

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

Appeal No. 82/2025

(IA No. 843/2025)

IN THE MATTER OF:

Rohit Singh

...Applicant

Vs.

Ministry of Environment, Forest and

Climate Change

...Respondent(s)

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PLACE New Delhi

DATE 28.01.2026

THROUGH

Ms. Suhasini Sen
Advocate, MoEF&CC

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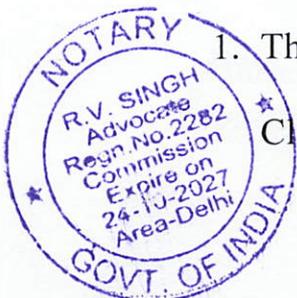
Climate Change

...Respondent(s)

**COUNTER AFFIDAVIT ON BEHALF OF THE MINISTRY OF
ENVIRONMENT, FOREST AND CLIMATE CHANGE.****MOST RESPECTFULLY SHOWETH:**

I, Amardeep Raju, currently working as Scientist 'E' at the Ministry of Environment, Forest and Climate Change (MoEF&CC), Delhi, do hereby solemnly affirm and state as under:

1. That I, in my official capacity in the Ministry of Environment, Forest and Climate Change, in the above mentioned matter, am conversant with the



facts and circumstances of the case on the basis of official records, and as such authorized and competent to swear this affidavit.

2. That, the present Appeal has been filed by the Appellant, inter alia, stating apprehended environmental impacts arising out of the proposed “Bulk Drug Park” project at District Una, Himachal Pradesh, and questioning the appraisal process undertaken by the Ministry of Environment, Forest and Climate Change under the EIA Notification, 2006. The Appellant has broadly stated that the proposed project would lead to adverse impacts on land, water resources, ecology, and public health, and has sought intervention of this Hon’ble Tribunal against the appraisal and grant of Environmental Clearance to the project.
3. It is most respectfully submitted that the Project Proponent, M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited (HPBDPIL), under the Department of Industries, Government of Himachal Pradesh, has proposed development of a “Bulk Drug Park” over an area of approximately 568.75 hectares (1405.41 acres) at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani and Malluwal, Tehsil Haroli, District Una, Himachal Pradesh.
4. That the proposed project is envisaged as an industrial estate comprising approximately 110 industrial plots intended for Active Pharmaceutical Ingredient (API) manufacturing units based on chemical synthesis, along with allied infrastructure including roads, utilities, greenbelt, Common



Effluent Treatment Plant (CETP), Treatment, Storage and Disposal Facility (TSDf), logistics hub, and other support facilities.

5. That the project falls under Item 7(c) of the Schedule to the EIA Notification, 2006, i.e., "Industrial Estates/Parks/Complexes," and is categorized as Category 'A', requiring prior Environmental Clearance from the Ministry of Environment, Forest and Climate Change.
6. That the proposal for grant of Terms of Reference (ToR) was considered by the Expert Appraisal Committee (EAC) for Infra-I Sector in its 367th meeting held on 26.06.2024, pursuant to which the Ministry granted ToR vide letter dated 01.08.2024, prescribing comprehensive and sector-specific parameters for preparation of the EIA/EMP report.
7. It is most humbly submitted that the proposal was thereafter placed for appraisal before the Expert Appraisal Committee (EAC- Infra-I sector) in its 398th meeting held on 29th-30th January 2025. The EAC, after detailed deliberations, deferred the proposal and recommended constitution of a sub-committee for site inspection and sought additional information on specific environmental aspects for informed appraisal. The relevant extract of the recommendation is as follows:

"...The EAC, taking into account the submission made by the project proponent has a detailed deliberation in its 389th meeting during 29th - 30th January 2025 and deferred the proposal. The EAC recommended that



a sub-committee shall conduct the site visit for further appraisal. The committee also requested to the PP to submit the information with respect to the above observations of the Committee...” A copy of the of the relevant extract of the minutes of the 398th meeting held on 29th-30th January 2025 is marked and annexed herein as **ANNEXURE R1/1**.

8. That the EAC, after detailed deliberations, deferred the proposal and recommended constitution of a sub-committee for site inspection and sought additional information on specific environmental aspects for informed appraisal. The Project Proponent was directed to submit requisite clarifications and compliance details as recorded in the Minutes of the said meeting.
9. It is humbly submitted that, in compliance with the aforesaid directions of the Expert Appraisal Committee, the Sub-Committee conducted a site visit at the project location on 29th-30th April 2025 and submitted its report, which was placed before and taken on record by the Expert Appraisal Committee in its 401st meeting held on 14th-15th May 2025. The said report has been taken on record and accepted by the EAC. A copy of the relevant extract of the minutes of the 401st meeting of the EAC held on 14th-15th May, 2025 is marked and annexed herein as **ANNEXURE R1/2**.
10. It is respectfully submitted that pursuant to the earlier appraisal and the site visit conducted by the EAC Sub-Committee, the proposal was again placed



before the Expert Appraisal Committee (Infrastructure Sector) in its 414th meeting held on 02.09.2025. In the said meeting, the Expert Appraisal Committee considered the report of the EAC Sub-Committee, the studies carried out by nationally reputed institutions including CBRI and ICAR-IISWC, the revised layout plan, amended green belt and afforestation plan, and the additional information and clarifications furnished by the Project Proponent. After detailed deliberations on all environmental aspects, the Expert Appraisal Committee recommended the project for grant of Environmental Clearance, subject to strict compliance with specific and standard environmental conditions as recorded in the Minutes of the said meeting. A copy of the relevant extract of the minutes of the 414th meeting of the EAC held on 02.09.2025 is marked and annexed herein as **ANNEXURE R1/3.**

11. That thereafter, the Ministry of Environment, Forest and Climate Change, after due consideration of the recommendations of the Expert Appraisal Committee made in its 414th meeting and in exercise of powers under the Environment Impact Assessment Notification, 2006, granted Environmental Clearance to the project "Bulk Drug Park" at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani and Malluwal, Tehsil Haroli, District Una, Himachal Pradesh, vide letter dated 25.09.2025. The said Environmental Clearance has been accorded subject to strict compliance with the specific and standard conditions stipulated therein and



provides for regulatory oversight and monitoring through the Regional Office of the Ministry.

12. That the Environmental Clearance dated 25.09.2025 has been granted subject to compliance with the following *Specific Conditions*, inter alia, as stipulated in the said Environmental Clearance. The relevant extract of the specific conditions are as follows;

“1.1 The EC is granted invoking the Specific Condition of the EIA Notification, 2006 for the proposed Bulk Drug Park. Since the bulk drug park is proposed with homogeneous type of industries, the individual industries including proposed industrial housing within such estates /complexes will not be required to take prior environmental clearance.

1.2 Recommendations of the CBRI report pertaining to the Landslide Susceptibility and Suggestive Remedial Measures shall be implemented with letter and spirit subject to amendment that Restricted No-Building/construction Zone will be maintained for higher elevations and steeper >25° slopes to reduce the impact of building infrastructures on the fragile slopes of the project areas.

1.4 A green Buffer Zone will be provided all along the boundary of the project as well as major and minor drains/nallahs (50 meter for



major and 15 meter for minor). Green belt of at least 30-meter width shall be created all along the boundary of the project area.”

1.6 Overall developable area shall be between 65 to 70 % of total project area and, in no case, shall exceed 70%.

1.13 The groundwater extraction shall be permitted for a maximum period of five (5) years from the grant of Environmental Clearance (EC). Beyond this period, the project proponent (PP) shall utilize water as per the proposed alternative arrangements made for surface water supply scheme approved by the Bhakra Beas Management Board (BBMB).

1.18 The installation of the Sewage Treatment Plant (STP) shall be certified by an independent expert and a report in this regard shall be submitted along with the six-monthly EC compliance report to the concerned IRO of the Ministry before the project is commissioned for operation...”

Standard EC Condition

“1.1 No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable.”



1.2 *The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996 and the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.*

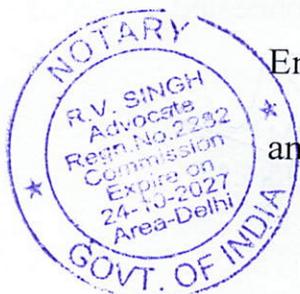
1.8 *The project proponent shall upload/submit six-monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC, CPCB and SPCB.*

1.12 *This Environmental Clearance is granted subject to the final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble National Green Tribunal and any other Court of Law, if any, as may be applicable to this project..."*

A copy of the Environmental Clearance dated 25.09.2025 is marked and annexed herein as **ANNEXURE R1/4**.

13. That the aforesaid specific and standard conditions demonstrate that the

Environmental Clearance has been granted after due application of mind and incorporates multiple safeguards addressing slope stability, water



management, green belt development, and regulatory oversight, thereby adequately addressing the apprehensions raised by the Applicant.

14. That the issues raised in the present Appeal were considered during the statutory appraisal process undertaken in accordance with the EIA Notification, 2006, including deliberations by the Expert Appraisal Committee in multiple meetings and a site visit by a duly constituted Sub-Committee. The Environmental Clearance has thereafter been granted subject to conditions, after due consideration of the relevant material on record.

15. That, in view of the aforementioned facts and circumstances, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to dismiss the present Appeal as being devoid of merit and pass such other order(s) as may be deemed fit in the interest of justice.

[Handwritten Signature]
D/9059/2024
I identified the deponent/executioner who has signed in my presence

VERIFICATION

28 JAN 2026

Verified at _____ on this _____ day of _____, 2026 that the contents of this affidavit based on official record(s) maintained and information available in the office are true and correct, no part of it is false and nothing has been concealed there from.



[Handwritten Signature]
solely affirmed before me, read over & explained to the deponent
Notary Public. **DEEP**
28 JAN 2026

[Handwritten Signature]
DEPONENT
अमरदीप राजू
AMARDEEP RAJU
वैज्ञानिक 'ई'/Scientist 'E'
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
M/o Environment, Forest and Climate Change
भारत सरकार, नई दिल्ली
Govt. of India, New Delhi

[Handwritten Signature]
DEPONENT
अमरदीप राजू
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mtrs from the habitation area located nearby the industrial estate so that the habitations at all sides shall be at a minimum of 500m away from the proposed red-category industries.

3.2. Agenda Item No 2:

3.2.1. Details of the proposal

Proposed “Bulk Drug Park” at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani and Malluwal, Teh. Haroli, Distt. Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Ltd. under Department of Industries, Government of Himachal Pradesh by HIMACHAL PRADESH BULK DRUG PARK INFRASTRUCTURE LIMITED located at UNA,HIMACHAL PRADESH			
Proposal For		Fresh EC	
Proposal No	File No	Submission Date	Activity (Schedule Item)
IA/HP/INFRA1/51747/5/2025	10/68/2023-IA.III	14/01/2025	Industrial estates/ parks/ complexes/ areas, export processing Zones (EPZs), Special Economic Zones (7(c))

3.2.2. Project Salient Features

“The EAC noted that the Project Proponent and the consultant have given an undertaking that the data and information given in the application and enclosures are true to the best of their knowledge and belief and no information has been suppressed in the EIA/ EMP report. If any part of data/ information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.”

3.2.1 The aforementioned proposal was placed before the EAC during its 389th meeting of the Expert Appraisal Committee held on 29th-30th January 2025. The project proponent and EIA consultant M/s Eco Paryavaran Laboratories & Consultants Pvt. Ltd. (formerly Eco Laboratories & Consultants Pvt. Ltd.), Mohali made a presentation and submitted the following information:

3.2.2 The proposed project is for the ‘Development of proposed “Bulk Drug Park” over an extent of 568.75 Ha (1405.41 Acres) at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani, and Malluwal, Tehsil Haroli, District Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Ltd. (HPBDPIL) under Department of Industries, Government of Himachal Pradesh’.

3.2.3 A New Industrial Estate in the name of Bulk Drug Park is proposed to be set up at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani, and Mulluwal, Tehsil Haroli, District Una, Himachal Pradesh. The proposed project comprises 110 Industrial Plots along with allied infrastructure and related services. The project site is falling in between the geographical coordinates ranging from 31°21'26.21" N and 76°10'22.98" E.

3.2.4 The proposed project activity is listed at schedule S.No.7(c) Industrial estates/parks/ complexes/Areas, export processing zones (EPZs), Special economic zones (SEZs), Biotech parks, Leather complexes under Category- ‘A’, of the schedule of the EIA Notification, 2006 and its

amendments due to applicability of general condition i.e. Punjab–Himachal Pradesh border lies at a distance of approx.100m from the nearest project boundary and the proposed project has an area greater than 500 hectares. Total Project Cost is Rs. 1923 Cr.

3.2.5 Terms of References (TOR) Details: The ToR proposal was considered in the 367th EAC meeting held on 26th June 2024, the committee recommended the proposal for undertaking a detailed EIA/EMP report. Ministry granted the vide letter No. 10/68/2023-IA.III dated 01.08.2024.

3.2.6 Public Hearing Details: The public hearing was conducted in the Una district of Himachal Pradesh state on 20.11.2024. The details of the public hearing are as follows:

Date	Venue	District and State	Chairman
20-11-2024	Open Ground, Near Forest Rest House, VPO Pollian Beet, Tehsil Haroli, District Una, Himachal Pradesh	Una District, Himachal Pradesh	Additional Deputy Commissioner, Una

3.2.7 Land use/Land cover of the project site: Out of 1,405.41 acres of land, 1,365.77 acres is the government land allotted to the Department of Industries and 39.64 acres is the private land purchased and transferred to the Department of Industries, Government of Himachal Pradesh for setup of the proposed industrial park.

