

Final Proceedings of 314th meeting of State Expert Appraisal Committee (SEAC) held on 30.04.2025 (Wednesday) at 10.30 AM in the Conference Hall no. 2, MGSIPA Complex, Sector-26, Chandigarh.

Following was present:

Sr. No.	Name of SEAC Member	Designation in SEAC
1.	Dr. Satnam Singh Ladhar	Chairman (in Person)
2.	Sh. Pardeep Garg	Member Secretary (in Person)
3.	Er. Manjit Singh	Member (in Person)
4.	Prof. Saroj Bala	Member (Through VC)
5.	Er. Daljeet Singh Cheema	Member (in Person)
6.	Mr. Aseem Kumar Sharma	Member (in Person)
7.	Dr. Naresh Kumar Bhardwaj	Member (in Person)

Item No. 01: Confirmation of the proceedings of 313th Meeting of State Level Expert Appraisal Committee (SEAC) held on 16.04.2025.

The draft proceedings of 313th meeting of SEAC held on 16.04.2025 was circulated to all the Members through e-mail dated 17.04.25 for sending their comments. The comments were received from Er. Manjit Singh, Er. D.S. Cheema, Shri. Aseem Kumar Sharma & Shri. Naresh Bhardwaj, Member(s), SEAC, vide email dated 18.04.2025 & 19.04.2025 and Member Secretary, SEAC vide email dated 21.04.2025 were incorporated in the final proceedings. Thereafter, the proceedings were uploaded on the Parivesh Portal with the approval of the Chairman SEAC.

SEAC confirmed the proceedings of 313th meeting of SEAC held on 16.04.2025.

Item No. 02: Action taken on the proceedings of 313th meeting of SEAC held on 16.04.2025

The action taken on the decisions of 313th meeting of SEAC held on 16.04.2025 has been completed.

Agenda Item No. 314.05: Application for Environmental Clearance (Violation) under EIA Notification dated 14.09.2006 for Group Housing Project Namely “Orchard County” at Village Sante Majra, Kharar-Landran Road, Kharar, District SAS Nagar, Mohali, Punjab by M/s Ansal Lotus Melange Projects Pvt Ltd. (Proposal No. SIA/PB/INFRA2/426593/2023).

The Project Proponent was granted Terms of Reference (**Violation**) vide letter No. 5010 dated 19.01.2022 issued by SEIAA under EIA notification dated 14.09.2006 for carrying out EIA study.

The Project Proponent has applied for obtaining Environmental Clearance (**Violation**) under EIA notification dated 14.09.2006 for Group Housing Project Namely “Orchard County” at Village Sante Majra, Kharar-Landran Road, Kharar, District SAS Nagar, Mohali, Punjab for total land area of 48,090.24 sqm (11.88 acres) having built up area is 1,04,388.877 sqm. The project is covered under category 8(a) of the schedule appended with the EIA notification dated 14.09.2006.

The Project Proponent further informed that the construction of project has been exceeded the limit of built-up area as per earlier Environmental Clearance and validity of earlier Environmental Clearance also got expired.

The Project Proponent has submitted final EIA/EMP report and he has deposited of Rs. 2,08,780/- vide UTR No. HDFCR52022041361104981 dated 13.04.2022.

Deliberations during 273rd meeting of SEAC held on 12.01.2024.

The meeting was attended by the following:

- (i) Sh. Vishwa Prakash, A.G.M
- (ii) Dr. Sandeep Garg, EC-Coordinator M/s Eco Paryavaran Laboratories & Consultant Pvt Ltd.
- (iii) Mrs. Jyoti Rani, EC- Coordinator M/s Eco Paryavaran Laboratories & Consultant Pvt Ltd.

The Committee allowed the Environmental Consultant to present the salient features of the application proposal. Thereafter, the Environmental Consultant presented the case as under:

Sr. No.	Description	Details
1	Basic Details	
1.1	Name of Project & Project Proponent:	Group Housing Project namely “Orchard County” by M/s Ansal Lotus Melange Projects Pvt. Ltd.
1.2	Proposal:	SIA/PB/INFRA2/426593/2023
1.3	Location of Project:	Village Sante Majra, Kharar-Landran Road, Kharar, District S.A.S Nagar, (Mohali), Punjab.
1.4	Details of Land area & Built up area:	Site area: 48,090.24 sq.m. (11.88 acres) Built up area: 1,04,388.877 sq.m.

1.5	Category under EIA notification dated 14.09.2006	The project falls under S.No. 8 (a) - 'Building & Construction Project' as built-up area of the project will be 1,04,388.877 sq.m.
1.6	Cost of the project	Rs. 210.66 crores. Out of which, Rs. 155.42 Crores amount has already been spent on the project.
2.	Site Suitability Characteristics	
2.1	Whether project is suitable as per the provisions of Master Plan:	The project falls under Residential Zone as per Master plan of Kharar.
2.2	Whether supporting document submitted in favour of statement at 2.1, details thereof: (CLU/building plan approval status)	The Project Proponent has submitted approved layout plan approved by Municipal Council, Kharar.
3	Forest, Wildlife and Green Area	
3.1	Whether the project required clearance under the provisions of Forest Conservation Act, 1980 or not.	Yes. NOC has already been obtained for diversion of 0.0025 ha of forest land.
3.2	Whether the project required clearance under the provisions of Punjab Land Preservation Act (PLPA), 1900.	No. Project is not covered under PLPA, 1900.
3.3	Whether project required clearance under the provisions of Wildlife Protection Act 1972 or not:	No. The project does not require clearance under Wildlife Protection Act, 1972.
3.4	Distance of the project from the Critically Polluted Area.	The nearest critically polluted area is Ludhiana located at a distance of approx. 80 km from the project.
3.5	Whether the project falls within the influence of Eco-Sensitive Zone or not.	No. The project does not fall within any eco-sensitive zone. City Bird Sanctuary and Sukhna Wildlife Sanctuary are at a distance of approx. 12 km; E & 17.3 km; E respectively from the project location.
3.6	Green area requirement and	Total green area: 4.37 acres (17,704.465 sq.m.) i.e. 36.8% of the total site area.

	proposed No. of trees:	No. of trees required = 601 trees. However, 660 no. of trees has already been planted.																											
4.	Configuration & Population																												
4.1	Proposal & Configuration	<p>The project will consist of 28 Blocks (708 Flats), 1 EWS block (72 Flats), 1 Club house and 1 Guard Room.</p> <p>Area Statement</p> <table> <tr> <th>Sr. No.</th><th>Description</th><th>Area (in sq.m.)</th></tr> <tr> <td>1.</td><td>Total Site Area</td><td>48,090.24 sq.m. (11.88 acres)</td></tr> <tr> <td>2.</td><td>Permissible Ground Coverage (@ 35%)</td><td>16,831.584</td></tr> <tr> <td>3.</td><td>Proposed Ground Coverage (@ 24.325%)</td><td>11,698.205</td></tr> <tr> <td>4.</td><td>Permissible FAR (@ 2)</td><td>96,180.48</td></tr> <tr> <td>5.</td><td>Proposed FAR (@ 1.94)</td><td>93,613.32</td></tr> <tr> <td>6.</td><td>Non FAR <ul style="list-style-type: none"> Mumty & Machine room Area Basement Area </td><td> 10,775.55 1440.94 9,334.61 </td></tr> <tr> <td>7.</td><td>Built-up Area (FAR + Non FAR)</td><td>1,04,388.87</td></tr> <tr> <td>8.</td><td>Green Area (@ 36.815%)</td><td>17,704.465</td></tr> </table>	Sr. No.	Description	Area (in sq.m.)	1.	Total Site Area	48,090.24 sq.m. (11.88 acres)	2.	Permissible Ground Coverage (@ 35%)	16,831.584	3.	Proposed Ground Coverage (@ 24.325%)	11,698.205	4.	Permissible FAR (@ 2)	96,180.48	5.	Proposed FAR (@ 1.94)	93,613.32	6.	Non FAR <ul style="list-style-type: none"> Mumty & Machine room Area Basement Area 	10,775.55 1440.94 9,334.61	7.	Built-up Area (FAR + Non FAR)	1,04,388.87	8.	Green Area (@ 36.815%)	17,704.465
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4.2	Population details	4,324 persons																											
5	Water																												
5.1	Total fresh water requirement:	370 KLD																											
5.2	Source:	Bore wells																											
5.3	Whether Permission obtained for abstraction/supply of the fresh water from the Competent Authority (Y/N) <i>Details thereof</i>	<p>Permission from CGWA was already obtained.</p> <p>Later, application was filed to PWRDA regarding abstraction of ground water. However as per recent guidelines, permission from PWRDA is not required as water demand is utilized exclusively for Drinking and Domestic use.</p>																											
5.4	Total wastewater generation:	437 KLD																											
5.5	Treatment methodology: <i>(STP capacity, technology & components)</i>	437 KLD of wastewater will be generated from the project which will be treated in STP of 350 KLD capacity & proposed STP of capacity 100 KLD. However, presently, STP of capacity 350 KLD has been installed within the project site to cater the current wastewater load of the project.																											
5.6	Treated wastewater for flushing purpose:	186 KLD																											

5.7	Treated wastewater for green area in summer, winter and rainy season:	Summer: 97 KLD Winter: 32 KLD Monsoon: 9 KLD					
5.8	Utilization/Disposal of excess treated wastewater.	Excess treated wastewater will be disposed off into MC sewer after recycling for landscaping & flushing.					
5.9	Cumulative Details:						
	S. No.	Total water Requirement	Total wastewater generated	Treated wastewater	Flushing water requirement	Green area requirement	Into sewer
	1.	556 KLD	437 KLD	428 KLD	186 KLD	Summer: 97 KLD Winter: 32 KLD Monsoon: 9 KLD	Summer: 145 KLD Winter: 210 KLD Monsoon: 233 KLD
5.10	Rain water harvesting proposal:	Total 8 Rain water recharging pits has already been constructed for artificial rain water recharge within the project premises.					
6	Air						
6.1	Details of Air Polluting machinery:	There will be provision of 3 DG sets i.e. 1 DG set of 350 KVA capacity, 1 DG set of 750 KVA and 1 DG set of 1050 KVA for standby use for emergency purposes. DG set will be provided with acoustic enclosure and will run on HSD fuel. Out of which, 2 DG sets of capacity 350 KVA & 750 KVA have been provided within the project for power backup.					
6.2	Measures to be adopted to contain particulate emission/Air Pollution	Acoustic enclosure to minimize noise generation and adequate stack height for proper dispersion.					
7	Waste Management						
7.1	Total quantity of solid waste generation	1,645 kg/day					
7.2	Whether Solid Waste Management layout plan by earmarking the location as well as area designated for installation of Mechanical Composter and Material Recovery	Solid waste management area has been provided. Biodegradable waste will be composted by use of 2 composters of 500 Kg & 250 Kg. Recyclable component will be disposed off through authorized recycler vendors. Inert waste will be dumped to authorized dumping site.					

	Facility submitted or not.																																																						
7.3	Details of management of Hazardous Waste.	Hazardous Waste in the form of used oil from DG set will be generated which will be managed & disposed off to authorized vendors as per the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016 and its amendments.																																																					
8	Energy Saving & EMP																																																						
8.1	Power Consumption:	Total power demand for the project will be 5,800 KW. Out of which, existing power load is 2,918 KW. The power is being supplied by Punjab State Power Corporation Limited (PSPCL).																																																					
8.2	Energy saving measures:	Use of only LED lighting for energy saving. LED lights have been used in towers, lift lobby, stair case, basement, etc. Further, solar panels are also proposed at the terrace of the Project.																																																					
8.3	Details of activities under Environment Management Plan.																																																						
	<table><tr><th rowspan="2">Sr. No.</th><th rowspan="2">Title</th><th colspan="2">Remaining Construction Phase</th><th>Operation Phase</th></tr><tr><th>Capital Cost (Rs. Lakhs)</th><th>Recurring Cost (Rs. Lakhs/ Annum)</th><th>Recurring Cost (Rs. Lakhs/ Annum)</th></tr><tr><td>1.</td><td>Air Pollution Control (Tarpaulin sheets/ barricading, DG set, stack height, anti-smog gun, sprinklers, etc.</td><td>15</td><td>1</td><td>1</td></tr><tr><td>2.</td><td>Water Pollution Control/ Sewage Treatment Plant (Additional STP of 100 KLD, MBBR- UF)</td><td>30</td><td>3</td><td>4</td></tr><tr><td>3.</td><td>Noise Pollution Control (Acoustic enclosure etc.)</td><td>2</td><td>0.5</td><td>0.5</td></tr><tr><td>4.</td><td>Landscaping</td><td>6</td><td>2</td><td>3</td></tr><tr><td>5.</td><td>Solid Waste Management (2 mechanical composters of 500 kg & 250 kg)</td><td>28</td><td>1.5</td><td>2.5</td></tr><tr><td>6.</td><td>Rain water recharging</td><td>2</td><td>2</td><td>2</td></tr><tr><td>7.</td><td>Energy Conservation (LEDs & Solar Panels)</td><td>15</td><td>2</td><td>2</td></tr><tr><td>8.</td><td>Miscellaneous</td><td>8</td><td>2</td><td>2</td></tr><tr><td></td><td>Total</td><td>106</td><td>14</td><td>17</td></tr></table>	Sr. No.	Title	Remaining Construction Phase		Operation Phase	Capital Cost (Rs. Lakhs)	Recurring Cost (Rs. Lakhs/ Annum)	Recurring Cost (Rs. Lakhs/ Annum)	1.	Air Pollution Control (Tarpaulin sheets/ barricading, DG set, stack height, anti-smog gun, sprinklers, etc.	15	1	1	2.	Water Pollution Control/ Sewage Treatment Plant (Additional STP of 100 KLD, MBBR- UF)	30	3	4	3.	Noise Pollution Control (Acoustic enclosure etc.)	2	0.5	0.5	4.	Landscaping	6	2	3	5.	Solid Waste Management (2 mechanical composters of 500 kg & 250 kg)	28	1.5	2.5	6.	Rain water recharging	2	2	2	7.	Energy Conservation (LEDs & Solar Panels)	15	2	2	8.	Miscellaneous	8	2	2		Total	106	14	17	
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	In addition, adequate amount will be spent under Additional environment activities. Details regarding the AEA will be submitted prior to SEAC, Punjab meeting.																																																						
9	DETAILS OF THE VIOLATION:																																																						
9.1	Total cost of the project and total cost of project already executed	<ul style="list-style-type: none">The total cost of the project is Rs. 210.66 Crores which includes the cost of land as well as construction cost.Total project cost incurred so far is Rs. 155.42 Crores.																																																					

