

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONE, PUNE**

In

Appeal No.148/2025 (WZ)

Shakti Plastic Industries

...

Appellant

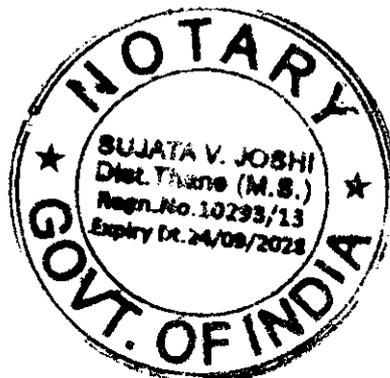
v/s

MPCB & Ors.

...Respondents

**Affidavit on behalf of Respondent No.1 Maharashtra
Pollution Control Board (MPCB)**

I, Kiran Hasabnis, Aged-Adult, Occupation-Service, the Regional Officer of the Maharashtra Pollution Control Board at Thane i.e. Respondent No.5, having office at Plot No. P 30, 5th Floor, Office Complex Building, Wagle Industrial Estate, Mulund Check Naka, Thane (West) 400 604, do hereby solemnly affirm and state as under :-



1. I am filing this Affidavit on behalf of the Respondent No.1- Maharashtra Pollution Control Board (MPCB) in compliance of the Order dated 1/12/2025 passed by this Hon'ble NGT. The submissions of the Respondent No.1-MPCB are as under:-



- (i) With reference to para 3 of the Order dated 1/12/2025, I say and submit that the Appellant-Industry has prepared a Report on Machinery Capacity Audit for manufacturing and feasibility of effluent treatment plant on their own. The Respondent No.1-MPCB has not directed to the Appellant-Industry to conduct the said audit.
- (ii) With reference to para 5 of the Order dated 1/12/2025, I say and submit that in view of the voluminous data submitted by the Appellant-Industry, the Respondent No.1-MPCB only recommended to the Central Pollution Control Board that Chartered Accountant may be appointed for verification of the invoices in its Report submitted to the Central Pollution Control Board. A copy of the Interim Report dated 5/1/2024 is enclosed herewith and marked as an **Annexure-'A'**.
- (iii) With reference to para 6 of the Order dated 1/12/2025, the Appellant has alleged that they have not been served with the Joint Inspection Report dated 30th & 31st January 2024 mentioned in the Show Cause Notice dated 08/04/2024 but





in their response dated 09/04/2024 to the same SCN (dated 08/04/2024) there is no whisper about not receiving the Joint Inspection Report. Yet, for the purpose of smooth hearing and Record's sake, a copy of the Report of Joint Inspection of the Appellant-Industry carried out by the Officials of the CPCB and MPCB on 30th and 31st January, 2024 is enclosed herewith and marked as **Annexure-'B'**.

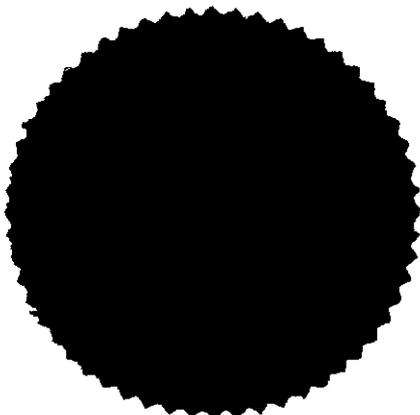
2. I say that the Board has filed its reply in the present Appeal as well as in IA No. 220/2025 (Condonation of Delay) on 06/11/2025 which kindly be taken into consideration at the time of hearing of the present Appeal.

3. Hence, these submissions.

Solemnly affirmed on this day of January, 2026 at

For and on behalf of Maharashtra Pollution Control Board,

(Kiran Hasabnis)
Regional Officer-Thane



**BEFORE ME
NOTARY**

**SUJATA V JOSHI
ADVOCATE & NOTARY**

101/102, Vishal Bldg., Station Road,
Kaiwa (W), Thane-400 605.



NOTED & REGISTERED
Sr. No. *Sh* 2026

19 JAN 2026



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4. Conclusions and recommendations as follow:

- a. Shakti plastic industries has 26 machineries for plastic waste processing with production capacity (as per invoices/ data sheets provided by industry for the machinery) of minimum of 2.32 lakh ton per annum to maximum of 4.51 lakh ton per annum of production, which is in line with the consented capacity and plastic EPR registration quantity of 2,88,000 ton per annum.
- b. Electricity bills submitted by industry are in line with consented plastic waste processing of capacity of industry.
- c. Physical verification of the industry was conducted as per SOP formulated by CPCB.
- d. It is noted that the industry has also generated some of the EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules.
- e. Shakti plastic industries has submitted soft copies of around 17,800 GST invoices for the plastic waste for plastic EPR portal of CPCB website. In view of the voluminous data, and also it was not possible to come up with an opinion w.r.t. quantity of actual plastic waste processing carried out by the industry. Therefore, it is recommended that a Chartered Account be appointed for verification of the invoices by Central Pollution Control Board.

2. M/s Technova Recycling Private Ltd.

A team for investigation of directions to MPCB reg. M/s Technova Recycling Private Ltd. was constituted comprising of Regional Officer, Kalyan, Sub-Regional Officer (RO-BMW) and Field Officer (RO-BMW). The team conducted visit on 12.12.2023 to M/s. Technova Recycling India Pvt. Ltd. Located at Sr. No - 147, GALA NO. 5-8, Om Trilok Industrial Complex, Mumbai Nashik Highway, Village - Sonale, Tal - Bhivandi, Dist - Thane as per Consent. Copy of the investigation report is enclosed for ready reference.

