

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA**

ORIGINAL APPLICATION NO. 98/2021/EZ

In the matter of:

BASUDEB BAR & ORS.

...Applicants

Vs.

**WEST BENGAL POLLUTION
CONTROL BOARD & ORS.**

... Respondents

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Filed on 26th November, 2022

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH AT KOLKATA**

Original Application No. 98/2021/EZ

Between:

Basudeb Bar & Ors.

...Applicant(s)

AND

West Bengal Pollution Control Board & Ors.

...Respondent(s)

**OBJECTIONS TO THE REPORT OF THE COMMITTEE
DATED 7th SEPTEMBER 2022 ON BEHALF OF
RESPONDENT NO. 6, AMBUJA CEMENTS LIMITED.**

Most Respectfully Showeth that:

Preliminary Submissions:

1. As per the order dated 11th April 2022 the committee was directed to “*assess the damage caused to soil and crop in the vicinity of the Respondent No.6, Unit and impose penalty accordingly*”. The committee was further directed to “*re-evaluate the Ambient Air Quality to determine the contribution of the Respondent No.6, Unit to the air pollution as segregated from the pollution that may be caused by the Truck Terminal and by the vehicular movements on NH-6 and thereafter, calculate the Environmental Compensation*”.
2. The Report of the Committee hereinafter “**The Report**” dated 7th September 2022 was filed before the Ld. National Green Tribunal

(Eastern Bench) and some pages of the Report were illegible. The counsel for Respondent No. 1 (West Bengal Pollution Control Board) was granted a weeks time to file a legible copy of the Report and was directed to serve the same to the counsel for Respondent No.6 (Ambuja Cements Ltd.) by 12th September 2022. The same was received on 18th October 2022.

3. It is submitted that, as per the orders of the Ld. Tribunal dated 18th October 2022, Respondent No. 1 i.e., West Bengal Pollution Control Board hereinafter “**WBPCB**”, was again directed to re-evaluate the Environmental Compensation.
4. It is submitted that the whole process of calculation made in the previous report dated 31.01.2022 is erroneous and unjustified. It is apparent that the Committee has wrongly proceeded retrospectively and has calculated the environmental compensation from 26.11.2015 when the Consent to Operate (CTO) was given. The same have been sustained by the Report of the present committee that *“unit is required to store all raw materials in covered sheds. The unit has failed to comply with this condition. Hence, Environmental Compensation was calculated from the date of Consent to Operate”*. It is submitted that this is not a valid reason to impose retrospective EC when the cause of action as per the record and as per the present OA/98 of 2021, could not have occurred before 2nd October 2021. Further the Respondent No. 6 has stated that ACL only “started keeping some slag in open areas since July 2021”. Which is/was a bonafide admission, one that has not been considered by the Committee.
5. Apart from allowing for no corrective action, both the Reports look retrospectively and presumptively back at the past to try and increase the Environmental Compensation (“EC”) even though it was not permissible

to look at any evidence preceding the date of filing of OA No. 98 of 2021 in view of s.14(3) of the National Green Tribunal Act, 2010 or at the earliest 6 months prior to that. There is no evidence of violation/s going back even earlier than the petition/OA. The two reports of Envirocheck filed alongwith the OA are both dated 08.01.2021 and OA/98/2021 was filed on 02.10.2021. The EC levied prior to i.e., 9 months before the date of the petition is in violation of law given that even Section 14(3) of The National Green Tribunal Act, 2010 expressly provides that:

“(3) No application for adjudication of dispute under this section shall be entertained by the Tribunal unless it is made within a period of six months from the date on which the cause of action for such dispute first arose.”;

Given that the reports pre-date the OA by some 9 months in view of s. 14(3), it is submitted that the OA itself is not maintainable and is liable to be dismissed on this ground alone.

6. The Respondent No.6 herein is submitting its objections in respect of the Report of the Committee dated 7th September 2022 as under.