9.2	Description of violation:			
	Sr. No.	Description	Ownership	Construction Status
	1.	Group Housing Project "Orchard County"	M/s Ansal Lotus Melange Projects Pvt. Ltd.	Approx. 75% construction has been completed and project is under partial operational phase. Tower nos. A1X, AX and club under violation
9.3	Date of commencement of the project	The construction work was started in July, 2007.		
9.4	Date of first submission of information of such violation to SEIAA	<p>The project proponent has applied for obtaining TORs under violation vide proposal no. SIA/PB/NCP/22975/2018.</p> <p>TOR application submitted to MoEF&CC on 13.09.2017.</p> <p>Violation was first identified during the PPCB visit on 11.11.2016. Copy of PPCB letter mentioning regarding the same is enclosed with the application. No construction has been done in the project after the submission of application to MoEF&CC i.e. vide dated 13.09.2017.</p>		
9.5	No. of days of violation	<p>1,297 days.</p> <p>Start Date – 25.02.2014</p> <p>End Date – 13.09.2017</p>		
9.6	Recurring and non-recurring cost for environmental damages	<p>Recurring cost = Rs. 0.01 Lakh/day or Rs. 12.97 Lakhs</p> <p>Non-recurring cost = Rs. 0.79 Lakhs</p>		
9.7	Cost of remediation plan and natural & community resource augmentation plan	Rs. 13.76 Lakhs		
9.8	Details of prosecution	<p>Prosecution has been filed under the provisions of Section 15 & 16 of Environmental Protection Act, 1986 in the district court, Kharar under the case title of Punjab Pollution Control Board VS M-s ANSAL LOTUS MELANGE PROJECTS PRIVATE LIMITED vide case no. COMA/30/2021. Copy of current status is enclosed with the application.</p>		
9.9	Penalty to be deposited with Punjab Pollution Control Board	<p>As per Office Memorandum of Government of India, Ministry of Environment, Forest and Climate Change, Impact Assessment Division dated 07.07.2021 regarding Standard Operating Procedure (SOP) for Identification and handling of violation cases under EIA Notification, 2006 in compliance to order of Hon'ble National Green Tribunal has been prepared. According to which:</p> <p>"For Expansion projects:</p> <p>i. Where operation/ production with expanded capacity has not commenced:</p>		

		<p>1% of the project cost attributable to the expansion activity incurred upto the date of filing of application along with EIA/EMP report.</p> <p>The additional project cost (attributable to the expansion activity) incurred on the violation part up to date of filing application is Rs. 3.5 crores. Thus, 1% of the total project cost comes out to be Rs. 3.5 lakhs. Thus, Rs. 3.5 lakhs will be considered as the penalty cost. This penalty fees amount will be deposited in the account of Punjab Pollution Control Board (PPCB) as penalty fees.</p>
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The Committee was apprised about the recent order dated 2.01.2024 passed by Hon'ble Supreme Court of India in Writ Petition (Civil) No. 1394 of 2023 titled as Vanashakti vs Union of India which is reproduced as under:

"1. Issue notices returnable in four weeks.

2. Until further orders, there shall be stay of operation of the Office Memorandum dated 7th July, 2021 and 28th January, 2022 issued by the Ministry of Environment, Forest and Climate Change".

The above said order of Hon'ble Supreme Court of India was also conveyed by Ministry of Environment, Forest and Climate Change, Govt. of India vide OM dated 8.01.2024. The MoEF&CC, Govt. of India vide above said OMs dated 7.07.2021 and 28.01.2022 issued a Standard Operating Procedure (SoP) for identification and handling of violation cases under EIA Notification 2006.

In view of above said orders of Hon'ble Supreme Court of India, the project proposal, being violation case, was deferred till the decision of the Court.

The Project Proponent has submitted reply through the Parivesh Portal.

Deliberations during the 296th meeting of SEAC held on 01.07.2024

Following was present on behalf of Project Proponent:

- (i) Mr. Vishwa Parkash, A.G.M Sales & Marketing
- (ii) Smt. Jyoti Rani, Environmental Coordinator, M/s Eco Paryavaran Laboratories and Consultants Pvt. Ltd.

The Project Proponent apprised the Committee about the NCLT Order dated 17.05.2024 stating that the applicant is not covered under the Supreme Court Order dated 02.01.2024 and grant liberty to the applicant to approach the concerned authorities for obtaining necessary Environmental Clearance and in that event, the Tribunal expect the concerned authorities to consider the case of the applicant in light of the order passed by the Hon'ble Supreme Court vide Order dated 02.02.2024.

The Hon'ble Supreme Court dated 02.02.2024 clarified that their orders dated 02.01.2024 would not come in the way of the Competent Authorities in considering the proposals for modifications/alterations in the Environmental Clearances if area of such projects had any valid Environmental Clearances prior to 07.07.21. Further, needless to state that such applications for

modifications/alterations would be considered by the Competent Authorities strictly in accordance with law as it existed prior to 07.07.2021.

The Project Proponent submitted that it has applied for Environmental Clearance under violation category on 13.09.2017 i.e. well before 07.07.21 and their case be appraised in light of the Orders dated 02.02.2024 of Hon'ble Supreme Court of India.

The Committee, after detailed deliberations, decided that SEIAA shall advise in the matter that whether such cases, who have applied before 07.07.21 for grant of Environmental Clearance under violation category, can be appraised as per MoEF&CC Notification dated 14.03.2017, in light of Supreme Court of India Order dated 02.02.24.

Deliberations during 302nd meeting of SEIAA held on 16.07.2024.

SEIAA perused the orders dated 02.02.2024 passed by Hon'ble Supreme Court of India in Writ Petition (Civil) No. 1394 of 2023 titled as Vanashakti vs Union of India and the operative part of the same is reproduced as under:

"We clarify that our orders dated 02.01.2024 would not come in the way of the competent authorities in considering the proposals for modifications/alterations in the Environmental Clearance if area of such projects had any valid environmental clearances prior to 07.07.2021.

Needless to state that such applications for modification/alteration would be considered by the Competent Authorities strictly in accordance with law as it existed prior to 07.07.2021.

We further clarify that our order should not be construed as having stayed any proceedings before any High Courts touching the subject matter of the office Memoranda, referred to above."

SEIAA also perused the procedure prescribed by MoEF&CC for dealing violations cases vide its notification no. S.O. 804(E) dated 14.03.2017, which prescribes following procedures for dealing applications for projects or activities or the expansion or modernisation of existing projects or activities requiring prior environmental clearance under the Environment Impact Assessment Notification, 2006 entailing capacity addition with change in process or technology or both undertaken in any part of India without obtaining prior environmental clearance from the Central Government or by the State Level Environment Impact Assessment Authority:

- In case the projects or activities requiring prior environmental clearance under Environment Impact Assessment Notification, 2006 from the concerned Regulatory Authority are brought for environmental clearance after starting the construction work, or have undertaken expansion, modernization, and change in product- mix without prior environmental clearance, these projects shall be treated as cases of violations and in such cases, even Category B projects which are granted environmental clearance by the State Environment Impact Assessment Authority constituted under sub-section (3) Section 3 of the Environment (Protection) Act, 1986 shall be appraised for grant of environmental clearance only by the Expert Appraisal Committee and environmental clearance will be granted at the Central level.

- In cases of violation, action will be taken against the project proponent by the respective State or State Pollution Control Board under the provisions of section 19 of the Environment (Protection) Act, 1986 and further, no consent to operate or occupancy certificate will be issued till the project is granted the environmental clearance.
- The cases of violation will be appraised by respective sector Expert Appraisal Committees constituted under subsection (3) of Section 3 of the Environment (Protection) Act, 1986 with a view to assess that the project has been constructed at a site which under prevailing laws is permissible and expansion has been done which can be run sustainably under compliance of environmental norms with adequate environmental safeguards; and in case, where the finding of the Expert Appraisal Committee is negative, closure of the project will be recommended along with other actions under the law.
- In case, where the findings of the Expert Appraisal Committee on point at sub-para (4) above are affirmative, the projects under this category will be prescribed the appropriate Terms of Reference for undertaking Environment Impact Assessment and preparation of Environment Management Plan. Further, the Expert Appraisal Committee will prescribe a specific Terms of Reference for the project on assessment of ecological damage, remediation plan and natural and community resource augmentation plan and it shall be prepared as an independent chapter in the environment impact assessment report by the accredited consultants. The collection and analysis of data for assessment of ecological damage, preparation of remediation plan and natural and community resource augmentation plan shall be done by an environmental laboratory duly notified under Environment (Protection) Act, 1986, or an environmental laboratory accredited by National Accreditation Board for Testing and Calibration Laboratories, or a laboratory of a Council of Scientific and Industrial Research institution working in the field of environment.
- The Expert Appraisal Committee shall stipulate the implementation of Environmental Management Plan, comprising remediation plan and natural and community resource augmentation plan corresponding to the ecological damage assessed and economic benefit derived due to violation as a condition of environmental clearance.
- The project proponent will be required to submit a bank guarantee equivalent to the amount of remediation plan and Natural and Community Resource Augmentation Plan with the State Pollution Control Board and the quantification will be recommended by Expert Appraisal Committee and finalized by Regulatory Authority and the bank guarantee shall be deposited prior to the grant of environmental clearance and will be released after successful implementation of the remediation plan and Natural and Community Resource Augmentation Plan, and after the recommendation by regional office of the Ministry, Expert Appraisal Committee and approval of the Regulatory Authority.
- The projects or activities which are in violation as on date of this notification only will be eligible to apply for environmental clearance under this notification and the project proponents can apply for environmental clearance under this notification only within six months from the date of this notification.

Further, MoEF&CC amended the notification no. S.O. 804(E) dated 14.03.2017, vide its notification no. S.O. 1030(E) dated 08.03.2018, which prescribes following procedures for dealing applications for projects or activities or the expansion or modernisation of existing projects or activities requiring prior environmental clearance under the Environment Impact Assessment Notification, 2006 entailing capacity addition with change in process or technology or both undertaken in any

part of India without obtaining prior environmental clearance from the Central Government or by the State Level Environment Impact Assessment Authority:

- In case the projects or activities requiring prior environmental clearance under the Environment Impact Assessment Notification, 2006 from the concerned regulatory authority are brought for environmental clearance after starting the construction work, or have undertaken expansion, modernisation, and change in product-mix without prior environmental clearance, these projects shall be treated as cases of violations and the projects or activities covered under category A of the Schedule to the Environment Impact Assessment Notification, 2006, including expansion and modernisation of existing projects or activities and change in product mix, shall be appraised for grant of environmental clearance by the Expert Appraisal Committee in the Ministry and the environmental clearance shall be granted at Central level, and for category B projects, the appraisal and approval thereof shall vest with the State or Union territory level Expert Appraisal Committees and State or Union territory Environment Impact Assessment Authorities in different States and Union territories, constituted under sub-section (3) of section 3 of the Environment (Protection) Act, 1986.”;
- In cases of violation, action will be taken against the project proponent by the respective State or State Pollution Control Board under the provisions of section 19 of the Environment (Protection) Act, 1986 and further, no consent to operate or occupancy certificate will be issued till the project is granted the environmental clearance
- The cases of violations will be appraised by the Expert Appraisal Committee at the Central level or State or Union territory level Expert Appraisal Committee constituted under sub-section (3) of section 3 of the Environment (Protection) Act, 1986 with a view to assess that the project has been constructed at a site which under prevailing laws is permissible and expansion has been done which can run sustainably under compliance of environmental norms with adequate environmental safeguards, and in case, where the findings of Expert Appraisal Committee for projects under category A or State or Union territory level Expert Appraisal Committee for projects under category B is negative, closure of the project will be recommended along with other actions under the law.”;
- In case, where the findings of the Expert Appraisal Committee or State or Union territory level Expert Appraisal Committee on point at sub-paragraph (4) above are affirmative, the projects will be granted the appropriate Terms of Reference for undertaking Environment Impact Assessment and preparation of Environment Management Plan and the Expert Appraisal Committee or State or Union territory level Expert Appraisal Committee, will prescribe specific Terms of Reference for the project on assessment of ecological damage, remediation plan and natural and community resource augmentation plan and it shall be prepared as an independent chapter in the environment impact assessment report by the accredited consultants, and the collection and analysis of data for assessment of ecological damage, preparation of remediation plan and natural and community resource augmentation plan shall be done by an environmental laboratory duly notified under the Environment (Protection) Act, 1986, or an environmental laboratory accredited by the National Accreditation Board for Testing and Calibration Laboratories, or a laboratory of the Council of Scientific and Industrial Research institution working in the field of environment.”;
- The Expert Appraisal Committee or State or Union territory level Expert Appraisal Committee, as the case may be, shall stipulate the implementation of Environmental Management Plan, comprising remediation plan and natural and community resource augmentation plan

corresponding to the ecological damage assessed and economic benefit derived due to violation as a condition of environmental clearance;

- The project proponent will be required to submit a bank guarantee equivalent to the amount of remediation plan and Natural and Community Resource Augmentation Plan with the State Pollution Control Board and the quantification will be recommended by the Expert Appraisal Committee for category A projects or by the State or Union territory level Expert Appraisal Committee for category B projects, as the case may be, and finalized by the concerned Regulatory Authority, and the bank guarantee shall be deposited prior to the grant of environmental clearance and released after successful implementation of the remediation plan and Natural and Community Resource Augmentation Plan, and after recommendation by regional office of the Ministry, Expert Appraisal Committee or State or Union territory level Expert Appraisal Committee and approval of the Regulatory Authority.”