During visit, it was observed that the industry has 06 machineries for plastic waste processing with production capacity (as per invoices/ data sheets provided by industry for the machinery) for capacity of 91,440-1,01,520 ton per annum of production, which is in line with the consented capacity and plastic EPR registration quantity of 86,400 ton per annum.

The report covers following aspects:

1. Chronology of the consent granted, plastic EPR registration and physical verification.
2. Key observations regarding details of industry process and documents along with details of plant machinery's processing capacity.
3. Observations during the visit and non-compliances-
4. OEM (Original Equipment Manufacturers) receipts (with capacity) were submitted by the industry for 2 agglomerators and one grinder. Receipts (without capacity) along with quotation/ estimates (including capacity) were submitted for two agglomerators and one grinder.
5. The industry has obtained Consent to Operate for Survey No - 147, GALA NO. 5-8. However, during the visit, it was noted that the industry has operation in gala no.

- 1,7,8 and 9 of the complexes. The industry has stopped operation in Gala No 5 and 6 and started operation in gala no. 1 and 9 at the same premises without consent amendment. Industry did not submit land agreement for the gala No. 1.
6. It was noted that the connected load for industry's electricity connection was 75 HP as per electricity bill submitted for gala No. 5 (electricity connection attached for gala no. 5,6,7,8). Electric capacity of the machineries given in above Table No. 1, whereas it was noticed that electric capacity of agglomerator-2 was 120 HP as per the purchase bill provided by the industry. However, the same capacity was not visible on the agglomerator-2. When enquired to the industry representative about the higher electrical capacity (120 HP) of the agglomerator-2 than the connected load (75 HP), they informed that they have changed the motor of the agglomerator to 60 HP. Therefore, the processing capacity of the agglomerator-2 will reduce. The industry did not submit the bill for the changed motor.
 7. Industry has submitted certificate of installed capacity by Chartered Engineer, which has submitted that the capacity is 1,04,832 MT/annum by reviewing the records of the industry.
 8. Electricity consumption of the plant for FY 2022-23 i.e. 42,781 kWh corresponds to 2,139 tonnes of plastic grinding (rough grinding). Therefore, electricity consumption seems to be considerably less than the consented processing capacity and EPR certificates.
 9. It is noted that the industry has also generated EPR credits for Services provided towards collection and recycling and not only for the requisite actual sales of recycled plastic/granules.
 10. Technova Recycling India Pvt. Ltd, Thane has submitted soft copies of 3378 GST invoices for the plastic waste for plastic EPR portal of CPCB website. In view of the voluminous data, and also it was not possible to come out with opinion w.r.t. quantity of actual plastic waste processing carried out by the industry. It is recommended that the financial aspect of the EPR certificates and GST invoices may be scrutinized through Chartered Accountant by Central Pollution Control Board.

MPCB has issued Show Cause Notice (SCN) for closure to M/s Technova Recycling Private Ltd. On 02/01/2024. Copy of the SCN is enclosed for ready reference.

It is also submitted that further detailed enquiry into the financial aspects regarding generation of EPR certificates on the basis of GST invoices, is required to be carried out through the Chartered Account firm for the industries by Central Pollution Control Board. After completion of the enquiry, suitable action will be taken on the industry and will be communicated to the Central Pollution Control Board.

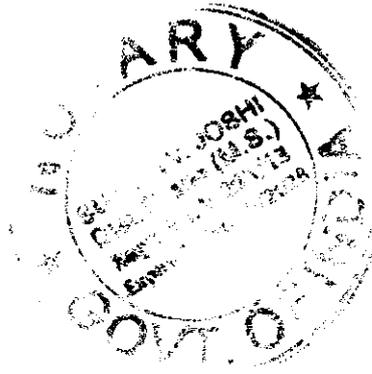
Yours faithfully,

(Signature)
(Dr. Avinash Dhakne, IAS)
Member Secretary

Copy Submitted to



- 1) The Director, Ministry of Environment & Forest, Paryavaran Bhawan, CGO Complex, Lodhi Road, New Delhi – 110 510.
 - 2) The Regional Director, Pune, Central Pollution Control Board
 - 3) Chairman, Maharashtra Pollution Control Board (MPCB)
- Copy to: Regional Officer (BMW), MPCB





LIFE
Lifestyle for
Environment



केन्द्रीय प्रदूषण नियंत्रण बोर्ड
CENTRAL POLLUTION CONTROL BOARD
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE, GOVT. OF INDIA

File No. CP-20/2/2024-UPC-II-HO-CPCB-HO

Date: 03.04.2024

To,

The Member Secretary
Maharashtra Pollution Control Board
Kalpataru Point, 2nd floor, Opp. PVR Theatre, Sion (E),
Mumbai-400022, Maharashtra

Sub: - Joint inspection of M/s. Shakti plastics industries, Gut no. 158 & 159 Nandgaon, Palghar, Maharashtra

Sir/Madam,

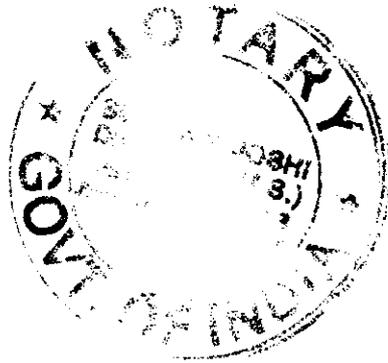
This has reference to CPCB's directions to MPCB dated 26.10.2023, action taken report dated 05.01.2024 submitted by MPCB and joint inspection of M/s. Shakti plastics industries conducted by officials from CPCB & MPCB on January 30 & 31, 2024.

