

BEFORE THE HON'BLE NATIONAL GREEN  
TRIBUNAL, PRINCIPAL BENCH AT NEW DELHI

EXECUTION APPLICATION NO. 41/2023

IN

ORIGINAL APPLICATION NO. 94/2023

**IN THE MATTER OF:**

HAIDER ALI

...APPLICANT

VERSUS

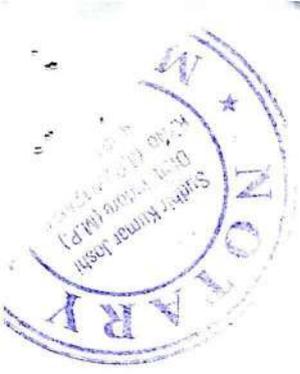
UNION OF INDIA AND ORS.

..RESPONDENTS

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NDOH- 0205.2024

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THROUGH

**SNJ AND PARTNERS**  
**ADVOCATES FOR RESPONDENT NO. 17**  
**L-18, (L.G.F)**  
**Lajpat Nagar-III**  
**New Delhi-110024**

**New Delhi**

**Date 20-04, 2024**

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...RESPONDENTS

**REPLY ON BEHALF OF MADHYA PRADESH CRICKET  
ASSOCIATION – RESPONDENT NO. 17**

**MOST RESPECTFULLY SHOWETH:**

1. The Original Application no. 94/2021 in the present Application was filed by the Applicant against use of ground water for maintenance of Cricket play grounds without availing of alternative of using STP treated water and installing rainwater harvesting systems for storing and recharge of ground water, leading to depriving people of potable drinking water, wherein vide order dated 15.04.2021, this Hon'ble Court has issued following directions:

a) "Accordingly, we direct the Secretary, Ministry of Jal Shakti to hold a joint meeting within one month with the nominees of the Ministry of Youth Affairs and Sports (not below the rank of Joint Secretary), representative of BCCI and CPCB to consider the issue of regulating extraction of ground water for maintenance of Cricket play grounds. If necessary, any other expert may also be coopted. The issues for consideration may inter alia include –

- 
- b) prohibiting use of ground water for maintenance of the play grounds atleast during the time no match is being actually played and exploring utilization of STP treated water;
- c) ensuring that effective rain water harvesting and water storage/recharging systems are installed in all playgrounds to save the ground water;
- d) laying down mandatory requirement of engagement of an environmental expert for every cricket stadium for ensuring compliance with the environmental norms,
- e) using every sport event with the programme of awareness for environment protection, using a part of profit from commercial activities as a mandatory obligation.
- f) The decisions taken in the meeting may be followed up by appropriate statutory orders.”

2. That subsequently, a show cause notice dated 27.06.2023 was issued by Central Ground Water Authority alleging that during the inspection of the Holkar Stadium it was found to have 5 tubewells/borewells in the premises which was allegedly using groundwater without any valid NOC from Central Ground Water Authority. That the Show Cause Notice sought explanation of the reasons as to why No Objection Certificate for ground water extraction was not sought from the concerned department, i.e. CGWA/SGWA and why penalty/Environmental Compensation should not be imposed for illegal withdrawal of ground water on Holkar Cricket Stadium, Indore, Madhya Pradesh. The copy of Show Cause Notice dated 27.06.2023 is annexed as **Annexure A-1**.



That the Answering Respondent issued a Reply Notice dated 10.07.2023 whereby it was informed to the CWGA, as inter alia:

- a) *The inspection of the Holkar Stadium was conducted by a team of officials deputed by the authority on 7<sup>th</sup> June, 2023.*
- b) *That it was informed, explained and demonstrated to the team about the following efforts for rain water harvesting;*
  - a. *Since the year 2006, the association has developed the rain water recharge/harvesting system for the stadium. The system was explained and demonstrated to the team. There are 12 wells/chambers inside the ground (i.e., beneath the playfield with a diameter of 20 feet and depth of 20 feet). A water trench/channel is constructed all along the periphery of the ground. The trenches have de-siltation areas. The ground has a gradient from the center point towards the peripheral trench. The rainwater from ground surface, rooftop, stands and major portion of the exterior area is channelized through surface, pipes and trenches to these wells. The water through these wells is further passed deep down into the strata through adequate tube wells (in each well). The layout of stadium ensures that very less rainwater is wasted through storm-water drain, which again have been kept separate from the sewer lines attempting to avoid rainwater runoff through sewer lines resulting in wastage of water. And as a matter of fact, the*



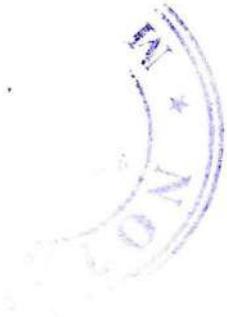
*association has completed the construction of this system before the stadium was inaugurated for the first match in 2006.*

- b. The association periodically maintains the recharge/harvesting system for appropriate efficiency.*
  - c. The excess water from the RO system is being reused and not wasted in the sewer lines*
  - d. During matches of high footfall, the association purchases potable water from external sources whereas the water required for other necessities is managed internally*
  - e. A third party data was provided with respect to potential volume of water which was harvested based on the local rainfall in 2022. The volume of water restored was approximately 3.00 Crore Liters in 2022. Further the stadium is located in the heart of the city, being an open plot, as against a congested construction space, the ground provides excellent opportunity Rain Water Harvesting. And as a matter of fact, the Rain Water Harvesting System has helped to stop the depletion of water in the locality and even in the nearby dwellings are benefitted with it.*
- c) It was also informed to the inspection team that the stadium is not being used for international matches or IPL matches very frequently like the other stadiums. Since the inauguration of the stadium in 2006, only 28 days of cricket matches has been organized in 18 years (Test match: 10 days, ODI match: 6 days, T20 match: 3*



days, IPL: 9 days). Thus, effectively about 1 ½ match day is organized every year. Further the capacity of the stadium is approximately 27,000 spectators and the actual attendance varies from match to match depending on the teams, match type, period when the match is being played, recent history of the teams and other such factors.

- d) *The use of stadium is very restricted and it is not been given for commercial use like non-competitive matches, shooting of film etc.*
- e) *The Stadium is developed on a small piece of land admeasuring approx. 8 ¾ acres. Apart from ground and stadium buildings, there is no vast land where plantation exists. Further there is no other facilities like club house or other sports facilities. Therefore, the water requirement for activities is bare minimum.*
- f) *That the inspection team was also informed about the inefficacy of the Sewage Treatment Plant in the stadium. As there is a lack of facility which can continuously generate the input for the STP except on the match days when the footfall is high. This situation was duly assessed and thereafter rainwater harvesting system was chosen in the direction of being an environmentally friendly action.*
- g) *That with respect to the findings of having tube wells for water sourcing without having a NOC for ground water extraction was admitted. It was informed that 4 out of 5 tube wells are used on a cyclical basis, whereas one tubewell was not used. That further until the visit by the inspection team, the association was under the*



*bonafide opinion that the water requirement for ground maintenance is akin to an agricultural activity and hence it does not require any NOC. Also, majority of water used for maintenance of ground is going into the soil strata and for any cricket ground, it is not required for the ground to be water regularly as excessive watering in fact damages the grass quality as well as it is not possible to play on a ground with high moisture or water content.*

The copy of Reply Notice dated 10.07.2023 is annexed as **Annexure A-2**.

4. That subsequently, the Applicant had filed MA 16/2023, which was later renumbered to instant EA 41/2023, in pursuance of which, a meeting dated 17.07.2023 was conducted under the chairmanship of Secretary, DoWR, RD and GR, Ministry of Jal Shakti, wherein among other concerned authorities, Shri Rohit D Pandit, CAO Madhya Pradesh Cricket Association also attended the aforesaid meeting with respect to Holkar Stadium, Indore.
5. That in the aforesaid meeting dated 17.07.2023, following directions were issued by Secretary, DoWR, with respect to State Cricket Associations, and in particular, the Answering Cricket Association:

*“1. All cricket associations/owner/management of the stadiums, who have not installed Rain Water Harvesting System (RWH) so far, must install RWH within three months and initiate concrete steps to implement the direction of NGT so as to become less dependent on fresh*



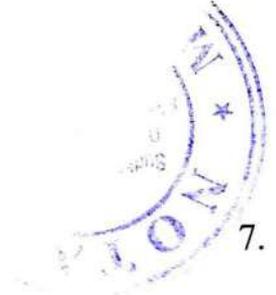
*water. They can engage consultants for feasibility study and seek guidance from CGWB in this regard.*

*2. All stadium authorities may engage consultants to ensure use of treated water. The concerned Stadium authorities may approach local authorities/ Municipal Corporations and explore the possibilities for supply of treated water for maintenance of cricket grounds. Feasibility of installing Sewage Treatment Plant (STP) may be studied by engaging consultants. Concerned Cricket Association shall provide the timeline for installation of Treated Water Facility/STP.*

*3. Stadium authorities may approach ground water authorities regulating and controlling ground water in their respective States for obtaining No Objection Certificate (NOC) for ground water abstraction. In case of non-compliance, necessary action/penal action as deemed appropriate as per extant rules/guidelines shall be taken by the concerned authorities. CGWA/SGWA shall provide support to all cricket associations and owner of the stadiums for obtaining No Objection Certificate for extraction of ground water."*

6. In pursuance of the aforesaid directions, it was informed by the Answering Respondent in the said meeting itself that the Holkar Stadium was amongst the first Associations to implement the directions of Hon'ble NGT as the RWH (Rain Water Harvesting) System in the aforesaid Holkar Stadium, Indore was already in place since the time of its inception in 2006 and assured that the association would explore the feasibility of Sewage Treatment Plant/ use of Treated Water. It was also informed that since the frequency of matches /big events in the stadium is very low, the need to use groundwater is also very minimal. It was also assured by the Answering Respondent that the

association will take steps to obtain NOC from CGWA for ground water abstraction.



7. That in furtherance of the assurances given, the Answering Respondent has started the process of obtaining NOC from the CGWA and application for NOC has been filed on 20.02.2024. Further the Answering Respondent has already paid on 14.02.2024 a sum of Rs.16,04,795/- (Rupees Sixteen Lakhs Four Thousand Seven Hundred and Ninety Four only) towards environmental compensation to Central Ground Water Board. A copy of Proof of Payment and Challan Slip dated 14.02.2024 is annexed as **Annexure A-3(Colly)**.

8. That earlier Application for the NOC was not feasible and was not possible to be made as there was no category for stadiums, cricket grounds and other sports grounds. It is humbly submitted that after the amendment notification dated 29.03.2023 was published by Ministry of Jal Shakti, and clause (vi) was added in paragraph 4.3 and only subsequent to the amendment it has become possible for the answering Respondent to make an application for the NOC. Therefore, the penalty imposed retrospectively for non-compliance of NOC conditions, the basis of computation of which is unknown, is harsh and arbitrary. Without prejudice to the aforesaid, the answering Respondent made the payment of penalty.



9. That since this Hon'ble Tribunal, vide order dated 07.12.2023 had directed to implead Madhya Pradesh Cricket Association as Respondent in the instant Execution Application, it is hereby submitted before this Hon'ble Tribunal that the directions issued by the CGWA had been duly complied by the Answering Respondent.

10. The answering Respondent is conscious of the environment and has even undertaken various campaigns for raising awareness about the environment and the need for adopting eco-friendly measures.

11. That in reference of the advisory direction by CGWA to ascertain the possibility and feasibility of STP installation in the Stadium, it is hereby submitted that the Answering Respondent has appointed consultants and the feasibility of the STP would be ascertained accordingly and the status would be updated.

12. That further multiple efforts have been taken by the Answering Respondent since inception of the stadium to mitigate the impact on environment which are elaborated hereunder:

- a) The Answering Respondent has installed the Rainwater harvesting system at Holkar Stadium since 2006. The estimated amount of rainwater routed to the ground as per the rainfall at Indore in 2022 is 3Crore Liters approx – which is much more than the water required for the maintenance of the ground.