Objections to the Report of the Committee dated 7th September 2022:

- i. OA/98/2021 at page 8 para 4 alleges that the *“health of the applicants have been severely impacted by the continuous operation of the Industrial unit...”*. At para 5 it states that *“dust particles and other particulate matters are causing immeasurable damage to the crops of the Applicants in the adjoining agricultural fields”*. The Report dated 7th September 2022, at page 4 para 7 demonstrates that *“there is no impact on soil crop growth as well as impact on the Health of local*

people, there is hardly any reason to calculate damage for the same". At page 7 of the Report it is observed by the Committee that, *"As there is no abnormality in soil or crop growth, and no reported health impact, hence no compensation to the villagers may be necessary"*. Further, the Report at page 11 at point No. V observes that, *"Regarding physical condition of the soil of the crop fields no abnormality were found"*. At page 12 of the Report following observations have been recorded:

"1. the distance between the boundary wall (about 15 ft height) and the factory site apparently seems to be adequate and green garden boundary has been made for prevention of from pollution to local environment

2. the screening of the local population on health hazard shows no significant differences in respiratory troubles and skin problems compare to other areas. Most of the population reside in a poor environment and unhygienic conditions".

It is pertinent to mention that the Report at page 12 further states that *"Ambuja Cement authority organises health camp in the adjoining areas on regular basis"*. As can be appreciated from the foregoing, Respondent No. 6 has not only taken steps to curb the pollution in the area by providing green cover but has also taken initiatives for the health and safety of the local population. Further, there is considerable improvement in air quality (90% change) from 2020 to 2022 as recorded in the table at page 6 Sl. No.3 of the Report.

- ii. The Methodology devised by the Committee to calculate Environmental Compensation thus seems to be patently erroneous.

The same is not in accordance with the formula devised by the CPCB. In the case of *Paryavaran Suraksha Samiti vs. Union of India* [OA No. 593/2017], the following formula was devised by the CPCB:

“The Environmental Compensation shall be based on the following formula: $EC = PI \times N \times R \times S \times LF$

Where,

EC is Environmental Compensation in Rupees

PI is the Pollution Index for the relevant industrial sector

N is the Number of days when violation actually took place

R is the “factor” in Rupees (₹) for EC

S is the Factor for scale of operation

LF is the Location factor.

In note (b) of the CPCB methodology for calculating Environmental Compensation, N is defined as under:

“(b) N, number of days for which violation took place is the period between the day of violation observed/due date of direction’s compliance and the day of compliance verified by CPCB/SPCB/PCC.”

- iii. As apparent from the above, the number of days of violation are to be calculated/commence from the day when the violation was observed or the due date of a required compliance till the date of compliance by the relevant industry as verified by Central Pollution Control Board (CBCB/R-5) or the State Pollution Control Board. In this case, the verification process has been pursued by WBPCB (Respondent No.1). It is submitted that the Committee in the present case has calculated

the Environmental Compensation from 26.11.2015, i.e. from the date of grant of Consent To Operate (CTO), which is erroneous and naturally that a yet to be operational plant was polluting from day one. As per the stated methodology, the date when the violation commenced cannot be earlier than the date of the filing of the present OA or the date when the complaint to the WBPCB (Respondent No.1), was made by the Applicants herein. The calculation made in the Report is thus unsustainable. It cannot be presumptively calculated from the date of grant of CTO.

- iv. At page 13 of the Report at Sl. No. 4, the committee's response to the salient points of Units submission, the committee has stated that "*No. of days was considered from the date of consent to operate since every industry is expected to be ready for operation*". It is submitted as per the methodology devised by CPCB in *Paryavaran Suraksha Samiti vs. Union of India* the Environmental Compensation can only be levied from the date when the violation was observed. No data for any violations has been placed on record demonstrating that ACL was causing air pollution since 2015 or earlier than 2021. It is pertinent to mention that an industry cannot start to pollute the environment from the day they commence operations. If such a view as taken by the committee is considered (without any basis) then the same would be illegal and erroneous.
- v. As per the order dated 11.04.2021 the committee was directed "*to determine the contribution of Respondent No.6, unit to the air pollution as segregated from the pollution that may be caused by the Truck Terminal and by the vehicular movement on NH-6*". The Report at page 6 Sl. No. 3 provides that "*Ambient air quality was re-evaluated*

on 5-6th May 2022 by conducting ambient air quality monitoring at the two same locations in the villages as was done in the previous occasion (December 2021). The location near the truck terminal and NH-6 was not considered for re-evaluation". The Report observes that the values of PM10 and PM2.5 were much lower as compared to December 2021. Further, at Sl. No. 3 of the Report, it is also stated that the "*problem of air pollution from the industry as reported by the complainant is primarily seasonal*". Therefore, it is stated that Respondent No. 6 should not be liable for Environmental Compensation from 26.11.2015 and that the Environmental Compensation as imposed should be reconsidered for this reason alone.

