

BEFORE THE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI  
ORIGINAL APPLICATION NO. 141 OF 2023

Ganiseti Satyanarayana & Anr,

.....APPLICANT(S)

VERSUS

The Union of India

Represented by its Secretary,

MoEF&CC, New Delhi and Ors.

.....RESPONDENT(S)

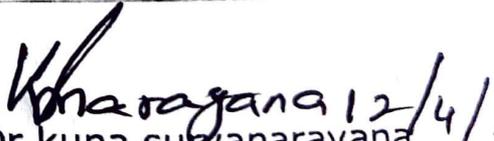
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Place: Vijayawada

Date: 12.04.2025

  
Dr. Kuna Suryanarayana  
COUNSEL, MOUF&CC,  
NGT, Chennai

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**REPLY AFFIDAVIT ON BEHALF OF RESPONDENT NO.1 i.e., THE UNION OF INDIA THROUGH ITS SECRETARY, MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE**

I, **Dr. Murali Krishna Chimata S/o Shri Srinivasulu Chimata (Late)**, aged about 43 years, presently working as Scientist - 'E' in the Ministry of Environment, Forest & Climate Change (hereinafter referred to as "MoEF&CC"), Government of India, at Sub-Regional Office, Vijayawada, do hereby, in my official capacity, solemnly affirm and state on oath as under:

1. That, I am acquainted with the facts and circumstances of the instant Original Application and duly competent to swear the present reply affidavit on behalf of the Ministry of Environment, Forest Climate Change based on the official records maintained therein.

  
डॉ. मुरली कृष्ण चिमटा/Dr. Murali Krishna Chimata  
वैज्ञानिक "ई"/Scientist "E"  
भारत सरकार/Government of India  
पर्यावरण, वन और जलवायु परिवर्तन मंत्रालय  
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उप-कार्यालय, विजयवाडा-520 010  
Sub-Office, Vijayawada-520 010

2. It is humbly submitted at the very outset that the contents of the Original Application unless specifically admitted, are denied to the extent that they are inconsistent with the submissions made hereinafter.
3. It is humbly submitted that the Applicant's grievance is that M/s. Ramky Pharma City Private Limited (now M/s Visakha Pharma City Limited) has violated its Environmental Clearance (hereinafter referred to as "EC") dated 10.03.2005, along with other consent conditions, by unlawfully discharging untreated effluents into nearby irrigation tanks, canals, and the Bay of Bengal. As a result, the water in these bodies has been contaminated, affecting both surface and groundwater. The Applicant further alleges that the Project Proponent (hereinafter referred to as "PP") is illegally excavating a large-scale pond near Thanam village, which may adversely impact the agriculture and groundwater in the surrounding areas. Furthermore, the Applicant is aggrieved that the affected villagers have not been rehabilitated.
4. It is humbly submitted that EC for the Pharma City Project at Parawada, Visakhapatnam District, Andhra Pradesh, was granted to M/s Ramky Pharma City (India) Pvt. Ltd. by the Answering Respondent vide letter no. J.12011/1/2004-IA (CIE) dated 10.03.2005. Subsequently, the project was also granted an EC for marine disposal of treated effluent from the proposed Pharma City near Lemarthy village, Parawada Mandal, Visakhapatnam District, to the Bay of Bengal near Tikkavanipalem Hamlet, Cheepurupalli West Village, Parawada Mandal, Hyderabad, vide EC letter no. 11-5/2006-IA.III dated 26.06.2006. Thereafter, the EC dated 10.03.2005 was transferred from M/s Ramky Pharma City (India) Pvt. Ltd. to M/s Visakha Pharma City



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Ltd. through a transfer EC dated 03.10.2022. Further, vide EC corrigendum dated 17.04.2023, the PP obtained approval from the Ministry for a change of correspondence address. Copies of the ECs dated 10.03.2005, 26.06.2006, and 03.10.2022, along with the corrigendum dated 17.04.2023, have been annexed herewith as **Annexure-R1/1**, **Annexure-R1/2**, **Annexure-R1/3**, and **Annexure-R1/4**, respectively.

5. It is humbly submitted that the Answering Respondent has been following a set procedure for Post EC Monitoring and Compliance of projects based on the Standard Operating Procedure (hereinafter referred to as "SoP") established vide Office Memorandum dated 25.11.2022. A copy of the O.M dated 25.11.2022 is annexed herewith as **Annexure-R1/5**.
6. It is humbly submitted that in light the above-mentioned SoP dated 25.11.2022, the Answering Respondent vide letter no. IA- L-11011/90/2023-IA-I dated 08.11.2023 requested the Sub-Office of the Ministry at Vijayawada to furnish a condition wise inspection report for the EC issued to the project along with a factual status report concerning the issues raised in the Application. A copy of the letter dated 08.11.2023 has been annexed herewith as **Annexure-R1/6**.
7. It is humbly submitted that the Sub-office Vijayawada submitted an inspection report vide letter no. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024, based on the inspection conducted on 30.08.2024. A copy of the Inspection report dated 19.09.2024 has been annexed herewith as **Annexure-R1/7**.

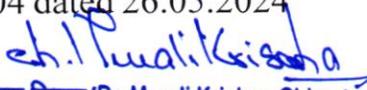
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8. It is humbly submitted that the inspection report submitted by the Sub-office Vijayawada was examined within the Ministry and it was observed that the Project Proponent has complied with all the conditions of the EC dated 10.03.2005 except for condition no. 10, which states "Rehabilitation works for the project-affected families will be provided as per the policies of the State Government of Andhra Pradesh." In order to address the pending compliance of EC condition no. 10, the Answering Respondent vide letter no. IA-L-11011/90/2023-IA-I dated 10.12.2024 directed the Project Proponent to submit a clarification/Action Taken Report (ATR) within 30 days from the date of issuance of the letter. A copy of the letter dated 10.12.2024 is annexed herewith as **Annexure-R1/8**.

9. It is further submitted that upon examination of the inspection report, it has been noted that in addition to EC compliance status, Sub-office Vijayawada has made the following observations which are relevant for overall environmental compliance at the site:

- i. That, M/s. Ramky Pharma City (India) Limited obtained permission as NoC from the Government of Andhra Pradesh (Environment, Forests, Science, and Technology Department) vide Letter No. 9768/SADA/2005 dated 06.01.2006, for the laying of pipeline for the discharge of treated effluents into the sea near Cheepurupalli (West) Village, passing through Coastal Relief Zone (hereinafter referred to as "CRZ") areas and Ministry vide its letter dated 26.06.2006 has accorded CRZ clearance for the same. Further, the PP has also obtained Public Liability Insurance (PLI) Policy from The New India Insurance Company vide Policy No. 9600 0036 2433 0000 0004 dated 26.05.2024 and the same is valid till 25.05.2025.

  
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- ii. The Jawaharlal Nehru Pharma City (JNPC) is a Pharma Special Economic Zone (SEZ), which was in operation with presence of around 100 pharma companies.
- iii. This belong to a Red-Category Pharma City Project housing hundreds of Pharmaceutical, Bulk Drug / API manufacturing units and located within close vicinity of residential villas with a proven history of accidents.
- iv. Based on the examination of the Safety Audit Report (2023) made available by the Project Proponent, Sub-office Vijayawada has noted that there were several vulnerable areas and points with probable potential hazards and the same were to be addressed immediately to avoid any further mishaps.
- v. Considering the history of occurrence of accidents leading to fatalities and fatal injuries to employees of pharmaceutical companies operating within the general ambit of EC issued to the Special Economic Zone (SEZ), appropriate initiatives by the Ministry/ Expert Appraisal Committee (EAC) is suggested by Sub-office Vijayawada w.r.t. around 100 units operating within SEZ on the basis CTO from APPCB under the prescribed policy. These are as follows:
  - a) Thorough Safety Audit by a team of qualified and expert professionals or agencies for identification and fixing of all vulnerable points in each company and in SEZ, which could be a potential hazard in future and may recommend appropriate safety measures.
  - b) Constitution of a Quick Disaster Response Team (QDRT) with a pool of multidisciplinary experts specifically trained for

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handling Pharmaceutical/ Chemical industrial hazards with adequate training, infrastructure and to be deployed on a 24x7 basis for immediate response for addressing any potential hazard as in this particular SEZ itself there are about 100 companies operating with CTO from APPCB.

10.It is further submitted that in view of the above mentioned examination and apprehensions highlighted by the Sub-office Vijayawada regarding 100 pharma industries (approx.) operating in the SEZ on the basis of CTO and without individual ECs, the Answering Respondent issued a letter dated 26.11.2024 requesting Andhra Pradesh Pollution Control Board (APPCB) to undertake detailed inspection and examine the compliance status of individual units in the SEZ and take appropriate action w.r.t. Consent to Operate (CTO) issued under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 as well as various authorizations issued under Waste Management Rules while also taking into consideration the observations of Sub-office Vijayawada in the matter. A copy of the letter dated 26.11.2024 is annexed herewith as **Annexure-R1/9**.

11.It is humbly submitted that in response to the Ministry's letter dated 10.12.2024 the PP had submitted an Action Taken Report vide letter dated 21.12.2024. A copy of the ATR dated 21.12.2024 has been annexed herewith as **Annexure-R1/10**.

12.It is humbly submitted that the ATR submitted by the PP was examined within the Ministry, and the following observations have been made:

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- i. During the transfer of EC from M/s Ramky Pharma City to M/s Vishakha Pharmacy Limited for the Pharma City Project at Parawada, M/s Vishakha Pharmacy Ltd. submitted an undertaking to accept all the terms and conditions of the EC dated 10.03.2005, granted to M/s Ramky Pharmacy. By providing this undertaking, M/s Vishakha Pharmacy became bound by the terms and conditions of the ECs dated 10.03.2005 and 03.10.2022. A copy of the undertaking submitted by M/s Vishakha Pharmacy Limited has been annexed herewith as **Annexure-R1/11**.
- ii. As per the ATR dated 21.12.2024, the PP has informed that Vishakha Pharmacy Limited (VPCL) is a Joint Venture project between Andhra Pradesh Industrial Infrastructure Corporation (APIIC) and Ramky Group. This project is developed on BOO (Build, Own, Operate) basis under PPP model (Public Private Partnership) for which a concession agreement is entered between the VPCL (Formerly known as Ramky Pharma City (India) Limited) and APIIC on 12-03-2004. Here, M/s Vishakha Pharmacy claims that as per clause 3.9 (a) of Concession Agreement dated 12.03.2004 executed between M/s Ramky Pharmacy and M/s APIIC, the latter warranted that they have no liability regarding any compensation or payment on account of land acquisition or rehabilitation and /or settlement of any persons affected thereby.
- iii. In this regard, as per examination in the Ministry, it is submitted that Clause 3.9 (a) of the Concession Agreement dated 12.03.2004 between M/s Ramky Pharmacy and Andhra Pradesh Industrial Infrastructure Corporation (APIIC) constitutes a mutual arrangement between the

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parties. However, compliance with the conditions of the EC is a statutory obligation, governed by the provisions of the Environmental Protection Act, 1986 and the EIA Notification, 2006, which hold precedence over private contractual agreements. Hence, M/s Ramky Pharmacy (now M/s Vishakha Pharmacy) has failed to rehabilitate the individuals affected by their project, constituting non-compliance with the specific conditions of the Environmental Clearance, as also noted in the monitoring report dated 19.09.2024.

13. It is humbly submitted that in furtherance of the above-cited observations, the Answering Respondent issued a Show Cause Notice under section 5 of the Environment (Protection) Act, 1986 for non-compliances observed w.r.t. the Pharma City Project to M/s Ramky Pharma City Pvt. Ltd. (now transferred to M/s. Visakha Pharmacy Limited). Further, the PP was directed to submit a response to this SCN within 15 days from the date of receipt of the notice. A copy of the SCN dated 27.02.2025 has been annexed herewith as **Annexure-R1/12**.

14. It is humbly submitted that in response to the SCN dated 27.02.2025, the PP has furnished a reply to the SCN vide letter dated 13.03.2025. A copy of the SCN response has been annexed herewith as **Annexure-R1/13**. This SCN response is under detailed examination in the Ministry for concluding action as per the prescribed procedure of compliance and monitoring.

15. In light of the above-stated facts and circumstances, it is most humbly prayed that the Hon'ble Court may kindly be pleased to take the present Reply Affidavit on record and may pass appropriate Order(s). direction(s) as deemed fit and proper under the facts and circumstances of the present case.

*Ch. P. Murali Krishna*  
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16. It is most humbly submitted that the Answering Respondent seeks leave to make additional submissions, if required, during the course of the proceedings.

*Ch. Murali Krishna*

**DEPONENT**

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**VERIFICATION**

I Dr. Murali Krishna Chimata, the above-named Deponent, do hereby verify that the contents of the above affidavit are true and correct to my knowledge as per the records of the Answering Respondent. No part of it is false and nothing material has been concealed there from.

Verified at Vijayawada on 11<sup>th</sup> April, 2025.

*Ch. Murali Krishna*

**DEPONENT**

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10  
No.J.12011/1/2004-IA (CIE)  
Government of India  
Ministry of Environment & Forests  
I.A. Division

Paryavaran Bhawan,  
CGO Complex, Lodhi Road,  
New Delhi-110003  
Tele fax: 011-24360695  
Dated: 10-3-2005

Dr. K.S.M. Rao,  
Managing Director,  
M/s Ramky Pharma City (India) Pvt. Ltd.  
Raj Bhawan Road, Somajiguda,  
Hyderabad-500082

**Sub: Environmental Clearance for Pharma City Project at Parawada,  
District Visakhapatnam, Andhra Pradesh**

Sir,

This has reference to your communications No.RPCIL/MoEF/04/2810 dated 28.10.04, enclosing EIA Report and other documents and subsequent letters dated 14.11.04, 28.12.04 & 24.1.05.

The Ministry of Environment and Forests has examined your application along with EIA/VEMP and other documents. It is noted that the proposal is for setting up Pharma City through the Nodal Agency, Andhra Pradesh Industrial Infrastructure Corporation Limited with the participation of private parties. The project has been awarded to Ramky Group. The project envisages industrial theme park providing manufacturing facilities for chemical, bulk drug and pharmaceutical industries. The Pharma City is located in Parawada Village, 24 Kms west of Visakhapatnam Town over an area of 862 ha of land with facilities encompassing **common infrastructure** (roads, power, water, drainage, etc.), **environment infrastructure** (effluent conveyance system, CETP, Marine Outfall, Common Hazardous Waste Management Facility, etc), **other facilities** (solvent recovery facilities, bulk container depots, etc.) and **social infrastructure** (banks, restaurants, hospitals etc.). The public hearing for the project was conducted at Parawada on 18<sup>th</sup> July 2004. The consent for establishment of Pharma City was awarded by APPCB on 22<sup>nd</sup> September, 04. Around 80 to 100 industrial units will be established in plot sizes from 2ha to 25 ha. Total water requirement for the project estimated at 70 MLD (70,000 cubic metres per day) for processes, power plant utilities and green belt uses. The source of water supply is the reservoir at Parawada which is part of the project proposal to bring Godavari water to Visakhapatnam through the Yeleru canal. Estimated cost of the project is approximately Rs.300 crores.