- 
- b) The Answering Respondent has installed rooftop solar energy plant at the Holkar stadium which is estimated to save annually 277 tons of carbon emission approximately.
- c) The Answering Respondent uses organic manure to prevent environmental hazards and also reuses excess water from the RO system and is not wasted in the sewer.
- d) For the matches organized at the Holkar stadium, the Answering Respondent has been adopting steps to make the event 'zero waste'. Such efforts were surveyed and audited by the independent institution like IIM (Indore). Concept like 3R (Reduce – Reuse – Recycle) is actively being implemented to showcase efforts towards environmental sustainability.
- e) The Answering Respondent has taken proactive steps to promote the campaign for water conservation by displaying banners and placards inside the stadium so as to attract the attention of the spectators and spread awareness towards conservation of water.
- f) The Answering Respondent does not use plastic base medium (commonly termed as flex medium) for any branding and instead use only biodegradable medium for any banners / advertisement which is placed inside the stadium. The biodegradable medium used for advertisement / branding is thereafter given to local NGO for using such

material to manufacture bags and such other utilities.

A copy of the report from IIM in relation to the efforts by the Answering Respondent towards 3R concept and the photos of Campaign of Water Conservation is annexed as Annexure A-4(Colly).

  
Respondent No. 17  
Madhya Pradesh Cricket Association

THROUGH

  
SNJ AND PARTNERS  
ADVOCATES FOR RESPONDENT NO. 17

L-18, (L.G.F)

Lajpat Nagar-III  
New Delhi-110024

New Delhi

Date 26-4-, 2024

Sl. No. 621104/24  
Date 15/04/2024

**BEFORE THE HON'BLE NATIONAL GREEN  
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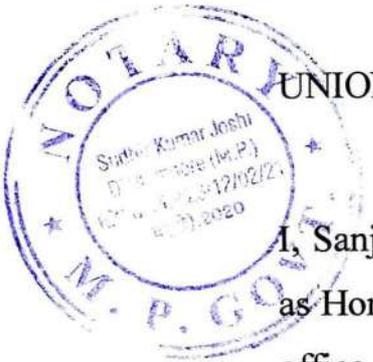
**AFFIDAVIT**

I, Sanjeev Rao, aged about 68 years S/o Narsingh Rao, working as Hon Secretary, at Madhya Pradesh Cricket Association having office at Holkar Stadium Race Course Road, Indore – 452003 (MP), do hereby solemnly affirm and state as under:-

1. That I am the authorized representative of the Madhya Pradesh Cricket Association in the aforesaid case and the accompanying Reply has been drafted under my instructions.
2. That I have gone through and understood the contents of the accompanying Reply, and state that the averments made therein are true and correct to my knowledge and legal submissions made therein are believed to be true and correct on legal advice received.
3. I further state that the contents of the accompanying Reply may be treated as a part of this affidavit, as if the same have been incorporated herein.

  
**DEPONENT**

  
**Sudhir Kumar Joshi**  
NOTARY  
Distt. INDORE (M.P.)



**VERIFICATION**

I, the above named deponent, do hereby verify that the contents of the above affidavit are true and correct, and nothing material has been concealed therefrom nor, any part of it is false.

Verified at Indore on this 15<sup>th</sup> day of April, 2024.



*[Handwritten Signature]*  
**DEPONENT**

**SWORN BEFORE ME**

This Document is Executed by Sandeep Singh Rawat  
& Signed Before me of Pages 2  
on dt. 15/04/2024 I Excepted the  
Contents to be True which reconised by  
Shri. Chandra Kant Lalwani

*[Handwritten Signature]*  
**Sudhir Kumar Joshi**  
NOTARY  
Distt. INDORE (M.P.)

*[Handwritten Signature]*  
**Identified by me**

File No. CGWA-21/31/2020-CGWA - 369  
Government of India  
Ministry of Jal Shakti  
Department of Water Resources, River Development & Ganga Rejuvenation  
CENTRAL GROUND WATER AUTHORITY  
18/11 Jam Nagar House, Man Singh Road, New Delhi - 110011  
cgwa-noc.gov.in

Date: 27.06.2023

SHOW-CAUSE NOTICE

Whereas the Central Government constituted the Central Ground Water Authority (hereafter referred to as the Authority) vide notification of the Government of India in the Ministry of Environment and Forests number S.O. 38 (E), dated the 14<sup>th</sup> January, 1997, followed by notification number S.O. 1124(E) dated 6th November, 2000 and S.O. 1121 (E) dated 13th May, 2010, for the purposes of regulation and control of ground water development and management in the whole of India and to issue necessary regulatory directions.

And whereas the Ministry of Jal Shakti has issued 'Guidelines to control and regulate ground water extraction in India' vide notification number S.O. 3289(E) dated 24th September, 2020, notified by Department of Water Resources, River Development and Ganga Rejuvenation, Ministry of Jal Shakti, which have pan India applicability.

And whereas an Amendment Notification dated 29.03.2023 has been further issued by Ministry of Jal Shakti, published in the Gazette of India, Extraordinary, Part II, section 3, sub-section (ii), vide Notification number S.O. 1509 (E), where clause (vi) has been added to Para 4.3 of the said Guidelines which provide that "**All stadiums, cricket grounds, and other sports grounds/courts, golf courses etc shall construct/install appropriate mechanism for artificial recharge of ground water / rain water harvesting.**"

And whereas SGWA/ Concerned Department is regulating groundwater in some States and MoJS Guidelines provide that "*wherever States/ Uts have come out with their own groundwater abstraction guidelines, which are inconsistent with the CGWA guidelines, the provisions of CGWA guidelines will prevail.*"

And whereas vide Order dated 15.04.2021 (copy enclosed) in Haider Ali vs. Union of India and Ors. (O.A. NO. 94/2021) passed by Hon'ble NGT, **the issue of excessive use of ground water for maintenance of Cricket playgrounds without availing alternatives, such as using STP treated water and installing rainwater harvesting systems for storing and recharge of ground water**, has been raised and the Hon'ble NGT has directed the Secretary, Ministry of Jal Shakti to hold a joint meeting with the nominees of the Ministry of Youth Affairs and Sports (not below the rank of Joint Secretary), representative of BCCI and CPCB to consider the issue of regulating extraction of ground water for maintenance of Cricket play grounds.

And whereas a list of all major stadiums has been provided by BCCI which includes Holkar Stadium, Indore, Madhya Pradesh.

And whereas a Meeting was held on 02.06.2023 under the Chairmanship of Secretary, DoWR. Ministry of Jal Shakti with all the concerned officers / officials wherein it was directed that "*Inspections of listed stadiums may be carried out by CGWA/ SGWA/ CPCB/ SPCB to ensure the compliance of Hon'ble NGT*"

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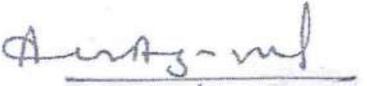
*directives/ CGWA Guidelines/ MoHUA guidelines. Suitable penal action may be initiated in case of violations / non-compliance of guidelines issued by the Government of Indian or State Government as per Groundwater Regulation Guidelines 2020 and the Environment (Protection) Act 1986."*

And whereas, an inspection of Holkar Stadium, Indore, Madhya Pradesh was carried out by the officials of CGWB/ other concerned departments in compliance of the directions of Secretary, DoWR, Ministry of Jal Shakti, and during the inspection, it has been found that the stadium has 5 tubewells / borewells in its premises and is using groundwater without valid NOC from Central Ground Water Authority, which is a necessary requirement as per the MoJS Guidelines.

**Now therefore**, in view of the violation of MoJS Guidelines observed above and in exercise of the powers vested under Section 5 of the Environmental (Protection) Act, 1986 and Gazette Notification, S.O. 3289(E) dated 24/9/2020, the authority hereby directs you to show cause to explain the reason as to why No Objection Certificate for ground water extraction was not sought from the concerned department, i.e. CGWA/SGWA and why suitable penalty / Environmental Compensation should not be imposed for illegal withdrawal of ground water.

You are hereby given an opportunity to submit your response, in any case within 15days of receipt of this notice, failing which appropriate action will be initiated under the provisions of Environmental (Protection) Act, 1986 and Gazette Notification S.O. 3289(E), dated 24/9/2020 and its Amendment dated 29.03.2023, at your own risk, cost and responsibility for illegal withdrawal of groundwater. Please note that failure submit a response will be understood that you have nothing to say in this regard.

To  
Rohit D pandit  
CAO, MPCA  
Madhya Pradesh Cricket Association  
cricket.operations@mpcaonline.com

  
27/6/23

(A.K. Agrawal)  
Member Secretary

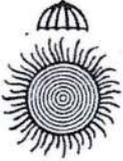
Copy to:

1. The Director (GW), DoWR, RD & GR, Ministry of Jal Shakti, Shram Shakti Bhawan, New Delhi.- for information.

2. The Regional Director, Central Ground Water Board, North Central Region, Block-1, 4th Floor, Paryawas Bhawan, Area Hills, Jail Road, Bhopal, Madhya Pradesh, 462011 - for information.

(A.K. Agrawal)  
Member Secretary

*RS*  
**TRUE COPY**



# MADHYA PRADESH CRICKET ASSOCIATION

Affiliated to BCCI

Registered 'Society' - No. 4751/1976

Holkar Stadium, Race Course Road, Indore-452 003 (M.P.) INDIA

Date : 10.7.2023

BY EMAIL (cgwa@nic.in)

**Shri. A K Agrawal**

Chairman and Member Secretary - Central Ground Water Authority  
Dept. of Water Resources, River Development and Ganga Rejuvenation  
Ministry of Jal Shakti - Govt. of India (18/11 Jam Nagar House, New Delhi 110011)  
cgwa@nic.in

**Subject: Reply to the show-cause notice dated 27.6.2023**

Respected Sir,

1. That, we are in receipt of the show-cause notice dated 27.6.2023 by way of your email. We herewith submit our preliminary response to the show-cause notice to the best of the information and details available to us. We also request you to allow us for any rejoinder / further submission in case required in the present matter.
2. That, the inspection of Holkar Stadium, Indore, was conducted by a team of officials deputed by the honourable authority on 7<sup>th</sup> June, 2023.
3. That, MPCA had extended fullest cooperation to the team, and in presence of the undersigned we discussed on several points to the satisfaction of the team, along with site inspection as deemed appropriate by the visiting officials.
4. That, we had informed, explained, and demonstrated to the team about our following efforts for rain water recharge / harvesting -
  - a. Since the year 2006, we had developed the rain water recharge / harvesting system for our stadium. The system was explained and demonstrated to the team.

There are 12 wells / chambers inside our ground (i.e., beneath the playfield with a diameter of 20 feet and depth of 20 feet). A water trench / channel is constructed all along the periphery of the ground. The trenches have de-siltation areas. The ground has a gradient from the center point towards the peripheral trench. The rainwater from ground surface, rooftop, stands, and major portion of the exterior area is channelized through surface, pipes, and trenches to these wells. The water through these wells is further passed deep down into the strata through adequate tube wells (in each well).

The layout of our stadium ensures that very less rainwater is wasted through storm-water drain, which again we have kept separate from the sewer lines attempting to avoid rainwater runoff through sewer lines resulting in wastage of water.

As a matter of fact, we had completed the construction of this system before the stadium was inaugurated for the first match in 2006.

MPCA | Reply to CGWA | July 2023

*(Signature)*  
10/7/23 → Page 1 of 4

Phone : (0731) 2543602

e-mail : cricket.operations@mpcaonline.com / secretary@mpcaonline.com

**TRUE COPY**



# MADHYA PRADESH CRICKET ASSOCIATION

Affiliated to BCCI

Registered 'Society' - No. 4751/1976

Holkar Stadium, Race Course Road, Indore-452 003 (M.P.) INDIA

- b. We periodically maintain the recharge / harvesting system for appropriate efficiency.
- c. We informed the team in respect to the excess water from our RO system being reused and not wasted in sewer drain.
- d. We informed the team that during matches of high footfall, we purchase the requirement of potable water from external sources whereas the water required for other necessities is managed internally.
- e. We provided them a data from a third-party in respect to the potential volume of water that was harvested based on the local rainfall in 2022. The volume of water recharged is approx. 3.00 Crore liters in 2022.

It may kindly be considered that our stadium is located in the heart of the city. Being an open plot, as against a congested constructed space, our ground provides excellent opportunity for water recharge / harvesting.