S. No.	Description	Area (in Acres)	Area (in Hectares)	Percentage (%)
1	Industrial Plot Area	558.28	22.93	39.72
2	Commercial Area	95.0	3.84	6.76

		2	5	
3	Electric Utilities	2 3. 3 7	9. 4 6	1.6 6
4	Utility Area	4 1. 6 5	1 6. 8 6	2.9 6
5	TSDF Area	2 9. 4 6	1 1. 9 2	2.1 0
6	Parking Area	1 8. 4 6	7. 4 7	1.3 1
7	Green Area: <ul style="list-style-type: none"> Green area under Industrial Plots to be developed by individual industries Green area developed by HPBDPIL 	4 6 5. 1 8 1 8 5. 7 2	1 8 8. 2 5 7 5. 1 6	33. 09 13. 21 19. 88
8	Treatment Units (STP/ETP/ MEE & WTP)	4 1. 0 8	1 6. 6 2	2.9 2

9	Logistic Hub and Warehouse	1884	762	134
10	Area under Roads	8645	3498	615
11	Area under existing Water Bodies	2733	1106	194
12	Others (Semi-public Area)	0300	0122	002
	Total Area	140541	56875	100

3.2.8 List of industries to be housed with the proposed project site are as following:

Category of Industries	As per EIA 2006 Notification	CPCB Classification
Member industries (API units) Synthetic organic chemicals industry (dyes & dye intermediates; bulk drugs intermediates and excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates)]	5(f)	Red
Common Effluent Treatment Plants (CETP)	7(h)	-
Treatment, Storage and Disposal Facility (TSDF) (comprising a secured landfill with a solid-liquid feed incinerator)	7(d)	-

The upcoming industrial units in the Bulk Drug Park (BDP) will only be API manufacturing units based on chemical synthesis (approx. 70 to 80 industrial units in 110 industrial plots) and such units are covered under the Red Category (Serial No. 60) as per CPCB categorization of industries. BDP as a whole is covered under the Red Category (Serial No. 32) as per CPCB categorization. CETP, TSDF & Incinerator are covered under the Red Category (Serial No. 14) as per CPCB.

3.2.9 Terrain and Topographical Features: The Project area comprises agricultural, barren, and bushy blocks with semi-hilly terrain. In general, most of the district lies between 600-900 m elevation and slope is less than 10°. Approx. elevation range of the entire project lies 390-590m above mean sea level (amsl). The drainage pattern of the project area is dendrite type and the flow of water is from NE to SW according to the natural slope of the surface i.e., towards river Beas. A total of five sharp slope areas with more than 45° angles were identified comprising an area of 2.96 acres. The details are as follows:

Sl. No.	Location of Slope	Area of Slope
1	Landfill site	0.89
2	Industrial Plot No. 110	0.68
3	Water Reservoir/ Pond	0.62
4	Common Steam Generation Area	0.57
5	Industrial Plot No. 93	0.20
Total Area (Acres)		2.96

3.2.10 Details of water bodies, impact on drainage:

Sl. No.	Water Bodies	Distance (~Kms.)
1	Soan/Swan River	8.0 (NE)
2	Panjoian Khad (Seasonal)	Within Project Site
3	Raamsar Pond	3.0 (NE)

Hum khad in Hum valley including proposed Bulk Drug Park in Haroli region forms the main drainage in the southwestern part of the district with elevation range of 300-600 m.

3.2.11 Water requirements: The total water requirement for the proposed project will be 22.1 MLD; out of which 15 MLD will be extracted from groundwater through borewells (15 Nos.), for an initial period up to materialization of surface water supply scheme, and 7.1 MLD will be recycled water met from

treated water. Breakup of the total water demand is given below:

Sl. No.	Description	Demand (MLD)	Source
1	Freshwater Demand (Portable + Process water demand)	15 (2.2 + 12.8)	Groundwater*
2	Flushing water demand	1.15	Treated water
3	AC Cooling demand	2.00	Treated water
4	Horticulture water demand	3.95	Treated water
5	Total Water Demand	22.1 MLD	Groundwater* & treated water

*The groundwater abstraction scheme will only be there until the surface water scheme comes into place i.e. until the materialization of the surface water scheme. As a substitute for the groundwater supply, a comprehensive scheme for the surface water supply has been approved by the concerned authority Bhakra Beas Management Board (BBMB). Under this proposal, a dedicated pipeline of approx. 15 km length will be laid which will supply surface water from the River Satluj to the project. 50 MLD of fresh water from the River Satluj will be supplied and a dedicated storage tank of a capacity of 100 MLD is proposed within project premises. This scheme has been envisaged keeping in view the future expansions and upcoming allied industries as well as the proposed housing schemes in the vicinity. The M/s HPBDPIL has already paid the seed money to the BBMB for the initiation of this scheme. Surface water from the river Satluj will be used to meet the freshwater requirements onwards to the operationalization of the scheme. A confirmation letter from the Jal Shakti Department, Himachal Pradesh obtained for the abstraction of groundwater has been submitted.

3.2.12 Waste Management: Hazardous waste generation from the proposed Bulk Drug Park has been estimated as 10-12 TPD and CETP sludge & MEE residue) & incinerable/co-processing waste will be 650-800 TPD. An integrated TSDF (comprising a secured landfill, and a solid-liquid feed incinerator is proposed inside the project for which 33.6 acres of land have been proposed. 4-5 kg/day of Biomedical waste is likely to be generated from the dispensary & Research Institute for Pharmaceutical advancement proposed within the project which includes minor first aid or medical use of disposable dressing material. This waste will be disposed of through the authorized Common Bio-medical Waste Collection and Disposal Agency as per Bio-medical Waste Management Rules, 2016 and its amendments. The solid waste generated will be 0.6 TPD during the construction and 8.8 TPD during the operation phase from various zones of the park. Biodegradable waste will be composted within project premises and recyclable components will be disposed of through authorized recycler vendors. The Solid Waste will be handled/disposed of as per the provision of Solid Waste Management Rules 2016 and its amendments.

Nearly 80 kg/day of Plastic Waste and 4 TPM (i.e. 130 kg/day) of E-Waste is expected to be generated. Both these wastes i.e. E-Waste and Plastic Waste will be handled/disposed of to the authorized recyclers, strictly as per the provision of the prevailing/relevant Rules. Wastewater: Common Effluent Treatment Plant of capacity 5 MLD based upon physio-chemical cum biological treatment technology including UF, RO & MEE will be provided within the project to treat the industrial effluent to be generated from industrial processes. Total Industrial wastewater generation will be 5 MLD (approx. 62 KLD by individual unit) which will consist of 1.5 MLD of HTDS and 3.5 MLD of LTDS streams. Treatment of LTDS process effluents will be done in CETP with ZLD and effluents of HTDS stream will be fed to MEE. 2.9 MLD of domestic effluent will be generated which will be treated in the proposed STP of capacity 3 MLD based on MBBR/SBR Technology.

3.2.13 Details of Tree Cutting and Green Belt Development: About 3,440 trees are proposed to be cleared due to the project alignment. A Greenbelt of 50m width along major streams/ nallah/ khads and 15m width along minor streams and project boundary shall be developed in an area of 113.1 ha (279.46 Acres) (19.88% of the total area) and approx. 34,400 trees of native/local species shall be planted. The remaining greenbelt will be developed by the member industries in an area of 75.2 ha (185.72 Acres) (13.21% of the total area) in their industrial premises along the plot boundary.

3.2.14 Diversion of forestland: The instant proposal does not envisage any diversion of forestland as there is no forest land involved in the proposed project site except some reserve and protected forest patches i.e., Polian Shamlat Reserve Forest (Adjacent to project boundary in South), Saloh and Bhadsali Open Jungle (approx. 5 km in North) Kangar Protective Forest (6 km in North-West), Saunli and Birampur Protected Forests (approx. 8 km in South).

3.2.15 There are no notified ecologically sensitive areas such as National parks or Wildlife Sanctuaries, Biosphere Reserves, Wildlife Corridors, Ramsar sites, and Tiger/Elephant Reserves (existing as well as proposed) within 10 km radius of the project. The Schedule I species reported within the study area are Leopard, Sambhar, Wild Boar, Indian Porcupine, Hyena, Common Peafowl, Spanish Owl, Griffon Vulture, Spanish Imperial Eagle, King Cobra, Rock Python, Russel's Viper, etc. A wildlife conservation and mitigation plan has been prepared and submitted to the D.F.O the wildlife conservation plan has been forwarded to the Chief Wildlife Warden for approval vide letter No. RK/WL/8373 dated 16.01.2025.

3.2.16 Energy conservation measures with estimated saving: A total of 14.2 MW of solar power generation is proposed as alternate energy on the rooftops of commercial buildings/ areas, electrical utility areas, and treatment units. Solar streetlights are to be used and industries shall be asked to look at the feasibility of installing solar heaters to feed preheated water for process operations. The feasibility of installing solar panels with battery backup along internal roads & buffer areas shall be explored to conserve energy. Industries & commercial establishments shall formulate a proposal to harness solar power within their premises, particularly on rooftops.

3.2.17 Use of PNG will be ensured to operate common infrastructure as boilers for steam generation, GAIL is committed for the supply of PNG to BDP as the GAIL has already a presence in the Tahliwal Industrial area approx. 8 km from the Bulk Drug Park (BDP) site. MEE for wastewater treatment, and Incinerators for hazardous wastes management by HPBDPIL and other industrial process/operations by member industries.

3.2.18 Details of Rainwater Harvesting: Construction of rooftop rainwater harvesting structures shall be made mandatory to conserve water resources as the freshwater demand of Bulk Drug Park (BDP) is 15 MLD. The project area falls in the Hum Valley and Swan catchment area with a groundwater extraction of about 70%. Hence to recharge groundwater, BDP will design a rainwater harvesting system in the Hum Valley and Swan catchment areas. Rainwater harvesting is proposed from rooftops of general buildings (other than industrial sheds) and other pucca areas through the dedicated drainage system. The provision for reservoir/storage tank for freshwater has been provided of capacity 50 ML (million liters). Additionally, the rainwater will be collected in a storage pond/ tank of 800 KL and surplus water will be collected in recharge wells/pits. After the treatment of rainwater, it will be reused in industrial processes, gardening, and flushing purposes.

3.2.19 Land acquisition and R&R issues involved: There is no R&R for the project. The area under the site falls under the “Banjar Kadim” category as per the revenue record with present ownership of the Department of Industries, Government of HP. The plot area of the project is 1,405.41 acres (568.75 Ha); out of which, 1,365.77 acres is the government land allotted to the Department of Industries and 39.64 acres is the private land purchased and transferred to the Department of Industries, Government of HP for setting up of the proposed industrial park.

3.2.20 Employment Potential: During the construction phase, manpower of 2,500 to 3,000 persons will be employed. During the operational phase, the proposed employment is projected for the entire bulk drug park with a worker density of 120 employees per hectare. Thus, as such, an employment opportunity for approx. 40,000 no. of employees will be generated. Apart from this direct employment, there will be numerous numbers of persons with indirect employment will be connected with this project. The exact number of such persons cannot be assessed at this stage; as such kind of employment/job work activities come from the informal/unorganized sectors. However, for the calculation of wastewater generation and other related entities/activities, a floating population of 10% of direct employees has been considered i.e. 4,000 persons, thus arriving at a total population of 44,000 persons.

3.2.21 Benefits of the project: The Indian Govt. has initiated a noble concept of “Aatmanirbhar Bharat” and this project will negate the need to import from the neighbouring countries to certain effects, which will add to the self-sufficiency of the country. Hence, the project is the need of the hour and deserves all the encouragement and facilitation for implementation, to promote technologies and industry. The project is intended to facilitate development of a well-planned and resource-efficient industrial base, a World-class sustainable connectivity infrastructure. Bulk Drug Park (BDP) proposed to establish a mixed-use area on site for essential services staff initially and may develop discreet sites in the future away from the park which may facilitate local development due to increased demand for domestic services. The need for additional housing in the project vicinity will provide an opportunity for surrounding villagers to build and lease out their houses. The basic infrastructure for the community needs will be strengthened by extending health care, educational facilities, drainage, and drinking water quality to the village, building/strengthening existing roads in the area, etc. The occupational health facility proposed on-site with all amenities may be used by the surrounding population in case of emergency.

3.2.22 Details of Court cases: The proposed project does not involve any court case/ litigation.

3.2.3. Deliberations by the committee in previous meetings

N/A

3.2.4. Deliberations by the EAC in current meetings

3.2.23 During the EAC, the committee observed the following:

- i. The committee noted that an Incinerator and a TSDF facility for handling Hazardous wastes are proposed within the boundary of the aforementioned Bulk drug park for which the environmental clearance shall be separately obtained.
- ii. The EAC noted that in the proposed site approx. 4728664.34 sqm (472 ha) cutting and filling involved for construction and this may cause the landslides. The PP as per their study found only 2.9 acre of land out of total project area of 1405 acre not suitable for slope stabilisation as per the condition of the TOR. EIA Study (Geologist zone I and Zone II report) has mentioned the elevation difference of 160 meters in the project area and also the hilly and undulating nature of the project terrain with soil having loose boulders. Therefore, there is a need to reassess the site and building development plan in the project through a nationally reputed institute like IIT or Central Building Research Institute (CBRI) so that the danger of soil erosion can be avoided for ensuring the longevity of the project. The committee also noted that there are many streams/drainages passing through the site thus the committee opined that it requires extraction of drainage patterns from the study area is required and after extraction of drainage further modeling studies of flow directions, flow accumulation, flood modeling studies using remote sensing data needs to be conducted.
- iii. The Committee noted that the proposal involves a large number of tree cutting and not sufficient attempts have been made by the PP to save the trees by reworking the green belt area within the project area.
- iv. PP has proposed to extraction of groundwater, in this regard in pursuant to the direction passed by Hon'ble NGT in application no. OA No. 176/2015 Ministry issued an OM F. No. 19-84/2019-IA.III dated 23rd May 2019 enumerating the process to conduct the study for utilization of groundwater Therefore, PP has to conduct all the studies mentioned in the said OM for further appraisal. It is noted that PP has not conducted the studies mentioned in the Ministry's OM dated 23rd May 2019.
- v. The EAC noted that initially 90 MTA rice husk shall be utilized as a fuel which is a cause for emission of particulate matter, however, PP stated that the GAIL PNG pipeline in the Tahliwal industrial area which is approx. 8 km shall be extended to the Bulk Drug Park, and after its commissioning, only PNG shall be utilized as fuel in the proposed Bulk Drug Park.
- vi. The EAC noted that the government notification order shown for the aforementioned Bulk Drug Park area is 108.3666 Ha. PP applied for the area of 568.75 Ha. During the Meeting PP mentioned that the notification has been revised and issued an area of 568.75 ha. The revised notification has to be submitted.
- vii. It is also noted that the proposed industrial area has been applied over an area of 568.75 ha,

however, the land use/land cover area is shown in PARIVESH Portal over an area of 614.35 Ha there is a mismatch in the land use/land cover data.

viii. The EAC noted that the warehouses proposed alongside the road should be utilized for the storage of chemicals, which can be a potential hazard in case of an accident leading to engulfing of vapours and affecting the evacuation/ mitigative measures.