3. The Ministry of Environment & Forests hereby accords environmental clearance to the project under EIA Notification dated 27th January, 1994 as amended subsequently subject to compliance of the following conditions:

**A. SPECIFIC CONDITIONS**

- (i) Waste water generated from each industrial unit in the industrial estate will be provided with pre-treatment before further treatment in the CETP to comply with the treatment standards.
- (ii) Process Logical control system with contact stabilisation will be implemented for treatment of waste water.
- (iii) The quality of effluent from the CETP will be as per the standards laid down for disposal of treated industrial waste to Sea.
- (iv) The cyanide waste will be collected and treated separately using Hydrogen Peroxide in place of Chlorine.
- (v) Oil and grease will be removed; treated and disposed properly, both at the individual industry level and at the CETP level.
- ⌘ (vi) The bioassay test will be conducted before releasing the treated waste to Sea to ensure safety to marine life/ecology.
- ⌘ (vii) Guard pond of at least one day capacity will be provided to be used as buffer during emergency.
- (viii) The design of Marine Outfall for disposal of final treated effluent will conform to the recommendations of NIO.
- (ix) Automatic Monitoring System will be installed for proper evaluation of the status of environment and the functioning of various treatment units.
- (x) Rehabilitation works of the project affected families will be provided as per the policies of the State Government of Andhra Pradesh.
- RISK → (xi) Document on Risk analysis and Disaster plan will be prepared for onsite and offsite. This will include guide lines for awareness, First Aid, Handling and Storage of Hazardous Raw Materials, Fire Fighting Facility, modes of communication, etc.
- (xii) Sewer lines from each industry to CETP will be properly designed to prevent solid/sludge settling. Over and above provision of flush tanks will be made for clearing any chokes.
- (xiii) Hazardous solid waste will be disposed in properly designed secured landfill sites to prevent pollution of ground water.
- (xiv) Rain water harvesting will be done in the project area taking due precautions so that there is no pollution of the under ground water.
- (xv) To conserve water, the treated waste water will be recycled/reused as shown in the comprehensive water management plan Report.
- (xvi) Green belt will be provided with plantation of appropriate species of trees around the project area.
- (xvii) Flooding of site during monsoon and possibility of storm water getting contaminated with chemicals/spillages will be prevented by diverting storm water to natural drains.
- (xviii) Proper care will be taken to nullify the effect of odour nuisance.

- (xix) In the effluent treatment plant, devices for removal of oil and grease will be inserted.
- (xx) The project proponents will obtain requisite permission/authorisation from other concerned authorities such as the State Maritime Authority, VUDA, CRZ Authority regarding the respective marine outfall and the proposed structures in the CRZ.
- (xxi) Utilization of flyash in the construction of infrastructure of the various structures of the industrial units may be encouraged.
- (xxii) Industrial units which cannot provide bag filter for the boiler emission control shall obtain the required steam from common generation facility.
- (xxiii) The state of art technologies will be installed for flow measurement and characterization before releasing the discharge from a unit into the sewer system.
- (xxiv) The parameters for BOD, COD, TDS, Phenol, oil & grease, heavy metals and suspended solids will also be included besides pH in monitoring the treated effluent.
- (xxv) The arrangement for flushing and cleaning of sewers shall be such as to preclude settlement of solids in the sewage system.
- (xxvi) A condenser shall be installed to recover water from the disposal system of high TDS effluents. The condensate shall be used for the development and maintenance of green belt. In this connection, the project proponents shall furnish a flow diagram showing the water balance for the entire system.
- (xxvii) Wastes bearing cyanides, Persistent Organic Pollutants (POPs) and high concentration of metals shall not be allowed to be discharged into the sewer system but would be transported through tankers and given a batch treatment at the CETP.
- (xxviii) The Disaster Management Plan shall be prepared and submitted to the local authorities. The project proponent shall keep the Ministry informed about the progress in this regard.
- (xxix) Continuous monitoring should be carried out of the stack emissions from the Thermal Power Plant and the incinerator and also set up at least one Ambient Air Quality Monitoring Station with the capability to monitor hazardous air pollutants in addition to the normal air quality parameters. The continuous monitoring shall in due course be connected online to the State Pollution Control Board.
- (xxx) The project proponent is further advised to look into the following issues:
- (a) Safety and health of the workers at the CETP (Common Effluent Treatment Plant) and TSDF (Transport, Storage, Disposal Facility)
  - (b) Prevention of pollution from rain water entering from outside or coming from contaminated areas.
  - (c) Use of solar energy and wind power.
  - (d) Development of Disaster Management Plan including the cyclonic conditions.
  - (e) Setting up of Automatic Continuous Monitoring Stations for air quality at strategic points in at least three locations at 120 degree angle.
  - (f) Encourage units to take appropriate measures for controlling odour.

**B.GENERAL CONDITIONS**

- i) The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.
- ii) No further expansion or modifications of the industrial estate shall be carried out without prior approval of the Ministry of Environment & Forests. 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 to assess the adequacy of conditions imposed and to add additional environmental protection measures, if required.
- iii) The project proponent shall comply with all the environmental protection measures and safeguards recommended in the EIA report.
- iv) Six monthly monitoring reports should be submitted to the Ministry and its Regional Office, Bangalore for review.
- v) A separate Environmental Management Cell equipped with full fledged laboratory facilities and adequate manpower shall be set up to carry out the environmental management and monitoring functions
- vi) The project authorities shall provide adequate funds both recurring and non-recurring to implement the conditions stipulated by the Ministry of Environment & Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.
- vii) The implementation of the project vis-à-vis environmental action plans will be monitored by Ministry's Regional Office at Bangalore/ State Pollution Control Board / Central Pollution Control Board. A six monthly compliance status report shall be submitted to monitoring agencies.
- viii) The project proponent shall advertise in at least two local newspapers widely circulated in the region around the project, one of which shall be in the vernacular language of the locality concerned informing that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the State Pollution Control Board / Committee and may also be seen at website of the Ministry at <http://envfor.nic.in>. The advertisement shall be made within 7 days from the date of receipt of the clearance letter and a copy of the same should be forwarded to the Ministry's Regional Office at Bangalore.
- ix) The project authorities shall inform the Regional Office of the Ministry at Bangalore as well as the Ministry at New Delhi the date of financial closure and final approval of the project by the concerned authorities and the date of start of land development work. A set of all the documents should be forwarded to the Regional Office of the ministry to undertake monitoring of environmental clearance.

4. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.
5. The Ministry reserves the right to stipulate additional conditions, if found necessary. The company will implement these conditions in a time bound manner.
6. The above conditions will be enforced, interalia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management & Handling Rules 2003), and the Public Liability Insurance Act, 1991 along with their amendments and rules.
7. The project proponent should acknowledge the receipt of the environment clearance letter and convey their concurrence to all the conditions stipulated above within 15 days from the date of issue of this letter. In case there is no response from the proponent, it would be deemed to have been agreed to.

**(S.Shiva Kumar)**  
**Director (IA)**

Copy to:

1. The Principal Secretary (Environment & Forests, Science & Technology), Government of Andhra Pradesh, Hyderabad.
2. Chairman, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-office Complex, East Arjun Nagar, Shahdara, New Delhi-110 032
3. The Chairman, Andhra Pradesh Pollution Control Board, 2<sup>nd</sup> floor, HUDA Complex, Maitrivaram, S.R.Nagar, Amerpet, Opposite Sarathi Studio, Hyderabad-500 038
4. Chief Conservator of Forests, Regional Office (Southern), Kendriya Sadan, 4<sup>th</sup> floor, 17<sup>th</sup> Main Road, II Block, Koramangala, Bangalore-560 034.
5. Director, Monitoring Cell, MoEF, N.Delhi
6. Director, EI Division, MoEF

**(S.Shiva Kumar)**  
**Director (IA)**



No. 11-5/2006-IA.III  
Government of India  
Ministry of Environment and Forests  
(IA-III Division)

Paryavaran Bhavan,  
CGO Complex, Lodhi Road,  
New Delhi - 110003.

Dated the 26<sup>th</sup> June, 2006

**Sub: Marine disposal of treated effluent from the proposed Pharma City near Lemarthy village, Parawada Mandal in Visakhapatnam District to Bay of Bengal near Tikkavanipalem (H) Cheepurupalli West Village Parawada Mandal, Hyderabad by M/s Ramky Pharma City (India) Limited – regarding.**

\*\*\*\*

Reference is invited to letter No.9768/SADA/2005, dated 6.1.2006 and dated 9.1.2006 forwarded by Environment, Forests, Science and Technology Department, Government of Andhra Pradesh. Similarly, information furnished vide letters No.PCIL/MoEF/06/01.04, dated 1.4.2006 from M/s Ramky Pharma City (India) Limited have been considered. Andhra Pradesh State Coastal Zone Management Authority has recommended the project. National Institute of Oceanography has carried out the demarcation of High Tide Line, Low Tide Line and CRZ area including firming up of outfall point.

The project involves laying and operate an outfall pipeline to discharge treated effluents into the sea near Cheepurupalli (West) village of Parawada Mandal in Visakhapatnam District. The industrial park with a cluster of pharmaceutical industries including bulk drugs units will be developed over an area of 2127 acres of land. The proposed Pharma city is located at Lemarthy village of Parawada Mandal which is not falling in CRZ areas and lies 17 km from the High Tide Line of Bay of Bengal. Ministry of Environment and Forests has accorded EC to the project on 10.3.2005 subject to a number of conditions and safeguards. The proposed pipeline passes across the a salt creek and reaches the marine land fall point on the southern side of the Tikkavanipalem fishing hamlet of Cheepurupalli West Revenue village. The route of the proposed pipeline is passing through CRZ including No Development Zone of CRZ-III. The width of the inter tidal zone varied between 100 and 125 mts at this stretch. No ecologically sensitive areas such as mangroves or national parks are present in the vicinity of the proposed land fall point or along the route of the pipeline.

Taking into account the above facts, the Ministry hereby accords permission for operation of the treated effluents collection and disposal scheme of M/s M/s Ramky Pharma City (India) Limited subject to stringent implementation of the conditions laid down by, Environment, Forests, Science and Technology Department, Andhra Pradesh vide their letter No.9768/SADA/2005, dated 6.1.2006. Further, M/s Ramky Pharma City (India) Limited should ensure that:-

- (i) The facilities constructed for the project should not cause any inconvenience or disturbance to the local communities including the fisherman.
- (ii) Periodic monitoring (once in 2 days) of the water at the discharge point should be carried out to ensure that the effluent discharged are within the norms laid down by the Andhra Pradesh State Pollution Control Board. The above analysis report should be submitted to Andhra Pradesh State Pollution Control Board for necessary action.
- (iii) The project proponent should ensure that no leakage or discharge of the effluent takes place in the Uppanar river.
- (iv) Any change in alignment or expansion of the project should be taken up only after obtaining necessary approvals from the concerned agencies.

- (v) Six monthly status report including effluent quality data etc., should be submitted to Ministry's Regional Office at Bangalore.

The above mentioned stipulations will be enforced among others under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (protection) Act, 1986, the Hazardous Chemicals (Manufacture, Storage and Import) Rules, 1989, the Coastal Regulation Zone Notification, 1991 and its subsequent amendments and the Public Liability Insurance Act, 1991 and the Rules made thereunder from time to time. The project proponents should also ensure that the proposal complies with the provisions of the approved Coastal Zone Management Plan of Andhra Pradesh and the Supreme Court's order dated 18<sup>th</sup> April, 1996 in the Writ Petition No.664 of 1993 to the extent the same are applicable to this proposal.

(Dr. N. H. Hosabettu)  
Director

To

**Director,**  
M/s Ramky Infra consulting Private Limited,  
RAMKY House, Rajbhavan Road,  
Somajiguda, Hyderabad - 500082.

Copy for information to:

- ✓ 1. Chief Conservator of Forests, Ministry of Environment & Forests, Regional Office (SZ), Kendriya Sadan, 4<sup>th</sup> Floor, E&F Wings, 17<sup>th</sup> Main Road, 1 Block, Koranmangla, Bangalore - 560034.
2. The Chairman, Central Pollution Control Board, Parivesh Bhavan, CBD-cum-Office Complex, East Arjun Nagar, Delhi - 110032.
3. Shri T. S. Chatterjee, IAS, Principal Secretary, Government of Andhra Pradesh, Environment Forests Science and Technology Department, Secretariat, Hyderabad - 500022.
4. The Chairman, Andhra Pradesh State Pollution Control Board, 2<sup>nd</sup> Floor, Maitrivanam, Huda Complex, S. R. Nagar, Hyderabad - 500038.
5. DIG (SU), Regional Office Cell, Ministry of Environment & Forests, New Delhi.
6. Guard File.
7. Monitoring Cell
8. Director (EI), Ministry of Environment & Forests, New Delhi.

*Dr. N. H. Hosabettu*  
(Dr. N. H. Hosabettu)  
Director

**F.No.J-12011/1/2004-IA (CIE)**

Government of India

Ministry of Environment, Forest and Climate Change

(Impact Assessment Division)

Indira Paryavaran Bhawan,  
Jor Bagh Road, Ali Ganj  
New Delhi – 110 003**Dated: 3<sup>rd</sup> October, 2022**

To,

**M/s Visakha Pharmacy Limited**2<sup>nd</sup> Floor, Corporate Bhawan, GSI Post Tattiannaram,  
Bandlaguda, Nagole, Hyderabad,  
Telangana, India-500068.**Subject: Transfer of Environmental Clearance titled environmental clearance from M/s Ramky Pharma City (India) Pvt. Ltd to M/s Visakha Pharmacy Limited for Pharma City Project at Parawada, District Vishakhapatnam, Andhra Pradesh.**

Sir,

Reference is invited to your online proposal no. IA/AP/NCP/278671/2022 dated 17<sup>th</sup> June 2022 seeking Transfer of environmental clearance titled 'Environmental Clearance for Pharma City Project at Parawada, District Vishakhapatnam, Andhra Pradesh vide letter no. J-12011/1/2004-IA (CIE) dated 10.03.2005' From M/s Ramky Pharma City (India) Pvt.Ltd to M/s Visakha Pharmacy Limited.

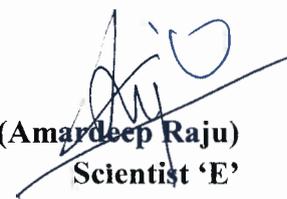
2. The Ministry of Environment, Forest and Climate Change (MoEF&CC) has examined the request submitted by you. It is noted that the name of the company has changed.

3. It is also noted that following documents have been submitted for the transfer of Environmental Clearance.

- i. Form No.7 for transfer of Environmental clearance.
- ii. Copy of the Environmental Clearance letter no.J-12011/1/2004-IA (CIE) dated 10.03.2005 granted for Pharma City Project at Parawada, District Vishakhapatnam, Andhra Pradesh.
- iii. Copy of No Objection Certificate (NoC) dated 02.09.2022 of M/s Ramky Pharma City (India) in a non judicial stamp paper for change the name of the environmental Clearance letter J-12011/1/2004-IA (CIE) dated 10.03.2005 to M/s Visakha Pharmacy Limited for unit situated at Jawaharlal Nehru Pharmacy City, Parawada Mandal, Vishakhapatnam.
- iv. Undertaking dated 07.09.2022 of M/s Visakha Pharmacy Limited in a non judicial stamp paper stating that they will be complying with the environmental safeguards mentioned in the environmental clearance letter dated 10.03.2005.
- v. Copy of Intimation letter no nil dated 23.05.2022 from Managing Director stating that Ramky Pharma City (India) Ltd will now conduct its business & operations under the name and title of Visakha Pharmacy Limited with effect from April 28, 2022 and submitted that this is only name change.

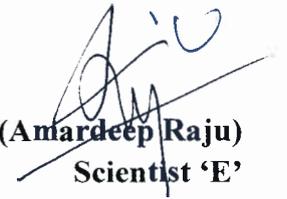
- vi. Certificate of incorporation pursuant to change of name from M/s Ramky Pharma City (India) Pvt. Ltd to M/s Visakha Pharmacy Limited issued by the Registrar of Companies, Hyderabad Telangana vide certificate dated 28.04.2022.
4. This Ministry has no objection for transfer of Environmental Clearance accorded vide letter no. J-12011/1/2004-IA (CIE) dated 10.03.2005 from M/s Ramky Pharma City (India) Pvt.Ltd to M/s Visakha Pharmacy Limited subject to satisfactory compliance to all stipulated specific and general conditions. You are also requested to obtain 'Concent to Operate' from the Andhra Pradesh Pollution Control Board in the name of M/s Visakha Pharmacy Limited.
5. M/s Visakha Pharmacy Limited shall comply with all specific and general conditions stipulated in the Environmental Clearance letter of even no. dated 10.03.2005.
6. The name change is being granted for the original proposals for which Environmental Clearance dated 10.03.2005 was granted earlier.
7. The project proponents will not make any changes in the project nature, structure or configuration and limit themselves to activities for which the Environmental clearance has been given earlier and the activities completed within the validity period of earlier EC dated 10.03.2005.
8. In case, there is a change in the scope of the project, fresh Environmental Clearance shall be obtained.

