Item No. 306.05: 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 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 the status of industries, if any*	*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 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 waterform 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 Kma (crow fly from the unit).*
3.	*Whether the site meets with the prescribed criteria for setting up of such projects.*	*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 (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.*

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**	

<table>
<tr><td>3.1</td><td>Whether the industry required clearance under the provisions of Forest Conservation Act 1980 or not:</td><td>(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.</td></tr>
<tr><td>3.2</td><td>Whether industry required clearance under the provisions of Wildlife Protection Act 1972 or not:</td><td>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.</td></tr>
<tr><td>3.3</td><td>Whether the industry falls within the influence of Eco-Sensitive Zone or not. (Specify the distance from the nearest Eco sensitive zone)</td><td>No, the industry does not fall within the influence of Eco-sensitive zone.</td></tr>
<tr><td>3.4</td><td>Green area requirement and proposed No. of trees:</td><td>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.</td></tr>
<tr><td>4.</td><td colspan="2">Product details</td></tr>
<tr><td>4.1</td><td colspan="2">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</th><th>Add. Capacity (TPA)</th><th>After expan. total capaci</th></tr>
</table></td></tr>
</table>

		(TPA)		**ty (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
	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 Etexilate 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

<table>
<tr><td>5</td><td colspan="2">Water</td></tr>
<tr><td>5.1</td><td>Total water demand:</td><td>1510 KLD</td></tr>
<tr><td>5.1(a)</td><td>Total industrial water demand:</td><td>1335 KLD
<table>
<tr><th>Description</th><th>Existing (in KLD)</th><th>After Expansion (in KLD)</th></tr>
<tr><td>Boiler</td><td>200</td><td>250</td></tr>
<tr><td>Cooling water</td><td>420</td><td>560</td></tr>
<tr><td>Manufacturing process</td><td>200</td><td>310</td></tr>
<tr><td>Other (back, wash, floor wash, ETP/RO/MEEs/ATFDs washing, wet scrubber, etc.</td><td>155</td><td>215</td></tr>
<tr><td>Total industrial water requirement</td><td>975</td><td>1335</td></tr>
</table></td></tr>
<tr><td>5.2(b)</td><td>Total domestic water demand:</td><td>175 KLD</td></tr>
<tr><td>5.2</td><td>Source:</td><td>3 no. of existing Tube wells</td></tr>
<tr><td>5.3</td><td>Whether Permission obtained for abstraction/supply of the fresh water from the Competent Authority (Y/N)

Details thereof</td><td>(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 requirement is 1283 KLD in alluvial terrain as such NOC is not required for ground water withdrawal from CGWA.</td></tr>
<tr><td>5.4</td><td>Water demand, Wastewater generation, Treatment methodology for wastewater and its utilization:</td><td>(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.

(ii) Out of 1150 KLD of fresh water requirement, 80 KLD shall be utilized for drinking purpose, 95 KLD shall be utilized for</td></tr>
</table>

		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. (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. (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. (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. (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. (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 "Ecoster-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:

During Construction Phase

Sr. No	Environmental Protection Measures	Capital Cost Rs. (Lakhs)
1.	Air & Noise Pollution Management (Stacks and Acoustics enclosure for DG set)	10.0
2.	Water Pollution Control (ETP, RO, MEE)	60.0
3.	Solid Waste Management	10
4.	Environment Monitoring & Management	1.0
5.	Occupational Health Surveillance	20.0
	Total	**101.0**

During Operation Phase

Sr. No	Environmental Protection Measures	Recurring Cost Rs. (Lakhs/ annum)
1.	Air & Noise Pollution Management (Stacks and Acoustics enclosure for DG set and Boiler)	2.0
2.	Water Pollution Control (ETP, RO, MEE, ATFD)	700.0
3.	Landscaping	20.0
4.	Solid & Hazardous Waste Management	90.0
5.	Environment Monitoring & Management	5.0
6.	Occupational Health Surveillance	4.0
7.	Safety training to workers	4.0
	Total	**825**