3.2.24 The EAC, taking into account the submission made by the project proponent has a detailed deliberation in its 389th meeting during 29th-30th January 2025 and **deferred** the proposal. The EAC recommended that a sub-committee shall conduct the site visit for further appraisal. The committee also requested to the PP to submit the information with respect to the above observations of the Committee.

3.2.5. Recommendation of EAC

Deferred for Site Inspection

3.3. Agenda Item No 3:

3.3.1. Details of the proposal

Environmental/CRZ Clearance for development of Berth 4 & 5 at Kattupalli Port by MARINE INFRASTRUCTURE DEVELOPER PRIVATE LIMITED located at THIRUVALLUR, TAMIL NADU			
Proposal For		Fresh EC	
Proposal No	File No	Submission Date	Activity (Schedule Item)
IA/TN/INFRA1/518970/2025	10/77/2023-IA.III	21/01/2025	Ports, harbors, breakwaters, dredging (7(e))

3.3.2. Project Salient Features

“The EAC noted that the Project Proponent and the consultant have given an undertaking that the data and information given in the application and enclosures are true to the best of their knowledge and belief and no information has been suppressed in the EIA/ EMP report. If any part of data/ information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.”

3.3.1 The aforementioned proposal was placed before the EAC during its 389th meeting of the Expert Appraisal Committee held on 29th-30th January 2025. The project proponent and EIA consultant M/s Assystem India Ltd. (Formerly known as L&T Infrastructure Engineering Ltd.), Chennai made a presentation and submitted the following information:

3.3.2 The proposal is for the Environmental and CRZ Clearance for the Development of Berth 4 & 5 at Kattupalli Port over an area of 136.28 Ha. The project site is located in Kattupalli Village, Ponneri Taluk, Thiruvallur District, Tamil Nadu by M/s Marine Infrastructure Developer Private Limited (MIDPL).

progress. These activities have taken considerable time from 2021 onwards till March 2025.

3.10.5 Wildlife Institute of India have submitted a time schedule of 2 years for conducting pre construction activities and another 02 years, another 2-3 years for monitoring and impact assessment studies, which is too exhaustive from project point of view.

3.10.6 In view of above, M/S NHIDCL requests to consider for grant of 01 term (04 year) extension of ToR and Amendment in Specific conditions with regard to agency stipulated for conducting various studies in already granted ToR so that the study can be carried out within shortest possible time frame as the project is schedule for award by October 2025.

3.10.7 The EAC, taking into account the submission made by the project proponent had a detailed deliberation in its 401st meeting during 14th-15th May, 2025 noted that as per the Ministry OM dated 8th June 2022 validity of ToR shall have four years from the date of issue. In the instant case the ToR was granted on 12.07.2021 having the validity till 11th July 2025. Thus, the validity of ToR shall not granted therefore **return the proposal on present form**. The Committee requested the PP to obtain the fresh ToR for further consideration.

Agenda 11: Consideration of Sub committee report on proposal for “Bulk Drug Park at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Jnani and Malluval, Teh. Haroli, District Una Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited under Department of Industries, Govt of Himachal Pradesh

The committee discussed the Sub committee report on the proposal for “Bulk Drug Park at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Jnani and Malluval, Teh. Haroli, District Una Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited under Department of Industries, Govt of Himachal Pradesh which was placed before it . After deliberation the report was accepted.

Annexure-I

The list of the Expert Appraisal Committee (Infra-I) Members participated during the 401st Meeting held on 14th-15th May, 2025.

S. No.	Name	Designation	14 th May, 2025	15 th May, 2025
1	Shri Manmohan Singh Negi	Chairman	Present	Present
2	Shri S. Jeyakrishnan	Member	Present	Present
3	Prof. V. K. Jain	Member	Present	Present
4	Dr. Jaya Kumar Seelam	Member	Present	Present
5	Dr. P. K. Dinesh Kumar	Member	Present	Present
6	Col. Prakash Tewari	Member	Present	Present
7	Dr. M.V. Ramana Murthy	Member	Present	Present
8	Dr. B. Kishore	Member	Present	Present
9	Shri Sharandeep Singh	Member	Absent	Absent
10	Shri Ashok Kumar Patre	Member	Absent	Absent
11	Ms. Bindu Manghat	Member	Absent	Absent
12	Dr. Niraj Sharma	Member	Present	Present
13	Shri Amardeep Raju	Member Secretary	Present	Present

Annexure II

Site visit report of sub-committee, constituted by Ministry of Environment, Forest & Climate Change, New Delhi-India for inspection of a proposed project of “Bulk Drug Park at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Jnani and Malluval, Teh. Haroli, District Una Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited under Department of Industries, Govt of Himachal Pradesh.

1. Background

The proposal for “Bulk Drug Park at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Jnani and Malluval, Teh. Haroli, District Una Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited under Department of Industries, Govt of Himachal Pradesh was submitted in the Ministry on 14.01.2025 in Parivesh Portal. The above proposal was considered in the 389th EAC (Infra I) meeting dated 29/01/2025. After detailed presentation, during the EAC, The Committee observed the following:

- i. The proposed project site of approx. 4728664.34 sqm (472 ha) area involves considerable cutting and filling for construction of the project infrastructures and this may cause the landslides. The PP as per their study found only 2.9 acre of land out of total project area of 1405 acre not suitable for slope stabilisation as per the condition of the TOR. EIA Study (Geologist zone I and Zone II report) has mentioned the elevation difference of 160 meters in the project area and also the hilly and undulating nature of the project terrain with soil having loose boulders. Therefore, there is a need to reassess the site and building development plan in the project through a nationally reputed institute like IIT or Central Building Research Institute (CBRI) so that the danger of soil erosion can be avoided for ensuring the longevity of the project. The committee also noted that there are many streams/drainages passing through the site thus the committee opined that it requires extraction of drainage patterns from the study area is required and after extraction of drainage further modelling studies of flow directions, flow accumulation, flood modeling studies using remote sensing data needs to be conducted.
- ii. The Committee noted that the proposal involves a large number of tree cutting and not sufficient attempts have been made by the PP to save the trees by reworking the green belt area within the project area.
- iii. The EAC noted that the government notification order shown for the aforementioned Bulk Drug Park area is 108.3666 Ha. PP applied for the area of 568.75 Ha. During the Meeting PP mentioned that the notification has been revised and issued an area of 568.75 ha. The revised notification has to be submitted.
- iv. In view of the above, the EAC, taking into account the submission made by the project proponent had a detailed deliberation in its 389th meeting during 29th-30th January 2025 and deferred the proposal. The EAC recommended that a sub-committee shall conduct a site visit for further appraisal of the project.
- v. The subcommittee comprising of following members was constitute by the Ministry of Environment, Forest and Climate Change vide its order no 10/68/2023-IA.III [E-260987] dated 29th April 2025

- Manmohan Singh Negi Chairman EAC
- Dr V K Jain Member
- Amardeep Raju Member secretary.

2. Site Visit and Brief of Project

A site visit by the Sub-committee was conducted on 29th – 30th April 2025 for the proposed project M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited under Department of Industries, Govt of Himachal Pradesh inter-alia presented a brief on the project to the sub-Committee. Following are the details provided:

- i. The proposed area under the Bulk Drug Park for which EC application is under consideration of the Competent Authority is 568.75 Ha.
- ii. The document/notification containing the details of 568.75 ha under the proposal for the establishment for the BDP is issued by the Dept. of Revenue, Govt. of HP vide Letter No. 105 dated 03.10.2020.
- iii. The PP in response to the suggestion made by the EAC about the need to reassess the site and building development plan in the project through a nationally reputed institute like IIT or Central Building Research Institute (CBRI) intimated the subcommittee that a study has been conducted by the National Institute of Technology, Hamirpur, which has brought down the possibility of earth cutting and filling in the project area and has accordingly suggested the plan. The Subcommittee was of the opinion that considering the experience of recent incidences of land subsidence and landslides in Himalayan states it is always be better if this environmental aspect is thoroughly examined and taken care of before taking up this economically important project of the state. Considering the experience of the Central Building Research Institute, Roorkee in the field of building research especially in the hilly states like Uttarakhand and Himanchal, NIT, Hamirpur study should be ratified by the CBRI from the angle of Risk assessment, seismic vulnerability and sub surface deformation and land slide and suggesting the environment friendly suitable building architecture.
- iv. It has been mentioned by the PP that the numeration of tree counting has been conducted by the State Forest Department. The total number of trees within the proposed area designated for infrastructural components such as electrical utilities, common logistics, treatment facilities, TSDF, and other utilities amounts to 8,599.
- v. Effort has been made to minimize tree cutting through an optimized layout design, resulting in the preservation of nearly 60% of the total trees. Consequently, only 40% of the total trees, approximately 3,440 trees, are anticipated to be felled.
- vi. Prior No Objection Certificate (NOC) has already been obtained from the Department of Forest, Government of Himachal Pradesh for the felling of trees falling within the proposed development areas.

3. Project review and Observations of the Sub-Committee

The Sub-Committee conduct the Site visit on 30/04/2025 and took complete round of the site wherever access road was available and observed the topography of the area from some high elevation points in and around the project side . Following are the observations:

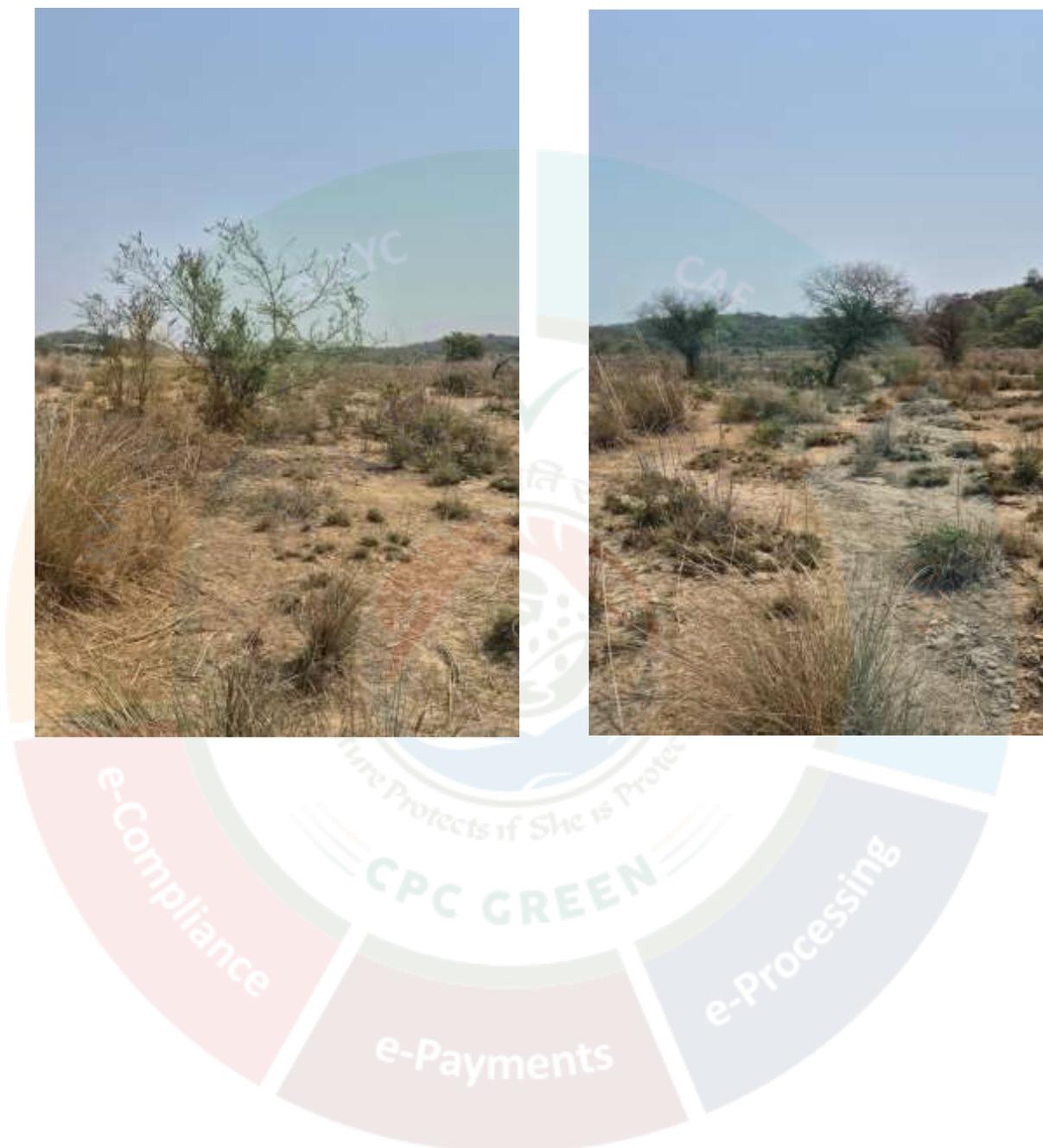
- i. Most of the land at the project site and adjoining areas is part of Shivalik range having a undulating terrain of small hills interspersed with narrow flatter valleys / depressions/smaller planes. Some wider valleys fall outside the project area which are being used for agriculture. Quite a good number of hillocks are having steep slopes above 45 degrees, however, the elevation of the small hillocks are not very high with gentle slopes. No work at the project site has been started in any manner. The approach road is constructed by the State Government to provide access to the nearby villages, however, the road is only up to the boundary of the site.
- ii. Several primary and secondary streams are passing through the site. There are some indications of gully erosion in the area.
- iii. Sparse to dense vegetation is available throughout the site in patches. In considerable area vegetation is with scattered canopy having few number of trees. Vegetation is of deciduous nature . As per the PP and state government officials accompanying the subcommittee intimated the status of vegetation is not forest. This is the revenue area placed under the control of the state forest department for its management and conservation. PP has already provided records about non- forest status of vegetation.