SEIAA observed that in order to have correct interpretation of the Hon’ble Supreme Court orders dated 02.02.2024, copy of I.A filed in Writ Petition (Civil) No. 1394 of 2023 titled as Vanashakti vs Union of India is also required to be seen, so that final decision in the matter may be taken.

After detailed deliberations, SEIAA directed the supporting staff to obtain copy of I.A filed in Writ Petition (Civil) No. 1394 of 2023 titled as Vanashakti vs Union of India and place before SEIAA during its next meeting.

Deliberation during 305th meeting of SEIAA held on 29.07.2024

SEIAA directed the supporting staff to obtain copy of I.As filed in Writ Petition (Civil) No. 1394 of 2023 in consideration of which the Hon’ble Supreme Court has issued its orders dated 02.02.2024 in this PIL and place before SEIAA during its next meeting.

Deliberations during 302nd meeting of SEAC held on 04.11.2024.

The Committee noted that the case was earlier considered in 296th meeting of SEAC held on 01.07.2024 wherein it was decided that SEIAA shall advise in the matter that whether such cases that were received before 07.07.21 for grant of Environmental Clearance under violation category, can be appraised as per MoEF&CC Notification dated 14.03.2017, in light of Supreme Court of India Order dated 02.02.24.

Further, SEIAA considered the matter in its 302nd meeting held on 16.07.2024 and lastly in its 305th meeting held on 29.07.2024, wherein SEIAA directed its supporting staff to obtain copy of I.As filed in Writ Petition (Civil) No. 1394 of 2023 in consideration of which the Hon’ble Supreme Court has issued its orders dated 02.02.2024 in this PIL and place before SEIAA during its next meeting.

In view of the facts given above, SEAC decided to forward the case to SEIAA for advice in the said matter, as decided in 296th meeting of SEAC held on 01.07.2024.

SEAC vide letter no. 833 dated 19.11.2024 send the proceedings of the said agenda item to SEIAA for taking further necessary action. No action taken report submitted by SEIAA so far.

Present Case

The Project Proponent vide email dated 04.04.2025 has informed that the case was submitted under "Violation Category" which was not taken up by the Committee, as the stay was imposed on MoEF&CC OM dated 07.07.2021 and 28.01.2022 by Hon'ble Supreme Court vide its Order dated 02.01.2024 in the matter of W.P(C) No. 1394/2023 titled Vanashakti vs. Union of India. Further, MoEF&CC vide OM dated 08.01.2024 circulated the above-said SC Judgement among the concerned stakeholders.

The Project Proponent has requested the Committee to consider the case in the upcoming meeting on the basis of Hon'ble Supreme Court Order dated 06.01.2025 in the matter of SLP(C) No. 49103/2024 titled as Fatima vs Union of India, the relevant part of the same is reproduced as under:

"We direct that if any applications are pending for grant of ex post facto clearances on the basis of OMs dated 19th February, 2021 and 7th July, 2021, the same shall be processed. However, final order granting approval shall not be passed till further orders."

Furthermore, the Hon'ble Supreme Court vide its order dated 19.02.2025 in the matter of W.P (C) 1394 of 2023 titled Vanashakti vs. Union of India has directed as under:

"Our attention is invited to the order passed in SLP(Civil)Diary No.49103 of 2024. In view of the stay granted in this petition (Writ Petition No.1394 of 2023), it is obvious that no post facto clearances on the basis of OMs dated 19th February, 2021 and 7th July, 2021 can be granted as the same have been set aside by the order impugned in SLP(Civil)Diary No.29103 of 2024. No benefit of OM dated 28th January, 2022 can be granted in view of the interim order dated 2 nd January, 2024. Even if the applications are pending seeking ex-post facto clearances on the basis of these OMs, the same shall be processed. However, final order granting approval/clearance shall not be passed till further orders."

Further, Office Memorandum (OM) dated 28.03.2025 issued by Ministry of Environment, Forest and Climate Change (MoEF&CC) iterated the SC judgement as under:

"6. Subsequently, the Hon'ble Supreme Court vide order dated 06/01/2025 (copy enclosed) while tagging the SLP(C) Diary No. 49103/2024 titled Fatima vs Union of India with W.P (C) 1394 of 2023 titled Vanashakti v. Union of India, inter-alia, held that "if any applications are pending for grant of ex post facto clearances on the basis of OMs dated 19th February, 2021 and 7th July, 2021, the same shall be processed However, final order granting approval shall not be passed till further orders." Further, the Hon'ble Supreme Court vide order dated 19/02/2025 (copy enclosed) in W.P (C) No. 1394/2023 titled Vanashakti vs. Union of India reiterated the same.

7. In this regard, in respectful compliance of the above-mentioned orders of the Hon'ble Supreme Court dated 06/01/2025 and 19/02/2025, the Ministry hereby directs that all projects that have applied under the provisions of the OM dated 07/07/2021 and which are pending as on 02/01/2024 may be processed pursuant to the orders of Hon'ble Supreme Court as mentioned in para 6 above."

Deliberations during 314th meeting of SEAC held on 30.04.2025.

The meeting was attended by the following:

- (i) Sh. Sandeep Kaur, Senior Manager M/s Ansal Lotus Melange
- (ii) Mrs. Jyoti Rani, EC- Coordinator M/s Eco Paryavaran Laboratories & Consultant Pvt Ltd.

During the meeting, the Committee perused the Supreme Court Order dated 24.02.2025 in the matter of Van Shakti Vs Union of India, the operative part of which is reproduced as under:

“In the meanwhile, there will be stay of operation and implementation of the impugned Notification dated 29.01.2025(Annexure-P24) as well as Office Memorandum dated 30.01.2025(Annexure-P25)”

The Committee thereafter perused the Hon’ble Supreme Court Order dated 28.03.2025 in the same matter which is reproduced as under:

“The applications for vacating stay/modification to be listed on a non-miscellaneous day i.e. 06.05.2025”

The Committee, in view of Hon’ble Supreme Court of India Order dated 28.03.2025, decided to defer the case till the vacation of stay by Hon’ble Supreme Court of India in CWP No. 166/2025 in the matter of Van Shakti Vs Union of India.

Agenda Item No.314.12: Application for Environmental Clearance under EIA notification dated 14.09.2006 for API Manufacturing Industrial Unit by M/s Sun Pharmaceutical Industries Limited, Village Toansa, P.O- Railmajra, Tehsil Balachaur, District SBS Nagar, Punjab. (Proposal No. SIA/PB/IND3/247699/2021).

The industry is an existing pharmaceutical unit and was granted Environmental Clearance by the State Competent Authority vide letter no. CSA/04/R-28/9179 dated 11.10.2004 for the manufacturing of 28 pharmaceutical drugs.

The industry was granted Consent to Operate under the provisions of the Water Act 1974 valid up to 30.09.2022 & Air Act 1981 up to 31.03.2024 for the manufacturing of active pharmaceutical intermediates @ 737.25 TPA.

The industry has applied for obtaining Environmental Clearance under EIA notification dated 14.09.2006 for API Manufacturing Industrial Unit for increase in total production capacity from 737.25 TPA to 1177.884 TPA at Village Toansa, P.O- Railmajra, Tehsil Balachaur, District SBS Nagar, Punjab.

The Project is covered under category 5(f) of the schedule appended with the EIA Notification dated 14.09.2006. In the latest OM dated 16.07.2021 issued by the Ministry of Environment, Forest and Climate Change, it has been mentioned as under:

"All proposals for projects or activities in respect of Active Pharmaceutical Ingredients (API), received from 16th July, 2021 to 31st December, 2021, shall be appraised, as Category 'B2' projects, provided that any subsequent amendment or expansion or change in product mix, after the 31st December, 2021, shall be considered as per the provisions in force at that time."

Since, the project has applied for obtaining Environmental Clearance on 28.12.2021, the project can be considered as B2 category project.

The Cost of project for expansion is Rs. 22 Crores and the industry had already deposited Rs. 2,20,000/- vide UTR no. CITIN21292607669 dated 24.12.2021. The adequacy of fee deposited by the Project Proponent has been checked and verified by the supporting staff, SEIAA.

Punjab Pollution Control Board vide letter no. 5019 dated 18.08.2022 has sent the latest construction status report with details as under:

Sr. No.	Points as desired by EE (SEIAA)	Comments
1.	Construction status of the proposal.	1 The industry has not procured any new land for expansion and the expansion shall be carried out in the existing shed which is not in use. No new construction activity has been carried at the proposed site.
2.	Status of physical structures within 500 m radius of the site including	1 The industry is an existing unit and adjacent and it on one side is M/s Centrient Pharmaceuticals India Private Limited (Approx. 200 m). The nearest village to the

	<i>the status of industries, if any</i>	<i>industry i.e. Village Tonsa is also within a distance of less than 100 m from the boundary wall of the industry. On the third side forest land is there. On the Front side, the National highway is there. Bist Doaba canal is at a distance of 100 ft. from the boundary if the unit, natural drain which carries rain water from the uphill villages is also adjacent to both the units i.e M/s Sun pharmaceutical Industries Limited and M/s Centrient Pharmaceuticals India Private Limited. Further, river Sutlej is at a distance of 2 Kms (crow fly from the unit).</i>
3.	<i>Whether the site meets with the prescribed criteria for setting up of such projects.</i>	<i>There are no specific siting guidelines for such type of units as such general siting guidelines are applicable. The industry is an existing unit and as per Master Plan, Rupnagar the Village Tonsa is covered under industrial zone and some of the area of village Rail Majra is classified as residential area (Low Density) including village Abaddis. No document regarding the classification of the industry, clearly stating about the classification and land use pattern of the existing 81.98 acres of the land. However, the industry has mentioned in its application form that a litigation with the Forest Department is pending in the Hon'ble Punjab and Haryana High Court (CWP18903 of 2015) and the same has not yet been decided. The industry informed that they had received notice from DFO Garshankar in 2006 alleging that the company had violated the provisions of section 1 & 2 of the Forest conservation Act, 1980 and the same has not been sorted till date. Therefore, the suitability of site Cannot be commented as the litigation is pending in the Hon'ble Punjab and Haryana High Court and there is no clarity to the aspect that the entire premises of the industry falls within the Industrial Zone of Master Plan, Rupnagar.</i>

SEAC allowed the Environmental Consultant of the Project Proponent to present the salient features of the project. He, thereafter, presented the case as under:

Sr. No.	Description	Details
1	Basic Details	
1.1	Name of Industry & Project Proponent:	M/s Sun Pharmaceutical Industries Limited