As a matter of fact, the rain water recharge / harvesting system at our ground has helped to stop the depletion of water table in this locality and even the nearby dwellings are benefitted with our system.

5. That, we explained to the team about our stadium not being used for international or IPL matches very frequently like some other stadiums of Mumbai, Bangalore, Delhi, Kolkata etc. Since the development of ground in 2006, only 28 days of such cricket has been organized in 18 years at our stadium (Test match : 10 days, ODI match : 6 days, T20 match : 3 days, IPL : 9 days). Thus, effectively about 1 ½ match day is organized at our end every year. This number is much less as compared to other stadiums.
6. That, we request you to kindly note that the capacity of our stadium is approx. 27,000 spectators. The stadium is not a typical building where there is a daily-regular footfall. Even for international matches, the footfall depends on several factors like the teams, match type, period when the match is to be played, recent history of matches, and such other factors. Therefore, even if the capacity of the stadium is approx. 27,000 spectators, the actual attendance varies from match to match.
7. We also submit that as our policy, we do not provide the ground for other commercial use like non-competitive matches, film shooting etc. Hence, the use of stadium is very much restricted.
8. That, we explained to the team about our stadium being developed on a very small plot of land i.e., approx. 8 ¾ acres. Apart from the ground and the stadium buildings, we do not have any vast land / area where plantation exists. We do not have other facilities like clubhouse or other sports facilities. Therefore, our requirement of water for activities is bare minimal.
9. That, we explained to the team about the staff - approx. 40/45 - being deployed at the stadium for routine maintenance.



# MADHYA PRADESH CRICKET ASSOCIATION

Affiliated to BCCI

Registered 'Society' - No. 4751/1976

Holkar Stadium, Race Course Road, Indore-452 003 (M.P.) INDIA

10. That, we explained to the team about the inefficacy of the STP plant in our case. We do not have any facility which can continuously generate the input for STP except on match days when the footfall is high. We had assessed this position and hence the rain-water recharge / harvesting system was our choice in the direction of environment friendly action.
11. That, based on the above, we request you to kindly consider that we are not using ground water for maintenance of cricket ground without installing rainwater recharge / harvesting systems for recharge of ground water level.
12. That, in addition to the above measures, we use organic manure to prevent environmental hazards.
13. That, MPCA has been proactively campaigning and taking steps for 3R system for solid waste management during matches with high footfall. In fact, matches at our stadium are almost zero waste events – which is even appreciated by external agencies like the local body and other NGO working in this area.

We were suggested by the visiting officials to initiate campaign about water conservation efforts also. We had readily agreed to this proposal in the best interests of the society.

14. That, we are also installing a rooftop solar energy plant - another effort of MPCA towards environment friendliness.
15. That, the city of Indore experiences decent rainfall during the period between June to September. Our place is not considered as drought prone area. Thereafter, this region experiences considerable cold between October to March during which we do not require to irrigate the ground much. For the remaining two months though the irrigation requirement is high, we do not conduct matches regularly due to the heat factor. Therefore, the requirement to irrigate the grass is relatively very less in our case.

That, it may kindly be considered that the frequency of irrigation is also dependent on soil type. The clay soil at our ground holds more water than sandy soils and therefore require less frequent irrigation. In fact, we are required to focus more on controlling the irrigation to avoid waterlogged conditions which are not good for the grass, as also game cannot take place when the soil is full of moisture.

16. That, our ground, located within the heart of our city, is in effect an asset considering the following predominant advantage of green grass-
- Grass absorbs atmospheric pollutants, acts as a dust filter, captures greenhouse gases, generates oxygen
  - Grass provides evaporative cooling that translates into energy savings,
  - Grass helps to remediate contaminated soils,



# MADHYA PRADESH CRICKET ASSOCIATION

Affiliated to BCCI

Registered 'Society' - No. 4751/1976

Holkar Stadium, Race Course Road, Indore-452 003 (M.P.) INDIA

A report by the Indian Council of Agriculture Research mentions that a 2,500 sqft of lawn produces enough oxygen for a family of four to breathe for one year. So, a grass cover of approx. 1,50,000 sqft at our ground is estimated to generate oxygen for 60 persons for a year.

17. That, in respect to your finding about having tube wells for water sourcing but not having a NOC for ground water extraction is admitted. It may kindly be considered that though there are 5 tube wells, we use only 4 out of them on a cyclical basis, whereas 1 tube well is not used.

However, till the time your team visited our ground, we were of the bonafide opinion that the water requirement for ground maintenance is akin to an agriculture activity and hence does not require NOC.

According to our understanding, major % of the water used for ground maintenance is going into the soil strata. Further, for any cricket ground, it is not required that the ground be watered regularly. Excessive water in fact damages the grass quality as also it is not possible to play on a ground with high moisture or water content.

We were also of the considerate opinion that we are not using the water commercially.

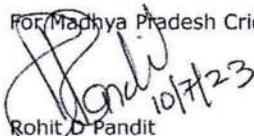
After discussion with your team, our attention was invited towards certain other points that may necessitate us to ascertain certain other facets and the norms regarding the NOC for extracting ground water. We had readily agreed to this guidance.

18. That, since we are not consuming water on a daily basis either for domestic use or for ground maintenance, we are in fact not sure whether the NOC will be applicable in our case. Our ground water abstraction is not regular and also the volume varies from day-today as per the requirement of the grass which is akin to agriculture use. Further, the matches are not played during summer whereas during monsoon season we do not require water at all. Moreover, we have installed the rain water recharge / harvest system throughout the ground since the year 2006.
19. That, we therefore request you to drop the charges as mentioned in your show cause notice.
20. That, we heartily appreciate the initiative taken by the Ministry in this area. As a law-abiding Institution we shall take all necessary steps to comply with the norms.

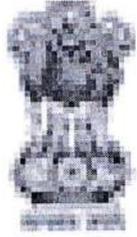
We hereby undertake to comply with your decisive advice, after considering the explanations offered in the foregoing paragraphs, within a reasonable timeframe.

Thanking you,

For Madhya Pradesh Cricket Association

  
Rohit D. Pandit

Chief Administrative Officer



# bharatkosh.gov.in

Government of India Receipt Portal

## RECEIPT

Transaction Ref.No. 1402240022183

Dated: Feb 14 2024 11:02PM

Received from M/S. MADHYA PRADESH CRICKET ASSOCIATION with  
Transaction Ref.No. 1402240022183

Dated Feb 14 2024 11:02PM the sum of INR 1604795 (Sixteen Lakhs Four  
Thousand Seven Hundred Ninety-Five Only) through Internet based Online  
payment in the account of

Environmental Compensation, , M P CRICKET ASSOCIATION EC CHRG REF 1-  
8/NCR/TS/NGT/2023/895.

**Disclaimer:- This is a system generated electronic receipt, hence no physical signature  
is required for the purpose of authentication**

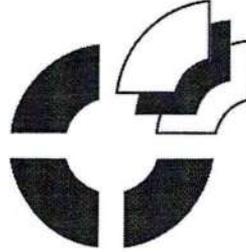
*Printed On: 18-02-2024 01:55:42*

**Courtesy :- Controller General of Accounts**

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NTRP (Toll free No.1800 118 111)		Challan					
Challan No. :	20241714022400022200	Challan Identification No. (CIN) by Bank:	000004202402140023435				
Transaction Ref No.	1402240022183						
Challan of money paid into <u>RESERVE BANK OF INDIA</u> (bank), <u>PAD, MUMBAI</u> (branch).							
To be filled in by the remitter			To be filled in by the Departmental Officer or at his instance				
Name (& or designation) and address of the party (i.e. Tax payer etc.) crediting money	Department/ Office from whose books the demand emanated	Full particulars of the nature of remittance and/or authority (if any)	Head of Account	Amount (INR)	Accounts Officer by whom adjustable	Order to the bank	Remarks
M/S. Madhya Pradesh Cricket Association Holkar Stadium Racecourse Road -	WATER RESOURCES - 002/OFFICER INCHARGE, CENTRAL GROUND WATER BOARD, State Unit, JAMNAGAR HOUSE MANSINGH ROAD NEW DELHI 110011[202417]	Environmental Compensation,	070202800020000	1604795.00	PAO (CGWB), Faridabad [002338]		
Date: 14/02/2024			Total : INR 1,604,795 , (Rupees :Sixteen Lakhs Four Thousand Seven Hundred Ninety-Five) Only				

# Implementing 3R Protocol during T20 Cricket matches at Holkar Stadium



सिद्धिमूलं प्रबन्धनम्  
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May 2018

## Executive Summary

The cleanest city in the country, Indore, saw an opportunity and a challenge in hosting the four T20 IPL matches at the city's Holkar stadium. The challenge lay in extending the city's high level of cleanliness to a large event with a gathering of over 30,000 people. The opportunity lay in the huge communication platform that cricket audiences provided. Building upon the recent "Indore Declaration" at the 3R summit, which the city had just hosted, the District Collector took the initiative to introduce 3R concepts to all the matches hosted in the city. He brought all the stakeholders to a common platform to execute this highly successful exercise in cleanliness and education on 3R. The stakeholders who made the exercise successful were District Administration, Madhya Pradesh Cricket Association (MPCA) managing the Holkar Stadium, Indore Municipal Corporation (IMC), a team from Basix an NGOs, Madhya Pradesh Pollution Control Board (MPPCB) officials, Indian representatives of United National Environmental Protection (UNEP), the event managers of the Indian Premier League (IPL), and Kings Eleven Punjab (KXIP), who had made Indore their second home. Indian Institute of Management, Indore was asked to document the exercise, so that it can evolve into a model to be adopted by the city for the following years. Ideated by the District Collector, planned by UNEP, MPPCB, KXIP, MPCA, BCCI & IMC, executed by a focused team and documented by IIM, this effort has been appreciated by the media, the teams, team-owners, players and the public at large.

This report documents the preparations done and provides details of the execution of the exercise. This is followed by a detailed analysis of the 3R output, observations, and identification of limitations. To document the learnings and to enable 3R compliant hosting of an event in the future, a standard protocol is proposed. This standard protocol consists of six distinct steps 1) Establishing a theme, 2) Assembling stakeholders, 3) Ideating and Delegating, 4) Coordinating execution, 5) Analysing, and 6) Learning. The reports ends with a discussion of the steps in the standard protocol to enable their future adoption.

The report has been prepared on a pro-bono basis in response to a formal request by Mr. Nishant Warwade, Collector of Indore (refer to Annexure 1).

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### Acknowledgements

This report is only a documentation exercise of the extensive efforts put in by the team on the ground, and without hesitation assigns the credit for the achievement to the team. The report has also gained from inputs from other faculty members, namely Prof. Sneha Thapliyal (IIM, Indore), Prof. Boeing Singh (IIT, Guwahati), and Prof. Rachna Gangwar (TAPMI, Jaipur), whose help I sought from time to time.

This report gained from ideas shared by members with us, and credits them for the same.

Report writing was done by Mr. Vaibhav Dixit and Mr. Indraneel Sahu, both second year students of Indian Institute of Technology, Varanasi and who were doing internship under me in the summer of 2018.

The errors and omissions remain mine.

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## 1. Introduction

Indore was declared the cleanest city of the country in 2017 and it has repeated the feat in the Swacch Sarvekshan rankings of 2018. This is no small accomplishment, considering that cleanliness has not been a traditional strong point. Such achievement recognition also permeates into many ancillary events. For instance, Indore was chosen to host the Eighth Regional 3R Forum in Asia and the Pacific from 9-12 April 2018.<sup>1</sup> During this event, representatives of 41 nations came to the city to sign a 3R declaration "Indore Declaration" and they also toured the city to witness for themselves its high level of cleanliness.

Being the cleanest city also raises expectations. Soon after the 3R summit, the city was to host four of the sixty T20 cricket matches for the Indian Premier League, being the second home to one of the eight cricket teams: Kings XI Punjab. The District Collector of Indore Shri Nishant Warwade was well aware of the cleanliness expectations from a public event like this, where over 30,000 people would gather to see the match at the Holkar Stadium. With the deliberations during the 3R forum fresh in his mind, he saw the hosting of the cricket match to present both opportunities and challenges. Hosting of events in Indore, the cleanest city in the country, raised expectations from all quarters, and something different and new was expected. The stadium and the ambience around it had to achieve the highest levels of cleanliness. On the other hand, the extensive popularity of cricket and the IPL platform provided an excellent opportunity for the city administration to connect with the public, and pass on a strong message on cleanliness. Further, this mode also provided a unique opportunity to show the world why Indore is the cleanest city and what is required for a city to retain its position atop the cleanliness index.