Please find attached herewith joint inspection report herewith for further necessary action. Action taken report be submitted to this office within 15 days from issuance of this letter.

This issues with approval of competent authority.

Yours faithfully,

(Divya Sinha)
Director & In charge, UPC-II



'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, New Delhi - 110032

दूरभाष/Tel: 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in

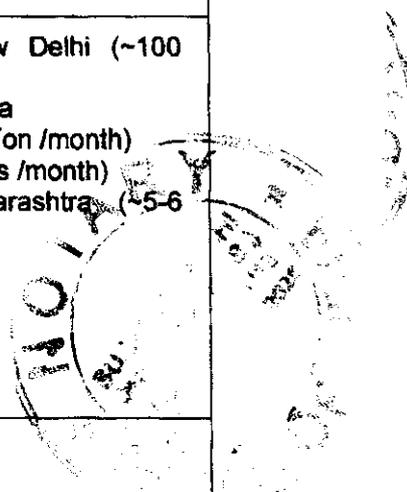
Joint Inspection of M/s Shakti Plastic Industries (PWP - recycler)

Inspection Team : 1. Sh. Nischal C, Sc. D, CPCB RD Pune
 2. Smt. Yogesh Chandra, Sc. C, CPCB Delhi
 3. Sh. Sandeep Shinde, EE, MPCB
 4. Sh. Sanjay More, SRO, MPCB
 5. Sh. Tapas Ukil, Sc. B, CPCB RD Pune
 6. Sh. Mayank Raj Purbey, Sc. B, CPCB Delhi

Date of Inspection : 30/01/2024 to 31/01/2024

**Report of Joint Inspection**

S. No	Items	Remark
	PART I: ONSITE AUDIT	
1	Verify all the details provided in application form	Annexure-I
2	Procurement Section	
a	Please call up randomly selected at least 05 suppliers to verify actual procurement details of plastic waste by PWP (source of PW, category & quantity of plastic waste supplied) and provide the following information.	1. Kalpna Enterprises, Patparganj, New Delhi (~100 Ton/month) 2. Aditya Polymers, Hyderabad, Telangana 3. K. R. Polymers, Bangalore (~200-300 Ton /month) 4. Chennai Polymers, Chennai (~900 Tons /month) 5. Shreyas Packaging, Palghar, Maharashtra (~5-6 Ton/month)
i	No. of suppliers contacted	05
ii	No. of suppliers for which supplier details could be verified.	05
iii	No. of suppliers for which PW category/ Quantity/both could not be verified. Please provide details.	As per details provided in Section 2a, the total quantity of plastic waste provided by the four suppliers (as confirmed by them) is of the order of ~15600 TPA. However, the corresponding quantity reported on the EPR Portal by the same suppliers is 3,18,77,080.29 Tons.





b	Please physically visit at least one of the suppliers contacted in 'a' above and provide the following details	M/s. Shreyas Packaging, Palghar Maharashtra was visited physically. The unit is supplying BOPP tapes (scrap) to M/s. Shakti Plastic Industries.								
i	No. of suppliers visited	01								
ii	No. of suppliers for which supplier details could be verified	01								
iii	No. of suppliers for which PW category/Quantity/Both could not be verified	0								
iv	No. of suppliers for which PW quantity could be verified	01								
C	Please confirm if adequate space has been provided for storage of plastic waste (Yes/No) if no, please provide details of the same.	Yes The industry has provided 02 sheds for Raw materials storage and segregation with a total area 4200 m ² . Further, it is observed that the facility is also using an open area of about 5600 m ² for storage of raw materials, which is not cemented/concreted. Details of plant layout is provided in Annexure-II.								
3 Production Section										
a	Is plant & machinery installed & commissioned in the unit as per the information declared in the Application form (Yes/ No) If no, please provide details of the same.	<p>No</p> <p>a) Details of plant machinery as per EPR Portal:</p> <p>Details of machineries provided by the unit on EPR portal is given in the Table 1 given below -</p> <table border="1" data-bbox="603 1527 1369 1899"> <thead> <tr> <th data-bbox="603 1527 810 1841">Machines (at EPR Portal) (1)</th> <th data-bbox="810 1527 954 1841">Number (2)</th> <th data-bbox="954 1527 1184 1841">Power rating (KWH) (Corresponding to the number of units reported in Column (2)) (3)</th> <th data-bbox="1184 1527 1369 1841">Processing Capacity (TPA) (4)</th> </tr> </thead> <tbody> <tr> <td data-bbox="603 1841 810 1899">Extruders</td> <td data-bbox="810 1841 954 1899">04</td> <td data-bbox="954 1841 1184 1899">888</td> <td data-bbox="1184 1841 1369 1899">14100</td> </tr> </tbody> </table>	Machines (at EPR Portal) (1)	Number (2)	Power rating (KWH) (Corresponding to the number of units reported in Column (2)) (3)	Processing Capacity (TPA) (4)	Extruders	04	888	14100
Machines (at EPR Portal) (1)	Number (2)	Power rating (KWH) (Corresponding to the number of units reported in Column (2)) (3)	Processing Capacity (TPA) (4)							
Extruders	04	888	14100							

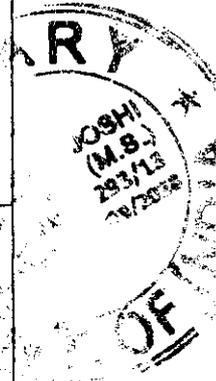


Agglomerator s	07	345	8400
Grinders	07	135	9360
Squeezer machine	01	122	6000
Washing Lines	02	843	3200
Total	21	2333	-

As per details given above, all machinery as reported in the Registration application were found in the plant premises.