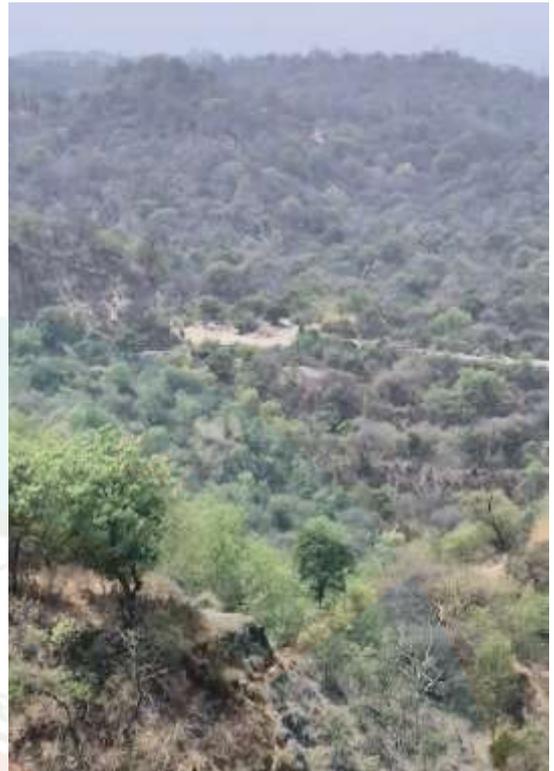
4. Conclusion and Recommendations

The sub-committee made following conclusions and recommendations:

- i. The study of the NIT Hamirpur should be ratified by the CBRI Roorkee from the angle Seismic vulnerability, risk assessment, sub surface deformation and landslides. If required, CBRI may submit their independent assessment of environmental vulnerability of the project site and suggest the architectural plan for the industrial park with the focus on minimising the disturbance of the topography of the area .
- ii. Considering hilly terrain and seismic vulnerability and erosion proneness of the project area the extent of area to be used for building infrastructure should be reduced optimally with focus on maintaining the hillocks with higher and steep slopes as natural green belt.
- iii. Project can be executed in phased manner. In the phase-I the development of site and establishment of industrial units should initially be taken up in low lying areas with flatter terrain or terrains with gentle slopes. After saturation of the area of the phase one Phase-2 can be initiated in other slopes but in no case in area beyond 30-degree slopes. , Accordingly revised lay out plan of the park shall be submitted to the EAC.
- iv. A comprehensive Soil and water conservation plan shall be prepared in consultation with ICAR- Indian Institute of Soil and Water conservation (IISWC) and implemented at the project cost to mitigate the impact of the project on the soil and water regime.
- v. A detailed green belt Development Plan shall be prepared in consultation with state Forest Department with the emphasis on preservation and afforestation of the hillocks with higher slopes not suggested for infrastructure development. The normal norms of 33% area coverage for green belt development will not be applicable here in view of hilly and environmentally vulnerable nature of the project side. The green belt plan shall be executed at the project cost.
- vi. Tree felling requirement shall be reassessed phase wise and submitted to the ministry. The committee opined that the proposed project can be executed in phased manner, i.e. in the phase-I the execution of the project can be started in the plane area. Further, in Phase-2, the undulating hillocks can be levelled to certain extent wherever required.

- vii. The environmental clearance for the project shall be granted for the entire land parcel in one go, provided, the necessary documents as highlighted by the Committee are submitted to the Ministry.





3.2. Agenda Item No 2:

3.2.1. Details of the proposal

Proposed “Bulk Drug Park” at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani and Malluwal, Teh. Haroli, Distt. Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Ltd. under Department of Industries, Government of Himachal Pradesh by HIMACHAL PRADESH BULK DRUG PARK INFRASTRUCTURE LIMITED located at UNA,HIMACHAL PRADESH			
Proposal For		Fresh EC	
Proposal No	File No	Submission Date	Activity (Schedule Item)
IA/HP/INFRA1/51747/5/2025	10/68/2023-IA.III	14/01/2025	Industrial estates/ parks/ complexes/ areas, export processing Zones (EPZs), Special Economic Zones (7(c))

3.2.2. Project Salient Features

The EAC noted that the Project Proponent and the consultant have given undertaking that the data and information given in the application and enclosures are true to the best of their knowledge and belief and no information has been suppressed in EIA/EMP report. If any part of data/information submitted is found to be false/misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

3.2.1 The above-mentioned proposal was earlier considered by the 389th meeting of the Expert Appraisal Committee held on 29th-30th January, 2025, EAC after detailed deliberation deferred the proposal and the EAC recommended that the sub-committee shall conduct the site visit for further appraisal and the committee also requested to the PP to submit the information as sought during the EAC meeting. The EAC Sub-committee conducted the site visited during 29th-30th April, 2025 and submitted the report, the EAC accepted the report submitted by the EAC sub-committee, the same is communicated to the PP. The copy of the same is annexed at Annexure-II. At this instance, the aforementioned proposal was placed before the EAC during its 414th EAC held on 02nd September 2025. The project proponent and EIA Consultants M/s. Eco Paryavaran Laboratories & Consultants Pvt. Ltd. Mohali made a presentation in the Ministry and submitted the following information:

Observation in 389 th meeting of Expert Appraisal Committee (Infra-1) held on 29 th -30 th January, 2025	Responses to the responses submitted by the P P during 414 th meeting of the Expert Appraisal Committee (Infra-1) being held on 02 nd September, 2025.
The committee noted that an Incinerator and a TSD F facility for handling Hazardous wastes are proposed within the boundary of the aforementioned Bulk drug park for which the environmental clearance shall be separately obtained	Incinerator and a TSDF facility has been proposed within the boundary of Bulk Drug Park for the handling of Hazardous wastes. As per EIA Notification 2006 and its amendments thereof, Common hazardous waste treatment, storage and disposal facilities (TSDFs) falls under Schedule 7(d) and All integrated facilities having incineration & landfill site falls under category A. Hence, separate Environmental Clearance will be obtained.

The EAC noted that in the proposed site approx. 47,28,664.34 sq.m (472 ha) cutting and filling involved for construction and this may cause the landslides. The PP as per their study found only 2.9 acre of land out of total project area of 1,405 acre not suitable for slope stabilisation as per the condition of the TOR. EIA Study (Geologist zone I and Zone II report) has mentioned the elevation cumulation, and flood modelling. The Institute difference of 160 meters in the project area and also the hilly and undulating nature of the project terrain with soil having loose boulders. Therefore, there is a need to reassess the site and building development plan in the project through a nationally

Reputed institute like IIT or Central Building Research Institute (CBRI) so that the danger of soil erosion can be avoided for ensuring the longevity of the project. The committee also noted that there are many streams/drainages passing through the site thus the committee opined that it requires extraction of drainage patterns from the study area is required and after extraction of drainage further modelling studies of flow directions, flow accumulation, flood modelling studies using remote sensing data needs to be conducted.

Initially, the National Institute of Technology (NIT), Hamirpur (H.P.) was engaged to conduct the aforementioned study, covering aspects such as soil erosion, long-term project stability, extraction of drainage patterns along with modelling of flow directions, flow accumulation and submitted its report accordingly.

However, the EAC sub-committee conducted the site visit during 29.04.2025-30.04.2025, the Subcommittee reviewed the study conducted by NIT, Hamirpur, and recommended that such a report should be prepared by an Institute of national repute with a dedicated Civil-cum-Building division, preferably the Central Building Research Institute (CBRI), Roorkee. In line with the recommendation, the responsibility for preparation of the report was subsequently entrusted to **CBRI, Roorkee**.

CBRI Roorkee has submitted "Integrated Geo Environmental Assessment and planning for safe development of Bulk Drug Park". The report contains specific recommendations and mitigation measures to ensure safety, longevity of the project w.r.t. most critical geological and geographical parameters including environmental safeguards in the following major aspects:

- Landslide Susceptibility and Suggestive Remedial Measures
- Layout Planning
- Infrastructure Safety

Similarly, the report by ICAR-IISWC contains specific recommendations on the following aspects: Soil Erosion Mitigation Strategy with manmade measures like Surface Drainage System, Retaining Walls & Toe Walls, Gabion Structures, Contour Bunding & Terracing, Sediment Barriers & Silt Fencing and Check Dams & Energy Dissipaters as key factors. Vegetative Measures with major onus on Grassing and Turfing, Plantation for Slope Stabilization and development of sufficient Green Belt.

Soil Management Practices to be adopted have been recommended for Topsoil Conservation, Mulching, Compaction & Soil Binding, and Stabilization of Construction Roads. In addition to above measures, During the **Construction Phase**, measures have been recommended such as daily water sprinkling to control dust and

loose soil, use of erosion blankets on steep or freshly cut slopes, covering of fill slopes and stockpiles, demarcation of vehicle routes and storage zones, and weekly site inspections to monitor and repair erosion control structures.

Similarly, for the **Post-Construction Phase**, the recommended measures include regular upkeep of plantations and drainage infrastructure, replanting in degraded or eroded areas, annual desilting of check dams, drains, and sediment traps, as well as monsoon-season monitoring of slopes and critical embankments across the BDP premises.

The summarized reports of **CBRI** and **ICAR- IISWC** are enclosed as *Annexure-1* and *Annexure-2*, and shall be treated as integral parts of the Environmental Clearance (EC) application. It is further submitted that all mitigation measures and recommendations will be implemented in true letter and spirit, particularly with respect to site stability, landslide susceptibility, slope protection, soil erosion prevention, and preservation of natural drainage systems. Accordingly, the project Layout Plan has been revised, and the Afforestation/Green Belt Development Plan has been amended to incorporate the recommendations of the above reports. The revised Layout Plan and amended Green Belt Development Plan are attached as *Annexure-3* and *Annexure-4*.

The crux & most vital recommendations to be implemented at ground level are elicited below:

- i. Buffer Zone will be provided all along the boundary of the project as well as major and minor drains/nallahs (50 meter for major and 15 meter for minor).
- ii. Mandatory Green Zone will be created for more than 33% of area in totality.
- iii. Restricted No-Building/construction Zone will be maintained for higher elevations and steeper slopes (>30°)
- iv. Use of vegetative cover as well as Jute Geo-textile & Coir- Geo textiles for stability of slopes and freshly cut steep surfaces.

	<p>v. Integrating Geo-Textile with grass padding will be provided for greater stability of root zones to eliminate erosion risk.</p> <p>vi. Steeper slopes (>30°) will be avoided and all other such vulnerable points will be provided with protective measures such as RCC wall, gabion wall and controlled cutting etc.</p>
<p>The Committee noted that the proposal involves a large number of tree cutting and not sufficient attempts have been made by the PP to save the trees by reworking the green belt area within the project area.</p>	<p>The plan for development of green belt and afforestation/compensatory plan has been reworked out by Department of Forest, Una and the amended plan has been attached as Annexure-4.</p> <p>The recommendation of the CBRI as well as of the ICAR-IISWC w.r.t. development of green belt and tree cutting issues have been duly considered which in-turn has necessitated the amendment in the layout plan and afforestation plan.</p> <p>With implementation of recommendations and due to amendment in the initial plans, compensatory plantation against each felled tree will be done in the ratio of 1:10 in principle and the density of the tree plantation will be 1100 numbers/ha. A total of 33.1 percent of the area of the project which comes out to be 1,24,399 under Green belt development plan and additional plantation/green area under landscaping will be maintained on the area of 13.21 ha. As such a robust/sustainable green area will be developed/maintained to achieve the ecological balance.</p>
<p>PP has proposed to extraction of groundwater, in this regard in pursuant to the direction passed by Hon'ble NGT in application no. OA No. 176/2015 Ministry issued an OM F. No. 19-84/2019- IA.III dated 23rd May 2019 enumerating the process to conduct the study for utilization of groundwater Therefore, PP has to conduct all the studies mentioned in the said OM for further appraisal. It is noted that PP has not conducted the studies mentioned in the Ministry's OM dated 23rd May 2019.</p>	<p>The EIA report has been prepared in consonance with the Office Memorandum issued by MoEF&CC vide F.No.19-84/2019- IA.III dated 23rd May 2019, the pointwise compliance is depicted as below:</p> <p>1) The impact assessment due to the proposed project has been carried out as per the Central Ground Water Authority (CGWA) amended from time to time. The EIA report contains all the relevant details regarding ground water abstractions and the provisions in the EMP. Due emphasis has already been accorded to reuse of the treated water to the optimum level. Overall, the water balance shows nearly 35% of total</p>

water requirement to be met from the recycled stream. Comprehensive study encompassing the hydrological and hydro-geological aspects has already been carried out and duly approved by the Jal Shakti Vibhag, Govt. of Himachal Pradesh. The said report is an integral part of the EIA report.

2) Comprehensive study encompassing the hydrological and hydro-geological aspects has already been carried out and duly approved by the Jal Shakti Vibhag, Govt. of Himachal Pradesh. The said report is an integral part of the EIA report.

3) There is no availability of treated sewage and treated effluent from any third party entity within 10 km radius of the project site. However, the sewage as well as effluent to be generated within the project itself will be re-utilized after treatment to the optimum level as per the further details in the next para.

4) The water requirement has been worked out in totality for the entire project. The wastewater expected to be generated will be treated to the optimum level through CETP & STP which include Ultra-Filtration (UF) and Reverse Osmosis (RO) Techniques. With the help of such advanced technologies the wastewater will be treated to such a level that it meets with the standards for its onward re-use/re-utilization within the project itself. The total requirement in the project will be 22.1 MLD; out of which 7.1 MLD will be met through reuse of the treated water. As such, the water balance shows nearly 35% of total water requirement to be met from the recycled stream.