This issues with the approval of the Competent Authority.

  
(Amardeep Raju)  
Scientist 'E'

Copy to:

1. The Principal Secretary, Department of Environment, Forest, Science & Technology, Government of Andhra Pradesh, Hyderabad, A.P.
2. The Member Secretary, AP Pollution Control Board, Chalamalavaii Street, Kasturibaipet, Vijayawada - 520 010.
3. The Chairman, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi -32.
4. The Additional Principal Chief Conservator of Forests (C), Aranya Bhavan, K.M. Munshi Road, Nagarampalem, Guntur-522004, Andhra Pradesh.
5. Monitoring Cell, MoEF&CC, Indira Paryavaran Bhavan, New Delhi.
6. Guard File/Record File.
7. Notice Board.

  
(Amardeep Raju)  
Scientist 'E'

**File No. J-12011/1/2004-IA (CIE)**  
**[Proposal No. IA/AP/NCP/296926/2023]**  
 Government of India  
 Ministry of Environment, Forest and Climate Change  
 (Impact Assessment Division)

Indira Paryavaran Bhawan,  
 JorBagh Road, Aliganj  
 New Delhi - 110 003

**Dated: 17<sup>th</sup> April, 2023**

To

M/s Visakha Pharmacy Limited,  
 Ramky Grandiose, 15<sup>th</sup> Floor, Sy No.136/2 & 4,  
 Gachibowli, Hyderabad, Telangana-500032.

**Subject: Change of address in the letter of Transfer of Environmental Clearance titled environmental clearance from M/s Ramky Pharma City (India) Pvt. Ltd to M/s Visakha Pharmacy Limited for Pharma City Project at Parawada, District Vishakhapatnam, Andhra Pradesh– Corrigendum reg.**

Sir,

This has reference to the your proposal no IA/AP/NCP/296926/2023 received on 03<sup>rd</sup> February, 2023 through PARIVESH Portal seeking corrigendum in Transfer of Environmental Clearance issued vide letter no J-12011/1/2004-IA (CIE) dated 3<sup>rd</sup> October, 2022.

**Details Submitted by Project proponent**

- i. Environmental Clearance for Pharma City Project at Parawada, District Vishakhapatnam, Andhra Pradesh was granted by the Ministry to M/s Ramky Pharma City (India) Pvt. Ltd vide letter no.J-12011/1/2004-IA (CIE) dated 10.03.2005.
- ii. Subsequently, Environmental Clearance was transferred from M/s Ramky Pharma City (India) Pvt. Ltd to M/s Visakha Pharmacy Limited vide letter dated 3<sup>rd</sup> October, 2022.
- iii. Now PP has requested to change the address from M/s Visakha Pharmacy Limited 2nd Floor, Corporate Bhawan, GSI Post Tattiannaram, Bandlaguda, Nagole, Hyderabad, Telangana, India-500068. To M/s Visakha Pharmacy Limited, Ramky Grandiose, 15<sup>th</sup> Floor, Sy No.136/2 & 4, Gachibowli, Hyderabad, Telangana-500032.

**Decision of MoEF&CC**

4. The MoEF&CC has examined the proposal in accordance with the Environment Impact Assessment (EIA) Notification, 2006 & further amendments thereto and noted that project proponent has requested for change in the address without change in the project nature, structure or configuration and limit to activities for which the Environmental clearance was accorded vide letter dated 10.03.2005. After examination of the instant proposal of M/s Visakha Pharmacy Limited, the Ministry hereby decided to issue



corrigendum to the Transfer of Environmental Clearance letter dated 3<sup>rd</sup> October, 2022 w.r.t. factual corrections in the said transfer of EC letter. The revised address shall be read as

“M/s Visakha Pharmacity Limited, Ramky Grandiose, 15<sup>th</sup> Floor, Sy No.136/2 & 4, Gachibowli, Hyderabad, Telangana-500032”.

5. All other terms and Conditions mentioned in the Environmental Clearance letter no. J-12011/1/2004-IA (CIE) dated 3<sup>rd</sup> October, 2022 shall remain unchanged.
6. The PP shall obtain fresh Environment Clearance in case of change in scope of the project if any.
7. This issues with the approval of the Competent Authority.

  
(Amardeep Raju)  
Scientist 'E'

Copy to:

- I The Principal Secretary, Department of Environment, Forest, Science & Technology, Government of Andhra Pradesh, Hyderabad, A.P.
- II The Member Secretary, AP Pollution Control Board, Chalamalavaii Street, Kasturibaipet, Vijayawada - 520 010.
- III The Chairman, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi -32.
- IV The Additional Principal Chief Conservator of Forests (C), Aranya Bhavan, K.M. Munshi Road, Nagarampalem, Guntur-522004, Andhra Pradesh.
- V Monitoring Cell, MoEF&CC, Indira Paryavaran Bhavan, New Delhi.
- VI Guard File/Record File.
- VII Notice Board.

  
(Amardeep Raju)  
Scientist 'E'

S.No. J-12011/1/2004-1A (CIE)

21

Speed Post



सूचना  
का अधिकार

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भारत सरकार सेवार्थ  
ON INDIA GOVERNMENT SERVICE

75  
आज़ादी का  
अमृत महोत्सव



To,  
M/s Visakha Pharmacy Limited,  
Ramky Grandiose, 15<sup>th</sup> floor, Sy No. 136/2 & 4,  
Nachibolli, Hyderabad, Telangana - 500032.

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय  
इंदिरा पर्यावरण भवन, जोर बाग रोड, अलिगंज, नई दिल्ली-110003  
Ministry of Environment, Forest and Climate Change  
Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj, New Delhi-110003

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भारत सरकार सेवार्थ  
Date: \_\_\_\_\_  
By: \_\_\_\_\_  
In Charge



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\* Indicates a required field.

\* Consignment Number

ED297227805IN

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Booked At	Booked On	Destination Pincode	Tariff	Article Type	Delivery Location	Delivery Confirmed On
Lodi Road HO	20/04/2023 17:14:03	500032	41.30	Inland Speed Post	Manuu S.O	24/04/2023 17:46:47

### Event Details For : ED297227805IN

#### Current Status : Item Delivery Confirmed

Date	Time	Office	Event
24/04/2023	17:46:47	Manuu S.O	Item Delivery Confirmed
24/04/2023	14:28:47	Manuu S.O (Beat Number:4)	Item Delivered [To: sag (Security Personnel) ]
24/04/2023	11:35:30	Manuu S.O	Out for Delivery
23/04/2023	10:24:47	Hyderabad NSH	Item Received
22/04/2023	02:49:46	Delhi AP TMO	Item Dispatched
22/04/2023	00:23:01	Delhi AP TMO	Item Received
21/04/2023	23:47:18	New Delhi NSH	Item Dispatched
21/04/2023	23:12:10	New Delhi NSH	Item Bagged
21/04/2023	20:25:45	New Delhi NSH	Item Received
20/04/2023	17:14:03	Lodi Road HO	Item Booked

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**DIN # 3293**



**Project Code**

100 - CO

DIN	Doc Source	Doc Type
3293	Inward	Correspondence

Date On Doc	Sent On	Received On
17-04-2023	20-04-2023	24-04-2023

No. Of Pages	From Whom
1	Govt of India, Ministry of Environment, Indira Paryavaran Bhawan, New Delhi

To Whom
Visakha Pharmacity Ltd

Through	Reference No
Courier	J-12011/1/2004-IA (CIE)

Number Of Annexure	Annexure Type
0	N/A

Keywords
-

Subject
Change of address in the letter of transfer of environmental clearance titled environmental clearance from Ramky Pharma city pvt ltd to Visakha Pharmacity Ltd for Pharma city Project

Am

**IA-J-11014/112/2022-IA-I**  
**Government of India**  
**Ministry of Environment, Forest & Climate Change**  
**Impact Assessment Division**

\*\*\*

Indira Paryavaran Bhavan,  
Jor Bagh Road, New Delhi-110 003  
Dated: 25<sup>th</sup> November, 2022

**Office Memorandum**

**Sub:- Standard Operating Procedure (SOP) for Post Environmental Clearance Monitoring and Compliance of the project -reg.**

**Background**

The Ministry has established 19 Integrated Regional Office (IROs) vide Notification No. 1-5/2013-ROHQ dated 13<sup>th</sup> August, 2020 with a view to achieving mandated outcomes related to Monitoring and Compliance of the project in an improved, timely and effective manner.

2. As far as monitoring and compliance of EC conditions are concerned, as per para 10 of the EIA Notification, 2006, it is mandatory for the project proponent to submit half-yearly compliance reports in respect of the stipulated EC conditions to the Ministry and its Integrated Regional Offices (IROs).

**The prescribed SOP wrt the Monitoring & Compliance is as given below:**

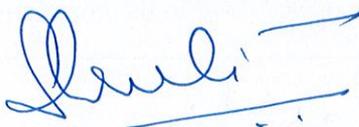
**1. IROs undertake inspection of the unit, with respect to the following scenarios:**

- i. IRO identifies ambiguity in half-yearly compliance reports with respect to the stipulated EC conditions submitted by Project Proponent (PP).
- ii. PP request IRO for issuance of Certified Compliance Report (CCR) in order to apply for expansion of the project under EIA, Notification 2006.
- iii. Complaint received against the project.
- iv. Direction from the Ministry based on PMO/VIP/PG/RTI etc. references.
- v. Random Inspection of projects.
- vi. Direction from Hon'ble court in various Court Matter.

2. Based on the observations during Monitoring IRO seeks Clarification/Action Taken Report (ATR) to the PP and submit Monitoring Report along with the clarification letter to the Ministry.

3. If PP fails to respond to it a reminder letter is sent by IA-Monitoring Cell allowing PP to submit ATR in 15 days.

4. **Action on the Monitoring Report by the Monitoring Cell:** Monitoring Cell of Ministry analyse the monitoring report submitted by IRO. Based on the observed Major and Minor partial/non-compliances clarification/ATR, if necessary, is sought from Project Proponent with direction to submit the response within a period of Thirty (30) days. If PP fails to submit the response of clarification/ATR letter within the time line period, a reminder letter as warning issued to the PP.



5. The response submitted by PP is examined in the Ministry and the Action taken report submitted by PP is sent to IRO for further verification. Based on IRO's verification report following actions are contemplated:

- i. If no satisfactory action has been taken by the PP and EC conditions are yet to be complied Ministry may issue Show-Cause Notice under the Section 5 and other provisions which may include Section 15 and 19 of the Environment (protection) Act, 1986.
- ii. If it is observed that the non-compliances are not rectified, Ministry provides an opportunity to PP for clarification in personal hearing under the chairmanship of officer not below the rank of Joint Secretary. Based on the outcome of the personal hearing if necessary, direction for Compensation/Suspension of EC may be issued.
- iii. If it is observed that PP has taken credible action to comply with the condition and the action is expected to be completed with some additional time, Ministry grant additional time in which actions are expected to be completed by PP to fully comply with the conditions mentioned in the EC and submit the compliance report duly verified by concerned IRO to the Ministry.
- iv. If it is observed that PP has now complied with all the conditions and the same has been confirmed in the verification report, Ministry issues Action Closure Letter (ACL) to the PP with direction to continuously submit six monthly compliance report on time.
- v. If it is observed that PP has violated the provisions of EIA Notification, 2006 and attracts the provisions of SOP dated 07.07.2022, Monitoring Cell intimates the concerned sector for taking appropriate action as deem fit.

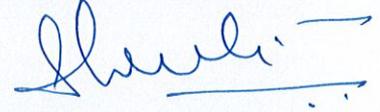
#### 6. Action after issuance of Show Cause Notice:

- i. Monitoring Cell of the Ministry prescribes a time line of Fifteen (15) days or Thirty (30) days for submission of reply of SCN based on the gravity of non-compliances. If PP fails to submit the response of SCN within the prescribed time period, if necessary, a warning letter may be issued.
- ii. The response to SCN submitted by PP is examined in the Ministry and if found necessary the reply submitted by PP is sent to IRO for further verification. Based on IRO's verification report following actions are contemplated:
  - a) If it is observed that PP has now complied with all the conditions and the same has been confirmed in the verification report, Ministry issues ACL to the PP with direction to continuously submit six monthly compliance report on time.
  - b) If it is observed that the non-compliances are not rectifiable, Ministry provides an opportunity to PP for clarification during personal hearing under the chairmanship of officer not below the rank of Joint Secretary. Based on the outcome of the personal hearing if necessary, direction for Compensation/Suspension of EC may be issued.

#### 7. Action in other scenarios:

- i. If it is observed that there is imminent risk to the environment and health due to noncompliance by the PP, SCN with time line of Fifteen (15) days is issued to PP. If PP fails to submit the response of SCN within the prescribed time period, if necessary

- a warning letter may be issued otherwise after Fifteen (15) days personal hearing may be conducted under the chairmanship of officer not below the rank of Joint Secretary.
- ii. Based on the outcome of the personal hearing if necessary, direction for Suspension of EC or other prescribed action under EPA may be issued.
- iii. If it is observed that due to non-compliance, accident has already been taken place, Ministry may immediately suspend the EC of the project till all the conditions are complied and duly verified by concerned IRO.



**(Dr. Shruti Rai Bhardwaj)**  
**Addl. Director/Scientist 'E'**

Encl.: As above

To,  
All Concerned

Copy for information to:

1. PS to Hon'ble Minister for Environment, Forest and Climate Change
2. PS to Hon'ble MoS (EF&CC)
3. PPS to Secretary (EF&CC)
4. PPS to DGF&SS (EF&CC)
5. PPS to AS (TK)/PPS to JS(SKB)
6. Guard File/Spare Copies
7. US(IT)/Consultant(IT)

By Speed Post



**F. No. IA-L-11011/90/2023-IA-I**  
**Government of India**  
**Ministry of Environment, Forest and Climate Change**  
**(I.A. Division)**

**Indira Paryavaran Bhavan**  
**Jor Bagh Road, Aliganj**  
**New Delhi-110 003**  
**Email: bhardwaj.adiraju@gov.in**  
**Dated: 8<sup>th</sup> November, 2023**

To,

**The Deputy Director General of Forests (C),**  
 Ministry of Environment, Forest and Climate Change,  
 Sub-Regional Office,  
 Vijayawada, Green House Complex,  
 Gopalareddy Road, Vijayawada-520010,  
 Andhra Pradesh

**Sub: OA No. 141/2023 in the matter of Ganiseti Satyanarayana & Anr. vs. Union of India & Ors.- reg.**

**Ref: i. Ministry's EC letter No. J-12011/1/2004-IAII(M) dated 10.03.2005.**

This is in reference to the matter pertaining to the O.A. 141 of 2023 in 'Ganiseti Satyanarayana & Anr. Vs. Union Of India & Ors.' before the National Green Tribunal (SZ), at Chennai, wherein the petitioner has alleged that the M/s. Ramky Pharma City has violated the Environmental Clearance (EC) discharging effluents from their plant into local village, irrigation tanks, canals and the sea.

2. Environmental Clearance has been issued to the project by Ministry vide letter dated J-12011/1/2004-IA.II (M) dated 10.03.2005.
3. In this regard, it is requested to furnish the condition-wise inspection report w.r.t EC issued to the project and factual status report w.r.t allegations made by the petitioner.
4. Being a court matter, the information may be provided at the earliest.

This issues with the approval of the Competent Authority.

Encl: As above

**(Dr. Bhardwaj Adiraju)**  
**Joint Director/Scientist 'D'**

Copy to:

1. Deputy Director General of Forests (C), Integrated Regional Office, CHENNAI, 1<sup>st</sup> and II<sup>nd</sup> Floor, Handloom Export Promotion Council, 34, Cathedral Garden Road, Nungambakkam, Chennai - 34.
2. Member Secretary, Infra, Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhawan, Jor Bagh Road-110003.