It is pertinent to state that apart from the Truck Terminal and NH-6 referred to and acknowledged in the Report, there are also a number of other industries in what is called the Jalan Industrial Complex (for example) which is referred to in the Environment Clearance letter dated 23rd June 2011 which provides that "*due to the existence of Jalan Industrial Complex, Howrah being a Critically Polluted area*". Therefore, it can be appreciated that due to the above-mentioned reasons, Howrah is a critically polluted area.

A copy of the Environment Clearance letter dated 23rd June 2011 is annexed herewith as **Annexure – 'R-6/15'**.

- vi. Despite acknowledging that the high emissions cannot only be attributed to ACL, the Report provides that no weightage factor could be considered as the CPCB methodology is silent on the issue of partial violation. Sl. No. 13 at page 15 of the Report read along with para 11 point (b) of the previous report dated 31.01.2022 states that:

“In this case, there is a partial violation of some conditions of EC, CTE & CTO while remaining conditions have been complied with. However, no weightage factor could be considered for partial violation of conditions on absence of such indicators in the CPCB methodology”.

It is submitted that violations recorded in the Report are of intermittent nature and not of a continuing nature and whenever apprised by the WBPCB, Respondent No. 6 has taken adequate measures and even the WBPCB has admitted this. It cannot be assumed that such violations date back to when the Consent to Operate was given. As and when the partial violations took place, the Environmental Compensation could only be levied when the same were observed. Therefore, in the present case, the Environmental Compensation levied as per the previous report and sustained by the Report calls for reconsideration.

- vii. It is submitted that as per the orders dated 11.04.2022 and 18.10.2022 of the Ld. Tribunal, the Report does not set out any distinction between the air pollution caused by ACL as opposed to air pollution caused by other sources such as the Truck Terminal, NH-6, other industries, the Jalan Industrial Complex etc. and therefore the Environmental Compensation must be re-evaluated.
- viii. In view of the foregoing facts and circumstances, it is apparent that the amount of Rs. 6,03,28,125/- (Rupees Six Crores Three Lacs Twenty Eight Thousand One Hundred and Twenty Five), calculated by the previous committee and not re-evaluated in the Report of the present committee as Environmental Compensation is unsustainable,

excessive and unwarranted. The same calls for drastic reduction for the reasons set out above and in the earlier objections dated 9th April 2022.

The Answering Respondent No.6 has already submitted its Preliminary Response on 2nd March, 2022 and its earlier Response to the Report of the Committee dated 31st January 2022 on 9th April 2022. In this regard, these objections may be read in addition to the Preliminary Response dated 2nd March, 2022 and Response dated 9th April 2022. For reasons set out above, in the Preliminary Response and in the Response to the Report of the Committee dated 31st January 2022, it is submitted that the Report cannot be sustained. The suggestions given in the previous report have already been taken on board by the Respondent No.6 as a responsible company, which has taken necessary steps to improve its plant as observed by the Report.

It is further submitted that the calculation given for Environmental Compensation is clearly excessive as being retrospective, the same is also mathematically not sustainable.

PRAYER

It is therefore most respectfully prayed that this Hon'ble Tribunal:

- (a) Recalculate the Environmental Compensation after taking into account the submissions made above and in the Preliminary Response dated 2nd March 2022 and in the Response to the Committee Report dated 31st January 2022 on 9th April 2022 and re-evaluate the Environmental Compensation in the Committee Report dated 31st January, 2022 inter alia because the same is retrospective, erroneous based on previous orders of the Ld. NGT Principal Bench and hence legally unsustainable.

(b) Pass such other and further order(s) as this Hon'ble Tribunal deems fit in the facts and circumstances of the case and in the interest of justice and equity.