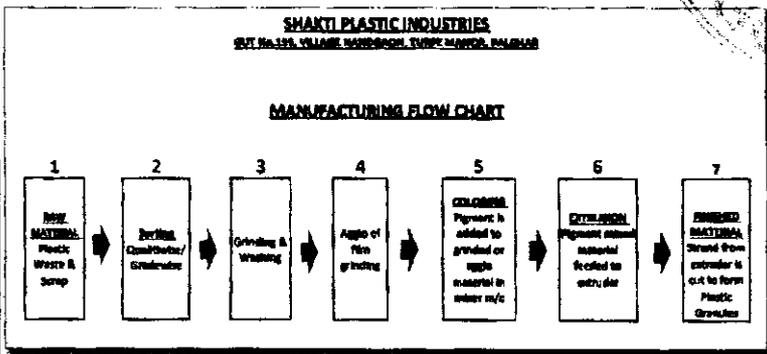
Following additional machinery was also found in the plant. Details given in Table 2 below:

Additional Machines	No.
Extruders	02
Agglomerators	02
Grinders	6
<u>1 Extruder, 3 Agglomerator and one grinder were found under maintenance during the inspection</u>	



b Please conduct trial run of plant (~ 1 hr) at maximum capacity to assess actual processing capacity (TPH);

Process Flow Diagram as per application submitted on the EPR Portal is given below:



As per the process flow diagram, the unit follows a series of operation i.e. the product from grinder is being channelled through agglomerator and then through extruders.

Details of trial Run (~1hr):

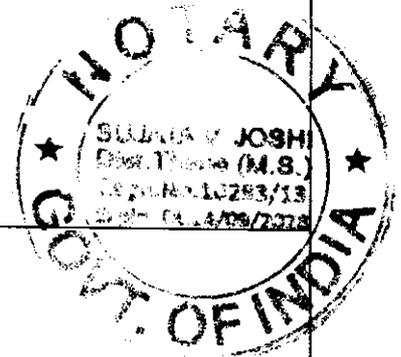


		<p>The trial run was conducted as per the details (Plant machinery and Process Flow Diagram) provided in the application form. 04 Extruders, 06 Agglomerators, 06 Grinders, 01 squeezer, and 02 washing lines were operational, where in 01 grinder and 01 agglomerator were under maintenance. (Refer Table 1 above)</p> <p>Following are the observations:</p> <p>a. Quantity of recycled plastic produced: 1.35 TPH b. Power Consumption: 44 KWH c. Wastewater Generation: 3000 lit/hr</p>
c	No. of hrs plant is operational per day	24
d	No. of days the Plant is operational per year	313
e	Plastic Waste Processed during the day of Audit (T)	<p>Based on the trial run, recycled plastic produced = $1.35 \times 24 = 32.4$ TPD</p> <p>Plastic Waste Processed: $32.4/0.9 = 36$ TPD</p>
f	Power consumption during the day of Audit (KWH)	<p>As per meter reading captured during the trial run (~1 hour), power consumption is 44 KWH. Similarly, power consumption for a day shall be = $44 \times 24 = 1056$ KW.</p>
g	Average monthly power consumption (Based on (e) &(f) above and the Average monthly production) (KWH) ((d/c)*No. of Working days/ month)	<p>Accordingly, Average Monthly power consumption as per the trial run = $44 \text{KWh} \times 24 \text{ hrs} \times 26 \text{ days/month} = 27,456$ KWh</p> <p>Average monthly production = $1.35 \times 24 \times 26 = 842.4$ Tons per Month</p>
h	Average monthly power consumption (Based on Electricity Bill of last three months) as per details of power consumption of machinery installed (random check to be	<p>Average Monthly power consumption as per electricity bills of 3 months (i.e. September'23 to November'23) = 17,455 KWH</p> <p>Copy of electricity bills is provided at Annexure-III.</p>

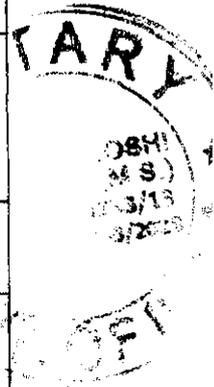


	carried out for one of the four quarters (Q1 to Q4) in a FY year)	
i	Is DG Set also supplying power to the Unit; If yes, please provide details including total capacity (KWH)	No
j	Are values obtained in (g) & (h) above comparable (Yes/ No) If "No", please provide details of the same	No Actual power consumption is 64% of the assessed power consumption required for production of 1.35 TPH of recycled plastic as observed during the trial run.
K	Is Area provided for storing finished products adequate (Yes/No) If "No", please provide details of the same.	Yes
l	Are Procurement details of added additives in conformity with production details (Yes/No) If no, please provide details of the same.	Following additives are being used as fillers: <ul style="list-style-type: none"> • Lime powder • Moisture powder • Carbon • Filler • Pigments Details of additives purchased as provided by unit, during 2022-23 at Annexure-IV.
m	Actual Production capacity (As per Audit team observations) (TPA) (Assessed Production capacity (TPH) * No. of Working hrs/day * No. of working days/ year	As per flow diagram available on EPR portal the final product is pellets/chips obtained through extruders. The maximum production capacity assessed from the 4 nos. of extruders is $1.35 * 24 * 313 = 10,141.2$ TPA