**(Dr. Bhardwaj Adiraju)**  
**Joint Director/Scientist 'D'**



भारत सरकार / GOVERNMENT OF INDIA

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय / MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE  
उप-कार्यालय, विजयवाड़ा / SUB-OFFICE, VIJAYAWADA

E-File No. SO/VIJ/EPA/EC-A/101/10-131/2024 **1465**

19.09.2024

To

The Member Secretary,  
Expert Appraisal Committee (Infra-II Sector, IA-III),  
Impact Assessment Division,  
Ministry of Environment, Forest and Climate Change,  
Government of India,  
3rd Floor, Vayu Wing, Indira Paryavaran Bhawan  
Aliganj, Jor Bagh Road, New Delhi - 110 003  
E-mail: [munna.shah@gov.in](mailto:munna.shah@gov.in)

**Sub: Issue of Certified Compliance Report (CCR) to M/s. Visakha Pharmacy Limited (Earlier known as M/s. Ramky Pharma City (India) Pvt Ltd--Reg**

**Ref: Ministry's Letter dated 08.11.2023, 05.03.2024, 01.08.2024 and 02.08.2024 in matters relating to OA No. 141 of 2023 (NGT-SZ) and OA No. 130 of 2024 (NGT-SZ)**

Sir,

Please find attached Inspection Report of M/s. Visakha Pharmacy Limited (earlier known as M/s. Ramky Pharma City (India) Pvt Ltd who have obtained EC from Ministry vide EC No. J-12011/1/2004-IA (CIE) dated 10.03.2005 and EC. No. 11-5/2006-IA.III dated 26.06.2006 (Marine Disposal), Corrigendum on 17.04.2023 and another EC from SEIAA, Andhra Pradesh on 28.06.2024.

2. This project was inspected by the undersigned on 30.08.2024 and during inspection, it was noted that this **SEZ WAS IN OPERATION WITH PRESENCE OF AROUND 100 PHARMA COMPANIES.**

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

Yours faithfully,

*Dr. Murali Krishna*

(Dr. Murali Krishna)

Additional Director (S)/ Scientist-E

**Copy for Information and Necessary Action:**

1. The Director, Monitoring Division (IA), Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhawan, Jor Bagh, New Delhi-110 003 (E-mail: [moefcc-monitoring@gov.in](mailto:moefcc-monitoring@gov.in))
2. Regional Director, CPCB, 2<sup>nd</sup> Floor, 40-E, BSNL Building, TVK Industrial Estate, CIPET Road, Guindy, Chennai-600 032 (E-mail: [rdchennai.cpcb@gov.in](mailto:rdchennai.cpcb@gov.in))
3. The District Collector, Collectorate, Vizianagaram, Andhra Pradesh- 535 003 (E-mail: [collector\\_vznm@ap.gov.in](mailto:collector_vznm@ap.gov.in))
4. The Member Secretary, Andhra Pradesh Pollution Control Board, Dr. YSR Paryavaran Bhawan, APIIC Colony Road, Gurunanak Colony, Autonagar, Vijayawada- 560 007 (E-mail: [membersecy@appcb.gov.in](mailto:membersecy@appcb.gov.in))
5. The Managing Director, M/s. Visakha Pharmacy Limited, Ramky Grandiose, 15<sup>th</sup> Floor, Sy. No. 136/2 & 4, Gachobowli, Hyderabad-500 032.

*Dr. Murali Krishna*

(Dr. Murali Krishna)

Additional Director (S)/Scientist-E

**Address:** Green House Complex, Gopal Reddy Road, Vijayawada, Andhra Pradesh- 520 010

**Office:** 0866- 2419788 **E-Mail:** [cm.krishna@gov.in](mailto:cm.krishna@gov.in) & [iro.vijayawada-mefcc@gov.in](mailto:iro.vijayawada-mefcc@gov.in)

**GOVERNMENT OF INDIA**  
**Ministry of Environment, Forest & Climate Change**  
 (Sub-Office, Vijayawada)  
 Andhra Pradesh-520 010

\*\*\*\*\*

INSPECTION REPORT

E-File No. SO/VIJ/EPA/EC-A/101/10-131/2024

1	Name of the project	Environmental Clearance for Pharma City Project at Parawada, District Visakhapatnam, Andhra Pradesh to M/s. Ramky Pharma City (India) Pvt. Ltd
2	Environmental Clearance Details	1) EC No. J-12011/1/2004-IA (CIE) dated 10.03.2005 2) Government of A.P (Environment Forests Science and Technology Department) Lr. No. 9768/SADA/2005 dated 06.01.2006. 3) EC No. 11-5/2006-IA.III dated 26.06.2006 (Marine Disposal) 4) Transfer of EC from M/s. Ramky Pharma City (India) Pvt. Ltd to M/s. Visakha Pharmacity Limited vide EC No. J-12011/1/2004-IA (CIE) dated 03.10.2022. 5) Corrigendum for Change of Address in EC Vide No. J-12011/1/2004-IA (CIE) dated 17.04.2023. 6) SEIAA/AP/AK/INFRA2/02/2024/241.27/241.20 dated 28.06.24
3	Address for Correspondence	The Managing Director, M/s. Visakha Pharmacity Limited, Ramky Grandiose, 15 <sup>th</sup> Floor, Sy. No. 136/2 & 4, Gachibowli, Hyderabad, Telangana- 500 032
4	Date of site visit for this report	30.08.2024
5	Type of Project	Pharma City Special Economic Zone (SEZ) and Common Hazardous Waste Treatment Facility/ Common Effluent Treatment Facility

**BRIEF ON THE PROJECT ALONG WITH THE PRESENT STATUS:**

M/s. Visakha Pharmacity Limited (Earlier M/s. Ramky Pharma City (India) Pvt Ltd had obtained Environmental Clearance (EC) from the Ministry vide EC No. J-12011/1/2004-IA (CIE) dated 10.03.2005 and later obtained Transfer of EC on 03.10.2022 from M/s. Ramky Pharma City (India) Pvt Ltd to M/s. Visakha Pharmacity Limited. Subsequently vide EC Corrigendum on 17.04.2023, PP has obtained approval from the Ministry for change of correspondence address. Based on examination of EC dated 10.03.2005, it is noted that this project was envisaged for setting up of a Pharma City through the Nodal Agency, Andhra Pradesh Industrial Infrastructure Corporation Limited (APIIC) with the participation of private parties on a Public Private Partnership (PPP) Model, which was awarded to Ramky Group. The project mainly envisaged industrial theme park providing manufacturing facilities for chemical, bulk drug and pharmaceutical industries in Parawada Village, 24 Kms West of Visakhapatnam town over an area of 862 ha of land with facilities encompassing Common Infrastructure (roads, power, water, drainage etc.) environmental infrastructure (effluent conveyance system, CETP, Marine Outfall, Common Hazardous Waste Management facility etc.) and other facilities (solvent recovery facilities, bulk container depots etc.) and Social Infrastructure (banks, restaurants, hospitals etc.). The Public hearing of the project was conducted at Parawada on 18.07.2004. The Consent for the establishment of Pharma City was awarded by APPCB on 22<sup>nd</sup> September 2004. Around 80-100 industrial units were envisaged to be established in various plot sizes ranging from 2 Ha to 25 Ha. Total water requirement for the project was estimated at 70 MLD (70,000 cubic meters per day) for processes, power plant utilities and green belt uses. The source of water supply is the reservoir at Parawada which is part of the project proposal to bring Godavari water to Visakhapatnam through the Yeleru canal. The estimated cost of the project was around Rs. 300 Crores.

*Ch. Prasad Krishna*

Based on verification of records made available by PP, it is also noted that M/s. Ramky Pharma City (India) Limited has obtained permission from Government of Andhra Pradesh (Environment Forests Science and Technology Department) vide Letter No. 9768/SADA/2005 dated 06.01.2006 obtained NOC for laying of pipeline for discharge of treated effluents into the sea near Cheepurupalli (West) Village passing through CRZ areas and Ministry vide its Letter dated 26.06.2006 accorded CRZ clearance for the same.

This project site was inspected on 30.08.2024 and during the visit it was noted that, there are 2 Pending Original Applications (OA's) before **The Hon'ble National Green Tribunal (NGT), Southern Bench, Chennai vide OA No. 141 of 2023 (SZ) titled Gannisetti Satyanarayana & Anr Vs Union of India, wherein Ministry is Respondent No.1.** Further, it is also noted that there is another OA No. 130 of 2024 titled **Boddapalli Apparao Vs Union of India & Ors, wherein Ministry is Respondent No.1.** Accordingly, based on the directions of the Ministry vide DO Letter dated **08.11.2023, 05.03.2024, 01.08.2024 and 02.08.2024** wherein, Sub-Office, Vijayawada was directed for submission of a Factual Status / Certified Compliance Report (CCR) of EC Conditions.

Further, it was noted that this project was inspected earlier also by the then Scientist posted in Sub-Office, Vijayawada during April 2024, but inspection report couldn't be furnished to Ministry for filing Counter Affidavit and accordingly, the undersigned based on the directions of the Competent Authority, re-inspected the project site on 30.08.2024 and based on the documents made available during and after the inspection for establishing compliance to EC conditions by the PP and as verified during the physical inspection of the project site, an inspection report is prepared detailing point wise compliance to EC conditions.

Further, PP has also taken Public Liability Insurance (PLI) Policy from The New India Insurance Company vide Policy No. 9600 0036 2433 0000 0004 dated 26.05.2024 and the same is valid till 25.05.2025.

Since this being a Red-Category Pharma City Project housing hundreds of Pharmaceutical, Bulk Drug / API manufacturing units and located within close vicinity of residential villages with a proven history of accidents, PP is directed to ensure periodical conduct of Safety Audit /Trainings to Staff and Employees on aspects related to Safety, Disaster Management and Emergency Response Procedures and copies of the Risk Assessment, Disaster Management and Safety Audit Reports may also be shared with concerned local enforcement agencies like District Collector, APPCB, Boilers Inspector, Factories Inspector, Fire Services Department etc. who are responsible for ensuring the Safety and Disaster Management aspects and suitably empowered under various Acts like Environment (Protection) Act, 1986, The Air (Prevention and Control of Pollution) Act, 1981; The Water (Prevention and Control of Pollution) Act, 1974 etc. to take appropriate action as per Law.

*Ch. P. Prudhvi Krishna*

## POINT WISE COMPLIANCE STATUS TO ENVIRONMENTAL CLEARANCE (EC) CONDITIONS

SPECIFIC CONDITIONS		
S. No	EC CONDITION	STATUS OF COMPLIANCE
1	Wastewater generated from each industrial unit in the industrial estate will be provided with pre-treatment before further treatment in the CETP to comply with the treatment standards.	<p><b>Being Complied</b></p> <p>Based on verification of records it is noted that PP has established CETP of 9.5 MLD which includes HTDS of 2.5 MLD and LTDS of 7.0 MLD. At present there are around 96 companies consisting mostly of chemical and pharmaceutical (bulk drugs and APIs) including R&amp;D facilities. Further, PP informed that all the units established in this SEZ carry out pre-treatment before letting the effluent to CETP. <u>However, it is not known whether all individual units have their pre-treatment facilities in their units or not as most of the companies are operating without EC in Pharmacy.</u></p> <p>Examination of average values of last 5 months (March to July 2024) of effluent received viz-a-viz treated in CETP are as follows:</p> <ol style="list-style-type: none"> <li>1. Total LTDS received in CETP= 78273 KL/Month</li> <li>2. Total HTDS received in CETP= 55170 KL/Month</li> <li>3. Total Treated Effluent (LTDS+HTDS) = 133443 KL/Month</li> </ol> <p>Based on examination of records like CFO issued by APPCB vide No. APPCB/VSP/65/HO/CFO/2021 dated 13.06.2023 and valid till 31.05.2026, APCCB has stipulated standards for receiving and discharge of effluents to CETP. PP is regularly undertaking analysis of treated water and on examination of latest analysis report dated 26.07.2024 undertaken by Re Sustainability Limited (Formerly known as Ramky Enviro Engineers Limited &amp; NABL Recognized), all the measured parameters were found to be within stipulated norms. Further, PP is also undertaking monitoring of Eco-Toxicity of treated water through CSIR-National Institute of Oceanography (NIO) on a monthly basis and examination of latest report of July 2024 indicated all the measured values to be within stipulated norms.</p> <p>During inspection, it is noted that PP has established Continuous Effluent Discharge Monitoring System from CETP to Marine Discharge and the records are maintained and the same is connected to CPCB and APPCB Servers. On the day of inspection, it was found that this online monitoring system was working well and was recording all the parameters like pH, TSS, COD, BOD.</p>

*ch. Pooja Krishna*

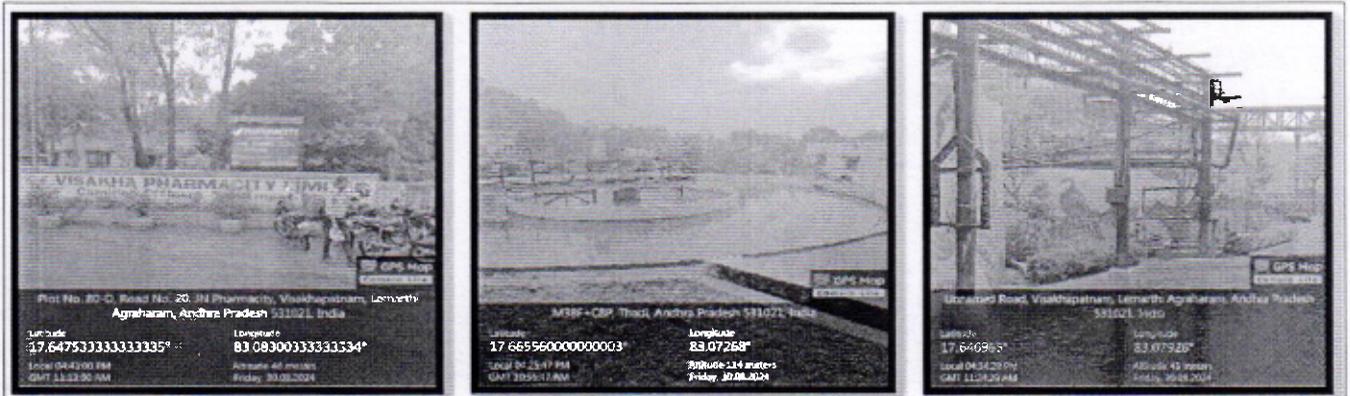


Fig 1-6: Common Effluent Treatment Plant (CETP)



<p>2</p>	<p>Process logical control system with contact stabilization will be implemented for treatment of wastewater.</p>	<p><b>Being Complied</b> Based on the information provided by PP, and as seen during the visit, it is noted that PP has established online monitoring system with process logical control system with contact stabilization for treatment of wastewater. During the treatment of HTDS/ LTDS based on level sensors, flow would be controlled and in case of exceedance of level, alarm would be popped up to alert the staff. Further, online DO sensor has also been installed for the biological control for optimization of aeration systems. Steam pressure control valves are installed in the treatment of HTDS effluent to optimize steam utilization. During inspection, online SCADA system with process logical control system was found to be working and all the essential parameters like settling time, aeration time, decanting time etc. were seen to working satisfactorily.</p>
<p>3</p>	<p>The quality of effluent from the CETP will be as per the standards laid down for disposal of treated industrial waste to Sea.</p>	<p><b>Being Complied</b> Same as detailed in Specific Condition No. 1. It was noted that the discharge of effluent from the CETP is under the control of APPCB officials and the lock and key is also maintained by them only and based on the disposal schedule, treated effluent is being let into marine waters and the same is monitored online through a dedicated online App namely APEMCL Marine.</p>