Date: 26th November, 2022
Place: Kolkata


for Respondent No. 6

Through



I.L.A. Pasrich & Company
Advocates Supreme Court & High Courts
901-905, Naurang House
21, Kasturba Gandhi Marg
Connaught Place
New Delhi – 110001
Advocates for the Respondent No.6/ACL

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
EASTERN ZONE BENCH AT KOLKATA**

Original Application No. 98 of 2021/EZ

Between:

Basudeb Bar &Ors.

...Applicant(s)

AND

West Bengal Pollution Control Board &Ors.

...Respondent(s)

AFFIDAVIT

I, Bhimsi Kachhot aged about 46years, son of Sh. Vijanandbhai Kachhot Resident of ACL Unit Sankrail, Howrah presently working as Vice-President for the Respondent No.6, do hereby solemnly affirm and state as follows:

1. I am an authorized signatory of the Respondent No.6 in the above-referred cause and I am conversant with the facts of the case and hence competent to depose accordingly.
2. I have read the contents of the accompanying Response to the Report and I affirm that the facts stated therein are true and correct to the best of my knowledge and belief based on record and have been drafted by my counsel upon my instructions, the Annexures are true copies of the documents referred to.

Bhimsi Kachhot

DEPONENT

VERIFICATION:

I, the above-mentioned deponent do hereby verify that the contents of the above Affidavit are true and correct to my knowledge and nothing material has been concealed therefrom.

Verified at Sankrail on this 26th day of November, 2022.

Bhimsi Kachhot

DEPONENT

Identified by me

Sujan Ray
SUJAN RAY
Advocate
Court, Kolkata



SOLEMNLY AFFIRMED AND DECLARED
BEFORE ME ON IDENTIFICATION

Rekha Tewari
REKHA TEWARI
NOTARY

26 NOV 2022

Paryavaran Bhawan
CGO Complex, Lodhi Road
New Delhi – 110 003
E-mail: ms.industry-mef@nic.in
Tele/fax: 011 – 2436 3973
Dated: 23rd June, 2011

To,

M/s Ambuja Cements Limited
Jaladhulagori, Village & P.O. Dhulagori,
P.S. Sankrail, District Howrah - 711 302,
West Bengal

Ph: 033- 6499 1280 Fax: 033- 2679 8423
E-mail: samir.sadhu@ambujacement.com

Sub: Modernization/expansion of existing cement grinding unit (from 1.50 MTPA to 2.40 MTPA) at Village Jala Dhulagori, Tehsil Sankrail, District Howrah in West Bengal by **M/s Ambuja Cements Limited (ACL)** - regarding **Environmental Clearance**

Sir,

This has reference to your letter no. nil dated 22.03.2011 along with copies of EIA/EMP reports seeking environmental clearance under the provisions of EIA Notification, 2006.

2. The Ministry of Environment and Forests has examined your application. It is noted that M/s. Ambuja Cements Ltd. have proposed for modernization/expansion of existing cement grinding unit (from 1.50 MTPA to 2.40 MTPA) at Village Jala Dhulagori, Tehsil Sankrail, District Howrah in West Bengal. This capacity enhancement of 0.9 MTPA will be achieved by installation of roller press in cement mill no.1 and two additional packers of 240 TPH capacity each. Total land area for the clinker grinding unit is 18.36 ha, out of which 3.82 ha has been developed under green belt/plantation and 0.67 ha of additional area will be developed under green belt. No additional land is required for the proposed expansion. Clinker (15,60,000 TPA), Gypsum (1,20,000 TPA), Fly ash (7,20,000 TPA) will be required as raw material after expansion of cement grinding capacity

3. No national park/wildlife sanctuary/biosphere reserve is located within 10 km. radius of the project site. No R & R plan is applicable in this project. River Hoogly flows at 4.5 Km distance in the SE direction from the project site. Sarenga Nallah is at a distance of approx 6 km in SSE of the plant site. Total cost of the project is Rs. 250 Crores. Capital cost for EMP has been estimated as Rs. 2.0 Crores. Besides, Rs.10.0 Crores to modify for unidirectional traffic movement to / from packing plant & 6.0 crores wagon loading arrangement has been earmarked and Rs. 0.20 Crores/annum has been earmarked towards total capital cost & recurring cost/annum respectively for environmental pollution control measures.