(ii) Details of activities proposed under Corporate Environment Responsibility:

S.No.	Activities	Annual Expenditure (in Lakhs)	Timeline	Total Expenditure (in Lakhs)
1.	Drinking Water: Providing potable water to the 240 families of village Toansa through deep bore well established by the company at lower side of villl-Toana and direct supply from the factory premises to upper side of village Toansa. Company is bearing all its maintenance/ operating cost	5	1 year	5
2.	Infrastructural / Health Services: 1. maintaining Subsidiary Health	1	1 year	1

		center focal point Toansa and providing required medicines to 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	0.7	1 year	0.7

	various occasions to the needy people.			
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 Hight 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 sq.m. (37.46 acres).
5.	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.	Revised water balance diagram is submitted.

<table>
<tr><td>6.</td><td>The industry shall submit single mode of disposal for each of the category of hazardous waste generated from the industry.</td><td>Details regarding disposal of hazardous waste is submitted.</td></tr>
<tr><td>7.</td><td>The industry shall allocate funds up to 1% of the total project cost under the following activities of Corporate Environment Responsibilities:
• 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).
(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.</td><td>Following funds have been allocated.

CORPORATE ENVIRONMENTAL RESPONSIBILITY at API TOANSA for 2022-23 & 2023-24
<table><tr><th>S .No.</th><th>Expenditure</th><th>Expenditure (in Lakhs)</th><th>Timeline</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>500000.0</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>200000.0</td><td>2022-23 & 2023-24</td><td>surrounding area</td><td>-</td></tr><tr><td>3</td><td>Rejuvenation</td><td>500000.0</td><td>2022-23</td><td>Vill-Bholew</td><td>-</td></tr></table></td></tr>
</table>

			of Village Ponds.		& 2023-24	al & Toansa	
		5	Provision of Solar Panels / solar street lights in the Government/ Municipal/ Other Public Schools, Hospitals, and Dispensaries, etc.	700000.0	2022-23	Toansa, Banah, Railmajra, Kathgarh & Bagowal	budgeted-2022-23 under rural dev
		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	Self-declaration to the effect that it shall not carryout Rain Water Harvesting for ground water recharging is submitted					

	not carryout Rain Water Harvesting for ground water recharging.	

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:

S. 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 228th Meeting of SEAC held on 5.09.2022. The Project Proponent shall submit the same.	**<u>Domestic water Demand:</u>** Domestic water demand is 95 KLD which is calculated as per preset standards specified in NBC, 2016. Population data arrived as per actual. Further, calculations have been done on threshold (maximum) values for domestic use as given below: Population = 1,125 employees • Fresh water demand @ 45 lpcd = 1,125 × 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 × 35 = 39 KLD • Visitors including transporters @ 15 lpcd = 325 × 15 = 5 KLD Total domestic water demand = 51 + 39 + 5 = 95 KLD **Industrial Water Demand:** 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. Therefore, to conclude the basis for industrial consumption, the industry has relied upon in house R&D and available data.
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
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.	As per the revised water balance, only 10 KLD of water will be lost during process. 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. 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. Revised water balance showing water requirement & recycling/reuse at each stage is submitted

<table>
<tr><td>4.</td><td>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?</td><td>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.</td></tr>
<tr><td>5.</td><td>The Project Proponent shall submit the NOCs for carrying out the various activities proposed under CER.</td><td>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:
<table>
<tr><th>S. No.</th><th>Expenditure</th><th>Amount (in Lakhs)</th></tr>
<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 Ansron along with conduct of training regarding awareness for use/ promote of renewable sources of energy</td><td>8.5</td></tr>
<tr><td>3.</td><td>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</td><td>8.5</td></tr>
<tr><td colspan="2">Total</td><td>Rs. 22 lakhs</td></tr>
</table>
Copy of NOCs regarding the same is submitted In addition of above, we wish to highlight that the industry is already undertaking many activities</td></tr>
</table>

		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 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.	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 compenstion 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 it's 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 it's successor SEIAA upon its notification.