5) The requirement of the fresh water has been worked out for different streams like domestic, industrial process etc. The detailed breakup of the water requirement under different heads has been elaborated in the water balance chart. For the abstraction of ground water, in principle approval has already been obtained from Competent Authority of the state i.e. Jal Shakti Vibhag, IPH Wing. A detailed project report (DP R) for ground water extraction has been prepared by the Jal Shakti Vibhag comprising of the availability of ground water, design of extracti

	<p>on wells, design of ground water recharging system and impacts on ground water resources along with infrastructure design and budgetary provisions.</p> <p>6) Principle approval for the same has already been obtained from Competent Authority of the state i.e. Jal Shakti Vibhag, IPH Wing (already attached as Annexure 9 of the EIA report), and However formal NOC for the abstraction of ground water will be obtained at the time of initiation of the project at ground level.</p>
<p>The EAC noted that initially 90 MTA rice husk shall be utilized as a fuel which is a cause for emission of particulate matter, however, PP stated that the GAIL PNG pipeline in the Tahliwal industrial area which is approx. 8 km shall be extended to the Bulk Drug Park, and after its commissioning, only PNG shall be utilized as fuel in the proposed Bulk Drug Park.</p>	<p>Six multi fuel fired boilers have been proposed for common steam generation facility based on the availability of fuels in the region. Fuels like rice husk and specially biomass are easily available in the state with high calorific value on economic rates.</p> <p>The impacts of project and air quality modelling has been assessed based on the utilization of rice husk as fuel.</p> <p>Though, the cleaner fuels as PNG can be utilized based on the availability of GAIL supply on the economic rates. GAIL has been approached and convinced to provide the PNG supply in the BDP area. Further deliberations for PNG supply to the project are underway at the government level (Dept. of Industries Govt. of HP). Specifically, submitted that issue of use of cleaner fuel relates to the operational aspect of the project and most likely, by the time the project as a whole gets commissioned, the PNG supply will be available to the project. As the proposed boilers will be having multi fuel option, therefore shifting to the PNG at the time of its availability, will be seamless.</p>
<p>The EAC noted that the government notification order shown for the aforementioned Bulk Drug Park area is 108.3666 Ha. PP applied for the area of 568.75 Ha. During the Meeting PP mentioned that the notification has been revised and issued an area of 568.75 ha. The revised notification has to be submitted.</p>	<p>The PP in the name and style of M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited (HPBDPIL) under Department of Industries, Government of Himachal Pradesh is holding independent possession of the entire area of the project i.e., 568.75 Ha. The document/notification containing the details of 568.75 ha under the proposal for the establishment for the BDP is enclosed herewith as Annexure-5 (Copy of letter issued by the Dept. of Revenue, Govt. of HP vide Letter No. 105 dated 03.10.2020).</p>

<p>It is also noted that the proposed industrial area has been applied over an area of 568.75 ha, however, the land use/land cover area is shown in PARIVESH Portal over an area of 614.35 Ha there is a mismatch in the land use/land cover data.</p>	<p>The proposed area under the Bulk Drug Park for which EC application is under consideration of the Competent Authority is 568.75 Ha and the same is mentioned on PARIVESH portal under heading 9.1.14.</p> <p>Total area under Land use/Land cover (under heading 9.1.17) is appearing as 614.35 Ha due to the repeated entry of green belt under heading 9.1.15 and 9.1.16, causing a mismatch in the Land use/Land cover data, which happened due to inadvertent typo error, inconvenience caused is regretted.</p> <p>The value of 614.35 Ha on the PARIVESH portal has been auto picked by the portal, is not correct and the Total area of the Project may be considered as 568.75 Ha as mentioned at Serial No. 9.1.14 in the application.</p> <p>The relevant page of the online application form with revised figures, attached as Annexure-6 (confirming the total project area as 568.75 Ha).</p>
<p>The EAC noted that the warehouses proposed alongside the road should be utilized for the storage of chemicals, which can be a potential hazard in case of an accident leading to engulfing of vapors and affecting the evacuation/ mitigative measures.</p>	<p>As advised/ guided by EAC, the location of warehouse marked on the layout plan for the storage of chemicals has been relocated from West side (upwind direction) to East side of the project (Downwind direction). Now proposed location of the warehouse has been clearly marked on the revised/amended Layout Plan.</p>
<p>The EAC, taking into account the submission made by the project proponent has a detailed deliberation in its 389th meeting during 29th-30th January 2025 and deferred the proposal. The EAC recommended that a sub-committee shall conduct the site visit for further appraisal. The committee also requested to the PP to submit the information with respect to the above observations of the Committee.</p>	<p>The subcommittee had been duly constituted and the designated worthy committee has already carried out the site inspection on 29th-30th April, 2025, giving clear cut and valuable guidelines/suggestions for the betterment of the environment. The suggestions/ recommendations of the subcommittee have been taken on record and compliance/reply of the same is given in the proceeding paragraphs</p>
<p>Compliance of the observations raised by the subcommittee after site visit on 29th- 30th April, 2025.</p>	
<p>The study of the NIT Hamirpur should be ratified by the CBRI Roorkee from the angle Seismic vulnerability, risk assessment, sub surface deformation and landslides. If required, CBRI may submit their independent assessment of environmental vulnerability of the project site and suggest the</p>	<p>After getting the requisite study conducted by the NIT, Hamirpur, owing to the suggestions of the subcommittee, the CBRI was requested to carry out the detailed study as well. The report prepared by the NIT, Hamirpur was also sent to the CBRI. CBRI has submitted its independent assessment</p>

<p>architectural plan for the industrial park with the focus on minimizing the disturbance of the topography of the area.</p>	<p>ent report containing mitigation measures and recommendations for the robust concept of the BDP encompassing all the relevant aspects ranging from safety, sustainability in the long run and all environmental issues. The brief of the said report has been outlined in the Point 1 above.</p>
<p>Considering hilly terrain and seismic vulnerability and erosion proneness of the project area the extent of area to be used for building infrastructure should be reduced optimally with focus on maintaining the hillocks with higher and steep slopes as natural green belt.</p>	<p>The seismic vulnerability, erosion issues, steep slopes and extent of area under building infrastructure has been deliberated upon in the CBRI report and accordingly the layout map has been amended. With amendment/revision in the layout map, the area under building infrastructure has been significantly reduced from 39.72% to 38.22%, thus significant area has been reduced under infrastructure.</p>
<p>Project can be executed in phased manner. In the phase-1 the development of site and establishment of industrial units should initially be taken up in low lying areas with flatter terrain or terrains with gentle slopes. After saturation of the area of the phase one Phase-2 can be initiated in other slopes but in no case in area beyond 30-degree slopes. Accordingly revised layout plan of the park shall be submitted to the EAC.</p>	<p>The amended/ revised layout plan has been worked out in two different areas viz-a-viz area under Phase 1 and area under Phase 2. It is the blanket assurance/commitment of PP to initiate the project starting with low lying areas with flatter terrain or terrains with gentle slopes under phase 1 and thereafter Phase-2 will be initiated in other slopes. No development has been proposed on the areas with more than 30-degree slopes.</p>
<p>A comprehensive Soil and water conservation plan shall be prepared in consultation with ICAR-Indian Institute of Soil and Water conservation (IIWC) and implemented at the project cost to mitigate the impact of the project on the soil and water regime.</p>	<p>The report by the ICAR-ISWC has been prepared on all the soil issues and soil conservation measures has been duly recommended. The recommendations of the said report w.r.t. soil conservation and water conservation will be implemented at ground level in totality. A brief outline of the various mitigation measures regarding soil erosions and conservation measures has already been given in Point 1 above.</p> <p>As far as water conservation is concerned, the project has been conceived with ZLD (Zero Liquid Discharge) methodology. Optimum level of recirculation of treated wastewater has been proposed. Out of the total water requirement of 22.1 MLD, 35% i.e., 7.1 MLD will be met through the recycling of wastewater. Only 15 MLD of fresh water will be used. To support/sustain the groundwater scenario in the long run, a parallel independent scheme has been chalked out by the State Govt. which will fetch 50 MLD of surface water from river Sutlej through dedicated pipeline.</p>
<p>A detailed green belt Development Plan shall be prepared in consultation with state Forest Department with the emphasis on preservation and afforestation.</p>	<p>The plan for development of green belt and afforestation/compensatory plan has been reworked out by Department of Forest, Una. A brief outline</p>

<p>restation of the hillocks with higher slopes not suggested for infrastructure development. The normal norms of 33% area coverage for green belt development will not be applicable here in view of hilly and environmentally vulnerable nature of the project side. The green belt plan shall be executed at the project cost.</p>	<p>of the amended afforestation/compensatory plan has been deliberated in Point. 3 above.</p>
<p>Tree felling requirement shall be reassessed phase wise and submitted to the ministry. The committee opined that the proposed project can be executed in phased manner, i.e. in the phase-I the execution of the project can be started in the plane area. Further, in Phase-2, the undulating hillocks can be levelled to certain extent wherever required.</p>	<p>As briefed in the preceding paras above, the layout plan has been reworked out in two different areas viz-a-viz area under Phase 1 and area under Phase 2. It is the blanket assurance/commitment of PP to initiate the project starting with low lying areas with flatter terrain or terrains with gentle slopes under phase 1 and thereafter Phase-2 will be initiated in other slopes. No development has been proposed on the areas with more than 30-degree slopes.</p>
<p>The environmental clearance for the project shall be granted for the entire land parcel in one go, provided, the necessary documents as highlighted by the Committee are submitted to the Ministry.</p>	<p>As given above, sincere efforts have been made to address all the observations and concerns raised by the worthy EAC as well as the subcommittee. The documents like layout plan, compensatory afforestation plan etc., have been amended/ revised to accommodate all the recommendations. Detailed studies via the Institutes of National repute have already been conducted and are attached with to be considered as integral part of the application. With this, we hope we have addressed the observations and will implement the recommendations at the ground level to the level of optimum satisfaction of all the stakeholders.</p>

3.2.2 Details of court cases: There is no Court case involve in the project.

3.2.3. Deliberations by the committee in previous meetings

Date of EAC 1 :29/01/2025

Deliberations of EAC 1 :

3.2.23 During the EAC, the committee observed the following:

- i. The committee noted that an Incinerator and a TSDF facility for handling Hazardous wastes are proposed within the boundary of the aforementioned Bulk drug park for which the environmental clearance shall be separately obtained.
- ii. The EAC noted that in the proposed site approx. 4728664.34 sqm (472 ha) cutting and filling involved for construction and this may cause the landslides. The PP as per their study found only 2.9 acre of land out of total project area of 1405 acre not suitable for slope stabilisation as per the condition of the TOR. EIA Study (Geologist zone I and Zone II report) has mentioned the elevation difference of 160 meters in the project area and also the hilly and undulating nature of the project terrain with soil having loose boulders. Therefore, there is a need to reassess the site and building development plan in the project through a nationally reputed institute like IIT or Central Building Research Institute (CBRI) so that the danger of soil erosion can be avoided for ensuring the longevity of the project. The committee also noted that there are many streams/drainages passing through the site thus the committee opined that it requires extraction of drainage patterns from the study area is required and after extraction of drainage further modeling studies of flow directions, flow accumulation, flood modeling studies using remote sensing data needs to be conducted.
- iii. The Committee noted that the proposal involves a large number of tree cutting and not sufficient attempts have been made by the PP to save the trees by reworking the green belt area within the project area.
- iv. PP has proposed to extraction of groundwater, in this regard in pursuant to the direction passed by Hon'ble NGT in application no. OA No. 176/2015 Ministry issued an OM F. No. 19-84/2019-IA.III dated 23rd May 2019 enumerating the process to conduct the study for utilization of groundwater Therefore, PP has to conduct all the studies mentioned in the said OM for further appraisal. It is noted that PP has not conducted the studies mentioned in the Ministry's OM dated 23rd May 2019.
- v. The EAC noted that initially 90 MTA rice husk shall be utilized as a fuel which is a cause for emission of particulate matter, however, PP stated that the GAIL PNG pipeline in the Tahliwal industrial area which is approx. 8 km shall be extended to the Bulk Drug Park, and after its commissioning, only PNG shall be utilized as fuel in the proposed Bulk Drug Park.
- vi. The EAC noted that the government notification order shown for the aforementioned Bulk Drug Park area is 108.3666 Ha. PP applied for the area of 568.75 Ha. During the Meeting PP mentioned that the notification has been revised and issued an area of 568.75 ha. The revised notification has to be submitted.
- vii. It is also noted that the proposed industrial area has been applied over an area of 568.75 ha, however, the land use/land cover area is shown in PARIVESH Portal over an area of 614.35 Ha there is a mismatch in the land use/land cover data.

viii. The EAC noted that the warehouses proposed alongside the road should be utilized for the storage of chemicals, which can be a potential hazard in case of an accident leading to engulfing of vapours and affecting the evacuation/ mitigative measures.

3.2.24 The EAC, taking into account the submission made by the project proponent has a detailed deliberation in its 389th meeting during 29th-30th January 2025 and **deferred** the proposal. The EAC recommended that a sub-committee shall conduct the site visit for further appraisal. The committee also requested to the PP to submit the information with respect to the above observations of the Committee.

3.2.4. Deliberations by the EAC in current meetings

3.2.3 Observation of the committee:

As per CBRI report

The areas at higher elevation with the initiation of drainage lines are prone to soil erosion and potential for landslides. Therefore, these areas with an spatial coverage of 169218.8 m² are declared as a Mandatory Green Zone. Special attention must be given in respect of adopting sustainable erosion control bio-engineering measures during the site development phase.

The slopes in the study area are relatively stable and not very steep. The Environmental Impact Assessment (EIA) report indicates an annual rainfall of about 1300 mm. This high rainfall intensity poses the risk of erosion and could cause instability in the slopes. Such instability may also affect any proposed superstructures in the vicinity. Therefore, the areas with higher elevations and >30° slope are declared as Restricted No-Build zones and may be considered for developing as green zone with suitable vegetation. The committee was of the view that considering increasing incidences of landslides and soil erosion it will be on safer side if the areas with higher elevation >25degree slopes are declared as Restricted No-Build zones and may be considered for developing as green zone with suitable vegetation . Accordingly the layout plan, green belt plan and afforestation plan are revised .