		Mr. Kheemanand Sharma Location Head
1.2	Proposal:	SIA/PB/IND3/247699/2021 Expansion by increasing the total production capacity from 737.25 TPA to 1177.884 TPA.
1.3	Location of Industry:	Village Toansa, P.O-Railmajra, Tehsil Balachaur, Distt. SBS Nagar (Nawanshahr), Punjab.
1.4	Land Area & Built up area:	331771 sq.m & 1,38,057.74 sq.m The expansion is proposed within the existing land area only.
1.5	Category under EIA notification dated 14.09.2006	Category 5(f); as per notification dated 27th March, 2020 and further extension notification dated 16th July, 2021.
1.6	Cost of the project	Total cost after expansion will be Rs. 685.21 Cr out of which Rs. 22 crores is the cost of proposed expansion.
2.	Site Suitability Characteristics	
2.1	Whether site of the industry is suitable as per the provisions of Master Plan:	The site of the industry falls in notified Industrial Zone as per master plan of Roopnagar.
2.2	Whether supporting document submitted in favour of statement at 2.1, details thereof: (CLU/building plan approval status)	Industry is an existing unit and had already been granted Consents under the Provisions of Water Act 1974 & Air Act 1981.
3	Forest, Wildlife and Green Area	
3.1	Whether the industry required clearance under the provisions of Forest Conservation Act 1980 or not:	(i) A copy of the NOC issued by Chief Conservator of Forest; Punjab vide letter no. 12177 dated 04.07.2003 wherein it has been mentioned that no forest area is affected due to setting up of the industrial unit. (ii) Writ Petition has been filed by the industry in the year 2015 at Hon'ble High Court of Punjab & Haryana at Chandigarh against the State's claim to consider the land, where unit is located, as a forest land, requiring clearance under Forest Conservation Act, 1980. The plant was established in the year 1985-86 on agricultural land, after obtaining necessary approvals from the concerned authorities including

		Department of Forest. A self-declaration in this regard has been submitted by the industry.																																																																										
3.2	Whether industry required clearance under the provisions of Wildlife Protection Act 1972 or not:	No wildlife sanctuary falls within the radius of 10 km from the industry however Ropar wetland is located at a distance of 4 Km from the project site. There is no national park or sanctuary within 10 km of the industry. Thus, no clearance under the provisions of the Wildlife (Protection) Act 1972 is required.																																																																										
3.3	Whether the industry falls within the influence of Eco-Sensitive Zone or not. (Specify the distance from the nearest Eco sensitive zone)	No, the industry does not fall within the influence of Eco-sensitive zone.																																																																										
3.4	Green area requirement and proposed No. of trees:	45% of total area i.e., 151610.44 sqm out of 331771 sqm has been developed under green belt. No. of dominant tree species already existing within the unit is 5209.																																																																										
4.	Product details																																																																											
4.1	The existing production capacity is 737.25 TPA (i) Existing Products Details: <table><tr><th>S.No.</th><th>Name of Product</th><th>Existing Capacity (TPA)</th><th>Add. Capacity (TPA)</th><th>After expan. total capacity (TPA)</th></tr><tr><td>1</td><td>Amoxycillin</td><td>450</td><td>-450.00</td><td>0</td></tr><tr><td>2</td><td>Doxycycline</td><td>6</td><td>-6.00</td><td>0</td></tr><tr><td>3</td><td>Ranitidine</td><td>120</td><td>-120.00</td><td>0</td></tr><tr><td>4</td><td>Semi Synthetic Drugs (max)</td><td rowspan="2">48</td><td>0</td><td>48</td></tr><tr><td>5</td><td>Atorvastatin/Simvastatin/ Lisinopril</td><td>84.00</td><td>84</td></tr><tr><td>6</td><td>Candesartan</td><td>0.25</td><td>11.99</td><td>12.24</td></tr><tr><td>7</td><td>Clorazepate</td><td>0.5</td><td>-0.50</td><td>0</td></tr><tr><td>8</td><td>Fluoxetine</td><td>4</td><td>-4.00</td><td>0</td></tr><tr><td>9</td><td>Levofloxacin</td><td>6</td><td>4.58</td><td>10.584</td></tr><tr><td>10</td><td>Isotretinoin / Acitretin</td><td>1.5</td><td>0.90</td><td>2.4</td></tr><tr><td>11</td><td>Benazepril /Quinapril/ Loratadine/ Ofloxacin/ Omeprazole</td><td>10</td><td>212.00</td><td>31.2</td></tr><tr><td>12</td><td>Fexofenadine /Pioglitazone</td><td>10</td><td>6.50</td><td>16.5</td></tr><tr><td>13</td><td>Cephalexin/Cefadroxyl/Cefdinir /Cefprozil</td><td>75</td><td>-75.00</td><td>0</td></tr><tr><td>14</td><td>Fosinopril /Lorazepam /Midazolam/ Enalapril Maleate</td><td>6</td><td>-1.00</td><td>5</td></tr></table>		S.No.	Name of Product	Existing Capacity (TPA)	Add. Capacity (TPA)	After expan. total capacity (TPA)	1	Amoxycillin	450	-450.00	0	2	Doxycycline	6	-6.00	0	3	Ranitidine	120	-120.00	0	4	Semi Synthetic Drugs (max)	48	0	48	5	Atorvastatin/Simvastatin/ Lisinopril	84.00	84	6	Candesartan	0.25	11.99	12.24	7	Clorazepate	0.5	-0.50	0	8	Fluoxetine	4	-4.00	0	9	Levofloxacin	6	4.58	10.584	10	Isotretinoin / Acitretin	1.5	0.90	2.4	11	Benazepril /Quinapril/ Loratadine/ Ofloxacin/ Omeprazole	10	212.00	31.2	12	Fexofenadine /Pioglitazone	10	6.50	16.5	13	Cephalexin/Cefadroxyl/Cefdinir /Cefprozil	75	-75.00	0	14	Fosinopril /Lorazepam /Midazolam/ Enalapril Maleate	6	-1.00	5
S.No.	Name of Product	Existing Capacity (TPA)	Add. Capacity (TPA)	After expan. total capacity (TPA)																																																																								
1	Amoxycillin	450	-450.00	0																																																																								
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14	Fosinopril /Lorazepam /Midazolam/ Enalapril Maleate	6	-1.00	5																																																																								

	Total-A			209.924
(ii) Proposed Products Details:				
S.No.	Name of the Product	Total capacity (TPA)		
1.	Abiraterone Acetate	7.56		
2.	Abiraterone Acetate stage-I	24.96		
3.	Amorolfine Hydrochloride	1.48		
4.	Arterolane Maleate	4.20		
5.	Bosentan Monohydrate	3.00		
6.	Carbamazepine	125.00		
7.	Cilazapril	1.20		
8.	Desloratdine	3.48		
9.	Donepezil HCl Monohydrate	7.20		
10.	Entacavir	0.02		
11.	Esomeprazole	25.92		
12.	Fluvastatin	11.00		
13.	Hydroxynovoldiamine	18.00		
14.	Lansoprazole	12.00		
15.	Luliconazole	4.80		
16.	Olanzapine	1.30		
17.	Oxetanone	27.50		
18.	Pantaprazole	84.00		
19.	Pentazocine	3.50		
20.	Pimavanserin	1.68		
21.	Ramipril	5.50		
22.	Rebeprazole	4.80		
23.	Repaglinide	2.16		
24.	Rosuvastatin Calcium	14.00		
25.	Safinamide	4.80		
26.	Sertraline Hydrochloride	150.00		
27.	Silodosin	2.16		
28.	Solifenacin Succinate	1.50		
29.	Tamsulosin	0.50		
30.	Telmisartan	7.20		
31.	Tenofovir	110.00		
32.	Ticagrelor	12.00		
33.	Tigecycline	0.18		
34.	Tolvaptan	1.92		
35.	Valganciclovir	3.60		
36.	Valsartan	5.00		
37.	Venlafaxin	5.40		
38.	Voglibose	0.08		
39.	Meloxicam	3.60		

	40.	Bempedoic Acid	7.20
	41.	Brivaracetam	4.80
	42.	Dabigatran Etxilate Mesylate	7.20
	43.	Dapagliflozin Propanediol Monohydrate	8.00
	44.	Molnupiravir	15.00
	45.	Tietinoin Tocoferil	0.06
	46.	R&D product	20.00
	47.	Hydroxychloroquine Sulphate	7.00
	48.	Roxaustat	3.00
	49.	Vilanterol Trifenatate	0.50
	50.	Lumateperone	1.00
	51.	Nadifloxacin	1.00
	52.	Flupirtine maleate	1.00
	53.	10 MIS	190.00
		Total-B	967.96
After expansion Overall Production capacity will be 1177.884 TPA			
5	Water		
5.1	Total water demand:	1510 KLD	
5.1(a)	Total industrial water demand:	1335 KLD	
		Description	Existing (in KLD)After Expansion (in KLD)
		Boiler	200250
		Cooling water	420560
		Manufacturing process	200310
		Other (back, wash, floor wash, ETP/RO/MEEs/ATFDs washing, wet scrubber, etc.	155215
	Total industrial water requirement	9751335	
5.2(b)	Total domestic water demand:	175 KLD	
5.2	Source:	3 no. of existing Tube wells	
5.3	Whether Permission obtained for abstraction/supply of the fresh water	(i) Permission for abstraction of 1000 KLD of ground water from PWRDA vide certificate dated 19.04.2022 submitted. (ii) A copy of letter dated 23.12.2010 has been issued by CGWA wherein it has been mentioned that the total water	

	<p>from the Competent Authority (Y/N)</p> <p>Details thereof</p>	<p>requirement is 1283 KLD in alluvial terrain as such NOC is not required for ground water withdrawal from CGWA.</p>
5.4	<p>Water demand, Wastewater generation, Treatment methodology for wastewater and its utilization:</p>	<p>(i) The total water requirement of the industry shall be 1510 KLD out of which 1150 KLD shall be met through fresh water supply and remaining 360 KLD shall be met through recycled water.</p> <p>(ii) Out of 1150 KLD of fresh water requirement, 80 KLD shall be utilized for drinking purpose, 95 KLD shall be utilized for domestic requirement, 310 KLD shall be utilized in the process, 250 KLD shall be utilized in the Boiler, 310 KLD shall be utilized for cooling water makeup and 105 KLD shall be utilized for other activities including bag wash, floor wash etc.</p> <p>(iii) The total domestic effluent generation shall be 90 KLD which shall be treated in the STP of capacity 100 KLD. The treated waste water of 85 KLD shall be utilized in the green area of 135310.44 sqm and 16308.83 sqm to developed as per the Karnal Technology.</p> <p>(iv) The HTDS effluent of 70 KLD shall be treated in the MEE of capacity 75 KLD which shall be further treated in ATFD. The residue generated shall be given to TSDF. The MEE condensate of 50 KLD shall be treated in RO.</p> <p>(v) The LTDS effluent of 180 KLD generated from the process, 35 KLD generated from boiler as blow down, 45 KLD as cooling tower blow down, 150 KLD from other activities and 50 KLD from MEE condensate. The entire quantity of 460 KLD shall be treated in the ETP capacity 600 KLD. The treated effluent of 440 KLD shall be passed through UF/RO-1/RO-2.</p> <p>(vi) One of the streams of RO permeate of 360 KLD shall be utilized back into the process and another stream of RO permeate of 60 KLD shall be utilized in the green area of 135310.44 sqm and 16308.83 sqm to develop as per the Karnal Technology. The RO reject of 110 KLD shall be utilized back into the MEE.</p>

		(vii)In summer season, the total treated effluent proposed to utilized in the green area shall be 145 KLD against the maximum loading capacity of 744 KLD whereas in winter season, the total treated effluent proposed to utilized in the green area shall be 145 KLD against the maximum loading capacity of 244 KLD and in rainy season, the total treated effluent proposed to utilized in the green area shall be 145 KLD against the maximum loading capacity of 67 KLD. Therefore, the industry has proposed to develop the 4 acres (16308.83 sqm) of the land as per Karnal Technology.		
5.5	Rain water harvesting proposal:	2 rain water harvesting pits have been provided for groundwater recharging.		
6	Air			
6.1	Details of Air Polluting machinery & APCD proposed:			
	Sources	Existing	Proposed	Treatment /Management
	Boiler	i.5 TPH Furnace Oil based boiler (standby; will be replaced after expansion) ii.12 TPH Furnace Oil based boiler (standby) iii.13 TPH Biomass/ Agriculture waste-based boiler	i. 6 TPH bio briquette-based boiler	i. Cyclone separator followed by Bag filter to be installed with 13 TPH ii. Cyclone separator followed by Bag filter to be installed with proposed boiler of 6 TPH
	Incinerator	0.5 TPH	-	Multi Cyclone Separator followed by Packed bed scrubber and Ventury Scrubber.
	DG sets	(i) 7*1250 KVA (ii) 1*750 KVA (iii) 1*2270 KVA	(i) 2*1250 KVA	DG set is attached with canopy and a stack of adequate height as per norms and same will be followed after expansion.
7	Waste Management			

7.1	Solid waste generation & its management (Mechanical Composter/Compost pits)						
		Category	Type of Waste	Color of Bins	Disposal Method	Total Waste (Kg/day)	
		Bio-Degradable	Organic Waste	Green	The industry will install “Eco-ster-organic waste composter” of 150 kg/day capacity to treat the biodegradable waste.	114	
		Non-Biodegradable Domestic solid waste	Recyclable Waste	Blue	Recycler	76	
		Recyclable paper waste	Recyclable Waste	Blue	Recyclable paper waste after shredding is being sold to the authorized dealer	600 kg/month (23 kg/day)	
		Total			213		
7.2	Hazardous Waste generation & its management						
	Sr. No	Category	Components	Unit	Generation		Disposal Method
					Existing	Total after Expansion	
	1	5.1	Spent Oil	T/Annum	25	40	Authorized recycler/Incineration
	2	20.3	Distillation residues	T/Annum	480	720	Incineration / Co-processing
	3	28.1	Process residue & wastes	T/Annum	1200	1500	TSDF/Incineration / Co-processing
	4	28.2	Spent Catalyst	T/Annum	40	60	Authorized Recycler /Co-processing
	5	28.3	Spent Carbon	T/Annum	80	120	TSDF / Co-processing/ Incineration
	6	28.4	Off-specification products	T/Annum	40	60	Incineration / Co-processing