4. To control particulate emissions, bag filters would be installed. Fly ash & clinker are stored in silos, gypsum is stored in covered shed. Regular water sprinkling will be carried on haulage road. Transportation of fly ash will be in the

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close bunkers and unloaded pneumatically to the silo and fly ash bin will be fitted with bag filters.

5. Total water requirement after proposed expansion will be 270 m³/day, which will be sourced from ground water. No industrial wastewater will be generated from the cement grinding process. Domestic waste water will be treated in the STP and treated water will be used for gardening & dust suppression within plant boundary. There will be no discharge outside the plant premises.

6. No solid waste will be generated from the grinding unit and the dust collected by dust collectors will be recycled in the process.

7. The stand alone cement grinding units are covered under Category 'B' as per para 3(b) of the Schedule of the EIA notification 2006, but due to the existence of Jalan Industrial Complex, Howrah, being Critically Polluted area, within 10 km from the Proposed project boundary, the proposal was appraised by Expert Appraisal Committee as per the general condition of the EIA Notification, 2006.

8. The proposal was considered by the Expert Appraisal Committee-1 (Industry) in its 24th meeting held during 19th - 20th May, 2011. The Committee recommended the proposal for environmental clearance subject to stipulation of specific conditions along with other environmental conditions. Public hearing was exempted by categorizing the project as B2 category.

9. Based on the information submitted by you, presentation made by you and consultant, M/s JM EnviroNet Pvt. Ltd., Gurgaon, the Ministry of Environment and Forests hereby accords environmental clearance to the above project under the provisions of EIA Notification dated 14th September 2006 subject to strict compliance of the following Specific and General conditions:

A. SPECIFIC CONDITIONS :

- i. Particulate emissions shall be controlled within 50 mg/Nm³ by installing adequate air pollution control system viz. Bag filters and stacks of adequate height etc. Data on ambient air, fugitive and stack emissions shall be submitted to the Ministry's Regional Office at Bhubaneswar, SPCB and CPCB regularly.
- ii. The National Ambient Air Quality Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 should be followed.
- iii. Gaseous emissions including secondary fugitive emissions from all the sources shall be controlled within the latest permissible limits issued by the Ministry and regularly monitored. Guidelines/Code of Practice issued by the CPCB should be followed.
- iv. The company shall install adequate dust collection and extraction system to control fugitive dust emissions at various transfer points, raw mill handling (unloading, conveying, transporting, stacking), vehicular movement, bagging and packing areas etc. All the raw material stock piles should be covered. A closed clinker stockpile system shall be provided. All conveyers should be

covered with GI sheets. Covered sheds for storage of raw materials and fully covered conveyers for transportation of materials shall be provided besides coal, cement, fly ash and clinker shall be stored in silos. Pneumatic system shall be used for fly ash handling.

- v. Asphaltting/concreting of roads and water spray all around the stockyard and loading/unloading areas in the cement plant shall be carried out to control fugitive emissions. Regular water sprinkling shall be carried out in critical areas prone to air pollution and having high levels of SPM and RSPM such as haul road, loading and unloading points, transfer points and other vulnerable areas. It shall be ensured that the ambient air quality parameters conform to the norms prescribed by the Central Pollution Control Board in this regard.
- vi. Efforts shall be made to reduce impact of the transport of the raw materials and end products on the surrounding environment including agricultural land. All the raw materials including fly ash should be transported in the closed containers only and should not be overloaded. Vehicular emissions should be regularly monitored.
- vii. Total ground water requirement shall not exceed 270m³/day and necessary permission from the competent authority for the drawl of water shall be obtained. Efforts shall be made to further reduce water consumption by using air cooled condensers. All the treated wastewater should be recycled and reused in the process and/or for dust suppression and green belt development and other plant related activities etc. No process wastewater shall be discharged outside the factory premises and 'zero' discharge should be adopted.
- viii. Efforts shall be made to make use of rain water harvested. If needed, capacity of the reservoir shall be enhanced to meet the maximum water requirement. Only balance water requirement shall be met from other sources.
- ix. All the bag filter dust, raw meal dust, coal dust, clinker dust and cement dust from pollution control devices should be recycled and reused in the process used for cement manufacturing. Spent oil and batteries should be sold to authorized recyclers / reprocessors only.
- x. Green belt shall be developed in at least 33 % area in and around the cement plant as per the CPCB guidelines to mitigate the effects of air emissions in consultation with local DFO.
- xi. At least 5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment based on locals need and item-wise details along with time bound action plan should be prepared and submitted to the Ministry's Regional Office at Bhubaneswar. Implementation of such program should be ensured accordingly in a time bound manner.

