To, The Member Secretary (Industry-2) Govt. of India Ministry of Environment, Forest, and Climate Change, Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj, Lodhi Road, New-Delhi-110003.

Sub: Expansion of molasses based Distillery from 35 to 65 KLPD by M/s. Brima Sagar Maharashtra Distilleries Ltd., at Shreepur, Tal. Malshiras, Dist. Solapur, Maharashtra. IA/MH/IND2/67191/2017, J-11011/192/2017-IA II(I), Agenda No. 42.5.1

Ref: Minutes of 42nd Expert Appraisal Committee (Industry-2) Meeting held during 29th -31st October 2018.

Sir,

With reference to the above subject matter and the Minutes of 42nd Expert Appraisal Committee (Industry-2) Meeting, we submit the inputs and clarifications as below on the following

Sr. No.	Inputs/clarifications sought by Expert Appraisal Committee	Compliance	
1.	The earlier EC dated 14 th May 2003, issued in favor of M/s. Brihan Maharashtra Sugar Syndicate Limited has not been transferred in the name of M/s. Brima Sagar Maharashtra Distilleries Limited due to submission of the proposal only on 9th October, 2018. As such, admissibility of the proposal is yet to be established	In the year 2011, there was no provision for submission of application online, we have submitted the application for expansion of the distillery capacity from 35 KLPD to 65 KLPD at which time we had requested for transfer of the Environment Clearance with all the documents, since the transfer could not take place, we have again applied online on as soon as we came to know that the transfer of the EC could not take place. We are tacking the proposal and it being under process in the Ministry.	
2.	For the alcohol production of 42.46 KLPD during FY 2015- 16 i.e. higher than the sanctioned capacity of 35 KLPD, amounting to non- compliance of the existing EC conditions, the reply submitted by the project proponent was not found convincing and needs to be looked into by the Ministry for appropriate action.	The industry does not have its own molasses and purchases molasses from the nearby sugar units for alcohol production. Sir, we are reproducing the production of alcohol during the year 2015-16. Sugar season in Maharashtra starts every year in November and the winter season is the period for maximum recovery of sugar which reflects in molasses. Due to high content of sugar from November to April, the recovery of alcohol is very high. However, as yield of alcohol is high, the effluent concentration shall be low due to	

		maximum extraction. Thus there will not be any increase in pollution load. However, having noticed this fact, we have taken care to reduce the molasses quantity and maintained the production		
		levels as per the EC conditions. As explained the		
		excess production was only 17 to 18 %. The		
		average production in the year 2015-16 taking into		
		consideration 270 days of distillery working is		
		41.045 KLPD.		
		Month and Year	Production of Spirit	
		(Year 2015-16)	in Liters	
		Apr-15	980500.2	
		May-15	1028827.8	
		Jun-15	1064906.5	
		July-15	752618.1	
		Aug-15	0.0	
		Sept-15	569196.2	
		Oct-15	1015450.2	
		Nov-15	1129731.9	
		Dec-15	1108186.6	
		Jan-16	1147599.9	
		Feb-16	1052472.8	
		Mar-16	1232608.4	
		Total	11082098.6	
		During the year 2016-17, and 2017-18 the average production was only 27.178 KLPD and 25.125 respectively, considering 270 days working of the		
		Distillery.		
	Approval by PESO for the site	At present, we are not marketing Ethanol as the existing 35 KLPD production capacity is required for our IMFL manufacturing. After the expansion,		
	and layout plan for Ethanol			
3.	storage facilities from safety			
	considerations.	we propose to supply Ethanol to oil companies for which we have submitted the application to PESO for approval.		

In view of above clarifications, you are requested to grant us the Environment Clearance for the expansion of the Distillery capacity from 35 KLPD to 65 KLPD.