	7	28.5	Date expired, discarded and off specification drugs/medicines	T/Annum	10	15	Incineration / Co-processing	
	8	28.6	Spent Solvent	T/Annum	1800	2800	Incineration /Co-processing/ Recycling/ Pre-processing	
	9	33.1	Contaminated liners, containers, shoe covers, alum. Foil etc.	T/Annum	100	300	Co-processing/ Authorized recycler	
	10	35.3	Chemical Sludge from Waste water treatment	T/Annum	600	1200	TSDF / Co-processing,	
	11	36.2	Filter media such as Filter clothes, bags etc.	T/Annum	50	75	Incineration / Co-processing	
	12	37.1	Sludge from wet scrubber	T/Annum	35	55	TSDF	
	13	37.2	Incinerated ash	T/Annum	50	75	TSDF	
8	Energy Saving & EMP							
8.1	Power Consumption:		S. No.	Description	Unit	Existing	Proposed	Total
1.			Power load	KW	21,491.12	2000	23,491.12	
2.			D.G. Set	KVA	7x1250 KVA, 1x750 KVA and 1x 2270 KVA	2 x 1250 KVA	7x1250 KVA, 1x750 KVA and 1x 2270 KVA, 2 x 1250 KVA	
8.2	Energy saving measures:		1. Installation of Pin mill, additional Air compressor will be stopped by running Pin Mill 2. Installation of Pressure Powered Pump Packaging Unit PPPU pumps for steam condensate recovery besides reducing power and wastewater generation. 3. Replacement of old 50 to 100 HP motors with IE3 motors 4. Replacement of HVLP (250+18w) lamp with 45-watt LED Lamps.					

		5. Replacement of high head centrifugal pump with low head-high flow Axial pump in MEE to save energy																												
8.3	(i) Details of activities proposed under Environment Management Plan: <u>During Construction Phase</u>																													
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		the people of vill-Toansa/Bholewal & Railmajra. 2. Organizing medical camps on demand to cater medical services to the local communities.			
	3.	Educational Activities: 1. To provide education support to the needy students. 2. To provide required infrastructure in the Govt schools of the area.	2	1 year	2
	4.	Social Activities: 1. Company under its social activities providing necessary support to the local communities such as ration items to the needy persons. 2. Providing of ration items for Langar sewa to the religious / social functions to make better relations with them. 3. Providing of fire woods from the company premises on various occasions to the needy people.	0.7	1 year	0.7
	5.	Health Services: (Sun Pharma Community Health Care Society): The activities are a blend of health preventive, promotive and curative components amply supported by field laboratory services.	22	1 year	22
		Total	30.7 lakhs		Rs. 30.7 lakhs

The Committee observed that the industry has already been granted Environmental Clearance from CSA-cum-SAC in 2004 for the manufacturing of 28 pharmaceutical drugs and now, the

industry has applied for increase in the total production capacity of active pharmaceutical intermediates from 737.25 TPA to 1177.884 TPA by addition of new pharmaceutical products along with changes in the production capacity of existing pharmaceutical products. The Committee asked the industry to submit the compliance report of the conditions imposed in the Environmental Clearance granted to the industry, to be certified by Punjab Pollution Control Board.

The Committee perused the status report of Punjab Pollution Control Board dated 18.08.2022, wherein, it has been mentioned as under:

“There are no specific siting guidelines for such type of units as such general siting guidelines are applicable. The industry is an existing unit and as per Master Plan, Rupnagar the Village Tonsa is covered under industrial zone and some of the area of village Rail Majra is classified as residential area (Low Density) including village Abaddis. No document regarding the classification of the industry, clearly stating about the classification and land use pattern of the existing 81.98 acres of the land submitted. However, the industry has mentioned in its application form that a litigation with the Forest Department is pending in the Hon’ble Punjab and Haryana High Court (CWP18903of 2015) and the same has not yet been decided. The industry informed that they had received notice from DFO Garshankar in 2006 alleging that the company had violated the provisions of section 1 & 2 of the Forest conservation Act, 1980 and the same has not been sorted till date. Therefore, the suitability of site Cannot be commented as the litigation is pending in the Hon’ble Punjab and Haryana High Court and there is no clarity to the aspect that the entire premises of the industry falls within the Industrial Zone of Master Plan, Rupnagar”.

In this regard, the representative of the industry apprised the Committee that the industry had already been obtained Consents under the provisions of Water Act 1974 & Air Act 1981 and authorization under Hazardous Waste Management Rules 2016. The Committee observed that in the absence of suitability of the site for setting up of such type of units, the application proposal of the industry cannot be considered for further appraisal. The Committee asked the industry to submit the latest status and compliance pertaining to the court case pending in the Hon’ble Punjab & Haryana High Court (CWP 18903/2015).

The Committee observed that the industry has not submitted the basis for estimating the industrial and domestic water demand (component wise) and also the basis for waste water generation (component wise) for boiler blow down, cooling tower blow down, MEE condensate etc., The Committee further perused the water balance of the industry and observed that the industry has proposed to install two MEEs of capacity 75 KLD for the treatment of HTDS effluent and 120 KLD for the treatment of the RO reject respectively. The MEE condensate of quantity 50 KLD generated from MEE (75 KLD capacity) is being sent to ETP for further treatment, whereas, the MEE condensate of 110 KLD generated from MEE (120 KLD) is proposed to be reused in the process. The Committee asked the Project Proponent as to why the one stream of MEE condensate is being treated in ETP and another stream being recycled/re-used. The industry could not submit proper justification in this regard. The Committee asked the industry to submit the basis for estimating the industrial and domestic water demand and waste water generation (component wise) and also the revised water balance by utilizing the entire quantity of MEE condensate in the system.

The Committee observed that the green area mentioned in the synopsis and water balance section of the industry does not match. The Committee asked the industry to rectify the error and submit the exact details of the green area by earmarking in the layout plan.

The Committee observed that the industry has proposed water requirement of 744 KLD for green area in summer season, 244 KLD in winter season and 67 KLD in rainy season. It further proposed that 145 KLD of treated waste water can be reused for green area. Further, the industry has proposed to develop 4 Acre of land as per Karnal Technology to utilize excess quantity of 78 KLD of treated wastewater generated during rainy season.

The Committee observed that the industry has not taken into account the requirement of fresh water for green area while estimating the fresh water demand of 1150 KLD. The Committee observed that 4 acres of the green area to be developed as per Karnal Technology can sustain more than 400 KLD of the treated wastewater against excess quantity of 78 KLD. The Committee asked the industry to check the same and submit the revised proposal.

The Committee further observed that the industry has proposed more than one mode of disposal for different categories of hazardous waste to be generated from the industrial operations. The Committee asked the industry to submit single mode of disposal for each of the category of hazardous waste generated from the industry.

The Committee observed that the industry is required to allocate funds under the following Corporate Environment Responsibility (CER) activities:

- a) Development of Mini Forests (Nanak Bagchi), raising of Avenue Plantations and Plantations in public/community areas.
- b) Rejuvenation of Village Ponds.
- c) Development of Infrastructure for utilization of treated effluent of STPs.
- d) Provision of solar panels in the Government / Municipal / other public schools, hospitals and Dispensaries, etc.
- e) Rainwater harvesting in Public Buildings.
- f) Alternatives to Single Use Plastic.
- g) Solid Waste Management
- h) Other activities relating to amelioration of Air, Water and Soil pollution as prescribed in the applicable District Environment Plan (DEP).
- i) Activities as proposed by the Project Proponent / their accredited consultants for the amelioration of Air, Water, and Soil pollution on the basis of field surveys and approved by SEIAA / SEAC.

The Committee did not agree with the proposal of the industry to construct Rain Water Harvesting Pits for ground water recharging. The Committee apprehended that the industry shall generate toxic fumes from the process unit and the vapor laden toxic fumes may rest on the roof & surface of the industry which shall eventually enters into ground water through RWH pits. Therefore, the installation of RWH pits may led to contamination of groundwater.

After detailed deliberations, SEAC decided to defer the case till the reply of the below mentioned observations:

- (i) The industry shall submit the compliance report of the conditions mentioned in the Environmental Clearance granted to the industry by the State Competent Authority vide letter no. CSA/04/R-28/9179 dated 11.10.2004 for the manufacturing of 28 pharmaceutical drugs, certified by Punjab Pollution Control Board.
- (ii) The industry shall submit the latest status & compliance pertaining to the court case pending in the Hon'ble Punjab & Haryana High Court (CWP 18903/2015).
- (iii) The industry shall submit the basis for estimating the industrial and domestic water demand and waste water generation (component wise) and also the revised water balance by utilizing the entire quantity of MEE condensate in the system.
- (iv) The industry shall submit the details of green area proposed to be developed as the green area mentioned in the synopsis and water balance section of the industry does not match.
- (v) The industry shall submit the revised calculation for fresh water demand by considering the fresh water requirement for green area in summer and winter season. Further, the industry shall submit the alternate proposal to utilize the balance excess quantity of 78 KLD being generated in rainy season.
- (vi) The industry shall submit single mode of disposal for each of the category of hazardous waste generated from the industry.
- (vii) The industry shall allocate funds up to 1% of the total project cost under the following activities of Corporate Environment Responsibilities:
 - a) Development of Mini Forests (Nanak Bagchi), raising of Avenue Plantations and Plantations in public/community areas.
 - b) Rejuvenation of Village Ponds.
 - c) Development of Infrastructure for utilization of treated effluent of STPs.
 - d) Provision of solar panels in the Government / Municipal / other public schools, hospitals and Dispensaries, etc.
 - e) Rainwater harvesting in Public Buildings.
 - f) Alternatives to Single Use Plastic.
 - g) Solid Waste Management
 - h) Other activities relating to amelioration of Air, Water and Soil pollution as prescribed in the applicable District Environment Plan (DEP).
 - i) Activities as proposed by the Project Proponent / their accredited consultants for the amelioration of Air, Water, and Soil pollution on the basis of field surveys and approved by SEIAA / SEAC.
- (viii) The industry shall submit the self-declaration to the effect that it shall not carryout Rain Water Harvesting for ground water recharging.

Deliberations during 273rd meeting of SEAC held on 12.01.2024.

The meeting was attended by the following:

- (i) Mr. Rakesh Goyal, Sr. Manager
- (ii) Mr. Sandeep Garg, EIA Coordinator, M/s Eco laboratories Pvt Ltd.
- (iii) Mrs. Jyoti Rani, EC- Coordinator M/s Eco Paryavaran Laboratories & Consultant Pvt Ltd.

The Committee allowed the Environmental Consultant to present the reply of the aforementioned observations. Thereafter, the Environmental Consultant presented the reply as under:

S. No.	Observations	Reply
1.	The industry shall submit the compliance report of the conditions mentioned in the Environmental Clearance granted to the industry by the State Competent Authority vide letter no. CSA/04/R-28/9179 dated 11.10.2004 for the manufacturing of 28 pharmaceutical drugs, certified by Punjab Pollution Control Board.	Even after deliberate attempts from us, Punjab Pollution Control Board is not verifying the compliance report of the conditions mentioned in the Environmental Clearance granted to the industry by the State Competent Authority vide letter no. CSA/04/R-28/9179 dated 11.10.2004 for the manufacturing of 28 pharmaceutical drugs. When requested to PPCB, the competent authority asked us to provide the official letter from SEAC, Punjab stating the requirement of verified compliance against the EC conditions mentioned in SAC approval.
2.	The industry shall submit the latest status & compliance pertaining to the court case pending in the Hon'ble Punjab & Haryana High Court (CWP 18903/2015).	The latest status & compliance pertaining to the court case pending in the Hon'ble Punjab & Haryana High Court (CWP 18903/2015) is attached
3.	The industry shall submit the basis for estimating the industrial and domestic water demand and waste water generation (component wise) and also the revised water balance by utilizing the entire quantity of MEE condensate in the system.	The same is submitted.
4.	The industry shall submit the details of green area proposed to be developed as the green area mentioned in the synopsis and water balance section of the industry does not match.	Total Green area of the unit is 1,51,610.44 sqm (37.46 acres).