*Ch. P. Pruthi Krishna*



		<p>laying design for discharge of effluent into marine waters and accordingly, the same has been implemented and further CSIR-NIO monitors the same along with bioassay study on a monthly basis and till date no deviation reported.</p>
9	<p>Automatic Monitoring System will be installed for proper evaluation of the status of environment and the functioning of various treatment units.</p>	<p><b>Being Complied</b>                  PP has installed 3 CAAQMS stations for monitoring of ambient air quality at 3 locations namely within SEZ, Thadi village and at Tanam village and this real time monitoring system is connected with servers of APPCB and CPCB. On the day of inspection, all the online systems were found to be working fine. PP has also installed Online Effluent Quality Monitoring System for monitoring of outflow quality from CETP prior to discharge into marine waters and the same is also connected to APPCB and CPCB servers.</p>
10	<p>Rehabilitation works of the project affected families will be provided as per the policies of the State Government of Andhra Pradesh.</p>	<p><b>Not Complied</b>                  Based on discussions held with PP, it was gathered that Government of Andhra Pradesh vide GO No. 29 dated 06.02.2019 sanctioned an amount of Rs. 57.63 Crores to meet the R&amp;R Provisions for shifting of the Tadi and its hamlet villages China Tadi and BC Colony due to heavy pollution released by the Pharmaceutical Industries in JN Pharma City and directions were issued to the District Collector, Visakhapatnam and the Vice- Chairman &amp; Managing Director, APIIC, Vijayawada. <u>However, till date compliance to this issue is not addressed.</u></p>

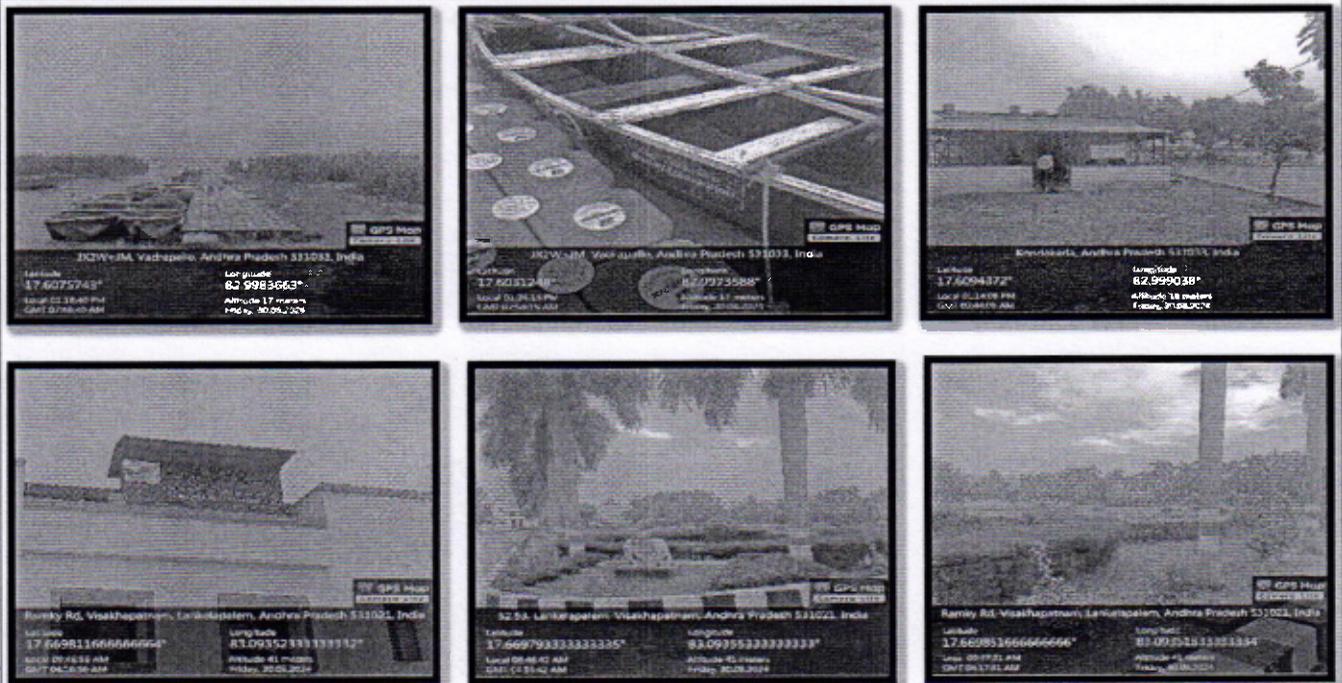


Fig 10-15: CSR Activities Undertaken by PP and Online Display at Project Office

*Ch. Puati Kaishaba*

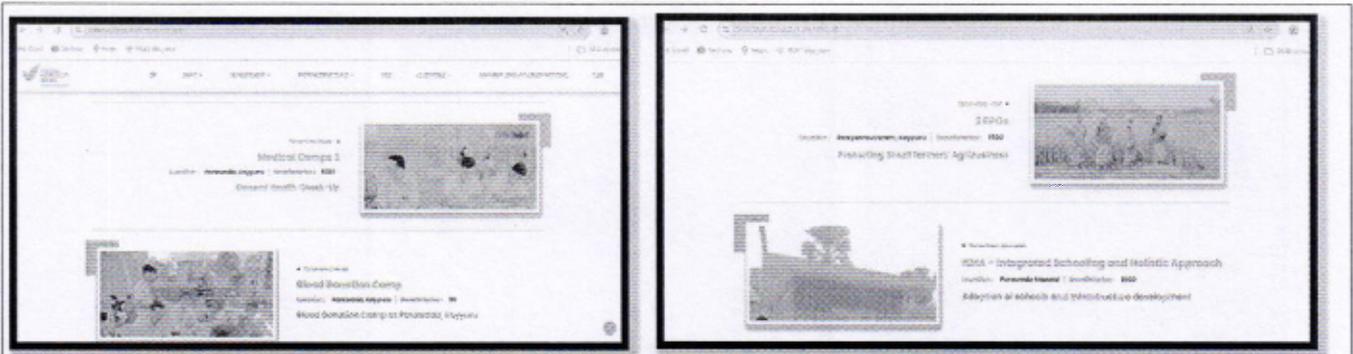


Fig 16-17: CSR activities undertaken by PP and details in their Website

11	<p>Documents on risk analysis and disaster plan will be prepared for onsite and offsite. This will include guide lines for awareness, First Aid, Handling and Storage of Hazardous Raw Materials, Fire Fighting Facility, modes of communication, etc.</p>	<p><b>Being Complied</b></p> <p>Based on examination of records, it is noted that PP has established onsite and offsite emergency plan prepared by internal fire and safety experts of M/s. Visakha Pharma City and have also prepared risk analysis and disaster management plan and have also undertaken Public Liability Insurance (PIL) Policy from The New India Assurance Company Limited vide document No. IRDAN190P0076100001 for an amount of Rs. 25.00 Crores and the same is valid till 25.05.2025.</p> <p>Verification of records indicated that PP has obtained Hazardous Waste Authorization from APPCB vide No. APPCB/VSP/65/HO/CFO/2021 dated 13.06.2023 and valid till 31.05.2026 and NOC from State Disaster Response and Fire Service Department vide No. RC No. 17922/MSE/ER/VSP/2021/SDP dated 26.11.2021 and the same is valid till 25.11.2026 (5 years). It was noted that PP has engaged DSS Sustainable Solutions (E.I DuPont) for providing training on Emergency Response Procedures and to handle Worst Case Scenario during the year 2023 and accordingly based on their suggestions have implemented several initiatives in the company. Further, PP is maintaining a periodical safety and emergency response trainings to all its employees from time to time. It was also noted that PP has deployed 2 No's of 15 KL capacity Fire Tenders for addressing any eventuality. Hazardous wastes are stored in closed sheds in containers in leak proof condition. It was also informed by the PP that a Safety Audit was conducted by Shri. Gandhi Reddy (Expert on Safety Audits) on 19.01.2023.</p>
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*Ch. Prudhikaishika*



Fig 18-20: Ambulance and Fire Engine in Pharma City

12	Sewer lines from each industry to CETP will be properly designed to prevent solid/sludge settling. Over and above provision of flush tanks will be made for clearing any chokes.	<p><b>Being Complied</b></p> <p>During inspection, it was noted that PP has installed proper sewer lines all over the SEZ, where in all the effluent generated from the individual units are being pre-treated and sent to common sewer lines and it was noted that PP has made provisions for clearing chokes by using flush tanks and from there the same is being sent for CETP for final treatment and further disposal in marine waters.</p>
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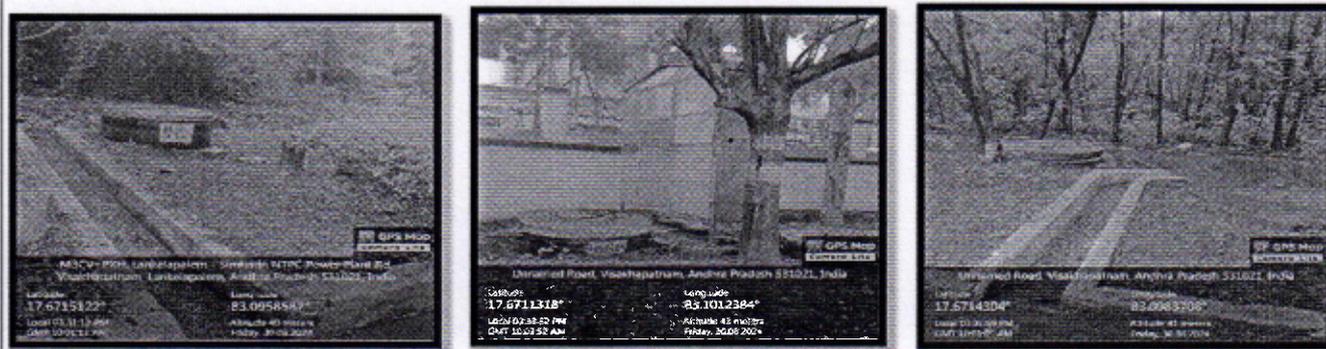


Fig 21-23: Effluent Disposal through dedicated Effluent Drains

13	Hazardous solid waste will be disposed in properly designed secured landfill sites to prevent pollution of ground water.	<p><b>Being Complied</b></p> <p>During inspection, it was noted that PP has established a Landfill Facility of 2,00,000 TPA along with an Incinerator of 17.1 TPD capacity (Rotary kiln 675 Kg/ Hr &amp; Single Drum Pyrolyzer- 2 Nos each of 150 kg/ 8 Kr capacity). On the day of inspection, due to heavy rains, the landfill site was temporarily capped and all the ash that was being generated from the Incinerator was stored in temporary sheds.</p>
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*Handwritten signature: ch. Prudhika Krishna*



Fig 24-29: Incinerator and TSDF Landfill Facility in Pharmacity

14	Rain water harvesting will be done in the project area taking due precautions so that there is no pollution of the underground water.	<p><b>Being Complied</b></p> <p>During inspection randomly when examined, it was found that PP has created around 15 No of recharge pits and have constructed a rainwater harvesting pond of about 100 x 65 x 3 meters dia for storing the rainwater.</p>
15	To conserve water, the treated waste water will be recycled reused as shown in the comprehensive water management plan Report.	<p><b>Being Complied</b></p> <p>Based on discussions held with PP, it was gathered that about 7700 KL/ Month of treated water is being used for cooling tower make up and remaining HTDS and LTDS treated water from CETP to be sent to guard ponds and then into the sea through the marine outfall after meeting the marine discharge standards as per the CTO issued by the APPCB.</p>
16	Green belt will be provided with plantation of appropriate species of trees around the project area.	<p><b>Being Complied</b></p> <p>As per records furnished, it was noted that the total project area as per EC is 862 ha which includes all common facilities like roads, CETP, Hazardous Waste Management Facilities, bulk container depots etc. As per the tree enumeration study conducted by Andhra University during the year 2020, the total area under the green cover was found to be 471 acres.</p>

*ch. Pruthi Krishna*



Fig 30-32: Greenbelt/ Plantations in Pharma City

17	Flooding of site during monsoon and possibility of storm water getting contaminated with chemicals/spillages will be prevented by diverting storm water to natural drains.	<b>Being Complied</b> During inspection, it was noted that PP has made adequate provisions for collection and disposal of storm water and for collection of effluent and sewer lines separately to avoid contamination. It was also informed by the PP that at regular intervals the effluent collection and sewer lines are cleaned as per established protocols and SOPs to avoid any contamination.
18	Proper care will be taken to nullify the effect of odour nuisance.	<b>Being Complied</b> During inspection, it was noted that PP has established double stage scrubbing and all the industries operating within the SEZ also have installed scrubbers to avoid odour nuisance. PP has also installed online VOC analyzers at different locations and all industries also have installed VOC analyzers as per Consent conditions.
19	In the effluent treatment plant, devices for removal of oil and grease will be inserted.	<b>Being Complied</b> Same as detailed in Point No.5
20	The project proponents will obtain requisite permission/authorization from other concerned authorities such as the State Maritime Authority, VUDA, and CRZ Authority regarding the respective marine outfall and the proposed structures in the CRZ.	<b>Being Complied</b> Based on verification of records, it is noted that PP has obtained the following approvals namely: <ul style="list-style-type: none"> <li>▪ Visakhapatnam Urban Development Authority (VUDA) approval vide RC No. 1922/05/L3 dated 03.12.2007 for establishment of Pharma SEZ</li> <li>▪ Government of Andhra Pradesh (Environment, Forests Science and Technology Department) vide Letter No. 9768/SADA/2005 dated 06.01.2006 issued NOC for laying pipeline under the provisions of CRZ Notification, 1991 for marine disposal of treated effluent.</li> <li>▪ PP has obtained CRZ Clearance from the Ministry vide No. 11-5/2006-IA.III dated 26.06.2006 for marine disposal of treated effluent from the proposed Pharma City.</li> </ul>
21	Utilization of fly ash in the construction of infrastructure of the various structures of the industrial units may be encouraged.	<b>Being Complied</b> Based on verification of records, it is noted that fly ash that is generated from the boilers (3 No's x 10 Tons) is disposed to brick manufacturers at free of cost.

*Ch. P. K. Krishna*

22	Industrial units which cannot provide bag filter emission control shall obtain the required steam from common generation facility.	<b>Being Complied</b> As per the information provided by the PP, all pharma units operating in SEZ and Non-SEZ have installed boiler stack online monitoring systems as per the Consent conditions of APPCB and the digital display boards are erected in front of the main gate of each company.
23	The state of art technologies will be installed for flow measurement and characterization before releasing the discharge from a unit into the sewer system.	<b>Being Complied</b> During inspection, it is noted that all the member industries and CETP have installed online flow monitoring systems and the same are connected to APPCB and CPCB servers. Verification of analysis reports of July undertaken by RE-Sustainability are found to be within stipulated norms and the analysis includes all the parameters as stipulated in EC.
24	The parameters for BOD, COD, TDS, phenol, oil & grease, heavy metals and suspended solids will also be included besides P <sup>H</sup> in monitoring the treated effluent.	
25	The arrangement for flushing and clearing of sewers shall be such as to preclude settlement of solids in the sewage system.	<b>Being Complied</b> PP has deployed vacuum tanker (1 No) for flushing and clearing of sewers and these sewer lines are cleaned on a periodical basis.
26	A condenser shall be installed to recover water from the disposal system of high TDS effluents. The condensate shall be used for the development and maintenance of green belt. In this connection, the project proponents shall furnish a flow diagram showing the water balance for the entire system.	<b>Being Complied</b> Even though EC condition stipulates utilization of condensate water for greenbelt, CFO issued by APPCB mandated the PP to dispose the treated effluent into marine discharge and accordingly as per CFO condition, PP is discharging the treated effluent into marine waters by laying a dedicated pipeline after due approvals.
27	Wastes bearing cyanides, persistent Organic Pollutants (POPs) and high concentration of metals shall not be allowed to be discharged into the sewer system but would be transported through tankers and given a batch treatment at the CETP.	<b>Being Complied</b> As per well laid down SOPs, PP is collecting Cyanide and POPs waste through dedicated tankers and after batch treatment disposing the same as per the duly established SOPs.
28	The disaster Management Plan shall be prepared and submitted to the local authorities. The project proponent shall keep the Ministry informed about the progress in this regard.	<b>Being Complied</b> Based on verification of records, it is noted that PP has established onsite and offsite and disaster management plan and have shared the same with local enforcement authorities.
29	Continuous monitoring should be carried out of the stack emissions from the Thermal Power Plant and the incinerator and also set up at least one Ambient Air Quality Monitoring Station with the capability to monitor hazardous air pollutants in addition to the normal air quality parameters. The continuous monitoring shall in due course be connected online to the SPCB.	<b>Being Complied</b> During inspection, it is noted that PP has established stack online monitoring system to the Incinerator and the same has been connected with CPCB and APPCB servers. Verification of analysis reports undertaken by NABL accredited agency namely RE Sustainability indicated all the measured values to be within stipulated norms. PP has established 3 No's of continuous ambient air quality monitoring stations (CAAQMS) and the same are connected to CPCB and APPCB servers.