Additionally, UNEP country director, who had been closely associated with the 3R forum, had shared that the World Environment Day would be celebrated on 5th June, and as India was the host country for this year, they were looking forward to setting an example. Thereby, the 3R concept was chosen as the core theme to be communicated through the IPL cricket match platform.

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<sup>1</sup> <http://www.india3rforum.in/index.php>

## Implementing 3R Protocol

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The 3R concept is fundamental to environmental sustainability. It has been adopted worldwide in everyday practice and large gatherings, and at times has been updated or added to suit specific cases. The 3 R's refer to :

- **Reduce**— what we use, and thereby decrease the amount of waste generated
- **Reuse**— what we have used, promote maximum utilization of available resources, beyond first use.
- **Recycle**— what we cannot reuse, such that core resources get minimally exploited.

At the same time, Mr Warwade also recognised that cleanliness was a team effort. It required coordinated efforts of hundreds of people, who not only had to be brought together but also guided, coaxed, enabled and enthusiastically supported. Hence, he decided to put together a team which could implement the theme.

With the decision to associate 3R with IPL and a team, the journey of the 3R IPL matches began. Mr Warwade coordinated the team, set up a communication mode, and led the team from the front. The agenda of the exercise was clarified and declared as "*to deliver the four IPL matches to be played at Indore with the highest levels of 3R compliance*", and to achieve zero landfill waste generation. This report maps the journey undertaken, highlighting the numerous steps taken, and concludes by not only analysing the whole exercise but also putting forward a green protocol which can be used for ensuring 3R compliance for any event, anywhere.

## 2. Planning and Preparation

The matches were to be held in Indore, which had a short albeit admirable legacy of cleanliness, and that legacy now was to include the IPL matches hosted in the city. This required meticulous planning and preparation, exploiting the extensive experience that the city possessed and building upon it.

Indore was ranked 150 in the cleanliness index in the year 2015. The city topped the list in the year 2017, and again in 2018. This seemingly herculean task was accomplished by the municipal corporation of Indore (IMC). IMC took numerous initiatives like making Indore a dustbin free city, popularizing door to door collection which was generally perceived to be a failed and impractical approach, making the city open defecation free by empanelling NGOs to help them disseminate the idea, use of extensive PR campaigns with popular faces supporting the campaign, hiring of self-motivated staff etc. Hence Indore had all the necessary experience and expertise to serve as a role model for other host cities in future.

The Indian Premier League is one of the biggest sporting extravaganzas in India. It enjoys a viewership of 19.4 million, distributed in all corners of India. This event takes place in 10 major cities. In the past, this platform has been used to spread awareness on many social issues. The Men Against Rape & Discrimination (MARD) campaign started by Farhan Akhtar got tremendous positive response after he used IPL to promote his campaign in IPL 2013. The IPL platform could be exploited to spread awareness regarding waste management in the country.

BCCI recognizes Madhya Pradesh Cricket Association's (MPCA) Holkar Stadium for hosting International Cricket Matches. In the year 2017, it had hosted two of the Indian Premier Leagues T20 matches. As Indore had initiated numerous steps to improve its Swacch Bharat cleanliness index rankings, MPCA introduced waste segregation in 2017. Though the exercise was not 100% effective, MPCA had gained some valuable insights into the waste segregation challenges. Consequently the MPCA team, during its planning for the IPL matches decided to take numerous steps to improve cleanliness, namely, :

- a. To segregate waste into wet waste, green waste, red waste and electronic waste
- b. To provide buffet food wherever possible, and reduce packaged food supply

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## Implementing 3R Protocol

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- c. To replace plastic cups by paper cups for water
- d. To use biodegradable garbage bags
- e. To display banners and other media showcasing the 3R concept, and
- f. To reuse all signage flexes and material scrap.

In an attempt to build upon the learnings from the 3R forum and after discussion with UNEP, Mr. Nishant Warwade, District Collector requested MPCA to make an attempt to make the four T20 IPL matches 'Single Use Plastic Free'. He intended to make Indore a pioneer in adopting the highest cleanliness standards for the IPL matches, and to guide the adoption of these high standards of cleanliness and waste management in the future, by formulating a green protocol. To ideate the plan of action, a joint meeting was held at the MPCA office on 26th April 2018. This was presided by the District Collector and attended by representatives from MPCA, IPL franchise Kings XI Punjab, BCC-IMG and IIM Indore.

The meeting initiated with Mr. Warwade briefing the attendees about the necessity of taking up the challenge. The need to demonstrate their efforts to curb the menace of plastics and inefficient waste management was felt. However, considering the short time available (less than 10 days) it was decided to achieve the target of no single use plastic by the 2020 IPL games, and this attempt to be refocused on implementing 3R comprehensively. To address this, it was decided to implement a "Green protocol" for the season, with the aim of minimizing the landfills. The need of extensive planning and coordination was also stressed upon by him.

During the meeting, it was brought to notice that a similar attempt was being made in the IPL matches in Bangalore. These attempts reported collection of 3-4 tonnes of mixed waste during a game, however, notably complete segregation could not be achieved. Bangalore, had again attempted the same during the match on 13th April 2018, and have been trying to improve their waste management.<sup>2</sup>

For coordination of the activities, a Whatsapp group was formed of all the heads of organisations who were involved in the exercise. This included Principal Secretary (Sports) MP Government

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<sup>2</sup> <http://www.downtoearth.org.in/news/ipl-joins-the-league-of-zero-waste-events-to-host-first-green-match-in-bengaluru-60174>

## Implementing 3R Protocol

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Mr. Aniruddha Mukherjee, District Collector Mr. Nishant Warwade, MPCA, Indore Municipal Commissioner Commissioner IMC Mr. Asheesh Singh,, BCCI representative Mr. Milind Kanmadikar, Regional Officer of Madhya Pradesh Pollution Control Board Indore Mr. R.K.Gupta, Associate Vice President of Basix (NGO) Shri.Gopal Jagtap and IIM, Indore Professor Swapnil Garg. This platform served as the primary medium of coordination for the team.

An action plan was proposed after deliberations by MPCA, Kings XI Punjab and IMG. This plan had three broad parts i.e., creating social awareness, execution of the 3R protocol and a post effort documentation and analysis. :

**For increasing Social Awareness the following steps were proposed to be taken,**

- a. 3R concept banners and media to be placed in and around stadium premises
- b. Video messages from team owners and captains to be released
- c. IPL franchises to circulate 3R messages on social media channels
- d. Extensive media coverage of the 3R steps taken

**For emphasis on the 3R Protocol during the match, Before/during the match (Preventive and collection measures)**

- a. All waste to be segregated into 3 categories: wet, dry and domestic hazardous waste
- b. Biodegradable garbage collection bags to be used and recycled
- c. Paper cups to replace plastic cups for serving water
- d. Buffet food to be provided for all hospitality areas
- e. Plastic food packets to be provided for all non-hospitality areas
- f. Paper placards and cheering material to replace plastic cheer-sticks etc.
- g. Plastic bags used for storage to be replaced by jute/fabric bags.
- h. Police and security to ensure no plastic material is carried inside by audience

**After the match (Disposal and processing)**

- a. A mobile composting unit to be placed inside stadium if feasible
- b. Local NGO to provide well-trained individuals for support
- c. Proper collection and disposal of all plastic material to be done
- d. All flexes and frames to be reused and/or recycled

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## Implementing 3R Protocol

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**For the documentation and analysis, IIM, Indore was requested for help.**

- a. The waste collection data to be analyzed
- b. A plastic audit to be conducted.
- c. Documentation for creating a standardised protocol

In the meantime, Madhya Pradesh Pollution Control Board (MPPCB) prepared and circulated a Green Protocol document, which summarized the legal position supporting the initiative, and also the steps to be undertaken for adopting the same. The salient points of the same are summarized below,

**Legal Position:** Municipal Solid Waste management Rules 2016 are applicable for the management of waste generated during any of the sports event. As per sub rule 3 of above rules "Stadia and Sports Complexes" having a waste generating rate exceeding 100 Kg/day are defined as "bulk waste generate". Thus the Rules 2016 are applicable on Madhya Pradesh Cricket Control Association Indore (MPCCAI). As per these rules, it was a regulatory requirement for MPCA to,

- Segregate and store the waste generated during the event in three separate heads namely biodegradable, non-biodegradable, and domestic hazardous waste in suitable bins and hand over to notified local authority.
- All the waste generators shall pay such user fee for solid waste management, as specified in the bye-laws of the Local Bodies.
- The waste generator shall have to intimate the Local Body, at least 03 working days in advance and the organizer of such event shall ensure segregation of waste at source and hand over collected waste to the local body.

MPPCB put forth the following steps as part of the Green Protocol:

### **Waste Management Protocol**

#### **Before/during the match (Preventive and collection measures)**

- a. Plastic straws to be replaced by bamboo/paper/steel
- b. Shirts and/or bails to be made from ocean plastics
- c. All branding to be done on recyclable media
- d. Volunteers to interact with crowd and emphasize source segregation of waste
- e. 100% compostable serviceware to be used

#### **After the match (Disposal and processing)**

- a. Flex banners to be given to slums as roofs or for preparation of carry bags
- b. Leftover food to be distributed among the needy

## Implementing 3R Protocol

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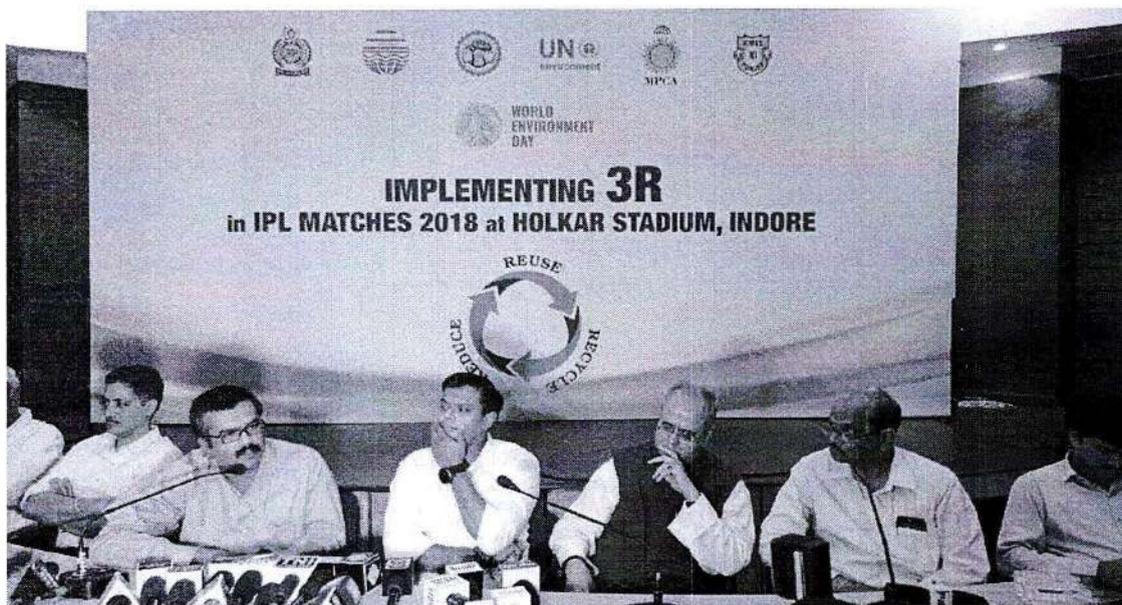
- c. All "waste" to be reused/recycled/routed to composting plant for processing.