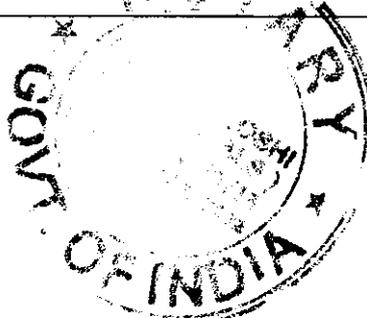
n	Deficit in actual production capacity as compared (As per Audit) to the registered production capacity (TPA)	<p>Yes</p> <p>Registered production capacity as per EPR portal: 2,88,000 TPA</p> <p>Maximum assessed capacity for recycled product = $1.35 * 24 * 313 = 10,141.2$ TPA</p> <p>Observed deficit: 2,77,858.8 TPA</p>
o	<p>Is Registered processing capacity in conformity with the plant & machinery installed in the unit</p> <p>Please read the plant & machinery details together with the process flow diagram (Yes/No) If no, please provide details of the same.</p>	<p>No; Details at Section "n" may be referred to</p>
p	<p>Have necessary electrical / water supply connections being provided to the plant & machinery (Yes/ No) If no, please provide details of the same..</p>	<p>Yes</p>
q	<p>Actual Processing capacity (TPA) as per Audit Team observations</p>	<p>Registered production capacity on EPR portal: 2,88,000 TPA</p> <p>Maximum assessed capacity for recycled product = $1.35 * 24 * 313 = 10,141.2$ TPA</p> <p>Observed deficit: 2,77,858.8 TPA</p>
4	<p>Waste Water generation and disposal</p>	



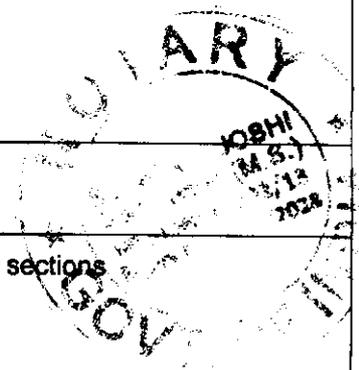
a	<p>Is the unit complying with CTO Conditions (Yes/ No) If no, please provide details of the same?</p> <p>Please refer to the SPCB/PCC monitoring details to check compliance with emissions & effluent standards.</p>	<p>No</p> <ul style="list-style-type: none"> • As per the conditions stipulated in CTO, the unit shall have ETP with capacity 3.0 m³/day, whereas the unit is treating wastewater of approximately 27 m³/day as per the logbook maintained by the unit. • No OCEMS installed • No flow meters at inlet and outlet were found installed. <p>Copy of CTO issued by MPCB is provided at Annexure - V.</p>
b	<p>Whether ETP is installed & operational (Yes/No) If no, please provide details of the same..</p>	<p>Yes, the ETP was found to be operational during the trial run.</p> <p>However, as per the log sheet submitted by the unit, the ETP has only operated for a time period of ~9 hrs each day. Details of log sheet of wastewater treatment is provided at Annexure - VI.</p>
c	<p>ETP Capacity (KLD)</p>	<p>As per CTO, unit shall have ETP with capacity 3.0 m³/day. No information regarding capacity of wastewater treatment was found at the installed ETP.</p>
<p>5 Solid Waste Management</p>		
a	<p>Whether solid waste is being generated in the production process (Yes/No) If no, please provide details of the same.</p>	<p>Yes, Sludge from ETP is being generated while process waste generated (i.e. plastic waste) is re-used in the production process.</p>
b	<p>If yes, storage area (m²)</p>	<p>~100 m²</p>
c	<p>Quantity of such solid waste generated (kg/d)</p>	<p>~5 kg/month (~0.2 kg/day)</p>
d	<p>Disposal Details (Physically verify and check relevant documents)</p>	<p>ETP Sludge is being sent to TSDF site of Taloja of Mumbai Waste Management Ltd. The copy of agreement is attached here as Annexure-VII.</p>
<p>6 Sales Section</p>		



a	Compare Invoice data with GST Statement and confirm that GST paid as per GST Statement is the same as per the consolidated invoice data for the period ((random check to be carried out for one of the four quarters (Q1 to Q4) in a FY year) – If No, please provide details	<p>The industry has made 698 sale entries on EPR portal till date i.e. 08.02.2024. Out of which, for 228 entries, invoices for sale of product are not uploaded by the unit.</p> <p>As per the invoice details submitted on EPR portal, the GST paid for sales of product (for FY 2022-23) = Rs. 5,59,48,493.5/-</p> <p>GST amount paid as per GSTR-1 form (for FY 2022-23) = Rs. 14,26,19,539/-</p>
b	Please randomly select at least 10 GST invoices uploaded on EPR portal and provide the following:	
i	No. of invoices selected	10
ii	Please provide no. of invoices in which Type/ Quantity / both of the finished product in the invoice is not in conformity with the information provided on the EPR portal. (Yes/ No). Please provide details of the same	The sale invoices (10) submitted by the unit were randomly checked. It was observed that invoices issued for services have been uploaded at EPR portal by the unit instead of sale of recycled product.
c	Please call up at least 5 such finished product buyers of the aforementioned selected invoices to verify actual sales of finished product	<ol style="list-style-type: none"> 1. BASF India Limited 2. Adama India Pvt Limited 3. Gujarat Co-operative Milk Marketing Fed Ltd. 4. Balaji Wafers Pvt. Ltd. 5. Rajdhani Flour Mills Limited
d	No. of buyers contacted	05
e	No. of buyers for which type / quantity / both of finished product sold could not	05 None of the five units confirmed that they had procured recycled Plastic from M/s Shakti Plastics. It was informed that they had