*Ch. Pooja Kishor*

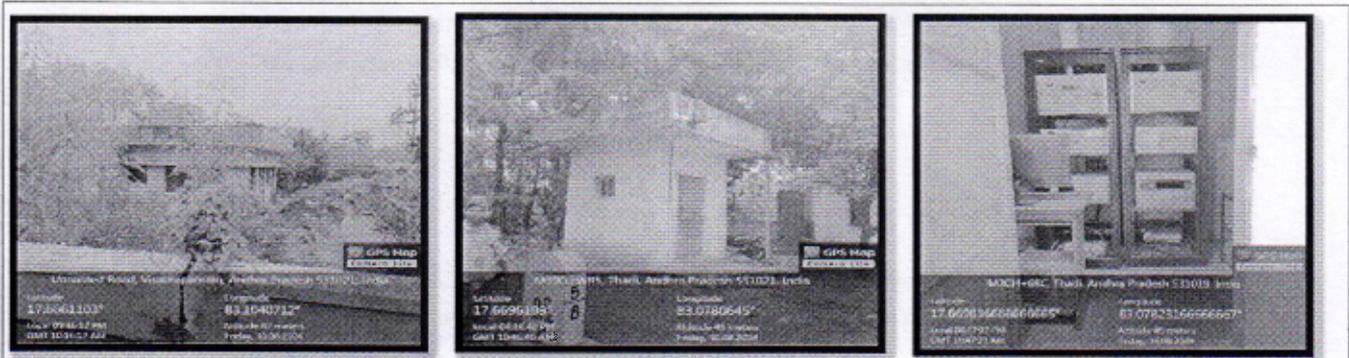


Fig 33-35: CAQMS Stations Installed near Tadi Village and SEZ



Fig 36-38: Online Display of Parameters by various companies in SEZ

30	The project proponent is further advised to look into the following issues:	
A	Safety and Health of the workers at the CETP (Common Effluent Treatment Plant) and TSDF (Transport, Storage, Disposal Facility)	<b>Being Complied</b> Based on discussions held with PP, it is noted that PP is conducting annual health checkups of all workers and records maintained as per Factories Act and PP has also established an Occupational Health Centre (OHC) and a doctor and nurse with an ambulance facility. PP has also entered into MoU/ Agreement with nearby hospitals like Kala Hospital in Visakhapatnam.
B	Prevention of pollution from rain water entering from outside or coming from contaminated areas.	<b>Being Complied</b> During the visit, it was noted that PP has constructed separate storm water drains and sewer lines to avoid contamination.
C	Use of solar energy and wind power.	<b>Being Complied</b> Based on discussions, it is noted that PP has established solar panels at WTP and R&D Block and Admin Block and generating about 500 KVA of power.
D	Development of Disaster Management Plan including the cyclonic conditions.	<b>Being Complied</b> PP has prepared a Disaster Management Plan including cyclonic conditions and shared with concerned local enforcement authorities for information and records.
E	Setting up of Automatic Continuous Monitoring Stations for air quality at strategic points in at least three locations at 120-degree angle.	<b>Being Complied</b> Same as detailed in Specific Condition No.9

*Ch. Puati Krishna*

F	Encourage units to take appropriate measures for controlling odour.	<b>Being Complied</b> Same as detailed in Specific Condition No.18.
<b>GENERAL CONDITIONS</b>		
i.	The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.	<b>Being Complied</b> Based on discussions held with PP, it is noted that PP is complying with most of the recommendations of the EC and stipulations as mandated by APPCB from time to time and accordingly, the same needs to be ensured by APPCB on regular intervals.
ii.	No further expansion or modifications of the industrial estate shall be carried out without prior approval of the Ministry of Environment & Forests. 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 to assess the adequacy of conditions imposed and to add additional environmental protections measures, if required.	<b>Refer Below</b> PP is aware of this EC condition and agreed to comply with the same.  However, it is not clear whether expansion/ modification of this EC relates only to the land area or different technologies/ processes that are used by various individual companies housed in SEZ and operating without EC as this condition is very generic in nature.
iii.	The project proponent shall comply with all the environmental protection measures and safeguards recommended in the EIA report.	<b>Being Complied</b> Based on verification of records and as seen during physical inspection, it is noted that PP is complying with most of the environmental protection measures and safeguards recommended in the EIA report some of which inter-alia includes establishment of CAAQMS stations, CETP, Landfill and Incinerator Facility, Scientific disposal of effluent in marine outfall, greenbelt, channels for collection and disposal of effluent generated from member companies, periodical monitoring of all environmental parameters like ambient air, noise, groundwater, stack emissions etc.
iv.	Six monthly monitoring reports should be submitted to the Ministry and its Regional Office, Bangalore for review.	<b>Being Complied</b> Based on examination of records, it is noted that PP is regularly submitting the half yearly compliance reports to the Regional Office/ Sub-Office of Vijayawada (earlier to Bangalore and Chennai) as per jurisdictional controlling office of MoEF&CC.
V.	A separate Environmental Management Cell equipped with full-fledged laboratory facilities and adequate manpower shall be set up to carry out the environmental management and monitoring functions.	<b>Being Complied</b> Based on examination of records, it is noted that PP has established a separate EMC with qualified people and a laboratory with all relevant facilities and manpower have been established for periodical monitoring of environmental parameters, effluents etc.
vi.	The project authorities shall provide adequate funds both recurring and non-recurring to implement the conditions stipulated by the Ministry of Environment & Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	<b>Being Complied</b> Based on examination of records and also as verified during inspection, it is noted that PP have been incurring adequate funds towards implementation of environmental safeguards both in terms of recurring and non-recurring expenditure. PP informed that needful provisions for the same are made on an annual basis after the board of directors' approval and

*Ch. Prudh. Krishna*

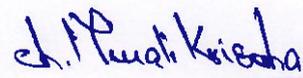
		the funds so earmarked are not diverted for other purposes. Based on undertaking provided by PP, an amount of Rs. 879.89 crores have been incurred for the same from 2004-2005 onwards and till the 1 <sup>st</sup> quarter of 2024. <b>However, PP has not submitted the exact details of expenditure for which activity this expenditure has been incurred.</b>
vii.	The implementation of the project vis-à-vis environmental action plans will be monitored by Ministry's Regional Office at Bangalore/State Pollution Control Board/Central Pollution Control Board. A six-monthly compliance status report shall be submitted to monitoring agencies.	<b>Being Complied</b> PP is aware of this EC condition and agreed to comply with the same.
viii.	The project proponent shall advertise in at least two local newspapers widely circulated in the region around the project, one of which shall be in the vernacular language of the locality concerned informing that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the State Pollution Control Board/Committee and may also be seen at website of the Ministry at <a href="http://envfor.nic.in">http://envfor.nic.in</a> . The advertisement shall be made within 7 days from the date of receipt of the clearance letter and a copy of the same should be forwarded to the Ministry's Regional Office at Bangalore.	<b>Being Complied</b> PP informed that pursuant to issue of EC, newspaper advertisement has been given in two newspapers but the details of the same couldn't be retrieved and hence compliance cannot be ascertained.
ix.	The project authorities shall inform the Regional Office of the Ministry at Bangalore as well as the Ministry at New Delhi the date of financial closure and final approval of the project by the concerned authorities and the date of start of land development work. A set of all the documents should be forwarded to the Regional Office of the ministry to undertake monitoring of environmental clearance.	<b>Being Complied</b> PP is aware of this EC condition and needful information have been shared with Regional Office, Bangalore under whose administrative control this region used to be initially.
4	The Ministry may revoke or suspend the EC, if implementation of the above conditions is not satisfactory.	<b>Being Complied</b> PP is aware of this EC condition and agreed to comply with the same.
5	The Ministry may stipulate additional conditions, if found necessary. The companies will implement the same in a time bound manner.	<b>Being Complied</b> PP is aware of this EC condition and agreed to comply with the same.
6	The above conditions will be enforcement under Water Act, 1974; Air Act 1981; EP Act, 1986; Hazardous Waste Rules, 2003 and Public Liability Insurance Act, 1991 along with their amendments and Rules.	<b>Being Complied</b> PP is aware of this EC condition and agreed to comply with the same.

*Ch. P. Prasad*

**Recommendations/ Suggestions:**

Based on the examination of the Safety Audit Report (2023) made available by PP and conducted by Shri. Gangi Reddy based on the request of PP, it was noted that there were several vulnerable areas and points with probable potential hazards and the same were to be addressed immediately to avoid any further mishaps. However, it is not clear, whether all those issues were comprehensive in nature or not and if so, whether the same has been duly addressed or not. In view of the above ambiguity and considering the history of occurrence of few accidents leading to fatalities and fatal injuries to employees of pharmaceutical companies operating within the general ambit of Environmental Clearance (EC) issued to the Special Economic Zone (SEZ), the following is suggested for further appropriate decision by the Ministry/ Expert Appraisal Committee (EAC):

- May take a view on the issue of applicability of individual Environmental Clearances (EC) to individual Pharmaceutical Companies operating within Pharma SEZ and involved in manufacture of different products with different technologies and operating with Consent to Operate (CTO) issued by the Andhra Pradesh Pollution Control Board.
- Recommend a thorough Safety Audit by a team of qualified and expert professionals or agencies for identification and fixing of all vulnerable points in each company and in SEZ, which could be a potential hazard in future and may recommend appropriate safety measures.
- Recommend constitution of a Quick Disaster Response Team (QDRT) with a pool of multidisciplinary experts specifically trained for handling Pharmaceutical/ Chemical industrial hazards with adequate training, infrastructure and to be deployed on a 24x7 basis for immediate response for addressing any potential hazard as in this particular SEZ itself there are about 100 companies operating with CTO from APPCB.



**Dr. Murali Krishna**  
**Additional Director (S)/ Scientist-E**

\*\*\*\*\*

**Speed Post/Online**

**F. No. IA-L-11011/90/2023-IA-I**  
Government of India  
Ministry of Environment, Forest and Climate Change  
(Compliance & Monitoring Division-IA Division)

\*\*\*\*\*

Indira Paryavaran Bhavan  
Jor Bagh Road, Aliganj  
New Delhi-110 003  
Email: moefcc-monitoring@gov.in

**Dated: 10<sup>th</sup> December, 2024**

To,

**M/s. Visakha Pharmacy Limited,**  
Ramky Grandiose,  
15th Floor, Sy. No. 136/2 & 4,  
Gachobowli' Hyderabad- 500032

**Sub: Action Taken Report (ATR) - Non-compliances observed with respect to the project Pharma City Project at Parawada, District Visakhapatnam, Andhra Pradesh to M/s. Ramky Pharma City (India) Pvt. Ltd (Now transferred to M/s. Visakha Pharmacy Limited) - reg.**

Ref:

- i. **Ministry vide EC No. J-12011/1/2004-IA (CIE) dated 10.03.2005 & EC No. 11-5/2006-IA.III dated 26.06.2006**
- ii. **Transfer of EC from M/s. Ramky Pharma City (India) Pvt. Ltd to M/s. Visakha Pharma city Limited vide EC No. J-12011/1/2004-IA (CIE) dated 03.10.2022**
- iii. **Corrigendum for Change of Address in EC Vide No. J-12011/1/2004-IA (CIE) dated 17.04.2023**
- iv. **SRO Vijayawada, Monitoring report no. letter no. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024.**

Sir,

Environmental Clearance (EC) was issued to the project Pharma City Project at Parawada, District Visakhapatnam, Andhra Pradesh to M/s. Ramky Pharma City (India) Pvt. Ltd (Now transferred to M/s. Visakha Pharmacy Limited) vide letter J-12011/1/2004-IA (CIE) dated 10.03.2005 & 11-5/2006-IA.III dated 26.06.2006, Transfer of EC vide EC No. J-12011/1/2004-IA (CIE) dated 03.10.2022, and Change of Address in EC Vide No. J-12011/1/2004-IA (CIE) dated 17.04.2023 subject to implementation of the various conditions and environmental safeguards contained therein.

2. The project was monitored by the Sub-Regional Office of MoEF&CC at Vijayawada on 30.08.2024. The report was submitted to the Ministry letter no. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024 **(copy enclosed)**.

3. The inspection report has been examined by the Ministry and following are observed non-compliance on the basis of review of SRO's report:

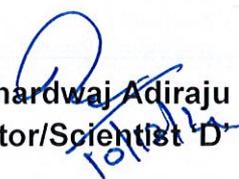
- i. Rehabilitation works of the project-affected families are yet to be complied (Condition-10; EC dated 10.03.2005)

4. In view of the foregoing, the Project proponent (PP) is hereby directed to submit the clarification/Action Taken Report (ATR) for observed non-compliance within next 30 days from the date of issuance of this letter. It may be noted that, if no satisfactory reply is received within the prescribed time frame, the Ministry will be constrained to take necessary action as deemed fit and appropriate in the circumstances of the case which inter-alia include issuance of Show-Cause Notice under the provision of Section (5) of the Environment (Protection) Act, 1986.

This issues with the approval of the Competent Authority.

Encl: As above

Yours faithfully

  
Dr. Bhardwaj Adiraju  
Joint Director/Scientist 'D'

**Copy to:**

1. The Deputy Director General of Forests (C), Ministry of Environment, Forest and Climate Change, Regional Office, 1st Floor, Additional Office Block for GPOA, Shastri Bhawan, Haddows Road, Nungambakkam, Chennai – 600006.
2. Member Secretary, Andhra Pradesh Pollution Control Board, Dr.Y.S.R Paryavaran Bhavan, APIIC Colony Road, Gurunanak Colony, Autonagar, Vijayawada- 520007
3. The Member Secretary, INFRA -I, Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-03. *(For information and further necessary action)*
4. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi-110032

  
Dr. Bhardwaj Adiraju  
Joint Director/Scientist 'D'

Indira Paryavaran Bhavan  
Jor Bagh Road, Aliganj  
New Delhi-110 003  
Email: bhardwaj.adiraju@gov.in

**Dated: 26<sup>th</sup> November, 2024**

To,

The Member Secretary,  
Andhra Pradesh Pollution Control Board, Dr.Y.S.R  
Paryavaran Bhavan, APIIC Colony Road, Gurunanak Colony,  
Autonagar, Vijayawada- 520007

**Sub: Non-compliances observed with respect to the project Pharma City Project at Parawada, District Visakhapatnam, Andhra Pradesh to M/s. Ramky Pharma City (India) Pvt. Ltd (Now transferred to M/s. Visakha Pharmacity Limited) - reg.**

**Ref. i. Ministry's EC No. J-12011/1/2004-IA (CIE) dated 10.03.2005 & EC No.11-5/2006-IA.III dated 26.06.2006**

**ii. Transfer of EC from M/s. Ramky Pharma City (India) Pvt. Ltd to M/s.Visakha Pharma city Limited vide EC No. J-12011/1/2004-IA (CIE) dated 03.10.2022**

**iii. Corrigendum for Change of Address in EC Vide No. J-12011/1/2004-IA(CIE) dated 17.04.2023**

**iv. SRO Vijayawada, Monitoring report no. letter no. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024.**

Sir,

Environmental Clearance (EC) was issued to the above cited projec vide letter J-12011/1/2004-IA (CIE) dated 10.03.2005 & 11-5/2006-IA.III dated 26.06.2006, Transfer of EC vide EC No. J-12011/1/2004-IA (CIE) dated 03.10.2022, and Change of Address in EC Vide No. J-12011/1/2004-IA (CIE) dated 17.04.2023 subject to implementation of the various conditions and environmental safeguards contained therein.