Project proponent has proposed that a Buffer Zone will be provided all along the boundary of the project as well as major and minor drains/nallahs (50 meter for major and 15 meter for minor).

PP assured that as per the recommendations of CBRI as well as of the ICAR-IISWC all the mitigation measures and recommendations will be implemented in true letter and spirits viz-a-viz site stability like Landslide Susceptibility, protection of steep slopes, prevention of soil erosion and natural drainage preservations etc.

As advised/ guided by EAC, the location of the warehouse marked on the layout plan for the storage of chemicals has been relocated from West side (upwind direction) to East side of the project (Downwind direction).

The total water requirement for the industrial park is estimated at 22.1 MLD, of which 15 MLD fresh water will initially be sourced from groundwater. Permission for this has been granted by the Jal Shakti Department, Government of Himachal Pradesh (letter dated 08/10/2020).

A comprehensive surface water supply scheme has also been approved by BBMB, involving a 15 km dedicated pipeline from the Satluj River. Under this scheme, 50 MLD of fresh water will be supplied, supported by a 100 MLD storage tank for exclusive project use. This provision accommodates future expansions, allied industries, and nearby housing developments. Once

operational, the surface water scheme will replace groundwater as the source of fresh water. M/s HPBDPIL has already deposited the seed money with BBMB to initiate the scheme.

The committee opined that the ground water extraction shall not be extracted more than 5 years from the grant of EC, after that pp shall use the water as proposed. A cap shall be imposed on groundwater extraction, restricting withdrawal to a maximum of 15 MLD, as approved by the regulatory authority. The project proponent shall ensure that extraction does not exceed this limit under any circumstances. A metering system shall be installed at all abstraction points, and monthly records of water withdrawal shall be maintained and submitted to the regulatory authority for compliance verification."

3.2.4 The EAC, taking into account the submission made by the project proponent has a detailed deliberation in its 414th meeting during 02nd September, 2025 and **recommended** the project for grant of environmental clearance for 'development of Proposed "Bulk Drug Park" at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani and Malluwal, Teh. Haroli, Distt. Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Ltd. under Department of Industries, Government of Himachal Pradesh' with specific conditions, as mentioned below, in addition to all standard conditions applicable for such projects.

3.2.5. Recommendation of EAC

Recommended

3.2.6. Details of Environment Conditions

3.2.6.1. Specific

Specific Conditions	
1.	The EC is granted invoking the Specific Condition of the EIA Notification, 2006 for the proposed Bulk Drug Park.
2.	Recommendations of the CBRI report pertaining to the Landslide Susceptibility and Suggestive Remedial Measures shall be implemented with letter and spirit subject to amendment that Restricted No-Building/construction Zone will be maintained for higher elevations and steeper >25° slopes to reduce the impact of building infrastructures on the fragile slopes of the project areas.
3.	In view of amendment in recommendations of CBRI suggested in (ii) above development layout plan, green belt plan including Mandatory green Zone in higher elevations, green zone in no building zones and green belt along major and minor drainages systems) and compensatory afforestation plan be re worked in consultation with state Forest Department and submitted to the IRO of MoEFCC prior to start of work and in no case not later than the date of submission of first first 6 monthly compliance report.
4.	A green Buffer Zone will be provided all along the boundary of the project as well as major and minor drains/nallahs (50 meter for major and 15 meter for minor). Green belt of at least 30

	meter width shall be created all along the boundary of the project area.
5.	All other recommendations of the CBRI report pertaining to lay out planning and Infrastructure Safety shall be implemented in true letter and spirit.
6.	Overall developable area shall be between 65 to 70 % of total project area and ,in no case, shall exceed 70%.
7.	As strongly recommended by the CBRI detailed surveys and geotechnical investigations for designing any stabilizing measures shall be carried out. Proper slope protection measures must include controlled cutting, strategic placement of suitable retaining structures with adequate drainage systems, and vegetation cover. Given the area's severe rainfall patterns, these measures are essential to withstand potential high-flow events and prevent damage to the infrastructure. Structural designing for infrastructure and industrial sheds shall be done in supervision of the CBRI, Roorkie and shall be based on the principle of minimum disturbance to topography and minimum earth cutting and filling. CBRI may consider the possibility of erecting the shed platform on stilts.
8.	All mitigation measures and recommendations made by the CBRI and ICAR-IISWC report shall be implemented in letter and spirit during construction and operational phase, particularly with respect to site stability, landslide susceptibility, slope protection, soil erosion prevention, and preservation of natural drainage systems.
9.	The recommendations in the report of the ICAR-ISWC for soil conservation and protection from the erosion shall be followed in direct supervision of the ISWC.
10.	As proposed Development of the project shall be carried out in 2 phases. Actual felling of the trees in the field shall be initiated under the direction and supervision of the state forest department only after finalisation of the structural designs, another prerequisite for start of the work so that project area does not remain exposed to the erosion forces for a long period after felling . In Phase I, out of the total 45,600 trees, a maximum of 21,702 trees are allowed to be felled with prior approval from the Competent Authority, while 23,898 trees shall be retained. Similarly, in Phase II, out of 222 trees, 146 trees shall be felled after obtaining necessary permissions, and 76 trees need to be retained.
11.	Green belt development plan/ afforestation plan as amended shall be executed under the supervision of the Forest Department.
12.	Project Proponent shall strive to enhance the Green Belt beyond 33% and that the trees planted in this regard would be planted under the campaign" __ __1 " and the details of the trees planted would be uploaded on the portal https://merilife.nic.in .
13.	The groundwater extraction shall be permitted for a maximum period of five (5) years from the grant of Environmental Clearance (EC). Beyond this period, the project proponent (PP) shall utilize water as per the proposed alternative arrangements made for surface water supply scheme approved by the Bhakra Beas Management Board (BBMB), which includes a 15 km dedicated pipeline from the Satluj River. Under this scheme, 50 MLD of fresh water will be supplied, supported by a 100 MLD storage tank earmarked exclusively for the project.

1 4.	This arrangement is designed to cater not only to the present requirement but also to accommodate future expansions, allied industries, and nearby housing developments. Once operational, the surface water scheme will fully replace groundwater as the source of fresh water.
1 5.	Construction spoils, including bituminous material and other hazardous materials, must not be allowed to contaminate watercourses and the dump sites for such material must be secured so that they should not leach into the groundwater.
1 6.	Vehicles hired for bringing construction material to the site should be, in good condition and should have a pollution check certificate and should conform to applicable air and noise emission standards, and should be operated only during non-peak hours.
1 7.	Any hazardous waste generated during the development/ construction phase, should be disposed off as per applicable rules and norms with necessary approvals of the Rajasthan State Pollution Control Board.
1 8.	The installation of the Sewage Treatment Plant (STP) shall be certified by an independent expert and a report in this regard shall be submitted along with the six-monthly EC compliance report to the concerned IRO of the Ministry before the project is commissioned for operation. Periodical monitoring of water quality of treated sewage shall be conducted. Necessary measures should be made to mitigate the odour problems from STP.
1 9.	Sewage shall be treated in the STP with tertiary treatment i.e. Ultra Filtration. The treated effluent from STP shall be recycled/reused for flushing and landscaping.
2 0.	Ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of PM10, PM2.5, SO2, and NOx are anticipated in consultation with SPCB within and outside the industrial estate area at least at four locations (one within and three outside the port area at an angle of 120° each), covering upwind and downwind directions. An appropriate Air Pollution Control (APC) system shall be provided for all the dust generating points including fugitive dust from all vulnerable sources, so as to comply with prescribed fugitive emission standards. Data on ambient air quality and emission shall be regularly submitted to the IRO, MoEF&CC along with the six-monthly EC & CRZ compliance report.
2 1.	Installation of Ambient Air Quality data shall display units for public display.
2 2.	The total renewable energy capacity up to solar power shall be explored and accordingly the plan shall be submitted to the IRO of the Ministry in its first six monthly compliance report and the progress of implementation of this plan be submitted in the subsequent 6 monthly compliance reports. Apart from this Industrial Estate shall ensure that individual industries utilize at least 10% of their total power requirement through renewable energy like solar etc.
2 3.	Roofs should meet the prescriptive requirements as per the Energy Conservation Building Code by using appropriate thermal insulation material to fulfill requirements.
2 4.	Red category industrial units to be avoided near residential areas, habitations and water bodies. A distance of approximately 500 meters shall be maintained for the establishment of the red category industry from the residential area.
2	All the recommendations of the EMP shall be complied with in letter and spirit. All the

5.	mitigation measures submitted in the EIA report shall be prepared in a matrix format and the compliance for each mitigation plan shall be submitted to RO, MoEF&CC along with a half yearly compliance report.
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3.2.6.2. Standard

5(f)	Synthetic organic chemicals industry
null	
1.	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
2.	The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, and Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 and other rules notified under various Acts.
3.	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
4.	The overall noise levels in and around the plant area shall be kept well within the standards 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 the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
5.	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
6.	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
7.	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal.
8.	The project proponent shall also upload/submit six monthly reports on Parivesh Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
9.	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted 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 along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.
10.	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/Committee and may also be seen at

	Website of the Ministry and at https://parivesh.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 shall be forwarded to the concerned Regional Office of the Ministry.
1 1.	The 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 start of the project.
1 2.	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.
Specific Conditions	
1.	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.

3.3. Agenda Item No 3:

3.3.1. Details of the proposal

Environmental Clearance for “Ghiloth Industrial area, village-Parpapur chak No. 1&3, at Ghiloth, Dabarwas, Distt. Kotputli- Behror, Rajasthan” by SYED HASAN located at KOTPUTLI-BEHROR,RAJASTHAN			
Proposal For		Expansion EC	
Proposal No	File No	Submission Date	Activity (Schedule Item)
IA/RJ/INFRA1/5488/53/2025	21-43/2011-IA. III	22/08/2025	Industrial estates/ parks/ complexes/ areas, export processing Zones (EPZs), Special Economic Zones (7(c))

3.3.2. Project Salient Features

“The EAC noted that the Project Proponent and the consultant have given undertaking that the data and information given in the application and enclosures are true to the best of their knowledge and belief and no information has been suppressed in EIA/EMP report. If any part of data/information submitted is found to be false/misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

3.3.1 The aforementioned proposal was placed before the EAC during its 367th meeting of the Expert Appraisal Committee held on 26th June 2024, the committee return the proposal in present form to apply under 7(ii) of the EIA notification, 2006 as amended as the proposal involved the change in configuration. The project proponent has submitted the application under 7(ii) of the EIA notification, 2006, the proposal was considered in the 409th meeting of the Expert Appraisal Committee held on 30th-31st July 2025. Wherein the committee observed that that the M/s Rajasthan State Industrial Development & Investment Corridor has obtained the EC vide letter no.21-43/2011-IA.III dated 6th March, 2013 for development of new industrial area chak no.123 at village Ghiloth Dabarwas, Partapur Behror Distt, Alwar, Rajasthan stating that all industries establish or proposed to establish will not fall under category A or B as per EIA notification. Now M/s Rajasthan State Industrial Development & Investment Corridor sought amendment to include auto manufacturing industries within the industrial area, however, auto Manufacturing does not fall under the ambit of EIA notification 2006. The Japanese zone, is spanning a total area of 215.932 hectares. Some of industry under this Zone may have built up area of > 20,000 sq meter. Which falls under 8(a) or 8(b) category B as the case may be.

3.3.2 The committee, informed that the Hon'ble High Court of Kerala in WP No.3097 of 2016 titled One



सत्यमेव जयते

File No: 10/68/2023-IA.III

Government of India
Ministry of Environment, Forest and Climate Change
IA Division



Date 25/09/2025



To,

Tilak Raj Sharma
HIMACHAL PRADESH BULK DRUG PARK INFRASTRUCTURE LIMITED
Himachal Pradesh Bulk Drug Park Infrastructure Limited Directorate of Industries Majitha House, Near
HP Secretariat Chhota Shimla, Shimla, SHIMLA, HIMACHAL PRADESH, 171002
trsharma4@gmail.com

Subject: Development of Proposed "Bulk Drug Park" at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani and Malluwal, Teh. Haroli, Distt. Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Ltd. under Department of Industries, Government of Himachal Pradesh-Environment Clearance reading.

Sir/Madam,

This is in reference to your application submitted to MoEF&CC vide proposal number IA/HP/INFRA1/517475/2025 dated 14/01/2025 for grant of prior Environmental Clearance (EC) to the proposed project under the provision of the EIA Notification 2006 and as amended thereof.

2. The particulars of the proposal are as below :

(i) EC Identification No.	EC25A3103HP5978020N
(ii) File No.	10/68/2023-IA.III
(iii) Clearance Type	Fresh EC
(iv) Category	A
(v) Project/Activity Included Schedule No.	7(c) Industrial estates/ parks/ complexes/ areas, export processing Zones (EPZs), Special Economic Zones, 7(d) Common hazardous waste treatment, storage and disposal facilities (TSDFs), 7(h) Common Effluent Treatment Plants (CETPs), 5(f) Synthetic organic chemicals industry
(vi) Sector	INFRA-1
(vii) Name of Project	Proposed "Bulk Drug Park" at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani and Malluwal, Teh. Haroli, Distt. Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park

	Infrastructure Ltd. under Department of Industries, Government of Himachal Pradesh
(viii) Name of Company/Organization	HIMACHAL PRADESH BULK DRUG PARK INFRASTRUCTURE LIMITED
(ix) Location of Project (District, State)	UNA, HIMACHAL PRADESH
(x) Issuing Authority	MoEF&CC
(xi) Applicability of General Conditions as per EIA Notification, 2006	No

3. The proposal is for the 'Development of proposed 'Bulk Drug Park'' over an extent of 568.75 Ha (1405.41 Acres) at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani, and Malluwal, Tehsil Haroli, District Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Ltd. (HPBDPIL) under Department of Industries, Government of Himachal Pradesh'.