	be verified. Please provide details	only procured EPR only EPR certificates from M/s. Shakti Plastics India.
7.	Please upload short embedded geotagged video of the Unit on the EPR Portal clearly showing plant & machinery while operating, raw material & finished product storage area of duration 45-60 Sec.	Uploaded on EPR portal
8.	EPR Certificate generation Status	
a	Please check all the sales invoices of finished product uploaded on EPR portal with the data uploaded on the EPR Portal for the following:	Covered in below sections
b	No. of sales invoices uploaded on EPR portal	698
c	No. of sales invoices for which finished product type/quantity/both is not in conformity with data uploaded on the EPR Portal. Please provide details	The industry has made 698 sale entries on EPR portal till date. Out of which, for 228 sale entries, invoices have not been uploaded. Out of the remaining 470 invoices uploaded on EPR portal, 468 no. of the invoices have been issued for services provided by the unit while 2 nos. of invoices have been uploaded for sale of grinded waste corresponding to a quantity of 11.6 Tons.
d	No. of sales invoice for which GST paid is in conformity with the data uploaded on the EPR Portal	Please refer section "c" above

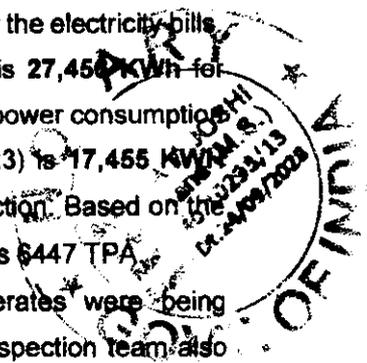


e	Are the invoices uploaded in conformity with the stipulated requirements prescribed in CPCB guidance manual (Yes/No)? If No, please provide details.	No, please refer section "c" above
f	Total Quantity of finished product (MT) sold as per invoices uploaded on CPCB portal.	Only 2 invoices, corresponding to sale of grinded plastic waste of quantity 11.6 Tons uploaded on the EPR Portal. No invoice uploaded for the sale of recycled plastic.
g	Are all GST E-invoices generated towards the sale of finished products? (Yes/No) If no, please details of value (MT) of EPR Certificates for which uploaded invoice is not found to be in order w.r.t CPCB guidance document and also cite type of discrepancy/ non-compliance (w.r.t, product, wrong GST etc.)	No, please refer section "c" above
9	List out the non-compliances observed	Key observations and non-compliances listed below
10	Signature of the Auditing Team with Name and Designation(at the end of report)...



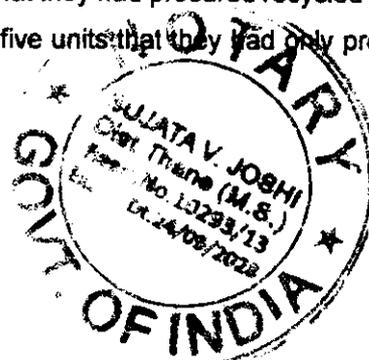
Key observations and non-compliances:

1. The facility is located at Gut no 158 & 159 Nandgaon, Palghar, and as per the plant layout, the total area of the plant including the storage sheds (10,720 m²) and open area (5,600m²) is **16,320 m²**. The mentioned area is more than the area provided at EPR portal i.e. 10,000 m².
2. Approximately 125 workers were observed working in the premises during the visit and the plant was operational.
3. Assessed production capacity as per the trial run conducted by the inspection team was found to be much less than the Registered processing capacity of the unit. The assessed production capacity of the unit is **10,141.2 TPA** as per the trial run conducted by the inspection team, wherein the Registered Processing capacity is 2,88,000 TPA. The trial run was conducted as per the details (Plant machinery and Process Flow Diagram) provided in the application form.
4. Assessed Average Monthly power consumption for production of **10,141.2 TPA** recycled product was found to be less than the actual power consumption as per the electricity bills. Assessed Average Monthly power consumption as per the trial run is **27,456 KWh** for production of 842 TPM i.e. 10,141.2 TPA. However, average Monthly power consumption as per electricity bills of 3 months (i.e. September'23 to November'23) is **17,455 KWh** which is 64% of the assessed power consumption required for production. Based on the electricity consumption, the actual production for a year is assessed as **6447 TPA**.
5. It was observed that intermediaries including grindings/ agglomerates were being generated from agglomerators and grinders listed in Table 1. The inspection team also assessed the production capacity of such machines and the same was found to be **64,377.45 TPA** of which 45,892 TPA is from grindings and 18,485 TPA is from agglomerates.
6. As per the clause 3.0 of EPR guidelines 'Recycling' means the process of transforming segregated plastic waste into a new product or raw material for producing new products. Accordingly, the PWP (recyclers) can be registered on the EPR portal for production of pellets/chips/products (process code R1 to R6) and EPR certificates can be generated for the sale of the same. Grindings & agglomerates of plastic waste does not amount to transforming of plastic waste and hence cannot be considered as product from "Recycling process". Also, as per clause 5 (a) of the Plastic Waste Management Rules, 2016, "*plastic waste, which can be recycled, shall be channelized to registered plastic waste recycler and recycling of plastic shall conform to the Indian Standard: IS 14534:1998 titled as*



Guidelines for Recycling of Plastics, as amended from time to time". And as per the Indian standard IS 14534:1998 titled Guidelines for Recycling of plastics, the process of recycling of plastic waste includes "the cleaned and washed material as obtained in 7.3.1 may be blended with additives, processing aids, pigments etc., as the case may be, and finally granulated by using appropriate screen mesh for filtration of contaminants and impurities".