2. The project was monitored by the Sub-Regional Office of MoEF&CC at Vijayawada on 30.08.2024. The report was submitted to the Ministry letter no. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024 (copy enclosed).

3. The inspection report has been examined in the Ministry and it is noted that in addition to compliance status for SEZ EC, RO has made following observations in the Monitoring report, which are of significance wrt overall environmental compliance status at the site:

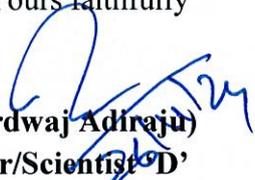
- i. This SEZ was in operation with presence of around 100 pharma companies.
- ii. This belong to a Red-Category Pharma City Project housing hundreds of Pharmaceutical, Bulk Drug / API manufacturing units and located within close vicinity of residential villas with a proven history of accidents.
- iii. Based on the examination of the Safety Audit Report (2023) made available by the PP, it was noted that there were several vulnerable areas and points with probable potential hazards and the same were to be addressed immediately to avoid any further mishaps.
- iv. Considering the history of occurrence of accidents leading to fatalities and fatal injuries to employees of pharmaceutical companies operating within the general ambit of Environmental Clearance (EC) issued to the Special Economic Zone (SEZ), appropriate initiatives by the Ministry/ Expert Appraisal Committee (EAC) is suggested by RO wrt around 100 units operating within SEZ on the basis CTO from APPCB under the prescribed policy. These are as follows:
  - a. a thorough Safety Audit by a team of qualified and expert professionals or agencies for identification and fixing of all vulnerable points in each company and in SEZ, which could be a potential hazard in future and may recommend appropriate safety measures.
  - b. constitution of a Quick Disaster Response Team (QDRT) with a pool of multidisciplinary experts specifically trained for handling Pharmaceutical/ Chemical industrial hazards with adequate training, infrastructure and to be deployed on a 24x7 basis for immediate response for addressing any potential hazard as in this particular SEZ itself there are about 100 companies operating with CTO from APPCB.

4. In view of the above and wrt apprehensions highlighted by the RO in reference to approx 100 pharma industries operating in the SEZ on the basis of CTO, APPCB is requested to undertake detailed inspection and examine the compliance status of individual units in the SEZ and take appropriate action wrt Consent to Operate (CTO) issued under Air and Water Act, and various authorizations issued under Waste Management Rules and also taking into consideration the observations of RO in the matter.

This issues with the approval of the Competent Authority.

*Encl: As above*

Yours faithfully

  
**(Dr. Bhardwaj Adiraju)**  
**Joint. Director/Scientist 'D'**

Copy to:

1. The Deputy Director General of Forests (C), Ministry of Environment, Forest and Climate Change, Regional Office, 1st Floor, Additional Office Block for GPOA, Shastri Bhawan, Haddows Road, Nungambakkam, Chennai – 600006

  
**(Dr. Bhardwaj Adiraju)**  
**Joint. Director/Scientist 'D'**



a winning destination

ADMINISTRATIVE OFFICE:

Visakha Pharmacity Limited

(Erstwhile Ramky Pharma City (INDIA) Limited)

Admin Block - Commercial Hub, Road No. 13, JNPC,

Parawada Mandal, Visakhapatnam - 531 019,

Andhra Pradesh, INDIA. T: +91 8924 236001 / 236018

CIN: U24239TG2004PLC042855

**Date:** 21.12.2024

To  
The Joint Director / Scientist D,  
Ministry of Environment, Forest and Climate Change  
(MOEFCC),  
Indira Paryavaran Bhavan,  
Jor Bagh Road, Aliganj,  
New Delhi - 110003.

**Sub:** Action Taken Report (ATR)- Non-compliances observed with respect to the project Pharma City Project at Parawada, District Visakhapatnam, Andhra Pradesh to M/s. Ramky Pharma City (India) Pvt. Ltd (Now transferred to M/s. Visakha Pharmacity Limited) - Reg.

**Ref:** Your letter no F.No. IA-L-11011/90/2023-IA-I, dated 10-12-2024.

Respected Sir,

We are in receipt of the above referred letter and noted the contents carefully.

We would like to bring to your kind notice that **Visakha Pharmacity Limited (VPCL)** is a Joint Venture project between Andhra Pradesh Industrial Infrastructure Corporation (APIIC) and Ramky Group, this project is developed on BOO (Build, Own, Operate) basis under PPP model (Public Private Partnership). The concession agreement is entered between the VPCL (Formerly known as Ramky Pharma City (India) Limited) and APIIC on 12-03-2004. As per the concession agreement Clause No. 3.9 (a) as follows.

**Clause No. 3.9 (a) - Transfer of Assets:** *APIIC warrants that the land together with the necessary right of way or way leaves having been acquired through the due process of law belongs to and is vested in APIIC, and that APIIC has full powers to hold, dispose of and deal with the same consistent, inter alia, with the provisions of this Agreement and that the Concessionaire shall, in respect of the above Assets, have no liability regarding any compensation payment on account of land acquisition or rehabilitation and/or resettlement of any Persons affected thereby.*

Page 1 of 2



Accordingly, APIIC complied the requirements of land acquisition / rehabilitation and/or resettlement of the affected families.

This is for your information and records.

Thanking You.

Yours Sincerely

For **M/s. Visakha Pharmacy Limited**

**Dr. P.P. Lal Krishna**  
**[Managing Director]**



**Encl:** Extract of Clause no. 3.9(a) of the Concession Agreement between APIIC and Visakha Pharmacy Limited on 12-03-2004.

**CC to:**

1. The Deputy Director General of Forests (C), Ministry of Environment, Forest and Climate Change, Regional Office, 1st Floor, Additional Office Block for GPOA, Shastri Bhawan, Haddows Road, Nungambakkam, Chennai — 600006.
2. Member Secretary, Andhra Pradesh Pollution Control Board, Dr.Y.S.R Paryavaran Bhavan, APIIC Colony Road, Gurunanak Colony, Autonagar, Vijayawada- 520007
3. The Member Secretary, INFRA-1, Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-03.
4. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi-110032.

- b. In the event of termination of this Agreement, the said charge shall stand extinguished on payment of compensation by APIIC to the Concessionaire to the extent they are entitled to receive the same in accordance with the provisions of this Agreement. However, nothing contained in this provision shall apply to the Assets of the Concessionaire not taken over by APIIC and the existing charge, if any, on such Assets shall, subject to the provisions of the Financing Documents, continue to subsist.

### 3.7 Financing Structure

The Concessionaire hereby agrees to adhere to the financial structure as set out in the Project Development Plan. Any material change in the Financing structure, including raising of additional debt, sub-ordinated debt, shall be subject to concurrence of APIIC.

### 3.8 Assignment of this Agreement

- a. Except as otherwise provided in this Agreement, neither Party shall assign its rights, title or interest in this Agreement in favour of any Person without prior written consent of the other Party.
- b. The Concessionaire may assign its rights, interests and benefits under this Agreement to the Lenders as security for Financing. Nothing contained in this Clause shall:
- i. absolve the Concessionaire from its responsibilities to perform/discharge any of its obligations under and in accordance with the provisions of this Agreement; and
  - ii. authorise or be deemed to authorise the Lenders to operate the Pharma City including the Common Facilities and Common Infrastructure, themselves.

In the event of termination of this Agreement, the assignment shall stand extinguished on payment of compensation by APIIC to Concessionaire, to the extent they are entitled to receive the same in accordance with the provisions of this Agreement.

### 3.9 Transfer of Assets

- a. APIIC warrants that the land together with the necessary right of way or way leaves having been acquired through the due process of law belongs to and is vested in APIIC, and that APIIC has full powers to hold, dispose of and deal with the same consistent, inter alia, with the provisions of this Agreement and that the Concessionaire shall, in respect of the above Assets, have no liability regarding any compensation payment on account of land acquisition or rehabilitation and/or resettlement of any Persons affected thereby.



17/SK

- b. The Concessionaire shall, subject to complying with the terms and conditions of this Agreement, remain in peaceful possession and enjoyment of the land mentioned in Clause 3.1 above during the Concession Period.

### 3.10 Approvals

- a. APIIC shall assist in obtaining "No Objection Certificate", i.e. consent for establishment of Pharma City from Andhra Pradesh Pollution Control Board.
- b. APIIC shall extend all possible assistance to secure all statutory and other approvals from various state government entities and departments as may be required from time to time. APIIC would provide administrative support for time bound state clearances.
- c. APIIC shall provide support for obtaining all Central Government clearances on a "Best Effort" basis.
- d. Nothing contained in this Clause shall relieve the Concessionaire of its obligations under this Agreement to obtain the clearances and to keep them in force and effect throughout the Concession Period.
- e. Concessionaire shall be responsible for the compliance with all necessary legal requirements under the Applicable Laws.
- f. The Concessionaire shall bear the costs of obtaining all the approvals.

### 3.11 Fiscal Incentives

- a. APIIC hereby undertakes to obtain from GoAP, as per the APIDEA and/or other Applicable Laws:
- i. Exemption of sales tax on all inputs required for project construction;
  - ii. Exemption of stamp duty and registration fees on the first transfer of land, from APIIC to the Concessionaire and on Project Agreements/Financing Agreements registered in the State;
- b. In cases found appropriate, APIIC may, at the request of the Concessionaire, issue recommendatory or supporting letters to any Government Authority recommending any permissible tax or duty concession or benefits to the Concessionaire.

### 3.12 Park Level Authority

A park level authority would be established for Pharma City, which would be responsible for giving the clearances at park level based on mutual discussions as per Applicable Law.





**VISAKHA  
PHARMACY  
LIMITED**

a winning destination

**ADMINISTRATIVE OFFICE:**

**Visakha Pharmacy Limited**  
(Erstwhile Ramky Pharma City (INDIA) Limited)  
Admin Block - Commercial Hub, Road No. 13, JNPC,  
Parawada Mandal, Visakhapatnam - 531 019,  
Andhra Pradesh, INDIA. T: +91 8924 236001 / 236018  
**CIN: U24239TG2004PLC042855**

**Date: 03-09-2022**

To,  
The Member Secretary- Infra 1  
Ministry of Environment & Forests,  
Paryavaran Bhavan, Lodhi Road,  
New Delhi- 110003

**Subject:** EC transfer of Pharmacy Project at Parawada, Visakhapatnam District, Andhra Pradesh - ADS reply

**Reference:** 1. Environmental Clearance vide letter No. J.12011/1/2004-IA (CIE) dt 10.03.2005  
2. EC Transfer Proposal No. IA/AP/NCP/278671/2022 dt. 17.06.2022.  
3. ADS raised on 26.08.2022

**Dear Sir,**

With reference to Additional detail sought (ADS) on 26.08.2022 for the above proposal, we are herewith enclosing the No Objection Certificate (NoC) and undertaking on non-judicial stamp paper for your consideration.

Request you to kindly do the needful in processing the EC Transfer application at the earliest.

Thanking You,

**for Visakha Pharmacy Limited.**

*P.P.*  
**Dr. P. P. Lal Krishna**  
**Managing Director**





ఆంధ్ర ప్రదేశ్ ఆంధ్ర ప్రదేశ్ ANDHRA PRADESH

SL.No. 867. Rs. 100/- Dt. 01-09-2022

Sold to D.V. Murthy s/o D. Narasimha Rao VSP

For Whom Visakha Pharmacy Ltd, JNPC Paravada

DA 492040

GORUPATI YERRI NAIDU

Licensed Stamp Vendor

L.No.03-16-025/2011,

R.L.No. 03-16-32/2021

Door No. 3-14, THANAM (V&P)

Paravada Mandal, Visakha Dist.

Cell No. 9704469446

#### UNDERTAKING

We, Visakha Pharmacy Limited (Erstwhile Ramky Pharma City (India) Limited) which is a Public Private Partnership Company incorporated under the provisions of the Companies Act, 1956 holding CIN: U24239TG2004PLC042855 and having Registered office at Ramky Grandiose, 15th Floor, Sy No 136/2 & 4, Gachibowli, Hyderabad ,TG - 500032 IN. are desirous to get the Environmental Clearance Certificate in the name of Visakha Pharmacy Limited at Admin Block - Commercial Hub, Road No. 13, JNPC, Paravada Mandal, Visakhapatnam - 531019, Andhra Pradesh, India. EC: No. J.12011/1/2004-IA (CIE) dated 10/3/2005.

We hereby confirm and undertake:

1. That the company is accepting all the terms and conditions under which Environmental Clearance Certificate was issued in the name of M/s. Ramky Pharma City (India) Limited.
2. That the company has received No objection certificate from M/s. Ramky Pharma City (India) Limited to get environmental clearance issued in the name of Visakha Pharmacy Limited.

for Visakha Pharmacy Limited

Dr. P. P. Lal Krishna

Managing Director





తెలంగాణ తేలంగానా TELANGANA

Sl. No: 2043 Date: 02/09/2022.

Sold To : Sridhar

S/o. : Lingaiah R/o Hyd.

For Whom : Visakha Pharmacy Ltd.

*[Signature]* AP 173320  
 K. VINAY KRISHNA  
 LICENSED STAMP VENDOR  
 L.No. 16-04-027/2017,  
 R.L.No. 16-04-070/2020  
 H.No: 8-2-248/11/7/25, ROAD NO:1,  
 BANJARA HILLS, HYDERABAD-82  
 MOBILE NUMBER:-9849883123

**TO WHOMSOEVER CONCERNED**

**NO OBJECTION CERTIFICATE**

We the Management of Visakha Pharmacy Limited do hereby confirm that we don't have any objection to change the name of the entity from RAMKY PHARMA CITY (INDIA) LIMITED TO VISAKHA PHARMACY LIMITED on environmental clearance certificate given by your office with registration number Clearance EC: No. J.12011/1/2004-IA (CIE) dated 10/3/2005 for unit situated at Jawaharlal Nehru Pharma City, Parawada Mandal, Visakhapatnam - 531019 in accordance with the Resolution passed by the Members of the Company on 28.03.2022 and approval accorded by the Ministry of Corporate Affairs on 28.04.2022.

**For VISAKHA PHARMACY LIMITED**

*[Signature]*  
**KESAVA DATTA NANDURI**  
**COMPANY SECRETARY**  
**M.No : A61331**



Speed Post/Online

**F. No. IA-L-11011/90/2023-IA-I**  
 Government of India  
 Ministry of Environment, Forest and Climate Change  
 (Compliance & Monitoring Division-IA Division)  
 \*\*\*\*\*

Indira Paryavaran Bhavan  
 Jor Bogh Road, Aliganj  
 New Delhi-110 003  
 Email: moefcc-monitoring@gov.in

Dated: 27<sup>th</sup> February, 2025

**Sub: Show Cause Notice under Section 5 of Environment (Protection) Act, 1986 for Non-Compliances observed with respect to the project Pharma City Project at Parawada, District Visakhapatnam, Andhra Pradesh to M/s. Ramky Pharma City (India) Pvt. Ltd (Now transferred to M/s. Visakha Pharmacity Limited) - reg.**

**Ref. i. Ministry's EC No. J-12011/1/2004-IA (CIE) dated 10.03.2005 & EC No.11-5/2006-IA.III dated 26.06.2006**

**ii. Transfer of EC from M/s. Ramky Pharma City (India) Pvt. Ltd to M/s.Visakha Pharma city Limited vide EC No. J-12011/1/2004-IA (CIE) dated 03.10.2022**

**iii. Corrigendum for Change of Address in EC Vide No. J-12011/1/2004-IA(CIE) dated 17.04.2023**

**iv. SRO Vijayawada, Monitoring report no. letter no. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024.**

WHEREAS, Environmental Clearance (EC) & CRZ Clearance was granted to M/s. Ramky Pharma City (India) Pvt. Ltd (Now transferred to M/s. Visakha Pharmacity Limited) vide letter No - J-12011/1/2004-IA (CIE) dated 10.03.2005 & EC No.11-5/2006-IA.III dated 26.06.2006, Transfer of EC from M/s. Ramky Pharma City (India) Pvt. Ltd to M/s.Visakha Pharma city Limited vide EC No. J-12011/1/2004-IA (CIE). dated 03.10.2022 and Corrigendum for Change of Address in EC Vide No. J-12011/1/2004-IA(CIE) dated 17.04.2023, subject to implementation of various conditions and environmental safeguards contained therein, and

2. WHEREAS, the project was monitored for ascertaining compliance to the conditions stipulated in the aforesaid environmental clearance by the Sub-Regional Office of the Ministry at Vijaywada on 30.08.2024. The report was submitted to the Ministry vide letter No. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024. **(Copy enclosed).**

3. WHEREAS, the inspection report dated 19.09.2024 was examined in the Ministry and based on the observed non-compliance letter seeking ATR was issued by the Ministry, to which PP submitted its response vide letter dated 21.12.2024. The response of the PP has been examined in coordination with Legal Monitoring Cell (LMC) of the Ministry. Accordingly, following has been concluded:

"M/s Ramky Pharmacity (now M/s Vishakha Pharmacity) has not rehabilitated the people affected by their project thereby not complied the Specific Condition no x of EC dated 10.03.2005, which is the responsibility of the project proponent as per the EC condition".