5.	<p>The industry shall submit the revised calculation for fresh water demand by considering the fresh water requirement for green area in summer and winter season.</p> <p>Further, the industry shall submit the alternate proposal to utilize the balance excess quantity of 78 KLD being generated in rainy season.</p>	Revised water balance diagram is submitted.																																									
6.	The industry shall submit single mode of disposal for each of the category of hazardous waste generated from the industry.	Details regarding disposal of hazardous waste is submitted.																																									
7.	<p>The industry shall allocate funds up to 1% of the total project cost under the following activities of Corporate Environment Responsibilities:</p> <ul style="list-style-type: none">• Development of Mini Forests (Nanak Bagchi), raising of Avenue Plantations and Plantations in public/community areas.• Rejuvenation of Village Ponds.• Development of Infrastructure for utilization of treated effluent of STPs.• Provision of solar panels in the Government / Municipal / other public schools, hospitals and Dispensaries, etc.• Rainwater harvesting in Public Buildings.• Alternatives to Single Use Plastic.• Solid Waste Management• Other activities relating to amelioration of Air, Water and Soil pollution as prescribed in the applicable District Environment Plan (DEP). <p>(i) Activities as proposed by the Project Proponent / their</p>	<p>Following funds have been allocated.</p> <table><tr><th colspan="6">CORPORATE ENVIRONMENTAL RESPONSIBILITY at API TOANSA for 2022-23 & 2023-24</th></tr><tr><th>S. No .</th><th>Expenditure</th><th>Expenditure (in Lakhs)</th><th>Time line</th><th>Area of action</th><th>Remarks</th></tr><tr><td>1</td><td>Drinking Water to the 240 families of village Toansa</td><td>50000 0.0</td><td>2022 -23</td><td>Toansa</td><td>Existing project - budgeted for 2022-23</td></tr><tr><td>2</td><td>Development of Mini Forests (Nanak Bagichi) raising the avenue plantation and Plantation in public/ community area.</td><td>20000 0.0</td><td>2022 -23 & 2023 -24</td><td>surrounding area</td><td>-</td></tr><tr><td>3</td><td>Rejuvenation of Village Ponds.</td><td>50000 0.0</td><td>2022 -23 & 2023 -24</td><td>Vill- Bholewal & Toansa</td><td>-</td></tr><tr><td>5</td><td>Provision of Solar Panels / solar street lights in the</td><td>70000 0.0</td><td>2022 -23</td><td>Toansa, Banah, Railmajra, Kathgarh &</td><td>budgeted- 2022-23 under rural dev</td></tr></table>						CORPORATE ENVIRONMENTAL RESPONSIBILITY at API TOANSA for 2022-23 & 2023-24						S. No .	Expenditure	Expenditure (in Lakhs)	Time line	Area of action	Remarks	1	Drinking Water to the 240 families of village Toansa	50000 0.0	2022 -23	Toansa	Existing project - budgeted for 2022-23	2	Development of Mini Forests (Nanak Bagichi) raising the avenue plantation and Plantation in public/ community area.	20000 0.0	2022 -23 & 2023 -24	surrounding area	-	3	Rejuvenation of Village Ponds.	50000 0.0	2022 -23 & 2023 -24	Vill- Bholewal & Toansa	-	5	Provision of Solar Panels / solar street lights in the	70000 0.0	2022 -23	Toansa, Banah, Railmajra, Kathgarh &	budgeted- 2022-23 under rural dev
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	accredited consultants for the amelioration of Air, Water, and Soil pollution on the basis of field surveys and approved by SEIAA / SEAC.		Government/ Municipal/ Other Public Schools, Hospitals, and Dispensaries, etc.			Bagowal	
		6	Rainwater Harvesting in Public Buildings/ schools.	400000.0	2022-23 & 2023-24	Govt Elementary school Toansa	-
		Total	Expenditure of approx Rs. 22 Lac to be expended	2300000.0			
8.	The industry shall submit the self-declaration to the effect that it shall not carryout Rain Water Harvesting for ground water recharging.	Self-declaration to the effect that it shall not carryout Rain Water Harvesting for ground water recharging is submitted					

The Project Proponent informed that the court case pending in the Hon'ble Punjab & Haryana High Court (CWP 18903/2015) relates to ground water pollution with next date of hearing as 4.03.2024. On perusal of ADS reply and after detailed deliberations, SEAC decided to defer the case till the decision of Hon'ble Punjab & Haryana High Court, as the matter relates to ground water pollution, and the receipt of the reply of below mentioned observations:

1. The Project Proponent has not submitted the basis for estimating the industrial and domestic water demand and waste water generation (component wise) as already asked in the ADS raised after considering the case in 228th Meeting of SEAC held on 5.09.2022. The Project Proponent shall submit the same.
2. The Project Proponent has proposed to utilized 69 KLD for treated waste water in the nearby construction activities. The Project Proponent shall submit the alternative proposal to utilize the same.
3. The Project Proponent shall justify the loss of 60 KLD of process water and 215 KLD of boiler water demand along with detailed calculations.
4. The Project Proponent in the water balance has proposed to discharge 50 KLD of MEE condensate into ETP of 600 KLD capacity and on other side it has proposed to recycle MEE condensate of 90 KLD. The Project Proponent shall justify that why the 50 KLD of MEE condensate cannot be recycled?

5. The Project Proponent shall submit the NOCs for carrying out the various activities proposed under CER.

The Committee allowed the Environmental Consultant to present the reply of the aforementioned observations. Thereafter, the Environmental Consultant presented the reply as under:

No.	Observations	Reply
1.	The Project Proponent has not submitted the basis for estimating the industrial and domestic water demand and waste water generation (component wise) as already asked in the ADS raised after considering the case in 228 th Meeting of SEAC held on 5.09.2022. The Project Proponent shall submit the same.	<p><u>Domestic water Demand:</u></p> <p>Domestic water demand is 95 KLD which is calculated as per preset standards specified in NBC, 2016.</p> <p>Population data arrived as per actual. Further, calculations have been done on threshold (maximum) values for domestic use as given below:</p> <p>Population = 1,125 employees</p> <ul style="list-style-type: none">• Fresh water demand @ 45 lpcd = $1,125 \times 45 = 51$ KLD• Miscellaneous water Demand (canteen, mess, etc. working on 24-hour basis i.e. 3 meals + 3 refreshments per day) @ 35 lpcd = $1,125 \times 35 = 39$ KLD• Visitors including transporters @ 15 lpcd = $325 \times 15 = 5$ KLD <p>Total domestic water demand = $51 + 39 + 5 = 95$ KLD</p> <p><u>Industrial Water Demand:</u></p> <p>The industry is in operation since 1986, thus into the business for more than 35 years. All figures viz-a-viz water consumption and wastewater generation have been taken on actual basis correlating with the previous track record/ history of the unit. Additionally, we have also taken into consideration the relevant data from our sister concerns located at Mohali, Gujrat & Chennai, for the purpose of assessment of industrial water demand of the unit.</p> <p>Therefore, to conclude the basis for industrial consumption, the industry has relied upon in house R&D and available data.</p>

2.	The Project Proponent has proposed to utilized 69 KLD for treated wastewater in the nearby construction activities. The Project Proponent shall submit the alternative proposal to utilize the same.	In monsoon season, treated water will be reused for horticulture purpose onto green area and excess treated water will be reused for cooling & plant washing purpose. Revised water balance is submitted									
	The Project Proponent shall justify the loss of 60 KLD of process water and 215 KLD of boiler water demand along with detailed calculations.	<p>As per the revised water balance, only 10 KLD of water will be lost during process.</p> <p>Further, boiler water demand is estimated to be 385 KLD; out of which 140 KLD will be met through fresh water and remaining 245 KLD from residual steam.</p> <p>Out of this, 350 KLD will be used in process, 35 KLD will be released as boiler blowdown and 10 KLD as process water loss.</p> <p>Revised water balance showing water requirement & recycling/reuse at each stage is submitted</p>									
	The Project Proponent in the water balance has proposed to discharge 50 KLD of MEE condensate into ETP of 600 KLD capacity and on other side it has proposed to recycle MEE condensate of 90 KLD. The Project Proponent shall justify that why the 50 KLD of MEE condensate cannot be recycled?	The industry has 2 nos. of Multi Effect Evaporators for High TDS & Low TDS effluent. After treatment of high TDS effluent distillate COD is more than the prescribed limit. Due to higher COD this condensate cannot be re-cycled, therefore 50 KLD of MEE condensate arising from high TDS effluent will be fed to the ETP of 600 KLD capacity to re-dress the COD. Further, RO reject MEE, distillate COD is well within the prescribed limit, hence can be directly used for recycling purpose.									
	The Project Proponent shall submit the NOCs for carrying out the various activities proposed under CER.	<p>For expansion, the additional cost of the project is 22 Cr. Therefore, 1% of the additional cost i.e. Rs. 22 lakhs is reserved for CER activities as per the details given below:</p> <table border="1"> <thead> <tr> <th>S. No.</th><th>Expenditure</th><th>Amount (in Lakhs)</th></tr> </thead> <tbody> <tr> <td>1.</td><td>Drinking water supply to 240 families of Village Toansa</td><td>5</td></tr> <tr> <td>2.</td><td>Provision of Solar Panels & Solar Street lights in common areas, Govt. School of Village Anson along with conduct of training regarding awareness for use/</td><td>8.5</td></tr> </tbody> </table>	S. No.	Expenditure	Amount (in Lakhs)	1.	Drinking water supply to 240 families of Village Toansa	5	2.	Provision of Solar Panels & Solar Street lights in common areas, Govt. School of Village Anson along with conduct of training regarding awareness for use/	8.5
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			promote of renewable sources of energy	
		3.	Provision of Solar Panels & Solar Street lights in common areas, Govt. School of Village Toansa along with conduct of training regarding awareness for use/ promote of renewable sources of energy	8.5
		Total		Rs. 22 lakhs
		Copy of NOCs regarding the same is submitted In addition of above, we wish to highlight that the industry is already undertaking many activities under CER/ CSR like pond rejuvenation, improvement of infrastructure etc.		

Deliberations during 282nd meeting of SEAC held on 28.03.2024.

The meeting was attended by the following:

- (i) Mr. Vaneet Gupta, Senior General Manager M/s Sun Pharmaceutical Industries Limited.
- (ii) Mrs. Jyoti Rani, EC- Coordinator M/s Eco Paryavaran Laboratories & Consultant Pvt Ltd.

The Project Proponent (PP) apprised the Committee that M/s Sun pharmaceutical has filed a case (CWP 18903/2015) on the Deptt. of Forest, Punjab regarding the land use of the project premises wherein the Department of Forest is claiming that the plant is established on the Forest Land and the Industry needs to pay some charges towards compensatory afforestation cost and net present value. The industry has challenged this claim of the Forest Department before the Hon'ble Punjab & Haryana High Court which is listed for hearing on 16.05.2024. The Committee noted the same.

The Committee on perusal of the water balance observed that 53% loss (285 KLD to 150 KLD) in the back wash, floor wash, ETP/RO/MEE/ATFD washings seems to be on very higher side and need to be checked. Further, it was proposed that 250 KLD of residual stream is being generated from 350 KLD of water for which the supporting calculations needs to be provided by the PP. Similarly, 50 KLD of MEE condensate is proposed to be treated in the ETP because of high COD and on the other hand 110 KLD of MEE condensate is proposed to be recycled. Further, the treated water is proposed to be utilized for cooling and washing for which the characterises of the waste water justifying its use for cooling and washing needs to be provided.

After detailed deliberations, the Committee decided to defer the case till the receipt of reply of the above-mentioned observations.

Accordingly, ADS was raised to the Project Proponent.

Now, the project proponent has submitted a reply through Parivesh Portal on 02.07.2024. Copy of the ADS reply is as per Annexure-A.

Deliberations during 298th meeting of SEAC held on 13.07.2024.

The meeting was attended by the following:

- (i) Mr. Rakesh Goyal, Senior Manager, M/s Sun Pharmaceutical Industries Limited.
- (ii) Mr. Sandeep Garg, EIA Coordinator, M/s Eco laboratories Pvt Ltd.
- (iii) Mrs. Jyoti Rani, EIA Coordinator, M/s Eco laboratories Pvt. Ltd.

The Committee further observed that PPCB in their status report dated 18.08.2022 mentioned that suitability of site cannot be commented as the litigation is pending in the Hon'ble Punjab and Haryana High Court and there is no clarity on the aspect that the entire premises of the industry falls within the Industrial zone of Master Plan, Rupnagar. The Committee in their meeting held on 05.09.2022 observed that in the absence of suitability of site for setting up of such type of Units, the application proposal of the industry cannot be considered for further appraisal.

The Committee observed that the project proponent in their ADS reply has not submitted any details with regards to CWP no. 18903/ 2015 due for hearing on 16.05.24 in the Hon'ble Punjab and Haryana High Court. Further, the Committee observed that the Project Proponent in the 273rd meeting of SEAC held on 12.01.2024 informed that the CWP 18903/2015 relates to ground water pollution whereas, the Project Proponent in 282nd meeting of SEAC held on 28.03.2024 informed that the said CWP is regarding the land use of project premises wherein the Department of Forest is claiming that the plant is established on the forest land and the industry needs to pay some charges towards compensatory afforestation cost and net present value. The same needs to be clarified by the Project Proponent. The Project Proponent during the meeting apprised the Committee that the Court Case is adjourned to 22.10.2024.

During the perusal of water balance, the Committee observed that the Project Proponent has proposed Karnal Technology in the land area of 7 acres for the disposal of excess treated waste water. The Committee asked the Project Proponent to submit the feasibility report for scientific disposal of the excess treated waste water in the land area proposed to be developed as per Karnal Technology. The Project Proponent agree to provide the same.