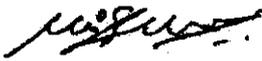
7. As per the MPCB consent issued to facility, the consented production capacity of the facility w.r.t. production of Plastic Granules & Reprocess Plastic Granules (with & without washing) is about 2,10,000 MTA; and w.r.t. Plastic Grinding & Agglomerate - semi-finished product (with & Without Washing Activity) is about 78,000 MTA. Copy of CTO of the unit is at Annexure - V.
8. Additional machineries were found installed which were not included in the original application, details of the same are given in Table 2 of the Report. Procurement invoices of such machines giving details of processing capacity, power rating, company name, manufacturing date etc. were not available. However, capacity (in kg/hr) printed on plain paper was pasted on each machine which could not be authenticated by the inspection team. The machines appeared to be quite old to the inspection team and many of such invoices were not issued in the unit's name.
9. During the inspection, plastic waste other than packaging waste such as car bumpers, trays, pipes, wire rolls, chairs etc. were found to be stored in the raw material storage section and the same were also being processed through grinders for production of HDPE & PET chips. EPR Certificates cannot be generated either through processing of non-packaging material as per provision of EPR Guidelines.
10. Appropriate sales invoices of recycled products were not found uploaded on the EPR Portal by the unit. The industry has made 698 sale entries on EPR portal till date. Out of which, only 2 invoices, correspond to sale of grinded plastic waste of quantity 11.6 Tons uploaded on the EPR Portal. No invoice has been uploaded for the sale of recycled plastic on the EPR Portal. 468 no. of the invoices have been issued for services provided by the unit. For remaining 228 sale entries, invoices have not been uploaded.
11. The sale of recycled plastic was not confirmed by the buyers as claimed by the unit. None of the five units contacted by the inspection team, to whom the unit claimed that it had sold recycled plastic on the EPR Portal, confirmed that they had procured recycled Plastic from M/s Shakti Plastics. It was informed by these five units that they had only procured EPR certificates from M/s. Shakti Plastics India.

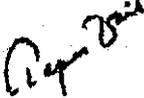


12. The unit is treating wastewater of approximately 27 m³/day as per the logbook maintained by the unit which is in contradiction of the conditions stipulated in CTO issued by Maharashtra SPCB as per which the unit shall have ETP with capacity 3.0 m³/day. ★

RECOMMENDATIONS

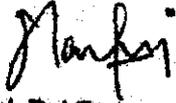
13. Environmental compensation (EC) corresponding to the quantity of EPR Certificates generated by the Unit to be levied by the MSPCB as none of the invoice uploaded on the EPR Portal was found to be meeting the requirements stipulated in the Guidance Document developed by CPCB. Also, none of the buyers confirmed procurement of recycled plastic from the Unit.
14. MSPCB to take further necessary action against the unit in accordance with provision of EPR Guidelines and Directions dated 26.10.23 issued by CPCB.
15. MSPCB to review the Consent and Registration granted to the Unit in view of points enumerated in the Observation section of the Report.

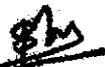

(Nischal C)
Sc. D, CPCB RD Pune

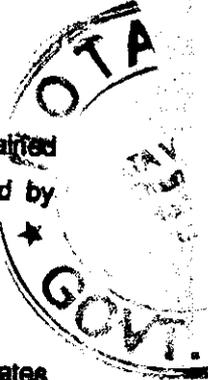
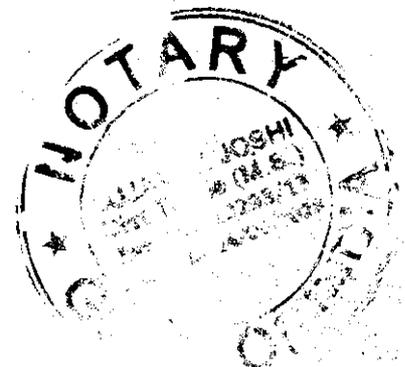

(Tapas Ukil)
Sc. B, CPCB RD Pune


(Sandeep Shinde)
FO, MPCB


(Yogesh Chandra)
Sc. C, CPCB Delhi

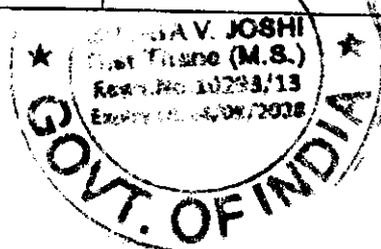

(Mayank Raj Purbey)
Sc. B, CPCB Delhi


(Sanjay More)
SRO, MPCB

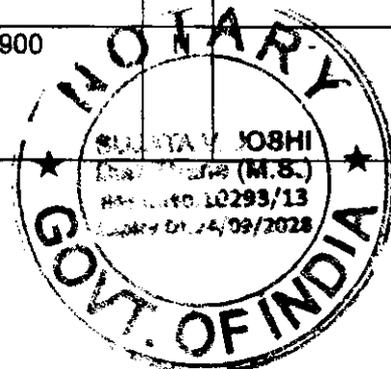


Details of Application form

1.	Company Details	Yes/No	Remarks
a.	PAN	Yes	-
b.	CIN (wherever applicable)	Yes	-
c.	GST	Yes	-
2.	Plot Area		<p>As per the information provided by the industry, the total area of all sheds- 10,720 m² and open storage area is 5600 m² as detailed in following:</p> <ul style="list-style-type: none"> • Raw material storage and segregation (02): 4200 m² • Washing and agglomeration process (01): 1400 m² • Grinding & agglomeration process (01): 2800 m² • Extrusion process & finished product storage (01): 2320 m² • Total area: 4200 + 1400 + 2800+ 12320 = 16320 m² <p>Apart from the above, there are open areas/spaces available, the area of these spaces is yet to be provided by the facility. Thus, the total plot area (Gut No.-158 & 159) is more than 10,000 sqm. which is mentioned in the EPR Portal.</p>
3.	No. of Workers	Yes	Total workers observed : approx. 125
4.	GPS Location of unit	Yes	Latitude: 19.735468 Longitude : 72.915976
5.	Authorised person	Yes	Mr. Rahul Poddar (Owner) Mr. Yogesh Sharma (Accountant)
a.	PAN	Yes	-
b.	Aadhar	Yes	-
6.	Registration (Fresh/Renewal)	Yes	Fresh