4. In the above context, your attention is drawn to provision of Section 5 of the Environment (Protection) Act, 1986 which is as reproduced below:

*"For the avoidance of doubts, it is hereby declared that the power to issue directions under this section includes power to direct-*

a. *The closure, prohibition or regulation of any industry, operation or process:*

or

b. *Stoppage or regulation of the supply of electricity or water or any other service."*

5. Now, therefore, you are directed to submit your response to the aforesaid non-compliance and explain as to why this Ministry should not take action against you under the provisions of Environment (Protection) Act, 1986 for the non-compliance and violation of the environmental conditions mentioned above.

6. You are also advised to submit your reply within 15 (fifteen) days of the receipt of this Notice falling which the ministry will be constrained to initiate action, as deemed fit and appropriate under the provision of section 5 of the Environment (protection) Act, 1986 and the circumstances of the case, with or without any further notice to the project. In your response, it may also be clearly stated whether a hearing is required by the project proponent before a final order is passed by this ministry. Further, this Show Cause is without prejudice to any other legal action which may be taken against you.

This issues with the approval of the Competent Authority.

To,

**The Project Head,  
Visekha Pharmacy Limited  
(Erstwhile Ramky Pharma City (INDIA) Limited)  
Admin Elock - Commercial Hub, Road No. '13, JNPC,  
Parawada Mandal, Visakhapatnam - 531019,  
Andhra Pradesh**



**(Dr. Shruti Rai Bhardwaj)  
Director/Scientist 'F'**

**Copy to:**

1. Ministry of Env., Forest and Climate Change, Vijayawada Green House, Gopalareddy Road, Vijayawada – 520010, Andhra Pradesh.
2. The Member Secretary, Andhra Pradesh Pollution Control Board, D.No. 33-26-14 D/2, Near Sunrise Hospital, Pushpa Hotel Centre, Chalamalavari, Street, Kasturibaipet, Vijayawada – 520010
3. The Chairman, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi-110032.
4. The Member Secretary, Infra-I Sector, MoEF&CC, New Delhi-03

5. Deputy Director General of Forests (C), Ministry of Environment, Forest and Climate Change Integrated Regional Office, Ist and IInd Floor, Handloom Export Promotion Council, 34, Cathedral Garden Road, Nungambakkam, Chennai – 34



**(Dr. Shruti Rai Bhardwaj)**

**Director/Scientist 'F'**



a winning destination

ADMINISTRATIVE OFFICE:

Visakha Pharmacy Limited

(Erstwhile Ramky Pharma City (INDIA) Limited)

Admin Block - Commercial Hub, Road No. 13, JNPC,

Parawada Mandal, Visakhapatnam - 531 019,

Andhra Pradesh, INDIA. T: +91 8924 236001 / 236018

CIN: U24239TG2004PLC042855

Date: 13.03.2025

To  
Dr. Shruti Rai Bhardwaj  
Director /Scientist 'F',  
Ministry of Environment, Forest and Climate Change  
(Compliance & Monitoring Division - IA Division)  
Indira Paryavaran Bhavan  
Jor Bagh Road, Aliganj,  
New Delhi - 110003.  
Email: moefcc-monitoring@gov.in

**Sub:** Action Taken Report (ATR)- Non-compliances observed with respect to the project Pharma City Project at Parawada, District Visakhapatnam Andhra Pradesh to M/s. Ramky Pharma City (India) Pvt. Ltd (Now transferred to M/s. Visakha Pharmacy Limited) - Reg.

**Ref:** Your letter no F.No. IA-L-11011/90/2023-IA-I, dated 27-02-2025.

Respected Madam,

We are in receipt of the above referred letter and we have noted the contents carefully.

We would like to bring to your kind notice that Visakha Pharmacy Limited (VPCL) is a Joint Venture project between Andhra Pradesh Industrial Infrastructure Corporation (APIIC) and Ramky Group, this project is developed on BOO (Build, Own, Operate) basis under PPP model (Public Private Partnership). The concession agreement was entered into between the VPCL (Formerly known as Ramky Pharma City (India) Limited) and APIIC on 12-03-2004. As per the concession agreement Clause No. 3.9 (a) as follows.

**Clause No. 3.9 (a) - Transfer of Assets:** APIIC warrants that the land together with the necessary right of way or way leaves having been acquired through the due process of law belongs to and is vested in APIIC, and that APIIC has full powers to hold, dispose of and deal with the same consistent, inter alia, with the provisions of this Agreement and that the **Concessionaire shall, in respect of the above Assets, have no liability regarding any compensation payment on account of land acquisition or rehabilitation and/or resettlement of any Persons affected thereby.**

As per the concession agreement, the liability of the rehabilitation / resettlement of the affected families/payment etc. lies upon the APIIC only in view of the **Clause No. 3.9 (a) - Transfer of Assets of the Concession Agreement** and therefore, APIIC has to comply with the requirements of land acquisition/ rehabilitation /resettlement of the affected families.

Whereas, the Sr. No. 10 of the Inspection Report submitted by the Sub-Regional Office of the Ministry vide a letter no. SO/VIJ/EPA/EC-A/101/10-131/2024/465 dated 19.09.2024 to the Member Secretary, Expert Appraisal Committee (Infra -II Sector, IA-III), MoEFCC, it is mentioned that Government of Andhra Pradesh vide GO No. 29 dated 06.02.2019 sanctioned an amount of Rs.57.63 crores to meet the R&R Provisions for shifting of the Tadi and its helmet villages China Tadi and BC Colony due to the pollutions released by Pharmaceutical Industries. Directions were also issued to the District Collector, Visakhapatnam and the Vice-Chairman & Managing Director, APIIC, Vijayawada.

*Shruti*  
24.03.2025

JD(BA)  
Page 1 of 2  
24/3/25  
24/3/25  
24/3/25

O/o Scientist-F (SRB)  
Dy. No. 1432775  
Date: 24.03.2025



Further, we would like to inform you that, the Pharmacy has been developed in 2143 acres as per the concession agreement and as per the concession agreement, the entire land has been acquired by Andhra Pradesh Industrial Infrastructure Corporation (APIIC) and Rehabilitation & Resettlement has also been provided to the affected families of JN Pharmacy Project by APIIC. In this regard, the report given by Spl. Deputy Collector (LA)-APIIC vide letter RC.No.08/2025/R&R/APIIC/dtd.11.03.2025 for the status of rehabilitation works of the JN Pharmacy - affected families is enclosed for your reference.

Further, we also inform you that, the Government of Andhra Pradesh vide GO No. 29 dated 06.02.2019 sanctioned an amount of Rs.57.63 crores to meet the R&R Provisions for shifting of the Tadi and its helmet villages China Tadi and BC Colony is not connected to the JN Pharmacy Project land and not part of the Environmental Clearance E.C.No. J-12011/1/2004-IA (CIE) dated 10.03.2005 & EC No.11-5/2006-IA.III dated 26.06.2006 obtained by M/s.Visakha Pharmacy Limited (Formerly known as Ramky Pharma City (India) Limited).

Accordingly and in view of the above clarifications, it is clear that APIIC is well aware of the GO No. 29 dated 06.02.2019 and the status of the shifting of the Tadi and its helmet villages China Tadi and BC Colony also mentioned in attached report given by Spl. Deputy Collector (LA)-APIIC vide letter RC.No.08/2025/R&R/APIIC/dtd.11.03.2025.

This is to further inform and request your good self that we, Visakha Pharmacy Ltd., require an opportunity of being heard before a final order is passed by the ministry.

Thanking You.

Yours Sincerely

For **M/s. Visakha Pharmacy Limited**

**Dr. P.P. Lal Krishna**  
[Managing Director]



**Encl:**

1. Report of Spl. Deputy Collector (LA)-APIIC - RC.No.08/2025/R&R/APIIC/dtd.11.03.2025.
2. Extract of Clause no. 3.9(a) of the Concession Agreement between APIIC and Visakha Pharmacy Limited on 12-03-2004.

**CC to:**

1. The Deputy Director General of Forests (C), Ministry of Environment, Forest and Climate Change, Regional Office, 1st Floor, Additional Office Block for GPOA, Shastri Bhawan, Haddows Road, Nungambakkam, Chennai - 600006.
2. The Member Secretary, INFRA-1, Sector, MoEF &CC, New Delhi-03
3. The Chairman, Central Pollution Control Board, Parivesh Bhavan, East Arjun Nagar, Delhi-110032
4. The Member Secretary, Andhra Pradesh Pollution Control Board, Dr.Y.S.R Paryavaran Bhavan, APIIC Colony Road, Gurunanak Colony, Autonagar, Vijayawada- 520007
5. Ministry of Env., Forest and Climate Change, Vijayawada, Green House, Gopalreddy Road, Vijayawada-520010.

Rc.No.08/2025/R&R/APIIC/dtd.11.03.2025.

O/o the Spl.Dy. Collector(LA),  
APIIC, Visakhapatnam.

From  
S.D.Anita.  
Spl.Dy. Collector (LA),  
APIIC, Visakhapatnam.

To  
The Managing Director,,  
Visakha Pharma City Limited,  
Administrative Building, JNPC,  
Parawada Mandal, Anakapalli Dist.

Sir,

Sub:- APIIC- Special Projects Zone - Anakapalli - Request for compliance status of Rehabilitation works of the JNPHARMA CITY PROJECT - Affected families- Report sent - Regarding.

Ref:- 1. VPCL/APIIC/SPZ/R&R/24-25/7 Date 05-3-2025 O/o the Visakha Pharma City Limited, Administrative Office, JNPC, Parawada Mandal, Anakapalli District.

2. GOMs.No. 29 of Industries and Commerce ( Infra) department dated 6.2.2019

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I invite attention to the reference cited.

It is to inform that an extent of Ac.2778.16 acres in the villages of Lemarthi Agraharam, E.Bonangi, Kothapalem, Ponnuru Agraharam and Doppavanipalem of Parawada Mandal was acquired for establishment of Pharma and Chemical Park vide G.O.Ms.No.501, dated 24.9.2001. The crucial date of 30.04.2007 was decided for allotment of house sites under R&R policy. Initially 1872 house site pattas were issued to the PDFs and Major married sons @ 144 sq.yards each. Subsequently 180 House site Pattas were issued during the years between 2020-2021 as per the orders of the Hon'ble High Court and Hon'ble Lokayuktha, Andhra Pradesh. All the pattas were issued in the A,B,C,D,E, and E extension layouts in Gajuwaka mandal and "F" layout in E.Bonangangi Village of Parawada mandal.

In regard to shifting of Tadi, Chinatadadi and BC, Colony, the Government have issued GOMs.No. 29 of Industries and Commerce ( Infra) department dated 6.2.2019 sanctioning an amount Rs. 57.53 crores to meet the R&R Provisions for shifting of Tadi and its hamlet Village China Tadi and BC Colony and directed the District Collector and VC&MD, APIIC to take necessary action in this matter. The amount was not released till date. The Tahsildar, Parawada may be addressed regarding the availability of land.

Yours faithfully,

*Spl.Dy. Collector (LA)*  
Spl.Dy. Collector (LA)  
APIIC, Visakhapatnam

*K. S. S.*

*DT*

INWARD	
Visakha Pharmacy Limited	
JNPC Site Vizag	
Sl. No. : 186	
Date : 11.03.2025	
Sign. : <i>[Signature]</i>	Authorised Signatory

- b. In the event of termination of this Agreement, the said charge shall stand extinguished on payment of compensation by APIIC to the Concessionaire to the extent they are entitled to receive the same in accordance with the provisions of this Agreement. However, nothing contained in this provision shall apply to the Assets of the Concessionaire not taken over by APIIC and the existing charge, if any, on such Assets shall, subject to the provisions of the Financing Documents, continue to subsist.

### 3.7 Financing Structure

The Concessionaire hereby agrees to adhere to the financial structure as set out in the Project Development Plan. Any material change in the Financing structure, including raising of additional debt, sub-ordinated debt, shall be subject to concurrence of APIIC.

### 3.8 Assignment of this Agreement

- a. Except as otherwise provided in this Agreement, neither Party shall assign its rights, title or interest in this Agreement in favour of any Person without prior written consent of the other Party.
- b. The Concessionaire may assign its rights, interests and benefits under this Agreement to the Lenders as security for Financing. Nothing contained in this Clause shall:
- i. absolve the Concessionaire from its responsibilities to perform/discharge any of its obligations under and in accordance with the provisions of this Agreement; and
  - ii. authorise or be deemed to authorise the Lenders to operate the Pharma City including the Common Facilities and Common Infrastructure, themselves.

In the event of termination of this Agreement, the assignment shall stand extinguished on payment of compensation by APIIC to Concessionaire, to the extent they are entitled to receive the same in accordance with the provisions of this Agreement.

### 3.9 Transfer of Assets

- a. APIIC warrants that the land together with the necessary right of way or way leaves having been acquired through the due process of law belongs to and is vested in APIIC, and that APIIC has full powers to hold, dispose of and deal with the same consistent, inter alla, with the provisions of this Agreement and that the Concessionaire shall, in respect of the above Assets, have no liability regarding any compensation payment on account of land acquisition or rehabilitation and/or resettlement of any Persons affected thereby.



- b. The Concessionaire shall, subject to complying with the terms and conditions of this Agreement, remain in peaceful possession and enjoyment of the land mentioned in Clause 3.1 above during the Concession Period.

### 3.10 Approvals

- a. APIIC shall assist in obtaining "No Objection Certificate", i.e. consent for establishment of Pharma City from Andhra Pradesh Pollution Control Board.
- b. APIIC shall extend all possible assistance to secure all statutory and other approvals from various state government entities and departments as may be required from time to time. APIIC would provide administrative support for time bound state clearances.
- c. APIIC shall provide support for obtaining all Central Government clearances on a "Best Effort" basis.
- d. Nothing contained in this Clause shall relieve the Concessionaire of its obligations under this Agreement to obtain the clearances and to keep them in force and effect throughout the Concession Period.
- e. Concessionaire shall be responsible for the compliance with all necessary legal requirements under the Applicable Laws.
- f. The Concessionaire shall bear the costs of obtaining all the approvals.

### 3.11 Fiscal Incentives

- a. APIIC hereby undertakes to obtain from GoAP, as per the APIDEA and/or other Applicable Laws:
- i. Exemption of sales tax on all inputs required for project construction;
  - ii. Exemption of stamp duty and registration fees on the first transfer of land, from APIIC to the Concessionaire and on Project Agreements/Financing Agreements registered in the State;
- b. In cases found appropriate, APIIC may, at the request of the Concessionaire, issue recommendatory or supporting letters to any Government Authority recommending any permissible tax or duty concession or benefits to the Concessionaire.

### 3.12 Park Level Authority

A park level authority would be established for Pharma City, which would be responsible for giving the clearances at park level based on mutual discussions as per Applicable Law.