### Social Awareness

- f. To pledge to go Single Use Plastic Free for all IPL matches by 2020
- g. To spread the message in all campaigns and outreach activities on and off the field as well as on all social media handles
- h. To propagate the message at critical junctures, like the replay screen after a boundary
- i. Pre and post match coverage of team owners addressing the cause and protocol to be aired

### Press Conference

With an attempt to involve the local media and press in increasing social awareness, a major press conference was held on 2nd May, 2018 by District Collector, Indore, with other team members of the 3R IPL group.<sup>3</sup>



Press conference held to increase reach and awareness

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<sup>3</sup> The press coverage details are available at the free press journal page:  
<http://www.freepressjournal.in/indore/ipl-matches-to-go-green-will-follow-indore-declaration/1268848>

## Implementing 3R Protocol

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During this press conference the press was briefed about the objective of the exercise and the members of the press were informed about

- 3R principle which would be adopted during cricket games.
- Means adopted to increase public awareness, and how the press could enable the same. That is use organic goods, bring jute bags, and where possible substitute plastic with paper (i.e., cups, plates, glasses, cheering material, placards, etc)
- Concrete steps adopted till now, and what the press members can emphasize in their press notes and coverage of the cricket match, to emphasize and enable 3R based cleanliness in the stadium during the matches.
- For the future, it was shared that events are proposed to be made plastic free by 2020, and this is a step in that direction.
- A perspective on making future events perspective 3R compliant, by showcasing a model implementation.

### 3. Execution

The execution phase covered the implementations of the action points discussed during the planning and preparation phase. These included measures taken to ensure spreading of social awareness and ensuring that littering in the stadium premises was minimized. The need for a dedicated team was felt to monitor the waste management system. The monitoring team was headed by Mr. Shrigopal Jagtap (Associate Vice President, BASIX). He was supported by about thirty-five staff members who were responsible for carrying out education and awareness initiatives, guiding the three hundred cleaning staff of stadium involved with collecting the waste generated, and ensuring its segregating at the central waste collection point. The waste collected was expected to be constitute both wet and dry waste. While the wet waste was to be segregated and converted into compost for use as fertilizer, the dry waste was required to be segregated and dispatched for recycling. The details of the steps taken to accomplish each of the objectives are listed below.

#### 1. Creating awareness through campaigns and outreach

The 3R protocol was widely publicised using various platforms. Radio message bytes were taken by the popular FM radio stations of Indore (93.5, 94.3, 92.7, and 98.3) of the team members. These were regularly played by the radio stations in the run up of the matches. These bytes, discussed the 3R, the initiatives taken, some advice for public, and a request for their helping hand in making the event 3R compliant. Radio messages also increased awareness about the prohibition on carrying plastic material inside the stadium premises 3-4 days before the matchday.

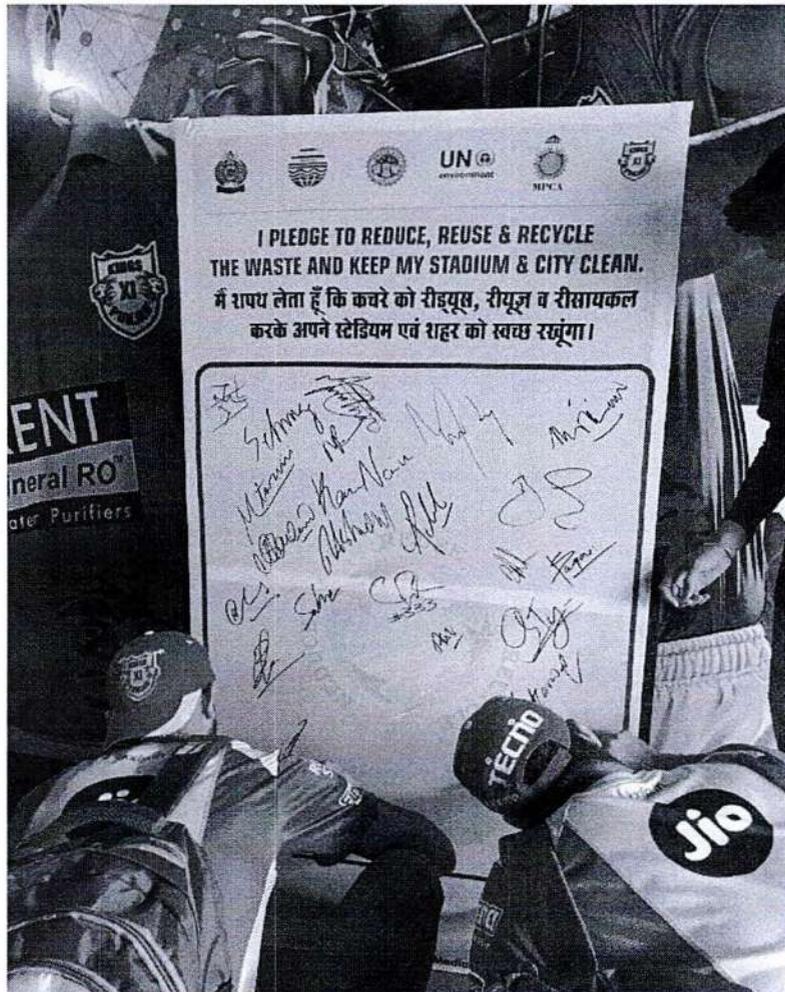
The Kings XI Punjab team joined hands and took a pledge to support 3R principle and keep the stadium and city clean and green. This gave a significant boost in spreading awareness as all the players enjoyed a massive fan following.

## Implementing 3R Protocol

Most visibly, a large number of small and medium-size banners (over hundred in number) were installed throughout the stadium. The banners were placed at positions having good visibility and from where they could best communicate the 3R idea.

A massive signature campaign was also carried out on the stadium premises. This involved 15,000 people signing and committing to adopt 3R and keep the stadium and city clean on big large white boards.

The event was also published extensively on social media platforms like Twitter and WhatsApp. Attractive WhatsApp forwards were sent to people across the city. This aimed to increase awareness of the 3R principle in the common public.

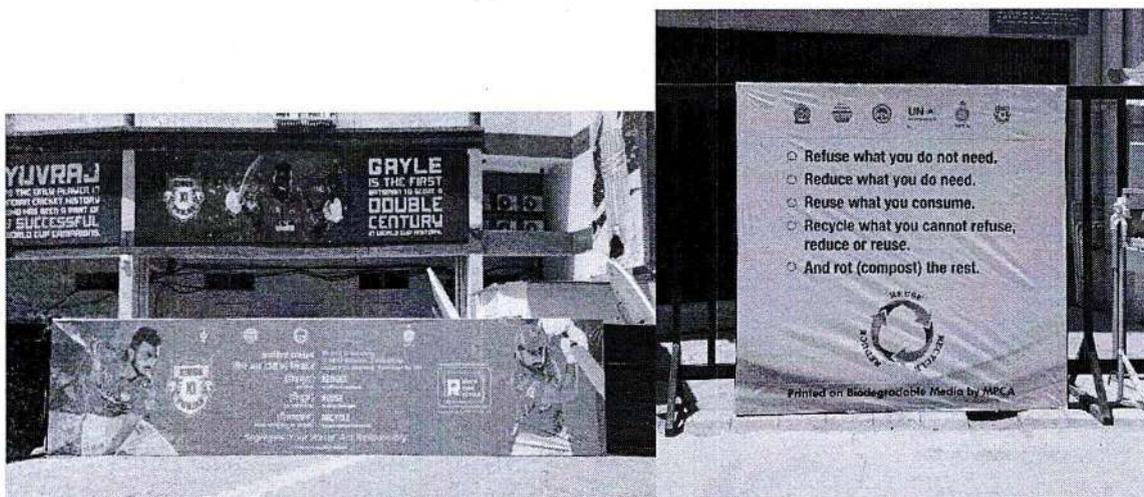


(a) Kings XI Punjab players sign the pledge to uphold 3R principles..

## Implementing 3R Protocol



(b) KXIP player Chris Gayle also contributed to the cause.



(c) Hoardings were installed in stadium emphasizing cleanliness and 3R's

## Implementing 3R Protocol



(d) Awareness messages were spread across all social media platforms.



(e) A massive signature campaign for 3R protocol was run at the stadium premises.

## 2. Zero littering and proper waste management

The 3R and green protocol message circulated through the different media had significant impact on public behavior, with almost no littering in the stadium. The cleaning staff further ensured the same by reaching out to spectators on their seats and collecting any trash generated. This further emphasized that littering was no longer an option. Additionally, about 500 dustbins of various capacities (240 litres, 200 litres and 35 litres) were kept at the stadium, to ensure that a dustbin was always in sight of the person, no matter where he went. These dustbins were color coded blue and green, for dry and wet waste respectively.

A team of NGO volunteers present in the stadium led by Mr. Jagtap, further guided the spectators on the proper use of dustbins and increasing awareness. This ensured one to one communication about the idea and deeper permeation of the 3R concepts among people.

Post the cricketing event, the stadium's cleaning staff collected all dry and waste waste separately. This was brought to the central waste collection hub. Here the dry waste was segregated into the different waste categories like plastic, PET bottles, grey board, iron scrap, pusta(kartoon), LD polythene black, and LD white. These were collected into biodegradable and recyclable garbage bags. The details of the different types of waste summarised below. The wet waste was handed over to the mobile composting unit.

## Implementing 3R Protocol



(a) A dedicated team of volunteers to interact with the spectators



(b) After collection, each type of waste was properly segregated into specific bins.

## Implementing 3R Protocol

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The waste generated consisted of a lot of different types of items, which were classified into categories on the basis of their method of recycling. The following categories were defined, and included similar items as shown below.

Category	Constituents
Plastic	Packaging material for water bottles
Pet bottles	Water and soft drinks
Grey board	Food packaging (Domino's, Hotel Surya)
Iron scrap	Flex frames
Pusta (kartoon)	Cardboard cartons for bulk packaging
LD polythene black	Garbage bags
LD white	Food boxes and packets
Wet waste	Leftovers and waste from kitchen (buffet)

### 3. Green waste management

Many steps were taken to ensure that the major portion of the waste generated was green and could be recycled or converted into compost. Firstly, all plastic material was strictly prohibited inside the stadium premises. This significantly reduced the plastic waste generated. Secondly, the use of one time use disposable water bottles was eliminated to a significant extent. This was done by installing water points wherein spectators could use paper cups to drink water. Drinking water was made freely available to the spectators from these water dispensing locations, in water cups. These water cups were of paper, which could be easily recycled. Also, as plastic cheering flags were strictly prohibited inside the stadium premises, flags made out from cloth material was used by teams for cheering purposes, and these were collected at the end of the match and sent for recycling. Things like display banners which cannot be recycled, were collected at the end of the four match sequence and distributed among poor people living in the slums, for protecting their kutchra roofs from rains. The recyclable waste was handed over to the extensive setup of IMC at its Integrated Waste Handling plant, for further processing.

## Implementing 3R Protocol



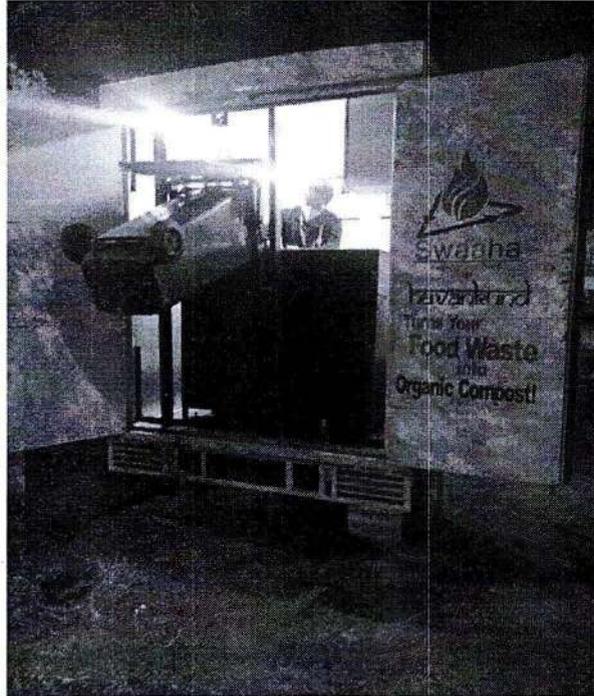
(a) Free water dispensing stations, with water distributed in recyclable paper cups



(b) Segregation of dry and wet wastes

Implementing 3R Protocol

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(c)The waste collected was sent to recycling plant

#### 4. Analysis

The post event analysis is done in two ways. Firstly, the actual implementation and execution was juxtaposed against the targets set out during the pre-planning phase. Secondly, a detailed analysis of the generated waste was carried out. This analysis was enabled by the observations made by the IIM, Indore team during their two post match visits to the stadium.