The Committee, after detailed deliberations has decided to defer the case till the receipt of reply of the below mentioned observations:

- (i) The Project Proponent in 273rd meeting of SEAC held on 12.01.2024 informed that the CWP 18903/2015 relates to ground water pollution whereas, the Project Proponent in 282nd meeting of SEAC held on 28.03.2024 informed that the said CWP is regarding the land use of project premises wherein the Department of Forest is claiming that the plant is established on the forest land and the industry needs to pay some charges towards compensatory afforestation cost and net present value. The Project Proponent shall clarify the same.
- (ii) The Project Proponent shall submit a copy of the order of the Hon'ble Punjab and Haryana High Court in CWP No. 18903/2015 due for hearing on 22.10.2024.

- (iii) The Project Proponent shall submit the feasibility report for scientific disposal of the excess treated waste water in the land area proposed to be developed as per Karnal Technology.

Accordingly, ADS was raised to the Project Proponent.

Now, the project proponent has submitted a reply through Parivesh Portal on 18.07.2024. Copy of the ADS reply is as per Annexure-E, relevant part of the same is reproduced as under:

S. No.	Observations	Reply
1.	The Project Proponent in 273 rd meeting of SEAC held on 12.01.2024 informed that the CWP 18903/2015 relates to ground water pollution whereas, the Project Proponent in 282 nd meeting of SEAC held on 28.03.2024 informed that the said CWP is regarding the land use of project premises wherein the Department of Forest is claiming that the plant is established on the forest land and the industry needs to pay some charges towards compensatory afforestation cost and net present value. The Project Proponent shall clarify the same.	In this regard, we wish to updated that the CWP 18903/2015 is related to land use of the project; wherein the Department of Forest is claiming that the plant is established on the forest land and industry needs to pay some charges towards compensatory afforestation cost and net present value.
2.	The Project Proponent shall submit a copy of the order of the Hon'ble Punjab and Haryana High Court in CWP No. 18903/2015 due for hearing on 22.10.2024.	The CWP 18903/2015 is related to land use of the project; wherein the Department of Forest is claiming that the plant is established on the forest land and industry needs to pay some charges towards compensatory afforestation cost and net present value. Copy of the court case is enclosed as Annexure I(a). Further, the screenshot showing the next date of said case is enclosed as Annexure I(b).
3.	The Project Proponent shall submit the feasibility report for scientific disposal of the excess treated waste water in the land area proposed to be developed as per Karnal Technology.	The feasibility report for scientific disposal of the excess treated water on 7 acres of land as per Karnal Technology is enclosed as Annexure II.

Deliberations during 301th meeting of SEAC held on 29.07.2024.

The meeting was attended by the following:

- (i) Mr. Rakesh Goyal, Senior Manager, M/s Sun Pharmaceutical Industries Limited.
- (ii) Mr. Sandeep Garg, EIA Coordinator, M/s Eco laboratories Pvt Ltd.
- (iii) Mrs. Jyoti Rani, EIA Coordinator, M/s Eco laboratories Pvt. Ltd.

The Committee observed that the industry has installed appropriate pollution control devices to achieve the prescribed standards, in compliance of the conditions imposed by Competent State Authority, Govt. of Punjab in their EC letter issued vide letter No. CSA/04/R-28/9179 dated 11.10.2004. Further, the Committee noted that the industry has also obtained Consent to Operate under the provisions of the Water Act, 1974 and Air Act, 1981, which are valid up to 31.03.2025.

The Project Proponent informed the Committee that the CWP No. 18903/2015 related to land use of the project pending in the Hon'ble Punjab and Haryana High Court is due for hearing on 22.10.2024. Further, it was informed that the Dept. of Forest is claiming that the plant is established on the forest land and the industry needs to pay some charges towards compensatory afforestation cost and net present value.

The Committee observed that the Project Proponent has proposed 7 acres of land to be developed as per Karnal Technology within the project premises for the disposal of excess treated waste water being generated from the industry.

The Committee observed that the proposed project meets the environmental norms for the treatment & disposal of waste water and the air pollution control measures. However, the permissibility of site, in view of matter pending in the Hon'ble Punjab and Haryana High Court with regards to its land use, cannot be decided in the present circumstances.

The Committee, after detailed deliberations has decided to forward the application to SEIAA with the recommendation for appropriate decision based on the matter pending in the Hon'ble Punjab and Haryana High Court.

Deliberation during 306th meeting of SEIAA held on 01.08.2024

The meeting was attended by the following:

- (i) Mr. Rakesh Goyal, Senior Manager, M/s Sun Pharmaceutical Industries Limited.
- (ii) Mr. Sandeep Garg, EIA Coordinator, M/s Eco laboratories Pvt Ltd.
- (iii) Mrs. Jyoti Rani, EIA Coordinator, M/s Eco laboratories Pvt. Ltd.

The Environmental Consultant presented the salient features of the project as under:

- i. The industry was established in the year 1986 in the name of M/s Ranbaxy Laboratories. The industry was taken over by M/s Sun Pharmaceuticals Industries Pvt. Ltd. in the year 2015.
- ii. M/s Ranbaxy Laboratories was granted clearance from CSA-cum-SAC in the year 2006 after obtaining NOCs from various stakeholder departments including forest department.
- iii. DFO, Garhshankar issued notice to the industry in 2006 intimating that land on which industry is established is coming under section 1 & 2 of PLPA and industry shall obtain permission from Forest Department.
- iv. In the year 2014, Forest Department asked for compensation from the industry as the land is coming under section 1 & 2 of PLPA.

- v. As per the jamabandi of the land on which the industry is established it is shown as private land for industrial purpose and no Govt. Land is coming within the project site.
- vi. Accordingly, they were left with no option but to file application in Hon'ble Punjab and Haryana High Court vide CWP No. 18903 of 2015 against the demand for compensation being raised by the Forest Department.

The Project Proponent was asked regarding inappropriate water balance submitted for summer, winter and monsoon season as for all these three seasons the water consumption and wastewater generation was same, especially in cooling towers with same evaporation loss. The project proponent could not give satisfactory reply in this regard.

Further, SEIAA observed that SEAC has conditionally forwarded the case to SEIAA. Though it has observed that the *"proposed project meets the environmental norms for the treatment and disposal of waste water and the air pollution control measures"*, it has forwarded the application to SEIAA *"with the recommendation for appropriate decision based on the matter pending in the in the Hon'ble Punjab and Haryana High Court"*.

SEIAA observed that further examination of the application and pending court case is required to be undertaken before deciding the matter which cannot be completed by the present Authority as its term is coming to an end in one day i.e on 02.08.2024.

After detailed deliberations, SEIAA decided to defer the application for consideration by its successor SEIAA upon its notification.

Deliberation during 309th meeting of SEIAA held on 17.02.2025

During the meeting, SEIAA considered the email request of the project proponent for deferment of the case to the next meeting.

After deliberation, SEIAA decided to accept the request and to defer the case to the next meeting.

Deliberation during 310th meeting of SEIAA held on 21.03.2025

The meeting was attended by the following:

1. Mr. Rakesh Goyal, Senior Manager, M/s Sun Pharmaceutical Industries Limited.
2. Adv. MPS Mann, M/s Sun Pharmaceutical Industries Limited.
3. Mr. Sandeep Garg, EIA Coordinator, M/s Eco Paryavaran Laboratories and Consultant Pvt. Ltd.
4. Mrs. Jyoti Rani, Field Area Expert, M/s Eco Paryavaran Laboratories and Consultant Pvt. Ltd.

The EIA-Coordinator presented the salient features of the project. Further, the project proponent submitted a signed copy of the presentation and authorization letter for Mr. Rakesh Goyal. The same was taken on record.

The industry has submitted its reply to the observation made by SEIAA in its 306th meeting as under:

Reply to observation 1:

- *There are 10 cooling towers within the industrial unit.*

- The makeup water demand is estimated based on three losses: Evaporation loss, drift loss and Cooling Tower blowdown.
- Only evaporation loss is vary seasonally as stated below:
 - During Summer Season the evaporation loss: 368 KLD
 - During Winter Season the evaporation loss: 228 KLD
 - During Monsoon Season the evaporation loss: 264 KLD

Accordingly, the revised water balance was submitted in the presentation.

Reply to observation 2:

- The Plant was established in the year 1985-86 after obtaining necessary clearances from the concerned authorities, including the Forest Department, who is a member of CSA-cum-SAC, the competent authority for granting clearance to our category of industry at that point of time.
- NOC was granted by Deputy Commissioner, Hoshiarpur (then District of village Toansa) to store Petroleum products which was also granted after having NOC from different authorities including the Forest department.
- In 2003, the Forest department has categorically mentioned in their NOC issued vide No. 12177, dated 04.07.2003 that "our Forests are not at all affected with the extension of this industry" (erstwhile Ranbaxy).
- All of a sudden in the year 2006, the Forest department issued us a notice stating that the land where our plant is established, is closed under provisions of Punjab Land Preservation Act 1900 (PLPA), thus it is a Forest land require clearance from the competent authority to use it for Industrial purpose by paying applicable charges.
- Thereafter, so many communications were exchanged with the Forest Department whereby we communicated that this is not a Forest land because when the Plant was established the relevant notification being relied by the Forest department was not in-force and certain other technical issues like no clear-cut demarcation of the Khasra No.s closed under PLPA & ambiguity of the area details etc.
- The Forest department not being agreeing to our contentions, we challenged the notices before High Court of Punjab & Haryana seeking directions for Forest department to withdraw the notices issued to us asking for taking clearance under The Forest (Conservation) Act, 1980 (FCA) by depositing charges. This matter is under adjudication at Hon'ble High Court and is next listed for 09.07.2025.
- It may be concluded that the question here is not about the suitability of the land for the project, rather is about whether the industry requires to obtain clearance from the competent authority by depositing the charges or not, keeping in view the circumstances narrated in preceding paras.
- Further, Department of Town & Country Planning, Government of Punjab has classified the area of village Toansa as Industrial area in the Land Use Plan (2010-2031) approved vide drawing No. D.D.T.P.(R) 45/2011 dated 12.08.2011. This also establishes that the area is Industrial zone.
- The Forest Act amendment Bill 2023, has amended the provisions regarding applicability of FCA 1980 and now the provisions of FCA 1980, would be applicable on the lands which has been changed from forest use to use for non-forest purpose after 12th December, 1996.

In reply to observations / queries / suggestions by SEIAA, the project proponent informed / submitted / undertook as under:

- i. The industry was granted first consent to operate vide no. HPR/10W/ETP(L)/88-89/R-21 dated 09.05.1988 in the name of M/s Ranbaxy Laboratories Ltd.
- ii. It had obtained approval from Competent Authority for expansion vide letter no. CSA/04/R-28/9179 dated 11.10.2004 for production capacity of 737.25 TPA and there is no change in the production capacity till date.
- iii. It was amalgamated with M/s Ranbaxy Laboratories Ltd. in the Year 2015.
- iv. It has proposed expansion in the production capacity from 737.25 TPA to 1177.884 TPA within existing premises.
- v. The said expansion proposal was submitted before 31.12.2022 and therefore, is covered under category B2.

During the meeting, SEIAA observed as under:

- a) The industry was granted consent to establish/NOC and consent to operate of PPCB from time to time and the detail of same is tabulated as under:

Date	Consent of PPCB	Production Capacity (TPA)	Trade Effluent/ Domestic Effluent (KLD)	Existing Capital Investment (Rs. In Crores)	Expansion Cost (Rs. In Crores)	Total cost after expansion
09.05.1988	Consent to Operate (Water Act)	-	122/28	-	-	-
28.06.2013	Consent to Operate (Water Act)	737.25	310/90	-	-	-
10.12.2013	NOC Expansion	735.25 to 1063.5	-	-	-	-
02.01.2014	Consent to Operate	737.25 By Product-Methyl Iodide	-	5.76	-	-
10.06.2016	Consent to Operate (Water Act)	737.25	370/90	616.99	-	-
03.04.2018	Consent to Operate (Water Act)	737.25 By Product-Pyridine Hydrobromide, DCU, Acetic Acid, Spent MnO2 & Ors.	-	629.86	-	-
16.04.2019	NOC (Expansion)	737.25	-	635.13	9.87	645
16.04.2019	Consent to Operate	737.25	-	635.13	-	-

12.04.2020	Consent to Operate- Varied (Air Act)	- Installation of new boiler of capacity 13 TPH	-	632.44	-	-
21.06.2021	Consent to Operate (Air Act)	-	-	642.58	-	-
25.06.2021	Consent to Operate (Water Act)	737.25	370/90	642.58	-	-
18.01.2022	Consent to Operate	737.25	-	663.21	-	-
11.04.2022	Consent to Operate (Air Act)	-	-	663.21	-	-
21.12.2022	Consent to Operate	368.5 (Reduced)	370/90	730.14	-	-
16.10.2023	Consent to Operate	368.5 (Reduced)	-	731.06	-	-
18.07.2024	Consent to Operate (Water Act)	737.25	-	731.06	-	-
25.07.2024	Consent to Operate- Varied (Air Act)	737.25	-	702.31	-	-

The facts in the table above are explained as under:

- The industry is increasing its total capital investment continuously to manifold since the Year 2014 i.e. Rs. 5.76 Crores to the Year 2024 i.e. Rs. 731.06 Crores.
- It has changed its by-products from Methyl Iodide in the Year 2014 to Pyridine Hydrobromide, DCU, Acetic Acid, Spent MnO₂ & Ors., in the Year 2018.
- It was granted CTE expansion in the Year 2019 and thereafter, it was granted Varied Consent to Operate for installation of new boiler of capacity 13 TPH.
- It was again granted Varied Consent to Operate under the Air Act, 1981 on 25.07.2024 through Invest Punjab.