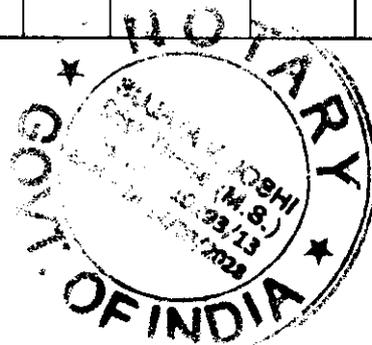


7.	Process Flow Diagram	No	Variation observed w.r.t to the flow diagram provided on portal and procedure being followed at the unit operations. Process flow diagram as submitted on EPR portal is attached as Annexure-VIII.					
8.	Consent Valid (Yes/No)	Yes	Copy of Consent to Operate issued by SPCBs/PCCs at Annexure-V					
9.	Authorization under Hazardous Waste Rules Valid (Yes/No/NA)	NA						
10.	Uploaded Pictures (embedded with geotag)							
a.	Raw Material	Yes	Geotagged pictures of the plant during the inspection is provided In Annexure -IX					
b.	Production Area	Yes	Geotagged pictures of the plant during the inspection is provided In Annexure -IX					
c.	Packaging Area	Yes	Geotagged pictures of the plant during the inspection is provided In Annexure -IX					
11.	Plant Machinery Details							
	S. No	Machine		Power Rating		Processing Capacity (TPA)	Assessed capacity (TPA)	
		Given details	Y/N	Given details	Y/N	Given details	Y/N	As per Trial Run (~1 hr)
	1	120mm Thermoplastic Extruder	Y	165	Power rating could not be verified	1000	N	2253.6
	2	Squeezer Machine	Y	122	-do-	6000	N	7136.4
	3	PP/PE/MLP washing plant	Y	563	-do-	2300	N	-
	4	PP/PE/MLP washing plant	Y	280	-do-	900		





5	Agglomerator	Y	75	-do-	2000	N	4144.4
6	Agglomerator	Y	75	-do-	2000	N	3679.4
7	Agglomerator	Y	75	-do-	2000	N	Under maintenance
8	Agglomerator	Y	30	-do-	600	N	2059.5
9	Agglomerator	Y	30	-do-	600	N	2868.5
10	Agglomerator	Y	30	-do-	600	N	1603.8
11	Agglomerator	Y	30	-do-	600	N	7192.5
12	Grinder	Y	26.25	-do-	2880	N	10296.1
13	Grinder	Y	22.50	-do-	1440	N	5625.3
14	Grinder	Y	18.75	-do-	1080	N	6077.2
15	Grinder	Y	18.75	-do-	1080	N	7812.5
16	Grinder	Y	18.75	-do-	1080	N	9154.8
17	Grinder	Y	15	-do-	900	N	6926.1
18	Grinder	Y	15	-do-	900	N	Under maintenance
19	120mm Thermoplastic Extruder	Y	276	-do-	3500	N	3380.4
20	Twin Screw Extruder	Y	216	-do-	4800	N	1878
21	Extruder for PPR	Y	231	-do-	4800	N	2629.2

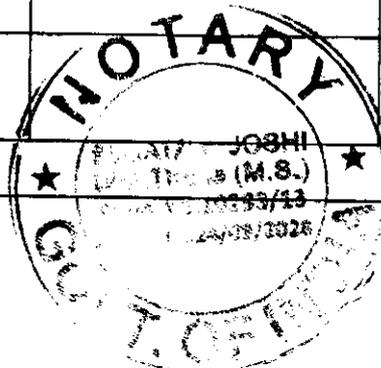




Note: Additional 6 grinders, 2 agglomerator, 2 extruders were found installed in the premises. Details of machine is at Table 2 of the report.

Invoices of machine as provided by the unit is attached as Annexure X.

12. Plastic Waste Processing / Packaging Material Production capacity								
	PWP	Processing Code mentioned at portal		Production Capacity (TPA) as mentioned on EPR portal		Product		
		Given details	Y/N	Given details	Y/N	Given details	Y/N	
1.	Cat-I	R1	Y	50000-HDPE	N	HDPE	Y	
2.	Cat-I	R1	Y	10000	N	PET	Y	
3.	Cat-II	R2	Y	105000	N	LDPE	Y	
4.	Cat-II	R2	Y	40000	N	PP	Y	
5.	Cat-II	R2	Y	10000	N	PS	Y	
6.	Cat-III	R3	Y	73000	N	MLP	Y	
As per flow diagram provided on EPR portal the recycled product is obtained through extruders. The assessed production capacity for Extruder is $1.35 * 24 * 313 = 10141.2$ TPA								
13.	Sanctioned Power load				Y/N		Remarks	
a.	Electricity Bill				No		The unit has declared sanctioned power load of 1788 KW on the EPR portal.	
14.	Waste Management Details						Yes	
15.	Pollution Control Measures						ETP is installed for waste water treatment	
16.	Disaster Management Plan							





a.	Onsite	Yes
b.	Offsite	Yes