4. A New Industrial Estate in the name of Bulk Drug Park is proposed to be set up at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani, and Mulluwal, Tehsil Haroli, District Una, Himachal Pradesh. The proposed project comprises 110 Industrial Plots along with allied infrastructure and related services. The project site is falling in between the geographical coordinates ranging from 31°21'26.21" N and 76°10'22.98" E.

5. The proposed project activity is listed at schedule S.No.7(c) Industrial estates/parks/ complexes/Areas, export processing zones (EPZs), Special economic zones (SEZs), Biotech parks, Leather complexes under Category- 'A', of the schedule of the EIA Notification, 2006 and its amendments due to applicability of general condition i.e. Punjab-Himachal Pradesh border lies at a distance of approx.100m from the nearest project boundary and the proposed project. Total Project Cost is Rs. 1923 Cr.

6. Terms of References (TOR) Details: The ToR proposal was considered in the 367th EAC meeting held on 26th June 2024, the committee recommended the proposal for undertaking a detailed EIA/EMP report. Ministry granted the ToR vide letter No. 10/68/2023-IA.III dated 01.08.2024.

7. Public Hearing Details: The public hearing was conducted in the Una district of Himachal Pradesh state on 20.11.2024. The details of the public hearing are as follows:

Date	Venue	District and State	Chairman
20-11-2024	Open Ground, Near Forest Rest House, VPO Pollian Beet, Tehsil Haroli, District Una, Himachal Pradesh	Una District, Himachal Pradesh	Additional Deputy Commissioner, Una

8. Land use/Land cover of the project site: Out of 1,405.41 acres of land, 1,365.77 acres is the government land allotted to the Department of Industries and 39.64 acres is the private land purchased and transferred to the Department of Industries, Government of Himachal Pradesh for setup of the proposed industrial park.

Sl.No.	Description	Area (in Acres)	Area (in Ha)	Percentage (%)
1	Industrial Plot Area	558.28	225.93	39.72
2	Commercial Area	95.02	38.45	6.76
3	Electric Utilities	23.37	9.46	1.66
4	Utility Area	41.65	16.86	2.96
5	TSDf Area	29.46	11.92	2.10
6	Parking Area	18.46	7.47	1.31
7	Green Area:	465.18	188.25	33.09
	· Green area under Industrial Plots to be developed by individual industries	185.72	75.16	13.21
	· Green area developed by HPBDPIL	279.46	113.09	19.88

8	Treatment Units (STP/ETP/ MEE & WTP)	41.08	16.62	2.92
9	Logistic Hub and Warehouse	18.84	7.62	1.34
10	Area under Roads	86.45	34.98	6.15
11	Area under existing Water Bodies	27.33	11.06	1.94
12	Others (Semi-public Area)	0.30	0.12	0.02
	Total Area	1405.41	568.75	100

9. List of industries to be housed with the proposed project site are as following.

Category of Industries	As per EIA 2006 Notification	CPCB Classification
member industries (API units) Synthetic organic chemicals industry (dyes & dye intermediates; bulk drugs intermediates and excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates)	5(f)	Red
Common Effluent Treatment Plants (CETP)	7(h)	-
Treatment, Storage and Disposal Facility (TSDF) (comprising a secured landfill with a solid-liquid feed incinerator)	7(d)	-

The upcoming industrial units in the Bulk Drug Park (BDP) will only be API manufacturing units based on chemical synthesis (approx. 70 to 80 industrial units in 110 industrial plots) and such units are covered under the Red Category (Serial No. 60) as per CPCB categorization of industries. BDP as a whole is covered under the Red Category (Serial No. 32) as per CPCB categorization. CETP, TSDF & Incinerator are covered under the Red Category (Serial No. 14) as per CPCB. Incinerator and a TSDF facility has been proposed within the boundary of Bulk Drug Park for the handling of Hazardous wastes. As per EIA Notification 2006 and its amendments thereof, Common hazardous waste treatment, storage and disposal facilities (TSDFs) falls under Schedule 7(d) and All integrated facilities having incineration & landfill site falls under category A. Hence, separate Environmental Clearance will be obtained.

10. Terrain and Topographical Features: The Project area comprises agricultural, barren, and bushy blocks with semi-hilly terrain. In general, most of the district lies between 600-900 m elevation and slope is less than 10°. Approx. elevation range of the entire project lies 390-590m above mean sea level (amsl). The drainage pattern of the project area is dendrite type and the flow of water is from NE to SW according to the natural slope of the surface i.e., towards river Beas. A total of five sharp slope areas with more than 45° angles were identified comprising an area of 2.96 acres. The details are as follows:

Sl. No.	Location of Slope	Area of Slope
1	Landfill site	0.89
2	Industrial Plot No. 110	0.68
3	Water Reservoir/ Pond	0.62
4	Common Steam Generation Area	0.57
5	Industrial Plot No. 93	0.20
Total Area (Acres)		2.96

11. Details of water bodies, impact on drainage:

Sl. No.	Water Bodies	Distance (~Kms.)
1	Soan/Swan River	8.0 (NE)
2	Panjoian Khad (Seasonal)	Within Project Site
3	Raamsar Pond	3.0 (NE)

12. Water requirements: The total water requirement for the proposed project will be 22.1 MLD; out of which 15 MLD will be extracted from groundwater through borewells (15 Nos.), for an initial period up to materialization of surface water supply scheme, and 7.1 MLD will be recycled water met from treated water. Breakup of the total water demand is given below:

Sl. No.	Description	Demand (MLD)	Source
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1	Freshwater Demand (Portable + Process water demand)	15 (2.2+12.8)	Groundwater*
2	Flushing water demand	1.15	Treated water
3	AC Cooling demand	2.00	Treated water
4	Horticulture water demand	3.95	Treated water
5	Total Water Demand	22.1 MLD	Groundwater* & treated water

13. The groundwater abstraction scheme will only be there until the surface water scheme comes into place i.e. until the materialization of the surface water scheme. As a substitute for the groundwater supply, a comprehensive scheme for the surface water supply has been approved by the concerned authority Bhakra Beas Management Board (BBMB). Under this proposal, a dedicated pipeline of approx. 15 km length will be laid which will supply surface water from the River Satluj to the project. 50 MLD of fresh water from the River Satluj will be supplied and a dedicated storage tank of a capacity of 100 MLD is proposed within project premises. This scheme has been envisaged keeping in view the future expansions and upcoming allied industries as well as the proposed housing schemes in the vicinity. The M/s HPBDPIL has already paid the seed money to the BBMB for the initiation of this scheme. Surface water from the river Satluj will be used to meet the freshwater requirements onwards to the operationalization of the scheme. Principle approval for the same has already been obtained from Competent Authority of the state i.e. Jal Shakti Vibhag, IPH Wing and However formal NOC for the abstraction of ground water will be obtained at the time of initiation of the project at ground level.

14. Waste Management: Hazardous waste generation from the proposed Bulk Drug Park has been estimated as 10-12 TPD and CETP sludge & MEE residue) & incinerable/co-processing waste will be 650-800 TPD. An integrated TSDF (comprising a secured landfill, and a solid-liquid feed incinerator is proposed inside the project for which 33.6 acres of land have been proposed. 4-5 kg/day of Biomedical waste is likely to be generated from the dispensary & Research Institute for Pharmaceutical advancement proposed within the project which includes minor first aid or medical use of disposable dressing material. This waste will be disposed of through the authorized Common Bio-medical Waste Collection and Disposal Agency as per Bio-medical Waste Management Rules, 2016 and its amendments. The solid waste generated will be 0.6 TPD during the construction and 8.8 TPD during the operation phase from various zones of the park. Biodegradable waste will be composted within project premises and recyclable components will be disposed of through authorized recycler vendors. The Solid Waste will be handled/disposed of as per the provision of Solid Waste Management Rules 2016 and its amendments. Nearly 80 kg/day of Plastic Waste and 4 TPM (i.e. 130 kg/day) of E-Waste is expected to be generated. Both these wastes i.e. E-Waste and Plastic Waste will be handled/disposed of to the authorized recyclers, strictly as per the provision of the prevailing/relevant Rules. Wastewater: Common Effluent Treatment Plant of capacity 5 MLD based upon physio-chemical cum biological treatment technology including UF, RO & MEE will be provided within the project to treat the industrial effluent to be generated from industrial processes. Total Industrial wastewater generation will be 5 MLD (approx. 62 KLD by individual unit) which will consist of 1.5 MLD of HTDS and 3.5 MLD of LTDS streams. Treatment of LTDS process effluents will be done in CETP with ZLD and effluents of HTDS stream will be fed to MEE. 2.9 MLD of domestic effluent will be generated which will be treated in the proposed STP of capacity 3 MLD based on MBBR/SBR Technology. Further the project has been conceived with ZLD (Zero Liquid Discharge) and optimum level of recirculation of treated wastewater has been proposed. Out of the total water requirement of 22.1 MLD, 35% i.e., 7.1 MLD will be met through the recycling of wastewater. Only 15 MLD of fresh water will be used. To support/sustain the groundwater in the long run, a parallel independent scheme has been chalked out by the State Govt. which will fetch 50 MLD of surface water from Sutlej River through dedicated pipeline.

15. Details of Tree Cutting and Green Belt Development: In Phase I, out of the total 45,600 trees, a maximum of 21,702 trees are allowed to be felled with prior approval from the Competent Authority, while 23,898 trees shall be retained. Similarly, in Phase II, out of 222 trees, 146 trees shall be felled after obtaining necessary permissions, and 76 trees need to be retained. The recommendation of the CBRI as well as of the ICAR-IISWC w.r.t. development of green belt and tree cutting issues have been duly considered which in-turn has necessitated the amendment in the layout plan and afforestation plan. With implementation of recommendations and due to amendment in the initial plans, compensatory plantation against each felled tree will be done in the ratio of 1:10 in principle and the density of the tree plantation will be 1100 numbers/ha. A total of 33.1% of the project area will be developed as a greenbelt. Of this, 113.1 ha (19.88% of the total area) will comprise plantations with approximately 34,400 native/local trees. The remaining greenbelt will be developed by member industries over 75.2 ha (13.21% of the total area) within their industrial premises along plot boundaries. Additionally, an area of 13.21 ha will be maintained under landscaping and plantation. Greenbelt of 50m width along major streams/nallah/khads and 15m width along minor streams and project boundary shall be developed. A

robust/sustainable green area will be developed/maintained to achieve the ecological balance.

16. Diversion of forestland: The instant proposal does not envisage any diversion of forestland as there is no forest land involved in the proposed project site except some reserve and protected forest patches i.e., Polian Shamlat Reserve Forest (Adjacent to project boundary in South), Saloh and Bhadsali Open Jungle (approx. 5 km in North) Kangar Protective Forest (6 km in North-West), Saunli and Birampur Protected Forests (approx. 8 km in South).

17. There are no notified ecologically sensitive areas such as National parks or Wildlife Sanctuaries, Biosphere Reserves, Wildlife Corridors, Ramsar sites, and Tiger/Elephant Reserves (existing as well as proposed) within 10 km radius of the project. The Schedule I species reported within the study area are Leopard, Sambhar, Wild Boar, Indian Porcupine, Hyena, Common Peafowl, Spanish Owl, Griffon Vulture, Spanish Imperial Eagle, King Cobra, Rock Python, Russel's Viper, etc. A wildlife conservation and mitigation plan has been prepared and submitted to the D.F.O the wildlife conservation plan has been forwarded to the Chief Wildlife Warden for approval vide letter No. RK/WL/8373 dated 16.01.2025.

18. Energy conservation measures with estimated saving: A total of 14.2 MW of solar power generation is proposed as alternate energy on the rooftops of commercial buildings/ areas, electrical utility areas, and treatment units. Solar streetlights are to be used and industries shall be asked to look at the feasibility of installing solar heaters to feed preheated water for process operations. The feasibility of installing solar panels with battery backup along internal roads & buffer areas shall be explored to conserve energy. Industries & commercial establishments shall formulate a proposal to harness solar power within their premises, particularly on rooftops.

19. Six multi fuel fired boilers have been proposed for common steam generation facility based on the availability of fuels in the region. Fuels like rice husk and specially biomass are easily available in the state with high calorific value on economic rates. The impacts of project and air quality modelling has been assessed based on the utilization of rice husk as fuel. However, use of cleaner fuel relates to the operational aspect of the project PNG will be utilised to operate common infrastructure as boilers for steam generation, GAIL is committed for the supply of PNG to BDP as the GAIL has already a presence in the Tahliwal Industrial area approx. 8 km from the Bulk Drug Park (BDP) site. MEE for wastewater treatment, and Incinerators for hazardous wastes management by HPBDPIL and other industrial processes/operations by member industries.

20. Details of Rainwater Harvesting: Construction of rooftop rainwater harvesting structures shall be made mandatory to conserve water resources as the freshwater demand of Bulk Drug Park (BDP) is 15 MLD. The project area falls in the Hum Valley and Swan catchment area with a groundwater extraction of about 70%. Hence to recharge groundwater, BDP will design a rainwater harvesting system in the Hum Valley and Swan catchment areas. Rainwater harvesting is proposed from rooftops of general buildings (other than industrial sheds) and other pucca areas through the dedicated drainage system. The provision for reservoir/storage tank for freshwater has been provided of capacity 50 ML (million liters). Additionally, the rainwater will be collected in a storage pond/ tank of 800 KL and surplus water will be collected in recharge wells/pits. After the treatment of rainwater, it will be reused in industrial processes, gardening, and flushing purposes.

21. Land acquisition and R&R issues involved: There is no R&R for the project. The area under the site falls under the "Banjar Kadim" category as per the revenue record with present ownership of the Department of Industries, Government of HP. The plot area of the project is 1,405.41 acres (568.75 Ha); out of which, 1,365.77 acres is the government land allotted to the Department of Industries and 39.64 acres is the private land purchased and transferred to the Department of Industries, Government of HP for setting up of the proposed industrial park. M/s Himachal Pradesh Bulk Drug Park Infrastructure Limited (HPBDPIL) under Department of Industries, Government of Himachal Pradesh is holding independent possession of the entire area of the project i.e., 568.75 Ha. Accordingly, Dept. of Revenue, Govt. of HP issued the Letter No. 105 dated 03.10.2020.

