

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,

SOUTHERN ZONE AT CHENNAI

Application No.125 of 2022

IN THE MATTER OF

KORATTUR LAKE PROTECTION PEOPLE'S MOVEMENT

..Applicant

VERSUS

State of Tamil Nadu,  
Represented by its Secretary to Government  
& Others

..Respondents

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Dated at Chennai on this the 15<sup>th</sup> Day of July, 2023

FILED BY

M/S. S.RAMASUBRAMANIAM &  
ASSOCIATES

ROC NO.7351/2015

9840021901

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ADDITIONAL AFFIDAVIT FILED ON BEHALF OF THE 10<sup>TH</sup> RESPONDENT

I, S Kumar son of Mr. P Selvaraj aged about 51 years and having address at No. 806, 63<sup>rd</sup> Street, 10th Sector, K K Nagar, Chennai -600 078. do hereby solemnly affirm and sincerely state as follows:

1. I am the General Manager – HR of the 10<sup>th</sup> Respondent Company and I am well acquainted with the facts of this case. I am duly authorized to swear this Affidavit on behalf of the Petitioner.
2. I submit that by Order dated 18.04.2023, this Hon'ble Tribunal directed the 10<sup>th</sup> Respondent to file an additional affidavit particularly with regard to the photographs in Page No 26 & 27 of the Application booklet filed by the

For GODREJ & BOYCE MFG. CO. LTD.

  
Authorised Signatory

For GODREJ & BOYCE MFG. CO. LTD.

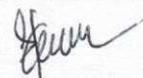
Authorised Signatory

Applicant. Accordingly, this Affidavit is being filed in compliance with the Order dated 18.04.2023.

3. I submit that the image in Page No. 26 of the Application booklet, is an image of the Storm Water Drain Outlet situated outside the factory of the 10<sup>th</sup> Respondent. It is pertinent to state that the said Storm Water Outlet seldom comes into use. The buildings in the 10<sup>th</sup> Respondent's factory are equipped with a mechanism to collect rain water falling on the rooftop through various pipes which connect to charging and percolation pits. It is submitted that the 10<sup>th</sup> Respondent's factory is equipped with 20 such percolation pits all around the 10<sup>th</sup> Respondent's factory. As already stated in the Reply dated 18.04.2023, the 10<sup>th</sup> Respondent has 150 KLD Rain Water Harvesting Sump. The water collected in the 150 KLD sump does not overflow at any given time. It is only in the rarest of rare cases that the 150 KLD sump overflow, and only in such rarest of rare cases, fresh rain water is released from the outlet seen at Page No. 26 of the Application Booklet. It is submitted that since 2017, only on two occasions of heavy flooding due to intense rainfall, there has been an overflow from the outlet of the 10<sup>th</sup> Respondent's factory and on other days, the outlet remains dry. It can be seen in the photograph in **Annexure 1** enclosed herewith that the same outlet as seen in Page No. 26 indicates that it is only a Storm Water Drain outlet and such indication is conveniently not displayed in the picture at Page No. 26 of the Application Booklet filed by the Applicant.

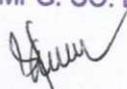
Authorised Signatory

For GODREJ & BOYCE MFG. CO. LTD.

  
Authorised Signatory

4. I submit that, the quality of the water flowing in the lake below the outlet as seen in Page No. 26 is not attributable to the 10<sup>th</sup> Respondent as the water upstream in itself is contaminated and polluted. It is submitted that the 10<sup>th</sup> Respondent is not responsible for such contamination as falsely alleged by the Applicant.
5. It is reiterated that the 10<sup>th</sup> Respondent has always ensured that the waste produced during its operations does not harm the environment in any way by installing various mechanisms to treat the same. The effluents from the factory of the 10<sup>th</sup> Respondent is treated and disposed off in accordance with the pollution control laws. The 10<sup>th</sup> Respondent has 125 KLD effluent treatment plant and a 100 KLD Sewage treatment Plant, the permissions for which have been renewed regularly.
6. It is submitted that the image in Page No. 27, is an image of the wall on the Front side main out gate of the 10<sup>th</sup> Respondent's factory. There is no outlet from the 10<sup>th</sup> Respondent's factory to discharge any untreated trade effluents into the canal. The Board shown therein is a Display Board in compliance with the Order of the Hon'ble Supreme Court in W.P. (C) No. 657 of 1995, which only displays the data inter alia pertaining to hazardous waste management and the nature of chemicals being used in the 10<sup>th</sup> Respondent factory. It is submitted that the said Board has been removed and relocated to a more conspicuous place.

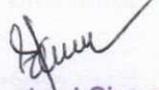
For GODREJ & BOYCE MFG. CO. LTD.

  
Authorised Signatory

7. It is submitted that the Picture in Page No. 27, does not in any way show an outlet from the 10<sup>th</sup> Respondent's factory discharging any untreated trade effluents. As stated above, the 10<sup>th</sup> Respondent is not responsible for such contamination as falsely alleged by the Applicant.

In light of the above, it is humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the present Application No.125 of 2022 as against the 10<sup>th</sup> Respondent and thus render justice.

For GODREJ & BOYCE MFG. CO. LTD.

  
Authorised Signatory

Solemnly affirmed and  
Signed his name in my  
Presence on this the 15<sup>th</sup> Day  
Of July 2023 at Chennai

BEFORE ME

ADVOCATE: CHENNAI

For GODREJ & BOYCE MFG. CO. LTD.

Authorised Signatory

ANNEXURE I



**BEFORE THE HON'BLE NATIONAL  
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