B. GENERAL CONDITIONS:

- i. The project authorities must strictly adhere to the stipulations made by the West Bengal Pollution Control Board and the State Government.

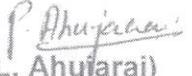
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- ii. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests.
- iii. The gaseous emissions from various process units shall conform to the load/mass based standards notified by this Ministry on 19th May, 1993 and standards prescribed from time to time. The State Pollution Control Board may specify more stringent standards for the relevant parameters keeping in view the nature of the industry and its size and location.
- iv. At least four ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of PM₁₀, SO₂ and NO_x are anticipated in consultation with the SPCB. Data on ambient air quality and stack emission shall be regularly submitted to this Ministry including its Regional Office at Bhubaneswar and the SPCB/CPCB once in six months.
- v. Industrial wastewater shall be properly collected, treated so as to conform to the standards prescribed under GSR 422 (E) dated 19th May, 1993 and 31st December, 1993 or as amended from time to time. The treated wastewater shall be utilized for plantation purpose.
- vi. The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (daytime) and 70 dBA (nighttime).
- vii. Occupational health surveillance of the workers should be done on a regular basis and records maintained as per the Factories Act.
- viii. The company shall develop surface water harvesting structures to harvest the rain water for utilization in the lean season besides recharging the ground water table.
- ix. The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report. Further, the company must undertake socio-economic development activities in the surrounding villages like community development programmes, educational programmes, drinking water supply and health care etc.
- x. As proposed, Rs 2.0 Crores and Rs. 0.20 Crores shall be earmarked towards capital cost and recurring cost/annum for environment pollution control measures to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government. An implementation schedule for implementing all the conditions stipulated herein shall be submitted to the Regional Office of the Ministry at Bhubaneswar. The funds so provided shall not be diverted for any other purpose.

- xi. A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.
 - xii. The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of the MOEF at Bhubaneswar. The respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; PM10, SO₂, NO_x (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
 - xiii. The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well as by e-mail) to the Regional Office of MOEF, the respective Zonal Office of CPCB and the SPCB. The Regional Office of this Ministry at Bhubaneswar / CPCB / SPCB shall monitor the stipulated conditions.
 - xiv. The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company alongwith the status of compliance of environmental conditions and shall also be sent to the respective Regional Office of the MOEF at Bhubaneswar by e-mail.
 - xv. The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at Website of the Ministry of Environment and Forests at <http://envfor.nic.in>. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same should be forwarded to the Regional office at Bhubaneswar.
 - xvi. Project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of commencing the land development work.
10. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.
11. The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.

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12. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 and the Public (Insurance) Liability Act, 1991 along with their amendments and rules.


(Dr. P.L. Ahujarai)
Scientist 'F'

Copy to:

1. The Secretary, Department of Environment, Govt. of West Bengal, Kolkata, West Bengal.
2. The Chairman, Central Pollution Control Board, Parivesh Bhavan, CBD-cum-Office Complex, East Arjun Nagar, Delhi-110032.
3. The Chairman, West Bengal Pollution Control Board, Parivesh Bhawan, 10A Block-LA, Sector-III, Salt Lake, Kolkata - 700091, West Bengal.
4. The Chief Conservator of Forests, Regional Office (EZ), Ministry of Environment and Forests A-3, Chandrashekharpur, Bhubaneswar - 751 023, Orissa
5. Guard File/ Monitoring File / Record File.


(Dr. P.L. Ahujarai)
Scientist 'F'