##### 1. Degree of implementation

For that purpose, a comparison of the objectives set forth and the measures actually implemented is shown below. The measures highlighted in green represent successful implementation, and red stands for the shortcomings which need to be improved upon.

Joint Meeting Agenda	Green Protocol(MPPCB)	Implementation Status
<b>MPCA</b>		
Waste Segregation - Wet, Dry, & Domestic Hazardous	Separate, sufficient bins, zero littering (1.6.c, 3.1)	Different bins for each of the categories were positioned all around the stadium
Biodegradable garbage collection bags		Used, Verified
Paper cups to serve water	Paper cups, water dispensers replacing bottles (1.4.a/b/c)	Paper cups used
Buffet food for all hospitality areas		In all places, except P5 Pavilion
Plastic packets for food in non-hospitality areas	Packed food in biodegradable material (3.9)	Food trays were distributed in these areas
Proper collection and disposal of plastic food packets		All the plastic waste was collected and disposed of
3R concept banners and related media	Posters around stadium (3.5)	Banners in sufficient numbers around the stadium
Mobile composting unit in stadium (if feasible)		HawanKund Unit of Swaaha Enterprises parked at the Stadium
Local NGO or authority to extend support on site	Team of volunteers (3.2, 3.3, 3.4)	Well trained team on board.

## Implementing 3R Protocol

	Bamboo/paper/steel straw to replace plastic (1.4.d)	Found to be unfeasible
	Cloth bags (jute/hemp/fabric) to replace plastic (1.4.e)	No plastic was allowed inside premises
	Shirts/bails made of ocean plastics (1.6.a)	Found to be unfeasible

<b>KXIP</b>		
Video message from owners & captains	Pre/post match coverage (1.3.b)	No evidence of such coverage for 3R protocol exists
Paper placards instead of plastic cheering material	Coherent + Cloth flags (1.5.a)	Recyclable cheering placards were used
Social media circulation	Coherent (1.2.a/b,	Social media circulation was done by the other stakeholders
Reuse of flexes and recycling of metal frames	Utilized for poor (3.7)	Flexes were given to the poor, metal frames were recycled
	Leftovers stored and distributed	Food was distributed among the groundsmen
<b>IMG (Event manager for IPL)</b>		
Video message from players on replay screen	Single-use plastic free video at 4/6 (1.3.a)	There seems to be no evidence of the same
Official videography of followed protocol		Official coverage was not given, local NGO filmed the process
<b>IIM</b>		
Documentation	Coherent (1.2.d)	Proper documentation of all measures was done
Plastic Audit	Coherent (1.2.d)	Waste data analysis was done in-depth

The green cells were fully implemented, while the red cells saw partial implementation.

## 2. Analysis of waste generation.

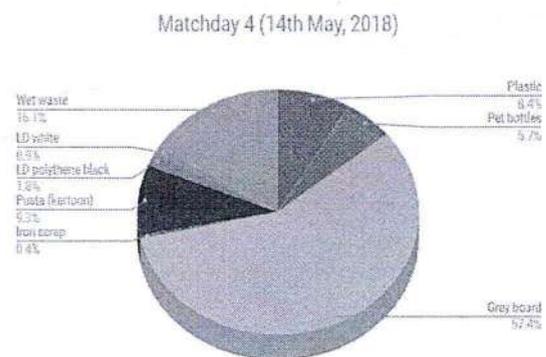
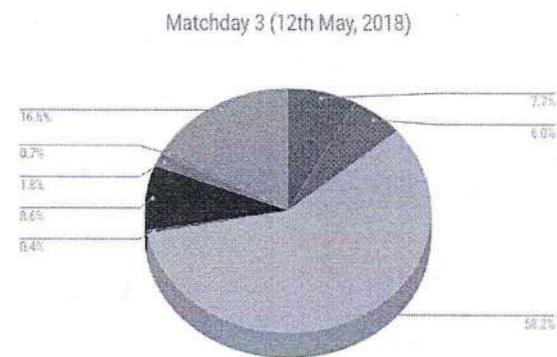
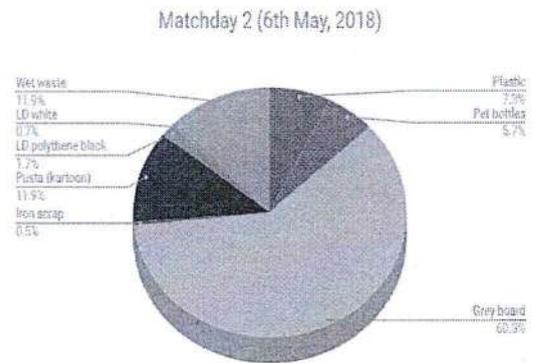
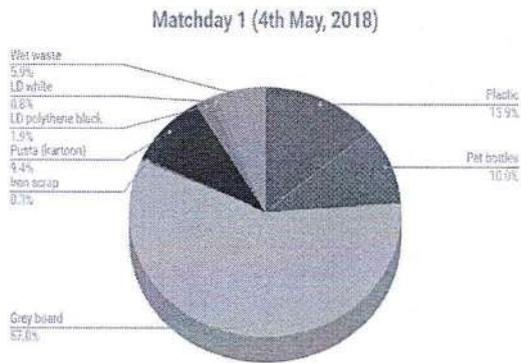
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Implementing 3R Protocol

To analyse the waste collection data recorded and understand the various factors that affect the generation of waste during a match. Further, this quantitative analysis helps identify where exactly the room for improvement lies from an organizational standpoint.

**Waste breakdown by category for each day**

The weight collected on each day was segregated into different categories and then weighed. The following pie charts depict the breakage of different weight categories on each of the matchdays. (Refer to annexure 2 for raw data)

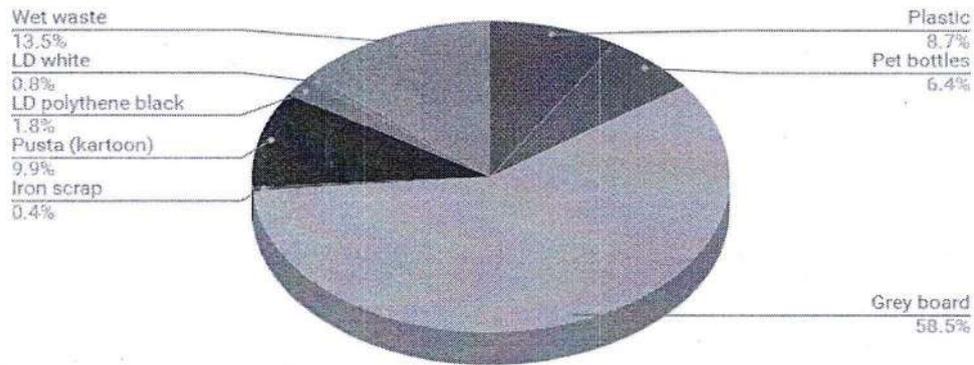


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## Implementing 3R Protocol

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In total, the mass of each category of waste recorded over the course of four matches is given below.

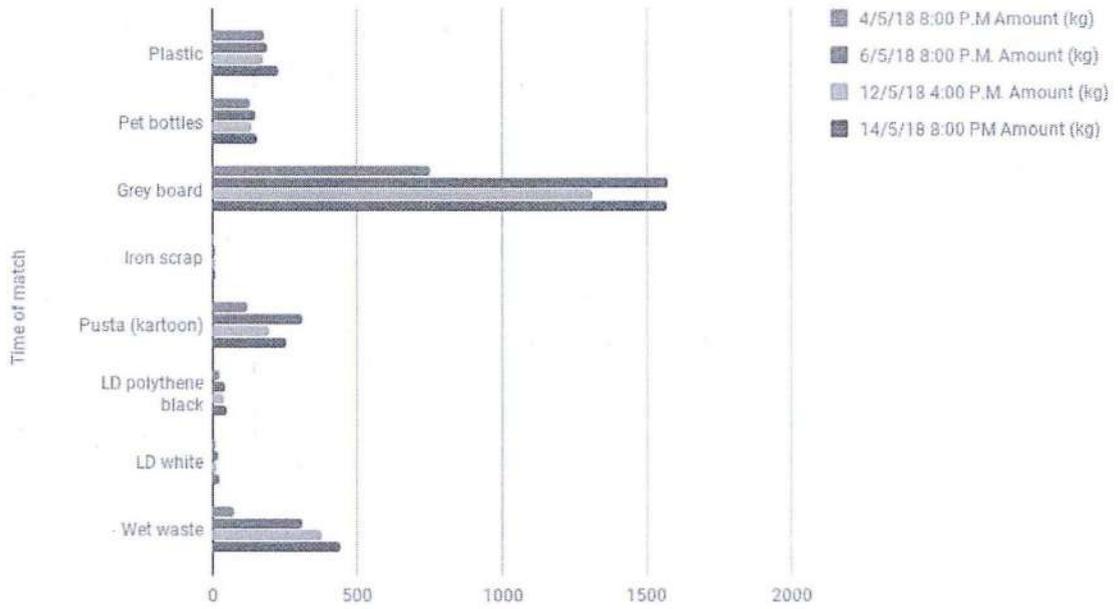


### Waste produced on each matchday by category

The above pie chart shows waste collected in a category over the course of 4 matches. Some interesting trends can be seen on noting how much waste in a category was recorded on each day, as can be seen below:

Implementing 3R Protocol

Date/Amount (in kg)



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## 5. Observations

The following observations stand out from analysis of the data above:

1. Major portion of the waste collected is grey board, which consists of food boxes from providers (Domino's, Hotel Surya etc) and paper cups for water.
2. On-site food arrangements were made for hospitality areas and the groundsmen, which became the major source of recorded wet waste. Significant volumes of wet waste were generated incrementally throughout the 4-Matchday period.
3. The amount of waste collected is also affected by the time of the match. 3 of the 4 matches were played from 8:00 PM, whereas on matchday 3 (12/05/2018) the game started at 4:00 PM. Recorded waste on matchday 3 is slightly lesser than that for the other matches (starting 8 PM), indicating that the 4 PM matches witness lesser waste generation.
4. The mass of PET bottles (soft drinks) recorded on Matchday 3 (12/04/2018) is lesser than the other matches. Since the match was at an earlier time (4 PM), the organizers had provided cold water in the dispensers all around the stadium, decreasing the consumption of soft drinks. A causality exists, i.e. providing cold water will reduce soft drink sales as well as the amount of PET bottles used and thrown.
5. A total of 1202 kg of wet waste was collected during the four matches. As it was properly segregated, this was sent to the central Integrated Solid Waste Management facility of Indore Municipal Corporation for conversion into compost. After removal of the water content, wet waste provides 25% of its input weight as compost. Nearly 300 kg of compost was obtained, which would have been sold for about ₹600/- (₹3/kg when sold loose and ₹2/kg when sold in packs). Further, the dry waste was also separated at the central facility, all recoverable value salvaged from it and sent for recycling. Hence, the waste generated during the matches was converted into cash and non-cash resources.
6. This exercise not only implemented 3R, but actually was able to carry about **Rot** and **Refuse**, hence making it a 5R compliant exercise.

## 6. Inferences

The in-depth analysis carried out raises some pertinent points which need to be kept in mind for the future. These are addressed below.

Grey board waste, which includes food serveware (like pizza boxes) and paper cups for water, constitute a major portion of the waste generated from the stadium. Reductions made in these can significantly impact the total waste generation from the match. Possible interventions lie in :

### Water distribution

- a) Replacing current PET bottles with souvenir bottles that are not single-use. This will cut waste generation at the very source, wherein spectators can either keep the bottles with them or return them for a refund, from where the bottles may be collected, washed, and distributed in government schools later on. This provides enough branding opportunities for the franchises and stakeholders involved to cover the costs of production, and would also serve to propagate the cause to a wider audience even after the match is finished. This will contribute to **Reuse** of waste material.
- b) This also presents an opportunity to introduce a new innovation in sustainable packaging of water, namely an edible water ball<sup>4</sup> recently developed by Skipping Rocks Lab in London. Water is packed in a ball made of natural material extracted from seaweed, which is actually cheaper than plastic. The ball is wholly consumable and generates no waste, and makes for a really quirky introduction to any gathering of people, while significantly contributing to the **Reduction** in waste generation.

