
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