22. The EAC Sub-committee conducted the site visit during 29th–30th April 2025 and made certain recommendations. Based on recommendations, the Project Proponent (PP) entrusted CBRI to carry out the required studies. Initially, the National Institute of Technology (NIT), Hamirpur (H.P.), was engaged to conduct the study, covering aspects such as soil erosion, long-term project stability, extraction of drainage patterns, and modeling of flow directions and flow accumulation. Upon submission, the report was also sent to the Central Building Research Institute (CBRI), Roorkee. However, Central Building Research Institute (CBRI), Roorkee has submitted its independent assessment report on

Integrated Geo-Environmental Assessment and Planning for Safe Development of the Bulk Drug Park, providing specific recommendations and mitigation measures to ensure the safety and longevity of the project with respect to critical geological and geographical parameters, including environmental safeguards in the following major aspects (i) Landslide Susceptibility and Suggestive Remedial Measures, (ii) Layout Planning and (iii) Infrastructure Safety.

23. The seismic vulnerability, erosion issues, steep slopes and extent of area under building infrastructure has been deliberated upon in the CBRI report and accordingly the layout map has been amended. With amendment/revision in the layout map, the area under building infrastructure has been significantly reduced from 39.72% to 38.22%, thus significant area has been reduced under infrastructure. The amended/revised layout plan has been worked out in two different areas viz-a-viz area under Phase 1 and area under Phase 2. It is the blanket assurance/commitment to initiate the project starting with low lying areas with flatter terrain or terrains with gentle slopes under phase-1 and thereafter Phase-2 will be initiated in other slopes.

24. As per CBRI report

a. The areas at higher elevation with the initiation of drainage lines are prone to soil erosion and potential for landslides. Therefore, these areas with an spatial coverage of 169218.8 m² are declared as a Mandatory Green Zone. Special attention must be given in respect of adopting sustainable erosion control bio-engineering measures during the site development phase.

b. The slopes in the study area are relatively stable and not very steep. The Environmental Impact Assessment (EIA) report indicates an annual rainfall of about 1300 mm. This high rainfall intensity poses the risk of erosion and could cause instability in the slopes. Such instability may also affect any proposed superstructures in the vicinity. Therefore, the areas with higher elevations and $>30^\circ$ slope are declared as Restricted No-Build zones and may be considered for developing as green zone with suitable vegetation. The committee was of the view that considering increasing incidences of landslides and soil erosion it will be on safer side if the areas with higher elevation >25 degree slopes are declared as Restricted No-Build zones and may be considered for developing as green zone with suitable vegetation. Accordingly the layout plan, green belt plan and afforestation plan are revised.

25. The ICAR-ISWC has prepared report for soil conservation measures and made certain recommendations. The recommendations of the said report w.r.t. soil conservation and water conservation will be implemented at ground level in totality.

26. Employment Potential: During the construction phase, manpower of 2,500 to 3,000 persons will be employed. During the operational phase, the proposed employment is projected for the entire bulk drug park with a worker density of 120 employees per hectare. Thus, as such, an employment opportunity for approx. 40,000 no. of employees will be generated. Apart from this direct employment, there will be numerous numbers of persons with indirect employment will be connected with this project. The exact number of such persons cannot be assessed at this stage; as such kind of employment/job work activities come from the informal/unorganized sectors. However, for the calculation of wastewater generation and other related entities/activities, a floating population of 10% of direct employees has been considered i.e. 4,000 persons, thus arriving at a total population of 44,000 persons.

27. Benefits of the project: The Indian Govt. has initiated a noble concept of "Aatmanirbhar Bharat" and this project will negate the need to import from the neighbouring countries to certain effects, which will add to the self-sufficiency of the country. Hence, the project is the need of the hour and deserves all the encouragement and facilitation for implementation, to promote technologies and industry. The project is intended to facilitate development of a well-planned and resource-efficient industrial base, a World-class sustainable connectivity infrastructure. Bulk Drug Park (BDP) proposed to establish a mixed-use area on site for essential services staff initially and may develop discreet sites in the future away from the park which may facilitate local development due to increased demand for domestic services. The need for additional housing in the project vicinity will provide an opportunity for surrounding villagers to build and lease out their houses. The basic infrastructure for the community needs will be strengthened by extending health care, educational facilities, drainage, and drinking water quality to the village, building/strengthening existing roads in the area, etc. The occupational health facility proposed on-site with all amenities may be used by the surrounding population in case of emergency.

28. Details of Court cases: Original Application No. 148/2025 (PB) Rohit Singh Vs. Ministry of Environment, Forest and Climate & Ors. is pending in Honble NGT(PB)

29. The EAC based on the information submitted and clarifications provided by the project proponent and detailed discussions held on all the issues during 389th meeting of the Expert Appraisal Committee held on 29th-30th January, 2025 and 414th meeting during 02nd September, 2025 **recommended** the project for grant of environmental clearance with stipulated specific conditions along with other Standard EC Conditions.

30. The Ministry of Environment, Forest and Climate Change has considered the proposal based on the recommendations of the Expert Appraisal Committee (Infrastructure, CRZ and other Miscellaneous projects) and hereby decided to grant Environmental Clearance for environmental clearance for 'Bulk Drug Park' over an extent of 568.75 Ha (1405.41 Acres) at Villages Kuthar Beet, Pollian Beet, Tibbian, Jodian, Janani, and Malluwal, Tehsil Haroli, District Una, Himachal Pradesh by M/s Himachal Pradesh Bulk Drug Park Infrastructure Ltd. (HPBDPIL) under Department of Industries, Government of Himachal Pradesh' under the EIA Notification, 2006 as amended, subject to strict compliance of the following specific conditions, in addition to all standard conditions applicable for such projects.

31. This issues with the approval of the Competent Authority.

Copy To

1. The Chief Secretary, Department of Environment, Science Technology & Climate Change, Government of Himachal Pradesh, Press Villa, Paryavaran Bhawan, Near US Club, Shimla-171 001, Himachal Pradesh.
2. The Principal Chief Conservator of Forests (HoFF), Himachal Pradesh Forest Department, Talland, Shimla-171 001, Himachal Pradesh.
3. The Deputy Director General of Forests (Central), Ministry of Environment, Forest and Climate Change (MoEF&CC), Integrated Regional Office Shimla, 1st & 2nd Floor, C.G.O. Complex, Shivalik Block, Longwood, Shimla-171 001, Himachal Pradesh.
4. The Chairman, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi-110 032.
5. The Member Secretary, Him Parivesh, Phase-III, New Shimla-171 009, Himachal Pradesh.
6. Compliance and Monitoring Division, Ministry of Environment, Forest and Climate Change (MoEF&CC), Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-110 003.
7. Parivesh Portal.
8. Guard File/ Monitoring File/ Record File.

Annexure 1

Specific EC Conditions for (Synthetic Organic Chemicals Industry)

1. Specific Conditions

S. No	EC Conditions
1.1	The EC is granted invoking the Specific Condition of the EIA Notification, 2006 for the proposed Bulk Drug Park. Since the bulk drug park is proposed with homogeneous type of industries, the individual industries including proposed industrial housing within such estates /complexes will not be required to take prior environmental clearance
1.2	Recommendations of the CBRI report pertaining to the Landslide Susceptibility and Suggestive Remedial Measures shall be implemented with letter and spirit subject to amendment that Restricted No-Building/construction Zone will be maintained for higher elevations and steeper >25° slopes to reduce the impact of building infrastructures on the fragile slopes of the project areas.

S.No	EC Conditions
1.3	In view of the amendments in the recommendations of CBRI suggested in the proposed development layout plan, the greenbelt plan — including the mandatory green zone in higher elevations, green zones in no-building areas, and greenbelts along major and minor drainage systems — as well as the compensatory afforestation plan, shall be reworked in consultation with the State Forest Department and submitted to the IRO of MoEFCC prior to commencement of work, and in any case, not later than the date of submission of the first six-monthly compliance report.
1.4	A green Buffer Zone will be provided all along the boundary of the project as well as major and minor drains/nallahs (50 meter for major and 15 meter for minor). Green belt of at least 30 meter width shall be created all along the boundary of the project area.
1.5	All other recommendations of the CBRI report pertaining to lay out planning and Infrastructure Safety shall be implemented in true letter and spirit.
1.6	Overall developable area shall be between 65 to 70 % of total project area and ,in no case, shall exceed 70%.
1.7	As strongly recommended by the CBRI detailed surveys and geotechnical investigations for designing any stabilizing measures shall be carried out. Proper slope protection measures must include controlled cutting, strategic placement of suitable retaining structures with adequate drainage systems, and vegetation cover. Given the area's severe rainfall patterns, these measures are essential to withstand potential high-flow events and prevent damage to the infrastructure. Structural designing for infrastructure and industrial sheds shall be done in supervision of the CBRI, Roorkie and shall be based on the principle of minimum disturbance to topography and minimum earth cutting and filling. CBRI may consider the possibility of erecting the shed platform on stilts.
1.8	All mitigation measures and recommendations made by the CBRI and ICAR-IISWC report shall be implemented in letter and spirit during construction and operational phase, particularly with respect to site stability, landslide susceptibility, slope protection, soil erosion prevention, and preservation of natural drainage systems.
1.9	The recommendations in the report of the ICAR-ISWC for soil conservation and protection from the erosion shall be followed in direct supervision of the ISWC.
1.10	As proposed Development of the project shall be carried out in 2 phases. Actual felling of the trees in the field shall be initiated under the direction and supervision of the state forest department only after finalisation of the structural designs, another prerequisite for start of the work so that project area does not remain exposed to the erosion forces for a long period after felling . In Phase I, out of the total 45,600 trees, a maximum of 21,702 trees are allowed to be felled with prior approval from the Competent Authority, while 23,898 trees shall be retained. Similarly, in Phase II, out of 222 trees, 146 trees shall be felled after obtaining necessary permissions, and 76 trees need to be retained.
1.11	Green belt development plan/ afforestation plan as amended shall be executed under the supervision of the Forest Department.
1.12	Project Proponent shall strive to enhance the Green Belt beyond 33% and that the trees planted in this regard would be planted under the campaign " एक_पेड़_म_11_के_नाम " and the details of the trees planted would be uploaded on the portal https://merilife.nic.in .

S.No	EC Conditions
1.13	The groundwater extraction shall be permitted for a maximum period of five (5) years from the grant of Environmental Clearance (EC). Beyond this period, the project proponent (PP) shall utilize water as per the proposed alternative arrangements made for surface water supply scheme approved by the Bhakra Beas Management Board (BBMB), which includes a 15 km dedicated pipeline from the Satluj River. Under this scheme, 50 MLD of fresh water will be supplied, supported by a 100 MLD storage tank earmarked exclusively for the project.
1.14	This arrangement is designed to cater not only to the present requirement but also to accommodate future expansions, allied industries, and nearby housing developments. Once operational, the surface water scheme will fully replace groundwater as the source of fresh water.
1.15	Construction spoils, including bituminous material and other hazardous materials, must not be allowed to contaminate watercourses and the dump sites for such material must be secured so that they should not leach into the groundwater.
1.16	Vehicles hired for bringing construction material to the site should be, in good condition and should have a pollution check certificate and should conform to applicable air and noise emission standards, and should be operated only during non-peak hours.
1.17	Any hazardous waste generated during the development/ construction phase, should be disposed off as per applicable rules and norms with necessary approvals of the Himachal Pradesh State Pollution Control Board.
1.18	The installation of the Sewage Treatment Plant (STP) shall be certified by an independent expert and a report in this regard shall be submitted along with the six-monthly EC compliance report to the concerned IRO of the Ministry before the project is commissioned for operation. Periodical monitoring of water quality of treated sewage shall be conducted. Necessary measures should be made to mitigate the odour problems from STP.
1.19	Sewage shall be treated in the STP with tertiary treatment i.e. Ultra Filtration. The treated effluent from STP shall be recycled/reused for flushing and landscaping.
1.20	Ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of PM10, PM2.5, SO2, and NOx are anticipated in consultation with SPCB within and outside the industrial estate area at least at four locations (one within and three outside the port area at an angle of 120° each), covering upwind and downwind directions. An appropriate Air Pollution Control (APC) system shall be provided for all the dust generating points including fugitive dust from all vulnerable sources, so as to comply with prescribed fugitive emission standards. Data on ambient air quality and emission shall be regularly submitted to the IRO, MoEF&CC along with the six-monthly EC & CRZ compliance report.
1.21	Installation of Ambient Air Quality data shall display units for public display.
1.22	The total renewable energy capacity up to solar power shall be explored and accordingly the plan shall be submitted to the IRO of the Ministry in its first six monthly compliance report and the progress of implementation of this plan be submitted in the subsequent 6 monthly compliance reports. Apart from this Industrial Estate shall ensure that individual industries utilize at least 10% of their total power requirement through renewable energy like solar etc.
1.23	Roofs should meet the prescriptive requirements as per the Energy Conservation Building Code by

S.No	EC Conditions
	using appropriate thermal insulation material to fulfill requirements.
1.24	Red category industrial units to be avoided near residential areas, habitations and water bodies.
1.25	All the recommendations of the EMP shall be complied with in letter and spirit. All the mitigation measures submitted in the EIA report shall be prepared in a matrix format and the compliance for each mitigation plan shall be submitted to RO, MoEF&CC along with a half yearly compliance report.

Standard EC Conditions for (Synthetic organic chemicals industry)

1.

S.No	EC Conditions
1.1	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
1.2	The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, and Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 and other rules notified under various Acts.
1.3	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
1.4	The overall noise levels in and around the plant area shall be kept well within the standards 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 the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
1.5	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
1.6	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
1.7	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom

S.No	EC Conditions
	suggestions/ representations, if any, were received while processing the proposal.
1.8	The project proponent shall also upload/submit six monthly reports on Parivesh Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
1.9	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted 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 along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.
1.10	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/Committee and may also be seen at Website of the Ministry and at https://parivesh.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 shall be forwarded to the concerned Regional Office of the Ministry.
1.11	The 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 start of the project.
1.12	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.

2. Specific Conditions

S.No	EC Conditions
2.1	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.