### Food packaging

- a) The food vendors using grey board serveware can significantly reduce the amount of waste generated by switching from food boxes to paper plates. Other serving alternative may lie in use of lightweight and easily recyclable material. Such a measure would considerably **Reduce** the waste generated, as well as promote **Recycling**.

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<sup>4</sup> <https://www.citylab.com/design/2015/03/this-futuristic-water-bottle-is-an-edible-gelatinous-blob/388087/>

Implementing 3R Protocol

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- b) The amount of wet waste generated is quite substantial, considering it is merely a byproduct of on-site food arrangements for a small fraction of the audience. Exploring alternative food arrangements, like providing an external venue or even optimizing the on-site preparation will **Reduce** the volume of wet waste and leftovers being generated during the event. The leftovers from the event are best distributed among the groundsmen, and the rest can be processed in a compost unit to **Rot**.
- c) The plastic waste generated constituted of water bottles and food trays. Possible amendments in the distribution of water has been explored above, but the case of food trays is a different scenario altogether. Various options were explored to test the utility of biodegradable food trays in a matchday scenario, but they succumbed to the limitations in practicality, wherein:
- i) It was observed that plates made from sugar pulp were unable to withstand food for more than four hours after packing. Hence, there exists a need to explore improved alternatives that do not suffer from this handicap, and thereby uphold the **Recycle** principle.
  - ii) During the planning phase the team recognized that biodegradable food trays were not available in the desired quantity and in the short time frame available. In the future, such arrangement may be made in advance, such that **Reduction in the** amount of plastic waste be achieved and conveniently **Rot** whatever waste gets generated.
- d) The waste generated and collected in the exercise had considerable residual value. The wet waste collected was processed into compost which was sold in the markets.

## 7. Limitations

### **Weight of waste is not an accurate metric.**

The quantitative analysis of the amount of waste recorded in each category is at best an indicative figure, and even a double-edged sword when drawing inferences. The difficulty is in recognizing whether too much waste recorded is good or bad, and it is subject to various uncertainties, like—

1. actual generation of waste: too much recorded waste may be good or bad
2. efficiency of collection: whether all the waste is being collected and accounted for
3. the nature of the waste: whether some waste is good because it can be recycled, while alternative options might cause harm to the environment in a more latent manner. For example, too much wet waste is a smaller problem than lesser amounts of plastic. Wet waste would get decreased by switching from buffet to food trays but would increase plastic waste. However, while wet waste if segregated properly can be easily converted into compost, recycling and reuse of plastic plates is more difficult.

### **Relationship between process and quantifiable measures:**

The process measures taken and waste generation (kind and quantity) are closely interrelated, and a causality can be established in certain aspects, like—

1. Banning any plastic water bottles and distributing water only in paper cups has significantly shifted waste generation from PET bottles to grey boards, which are recyclable.
2. Making buffet food arrangements for most people to reduce the amount of packaged meals being distributed saw an increase in wet waste generation, which is not necessarily a negative result. However, further improvements can be made, as covered earlier.

In other data sets, merely a correlation can be found. It has to be emphasized that the data is merely a measure of collected waste during a limited time-frame in specific premises, and therefore it cannot be considered a sufficient metric to gauge performance in such a case. An appropriate parameter will comprise of more than just this data, and without such a parameter the performance of this exercise cannot be measured satisfactorily.

### **Future work**

## Implementing 3R Protocol

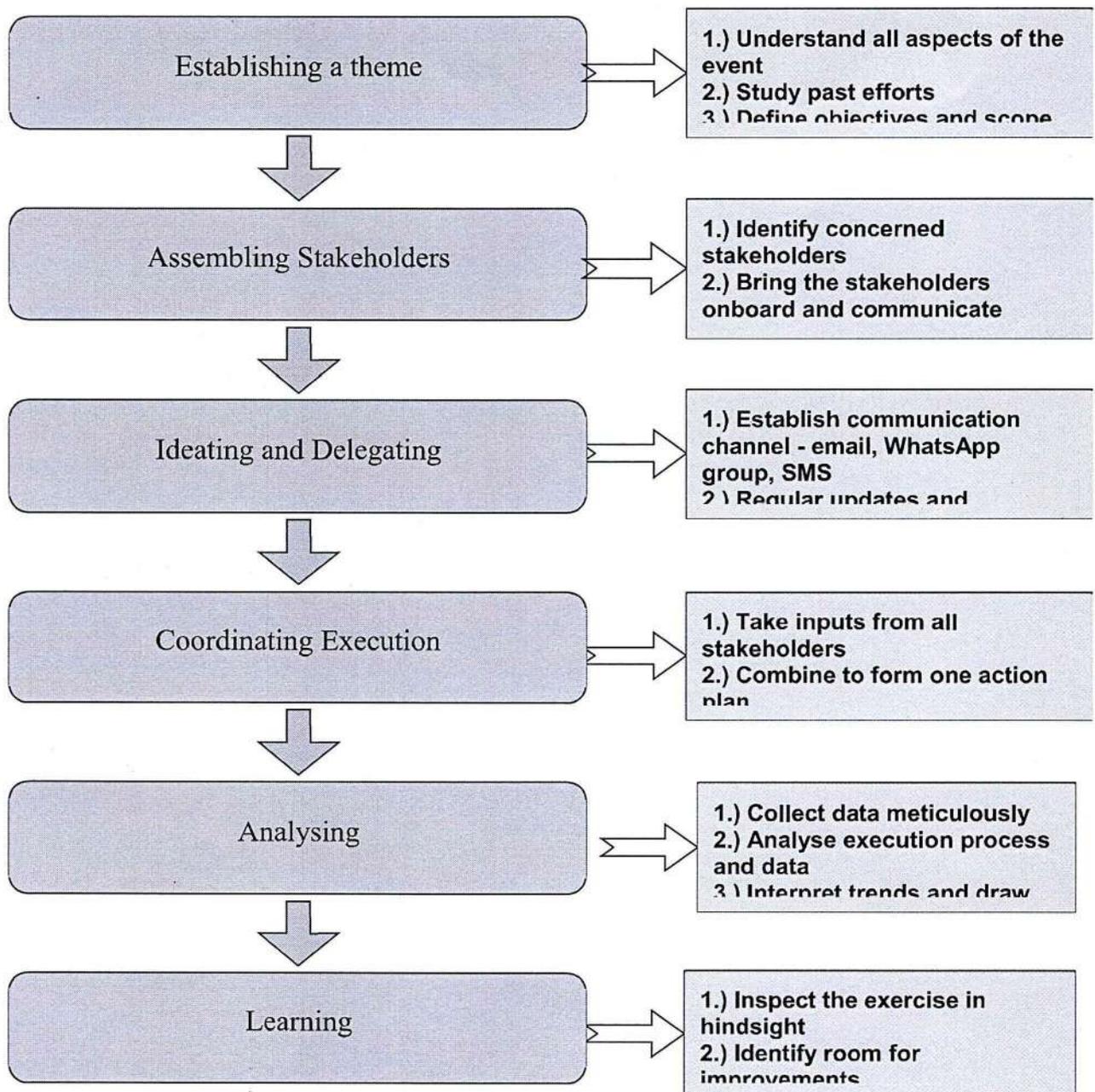
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The next step of this study lies in estimating and quantifying the carbon footprint of the individual activities leading to the full event. That would need a significantly more amount of input data and as of now we leave it for the future.

Further, concrete steps required to make a "single use plastic free IPL" still need to be identified from a holistic perspective for future implementation.

## 8. The Way Forward - Standard Protocol

The success of this exercise enables us to identify the Critical Success Factors for such an exercise, and to propose a generic and standard protocol that can be followed for repeating such an exercise in the future.



**1. Establishing a theme**

To undertake a change event, it is necessary to establish a theme around which the efforts can revolve and develop. This includes clearly identifying the situation/event at hand and coming up with a set of objectives that are to be accomplished, while being aware of all the past efforts that have been made. The objectives must be set realistically and should serve the desired purpose with the available resources.

In this particular case, the Madhya Pradesh Cricket Association (MPCA) was aware of the need for keeping the stadium clean (which was also a part of their core responsibility), and they had put in numerous efforts in the past in this direction. The District Collector set the project in motion by articulating the core idea and establishing a theme of the exercise: 3R IPL implementation and showcasing. The following objectives were identified,

- i. 3R protocol to be followed in all the matches to be hosted in Indore
- ii. Organized waste management techniques to be employed.
- iii. Create maximum public awareness through social media and on-site promotion
- iv. Analyse findings and document the process for future reference and amendments.

As we move from event to event, the themes need to evolve. For instance, the theme for the next event in this line could be identified as focus on one of the R or water conservation, or responsible cheering.

**2. Assembling stakeholders**

A coordinated effort is a necessary requisite for success. The involved agencies, who are the key stakeholders in the project, must be on board throughout the process. These should necessarily include the local government, the regulatory bodies, executive bodies, the execution team, and the end beneficiaries.

To put this in practice, the District Collector, representing the local government, called a meeting of the concerned agencies; attendees to the meeting included representatives from MPCA (execution), IPL franchise Kings XI Punjab (enablers), BCC-IMG (enablers), MP Pollution Control Board (regulatory body), and IIM-Indore (analysis and documentation).

### 3. Ideating and delegating

This is a very vital step in the whole process, where inputs given by the assembled agencies are collated into one cohesive strategy. The essence of ideation is to weigh all the inputs on merit and feasibility, and incorporate these into one action plan. The action plan will require concentrated efforts on numerous fronts, at the same time. Here delegation of responsibility should be practiced, and to the extent possible the implementing agencies made fully responsible for their assigned tasks. A culture of self-certification delivers better than a culture of checks. This process was fully practiced in the current case, and evident at multiple stages.

During the joint meeting of all the bodies mentioned above, propositions were made by MPCA, KXIP and BCC-IMG, and they openly shared their ideas for implementation and also debated openly on the constraints. When MPCA's efforts were required to be boosted by a professional cleaning organization, assistance from a local NGOs was planned for boosting the awareness campaign. The KXIP and IMG delegates shouldered the responsibility of publicizing these efforts, and they too highlighted that they would have to check with the legal department about the contractual clauses of celebrities and players for participation in the awareness campaign. When finally done through the help of district administration, through social media and other forums. To reduce need for continuous documentation, the representative from IIM Indore were tasked with the analysis and documentation of the whole exercise.

### 4. Coordinating execution

Coordination during execution before, during and after the event is of prime importance, as multiple stakeholders are to work together in a highly delegated environment. For this the coordination among the different members needed to be seamless. A dedicated platform based coordination, dedicated to the event like a Whatapp group, exists a feasible solution. The individual members can use the platform to broadcast progress, while issues and concerns and can be easily debated. Even documentation can be easily shared for information of the concerned and involved members. Again, while each member needs to focus and take care of its own assigned duties, when issues become serious others can contribute and share the responsibilities. However, at all times the core theme needs to be kept in mind, and it should be kept in focus.

During the course of the IPL matches, and also before and after them, all the involved agencies were constantly in touch over a WhatsApp group created by the District Collector. The team collaborated with each other via the group, and everybody was regularly updated on the next phase and accomplishments of the initiative, and also about site visits and feedback on the progress. This also enabled that the publicity and social media outreach be shouldered by the combined efforts from all the members.

### 5. **Analysing**

The goal of analysis is to collect data systematically and also interpret trends to enable learning. The observations often tend to be anticipated, but one should look out for outliers. While the analysis generally focuses on quantifiable end results and measurable items, it is also necessary to analyze the extent of implementation of the adopted process or protocol. However, the two need not be segregated, as often numerous interlinkages exist. That is, the protocol used determines the quantifiable and measurable aspects.

For the 3R IPL matches quantifiable data was collected on waste collected and segregated, while qualitative data was collected on the processes adopted during the whole exercise. This enabled a deep understanding of the problem in a comprehensive manner. way than before.