All these facts indicate that the industry is in a continuous process of expansion/modernization/process change.

- b) In the present application for Environmental Clearance (Fresh) for expansion of existing unit, the existing project cost of Rs. 663.21 Crore and expansion cost of Rs. 22 Crores is mentioned. This is not in consonance with the capital investments mentioned in the consents granted by the PPCB. This indicates that the information mentioned in the current application is not consonance with the information in the PPCB consents.

- c) That compliance report in the annotated form to the conditions of the approval granted by CSA-cum-SAC vide letter no. CSA/04/R-28/9179 dated 11.10.2004 has not been submitted.
- d) The detail of individual raw materials with total quantity of each is not submitted.
- e) It has mentioned R&D product at Sr. no. 46 of proposed products and no detail of the same is submitted.
- f) The evaporation losses mentioned seems very high.
- g) The copy of letter issued by the Forest Department in the Year 2006 is to be submitted.
- h) That in the application there is a change in all the products. Hence, the industry has to submit material balance calculations from the Institute of repute including pollution load for all 53 products mentioned.

After detailed deliberation, SEIAA decided as under:

1. To refer the case to SEAC to re-examine the case in light of the above said observations and give fresh recommendation in the case.
2. The above said observations be conveyed to the industry for information.

The case has been referred back by SEIAA through Parivesh Portal and asked to re-examine the case in light of observations raised by SEIAA.

Further, the Environmental Engineer, SEIAA vide letter no. SEIAA/MS/2025/96 dated 01.04.2025 forwarded the complaint of Sh. Tikka Yashveer Singh Bhallan, Illaqa Sangharsh Committee, Nangal, District Rupnagar, Punjab regarding the groundwater contamination and illegal mining in the State of Punjab. SEIAA requested to review the complaint in light of its contents and send recommendations accordingly. The relevant allegations made in the complaint are as under:

“GROUNDWATER CONTAMINATION

M/s Sun Pharma had in the past discharged untreated effluent/spent solvents into the ground water through illegal borewells and is still discharging untreated effluent into the sub soil strata. The ground water from shallow water table contains very high concentration of Benzene (IIT Ropar Report), which is a pharma industry's raw material and a very dangerous chemical for humans. The industry is playing with the lives of unsuspecting rural population of the nearest villages. The ground water of the area has been contaminated to such an extent that even after the passing of nearly 14-15 years' time, the nearby tube wells (shallow tube wells) installed for irrigation purpose pour-out dark yellowish-brown water for the initial 30-45 minutes of running, with pungent smell and huge white foam.

When the matter came to light in the year 2007-2008, the matter was brought into the notice of Hon'ble Punjab and Haryana High Court, Chandigarh and on the direction of the said court a district level committee was formed with Chairman, PPCB as its Chairman. The PPCB asked the IIT Ropar to conduct a study to assess the contamination of the ground water. The IIT Ropar submitted a report of more than 1200 pages but nothing on ground level was done. Although, the PPCB spent nearly 12.5 lacs for the said study but not a single penny has been spent by the PPCB or by the industry for the improvement of ground water quality in practical terms. No effort by the State

Pollution Control Board, District Administration and other authorities was undertaken to restore the quality of ground water in the area. Scores of meetings had taken place, lot of paper/pages have been written to name them as 'Reports", but nothing has been done so far in practical shape. On the advice of some experts, air sparging unit has been installed but it is operated only for few minutes when any officer comes for inspection. Even today, the nearby shallow tube wells are spitting yellowish-brown water with sharp pungent smell and huge foam formation. There is no Improvement in the ground water quality even after the passing of more than 15 years' time.

The above conditions can easily be seen/confirmed by putting any officer from CPCB or any other Central Govt. Officer, on the job, which will re-establish my above submissions.

ILLEGAL OCCUPIED FOREST LAND

M/s Sun Pharma Phagwara-Mohali Express Hwy. Tonsa, near Rupnagar Headworks, Distt: - SBS Nagar, Punjab is exploiting its big status and huge money at its disposal, to play with the lives of thousands of nearby residents and has damaged the environment to the greatest possible extent.

In year 2006, the DFO of the district SBS Nagar, Punjab had issued a notice to the industry to the fact that the industry has been established on the forest land. There after the DFO Office at SBS Nagar, Punjab has issued scores of notices from time to time but the industry has thrown all such notices in the dustbin. Even a court case in the Hon'ble Punjab and Haryana High Court, Chandigarh bearing CWP No- 18903 of 2015 could not rope-in/rein-in the industry to get the forest clearance for its operation, instead the industry has exploited the pendency of the court case by always saying to the authorities that the matter is sub-judice, albeit the court has not granted any interim relief.

The audacity and adventurousness of the industry can be gazed that the industry in 2021 has applied for obtaining Environmental Clearance from the SEIAA Punjab for its expansion. I wonder how such a violating unit which has already caused huge ground water contamination in the area can dare to seek approval for expansion? With the given scenario of damaged to the ground water quality and making mockery of the forest laws, the industry is supposed to be penalized, but it is seeking approval for expansion. This shows that the PPCB is a toothless tiger simply to blacken few papers/pages on daily basis. On the other hand, the PPCB is very harsh on the smaller units and never dare to touch big units like Sun Pharma.

My request is to deliberate/peruse the above submissions and form a committee with overall control of either a serving IAS officer or some judicial officer and to verify the facts. An Environmental compensation of 5 cr (on lump sum basis) be imposed on M/s Sun Pharma, Tonsa and such amount may be credit to the CPCB, and the same may be utilized for restoration of ground water quality of the area. Some third-party expert may also be entrusted with the verification process. Alternatively, the issue may be referred to the Vigilance Bureau Punjab and see the facts coming out of it. "

Deliberation during 314^h meeting of SEIAA held on 30.04.2025

The meeting was attended by the following:

- (i) Sh. Lokendra Joshi M/s Sun Pharmaceutical Industries Ltd.

(ii) Mrs. Jyoti Rani, EC- Coordinator M/s Eco Paryavaran Labs. & Consultant Pvt Ltd.

The Committee observed that SEIAA has raised certain observations and a complaint has been received from Sh. Tikka Yashveer Singh Bhallan, Illaqa Sangharsh Committee, Nangal, District Rupnagar, Punjab regarding the groundwater contamination and illegal mining against the industry.

After detailed deliberations, the Committee decided to defer the case till the receipt of pointwise reply of the below mentioned observations raised by SEIAA in its meeting held on 21.03.2025:

1. The industry was granted consent to establish/NOC and consent to operate of PPCB from time to time and the detail of same is tabulated as under:

Date	Consent of PPCB	Production Capacity (TPA)	Trade Effluent/ Domestic Effluent (KLD)	Existing Capital Investment (Rs. In Crores)	Expansion Cost (Rs. In Crores)	Total cost after expansion
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	(Water Act)					
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11.04.2022	Consent to Operate (Air Act)	-	-	663.21	-	-
21.12.2022	Consent to Operate	368.5 (Reduced)	370/90	730.14	-	-
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- (i) The industry is increasing its total capital investment continuously to manifold since the Year 2014 i.e. Rs. 5.76 Crores to the Year 2024 i.e. Rs. 731.06 Crores.
- (ii) It has changed its by-products from Methyl Iodide in the Year 2014 to Pyridine Hydrobromide, DCU, Acetic Acid, Spent MnO₂ & Ors., in the Year 2018.
- (iii) It was granted CTE expansion in the Year 2019 and thereafter, it was granted Varied Consent to Operate for installation of new boiler of capacity 13 TPH.
- (iv) It was again granted Varied Consent to Operate under the Air Act, 1981 on 25.07.2024 through Invest Punjab.

All these facts indicate that the industry is in a continuous process of expansion/modernization/process change.

2. In the present application for Environmental Clearance (Fresh) for expansion of existing unit, the existing project cost of Rs. 663.21 Crore and expansion cost of Rs. 22 Crores is mentioned. This is not in consonance with the capital investments mentioned in the consents granted by the PPCB. This indicates that the information mentioned in the current application is not consonance with the information in the PPCB consents.
3. That compliance report in the annotated form to the conditions of the approval granted by CSA-cum-SAC vide letter no. CSA/04/R-28/9179 dated 11.10.2004 has not been submitted.
4. The detail of individual raw materials with total quantity of each is not submitted.
5. m) It has mentioned R&D product at Sr. no. 46 of proposed products and no detail of the same is submitted.
6. The evaporation losses mentioned seems very high.

7. The copy of letter issued by the Forest Department in the Year 2006 is to be submitted.
8. That in the application there is a change in all the products. Hence, the industry has to submit material balance calculations from the Institute of repute including pollution load for all 53 products mentioned.
9. The industry shall submit the point wise reply of the Complaint received from Sh. Tikka Yashveer Singh Bhallan, Illaqa Sangharsh Committee, Nangal, District Rupnagar, Punjab regarding the groundwater contamination and illegal mining.

"GROUNDWATER CONTAMINATION

M/s Sun Pharma had in the past discharged untreated effluent/spent solvents into the ground water through illegal borewells and is still discharging untreated effluent into the sub soil strata. The ground water from shallow water table contains very high concentration of Benzene (IIT Ropar Report), which is a pharma industry's raw material and a very dangerous chemical for humans. The industry is playing with the lives of unsuspecting rural population of the nearest villages. The ground water of the area has been contaminated to such an extent that even after the passing of nearly 14-15 years' time, the nearby tube wells (shallow tube wells) installed for irrigation purpose pour-out dark yellowish-brown water for the initial 30-45 minutes of running, with pungent smell and huge white foam.

When the matter came to light in the year 2007-2008, the matter was brought into the notice of Hon'ble Punjab and Haryana High Court, Chandigarh and on the direction of the said court a district level committee was formed with Chairman, PPCB as its Chairman. The PPCB asked the IIT Ropar to conduct a study to assess the contamination of the ground water. The IIT Ropar submitted a report of more than 1200 pages but nothing on ground level was done. Although, the PPCB spent nearly 12.5 lacs for the said study but not a single penny has been spent by the PPCB or by the industry for the improvement of ground water quality in practical terms. No effort by the State Pollution Control Board, District Administration and other authorities was undertaken to restore the quality of ground water in the area. Scores of meetings had taken place, lot of paper/pages have been written to name them as 'Reports', but nothing has been done so far in practical shape. On the advice of some experts, air sparging unit has been installed but it is operated only for few minutes when any officer comes for inspection. Even today, the nearby shallow tube wells are spitting yellowish-brown water with sharp pungent smell and huge foam formation. There is no improvement in the ground water quality even after the passing of more than 15 years' time.

The above conditions can easily be seen/confirmed by putting any officer from CPCB or any other Central Govt. Officer, on the job, which will re-establish my above submissions.

ILLEGAL OCCUPIED FOREST LAND

M/s Sun Pharma Phagwara-Mohali Express Hwy. Tonsa, near Rupnagar Headworks, Distt: - SBS Nagar, Punjab is exploiting its big status and huge money at its disposal, to play with the lives of thousands of nearby residents and has damaged the environment to the greatest possible extent.

In year 2006, the DFO of the district SBS Nagar, Punjab had issued a notice to the industry to the fact that the industry has been established on the forest land. There after the DFO Office at SBS Nagar, Punjab has issued scores of notices from time to time but the industry has thrown all such notices in the dustbin. Even a court case in the Hon'ble Punjab and Haryana High Court, Chandigarh bearing CWP No- 18903 of 2015 could not rope-in/rein-in the industry to get the forest clearance for its operation, instead the industry has exploited the pendency of the court case by always saying to the authorities that the matter is sub-judice, albeit the court has not granted any interim relief.

The audacity and adventurousness of the industry can be gazed that the industry in 2021 has applied for obtaining Environmental Clearance from the SEIAA Punjab for its expansion. I wonder how such a violating unit which has already caused huge ground water contamination in the area can dare to seek

approval for expansion? With the given scenario of damaged to the ground water quality and making mockery of the forest laws, the industry is supposed to be penalized, but it is seeking approval for expansion. This shows that the PPCB is a toothless tiger simply to blacken few papers/pages on daily basis. On the other hand, the PPCB is very harsh on the smaller units and never dare to touch big units like Sun Pharma.

My request is to deliberate/peruse the above submissions and form a committee with overall control of either a serving IAS officer or some judicial officer and to verify the facts. An Environmental compensation of 5 cr (on lump sum basis) be imposed on M/s Sun Pharma, Tonsa and such amount may be credit to the CPCB, and the same may be utilized for restoration of ground water quality of the area. Some third-party expert may also be entrusted with the verification process. Alternatively, the issue may be referred to the Vigilance Bureau Punjab and see the facts coming out of it”.