### 6. **Learning**

In the end, the whole exercise should be kept in retrospect to learn from it and identify ways and means to improve on the performance achieved. The processes put in practice should be critically analyzed with respect to their achievements, and places for potential of incremental performance identified. This step enables the exercise to be formally closed with a clear set of learnings for the future.

While a lot was achieved in the 3R PIL exercise, during the closing one could identify numerous places for improvement like, use of biodegradable plates, better outreach through social media, higher involvement of the celebrities, experimentation with more innovative ideas to reduce or reuse the waste generated. These aspects need to form the input for the

Implementing 3R Protocol

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next such event, to ensure a cleaner, safer, and more widely received event compared to ever before.

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## 9. Conclusion

To the best of our knowledge, this is the first large event in India that has been able to rigidly follow the 3R protocol. **100% waste collection, and zero landfill has been achieved, which is a sizeable achievement.** Much progress has also been made towards achieving the Single Use Plastic Free objective, which can now be adopted for 100% compliance by 2022, or even before.

### Recommendations for future matches:

**Measuring 3R:** The documentation also brings out that waste measurement is a key operational parameter, but it should not be used as a performance parameter to measure the 3R effort. Similarly, the waste measurement (breakup) is not only contextual to the specific event, but it also highly dependent upon the actions that have been initiated.

**Generic Protocol:** Further, as part of this exercise a Green protocol was proposed by MPPCB and adopted. It was tested as we went along. However, this was prepare for this particular event and was deliberately a highly contextualized protocol. Based on the learnings during its implementation, we develop a standard protocol which can be used by the city for implementing 3R protocol for all kinds of future events that the city hosts.

Implementing 3R Protocol

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Annexure-1



**Office of the Collector and District Magistrate, Indore (M.P.)**

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No./ /2018 Indore, Date

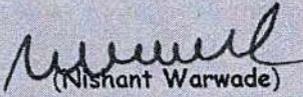
To,

Prof. Swapnil Garg  
IIM, Indore

We are Implementing 3-R Concept in IPL Matches being conducted in Indore. I request you and your team to help us proceed ahead in this venture in a strategic manner.

Looking forward to your cooperation.

With Warm Regards

  
(Nishant Warwade)  
Collector  
District Indore

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## Implementing 3R Protocol

**Annexure-2**

Day wise collection of data with categorisation of each type of waste generated with their respective weights

The waste collection data on each Matchday segregated into categories is as shown below:

Date	4/5/18	6/5/18	12/5/18	14/5/18	Total
Time of match	8:00 P.M	8:00 P.M.	4:00 P.M.	8:00 PM	
Category	Amount (kg)				
Plastic	180	190	175	230	775
PET bottles	130	150	135	155	570
Grey board	750	1575	1315	1570	5210
Iron scrap	4	12	9	11	36
Pusta (kartoon)	122	310	195	255	882
LD polythene black	25	45	40	50	160
LD white	10	18	15	25	68
Wet waste	76	311	375	440	1202
<b>Total</b>	<b>1297</b>	<b>2611</b>	<b>2259</b>	<b>2736</b>	<b>8903</b>

First aid and other kits around the stadium also produced waste which was collected separately and weighed. The bio-medical waste was recorded as shown:

Date	4/5/18, 8 PM	6/5/18, 8 PM	12/5/18, 4 PM	14/5/18, 8 PM	Total
Category	Amount (kg)				
Biological Waste	0.1	0.15	0.18	0.25	0.6
Medical Waste	2	2.5	2.5	3	10

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HOLKAR STADIUM INDORE

Presented By  
Jayesh Warhadkar  
V tech Infra indore

*PI*  
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## Area of Ground

S.No	Descriptions	Area M <sup>2</sup>
1	Ground	13248.5
2	Kapil Dev pavilion	2779.3
3	H K Gaikwad Pavillion	2453.8
4	Col C K Naidu Pavillon	2876.2
5	Madhavrao sindia	93.0
6	Gallery	7509.2
7	Total Area	28960.0

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## Rain Fall Calculations in year 2022

S.No	Discription	Area M <sup>2</sup>	2022 Rain fall In Meter	1 M <sup>3</sup>	Rain fall In liter year 2022
1	Ground	13248.5	1.04	1000	13778395
2	Kapil Dev pavilion	2779.3	1.04	1000	2890503
3	H K Gaikwad Pavilion	2453.8	1.04	1000	2551931
4	Col C K Naidu Pavillon	2876.2	1.04	1000	2991279
5	Madhavrao sindia	93.0	1.04	1000	96720
6	Gallery	7509.2	1.04	1000	7809619
7	Total Area	28960.0	1.04	1000	30118448

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## Area of Ground

- ▶ RESULT - 30118448 Leter
- ▶ In year 2022 total water harvesting by MPCA is three crore eleven lakh eight thousand four hundred forty eight liter .

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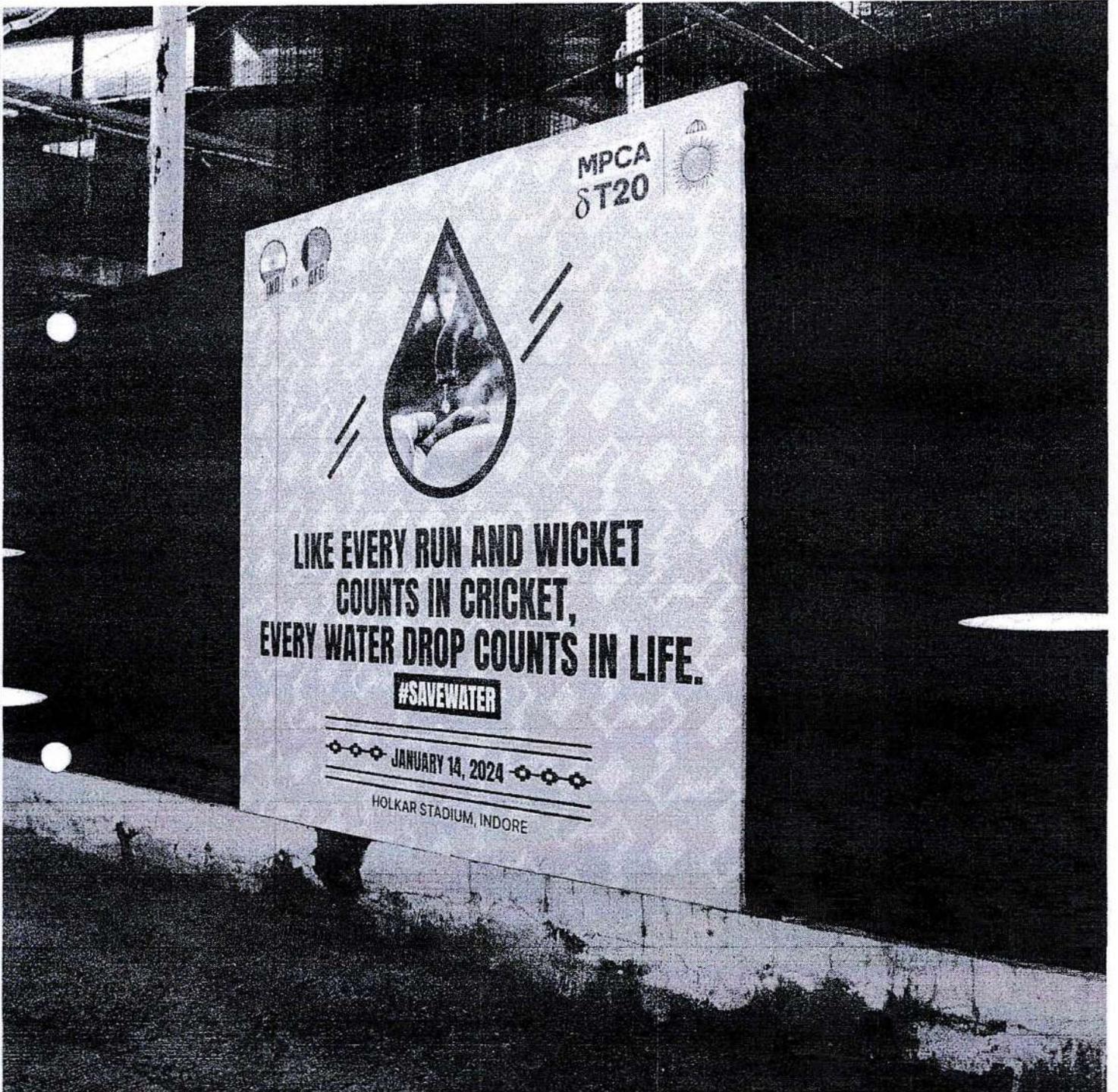




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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
NEW DELHI**

**Execution Application No. 41 of 2023  
IN**

**Original Application No. 94 of 2021  
(Earlier M.A. No. 16 of 2023)**

**IN THE MATTER OF:  
HAIDER ALI**

.....APPLICANT

**VERSUS**

**UNION OF INDIA & ORS.**

.....RESPONDENTS

**VAKALATNAMA**

Know all to whom these presents shall come that I SANJEEV RAO, (HONORARY SECRETARY OF MADHYA PRADESH CRICKET ASSOCIATION) aged about 68 years, S/o NARSINGH RAO, R/o INDORE presently in INDORE,

Them above named the *Respondent No. 17* do hereby appoint:

**DINESH SHARMA, RITIKA JHURANI  
ADVOCATE  
L-18, LGF, LAJPAT NAGAR III  
NEW DELHI-110024  
MOBILE NO. 9910699943  
TEL NO. +91-11-40157169**



Advocate(s), to be my/ our true and lawful attorney (s), in the matter noted above, to do all the following acts, deeds and things, or any of them, (jointly and severally) and also ratify anything already done on our behalf that is to say: -

1. To sign, verify and present and send notices, replies rejoinders, pleadings, appeals, cross-objections or petitions for execution, review, revision, other petitions or affidavit or other documents as shall be deemed necessary or advisable for the prosecution of the case or in relation thereto in all its stages.
2. To act appear and plead in the above-mentioned case in any court or tribunal etc, in which the same be heard or tried in the 1<sup>st</sup> instance or in appeal or review or revision or execution or in any other stage of its progress until its final decision.

*[Handwritten Signature]*



3. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise to or in any manner relating to the said case.
4. To receive documents, papers, records, orders etc. and to do all other acts all things, which may be necessary or proper to be done for the progress and in all course of the prosecution of the said case.
5. To employ any other legal practitioner, advocate or consultant authorizing him to exercise the power and authority hereby conferred on the Advocate (s) whenever he/they may think fit to do so.

And I/We hereby agree that whatever the Advocate (s) or his/ there substitute shall do in the premises shall be binding on me in all intents and purposes just as if it would have been done by me.

And I/We hereby agree not to hold the Advocate (s) or his/their substitute responsible for the said case in consequence of his absence from the court when the said case is called up for hearing.

And I/We hereby agree that in the event of the whole or any part of the free agreed by me/ us to be paid to the Advocate (s) remaining unpaid he/they shall be entitled to withdraw from the prosecution of the said case, or not to appear until the same is paid.

In witness whereof I/We hereunto set my/our hand to these presents the contents of which have been explained to and understood by me/us.

Date: 20.12.2024

Advocate (s)

*Ritika*  
RITIKA JHURANI  
D/2545/2011



*D. Shamu*  
Client

*D. Shamu*  
DINESH SHARMA  
D/2338/2012

*Ashish*  
BR/1186/2022

*Adulgaadi*  
UP 17592/23



Aashish &lt;litigation.aashish@gmail.com&gt;

**Haider Ali vs Union of India || EA No 41/2023 & OA No. 94/2023**

1 message

Aashish &lt;litigation.aashish@gmail.com&gt;

20 April 2024 at 15:49

To: maazjustice@gmail.com, sanobar ali Qureshi &lt;sanobaraliqureshi@gmail.com&gt;

Dear Sir,

Please find attached the reply on behalf of Respondent No. 9, 17 & 26 in the captioned case. This completes the service on the Applicant.

 HP Final.pdf MP Final.pdf Saurasthta Final.pdf

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Thanks &amp; Regards

**Aashish K. Gupta (Advocate)**

SNJ AND PARTNERS  
L-18, LGF, LAJPAT NAGAR-III  
NEW DELHI-110024  
Contact - 7004172845