

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

IA No. 582/2025

IN

OA No. 148/ 2025

IN THE MATTER OF:

Rohit Singh

.....**Petitioner**

VERSUS

State of Himachal Pradesh & Ors.

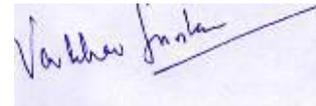
.....**Respondents**

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Respondent No. 04

Through Counsel



Dated: 01.11.2025

Place: Una

Vaibhav Srivastava

(Advocate)

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

IA No. 582 of 2025

IN THE MATTER OF:

Rohit Singh

.....Applicant

VERSUS

State of Himachal Pradesh & Ors.

.....Respondents

**REPLY TO INTERLOCUTORY
APPLICATION ON BEHALF OF
RESPONDENT NO. 04 i.e HP STATE
POLLUTION CONTROL BOARD.**



MAY IT PLEASE YOUR LORDSHIPS :

1. That the contents of para 1 are matter of record and need no reply from the replying respondent.
2. That the contents of para 2 relate to filing of main matter i.e OA 148/2025 by the petitioner before the Hon'ble Tribunal which are a matter of record and need no reply from the replying respondent. The reply to main matter has already been filed by replying respondent and the same may also be read as part and parcel of reply to present Interlocutory Application. As far as the issue of commencement of work of


Regional Officer
H.P.State Pollution Control Board
Phase-IV, Rakkar Colony,
Distt. Una (H.P.)-174303

HP Bulk Drug Park, Polian Beet, Una in absence of prior Environmental Clearance is concerned, it is submitted that the proposed site was inspected by the officials of the State Board on dated 30-09-2025 and during inspection no construction activities were observed. (Copy of Photographs are annexed as **Annexure R – 4/1**). The replying respondent has already clarified this fact in reply to main OA no. 148/2025

Further, It is pertinent to submit here that the Ministry of Environment, Forest and Climate Change (MoEF&CC) has now granted Environmental Clearance to the proposed Bulk Drug Park vide file no. 10/68/2023-IA.III dated 25/09/2025, after due appraisal and compliances with the provisions of EIA Notification, 2006. (Copy of Environmental Clearance annexed as **Annexure R – 4/2**).

3. That the contents of para 3 are wrong hence denied. As already submitted in para supra that during the last inspection of site by the officials of the HPSPCB, Regional Office, Una no such illegal mining or excavation activities were observed. However, it is further submitted that on the issue of alleged illegal mining the submissions from Department of Industries are also required.

4. That the contents of para 4 relate to the regulation, management and permission of groundwater extraction which falls within the purview of and calls for reply of HP Ground Water Authority and Jal Shakti Vibhag of HP.


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Beisdes, it is submitted that the Environmental Clearance to the said project has been granted by the Ministry of Environment, Forest and Climate Change and as per Environmental Clearance condition no. 1.13, the project proponent is permitted to use groundwater for the maximum period of five years from the date of grant of Environmental Clearance. The project proponent is required to utilize water from the approved surface water scheme, which includes a dedicated pipeline from the Satluj River and storage tank earmarked for the project, as specified under Environmental Clearance Condition No. 1.14. Accordingly, the project proponent's extraction through tube wells is in accordance with the Environmental Clearance conditions, and any alleged environmental impacts will be addressed by the State Board under its mandate for pollution control and regulatory oversight.

5. That the contents of para 5 relate to the issuance of tenders without Environmental Clearance, which do not pertain to and need no reply from the replying respondent. As already submitted in para supra the Ministry of Environment, Forest & Climate Change has granted Environment Clearance to the project proponent on dated 25-09-2025. So far as the issue of press conference is concerned the same was attended by the officials of respondent Board on the direction of the Deputy Commissioner, Una.



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6. That the contents of para 6 relate to filing of civil suit by Joint Director, Department of Industries before the court of Ld. Senior Civil Judge, Una , HP against petitioner are a matter of record and need no reply from the replying respondent.
7. That the contents of para 7 relate to the petitioner's complaint to SHO Haroli against the Director, Department of Industries, which do not pertain to and need no reply from the replying respondent.
8. Contents of para 8 relate to pendency of another case, OA No. 646/2023 pertaining to Pandoga Industrial area before the Hon'ble NGT are a matter of record. The said matter relate to applicability of EIA is pending adjudication before Hon'ble NGT. So far as the present case is concerned the MoEF&CC has granted Environmental Clearance to the proposed Bulk Drug Park in accordance with the provisions of the EIA Notification, 2006 during the pendency of main matter i.e. OA 148/2025, and any allegation regarding violation of the Environmental Laws or undermining of Environmental safeguards are premature and misconceived.

Limitation :-

The contention of the applicant that the matter is within limitation period is a matter of record and needs no reply from the replying respondent.


Regional Officer
H.P.State Pollution Control Board
Phase-IV, Rakkar Colony,
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REPLY TO THE GROUNDS –

- A. That the contents of para A are denied. It is submitted that State Board has not observed violations of the Water Act, 1974 or Air Act, 1981 or Environment Protection Act, 1986 under which it is mandated.
- B. That the contents of para B are denied. It is submitted that the MoEF&CC has already granted the Environmental Clearance to the project proponent and also no construction activities were observed by the officials of the State Board during the inspection.
- C. That the contents of para C relate to the illegal mining, stone crushing and land disturbances are denied and calls for reply of mining department.
- D. That the contents of para D are denied. It is submitted that the installation and use of tube wells for groundwater extraction falls under the mandate of Himachal Pradesh Ground Water Authority and Jal Shakti Vibhag and need no reply from the replying respondent. As far as replying respondent is concerned its role is limited to monitoring and controlling the water pollution and ensuring compliance with consent conditions under Water Act, 1974.
- E. That the contents of para E relate to the floating of tenders and financial decisions in relation to the Bulk Drug Park do not pertain to respondent Board hence need no reply from the replying respondent.




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- F. That the contents of para F relate to the negligence and disregard to the legal process. In regards to this it is submitted that the mandate of replying respondent is only limited to monitoring and controlling Water and Air Pollution, and ensuring compliance with environmental statutes.
- G. That the contents of para G do not pertain to State Board hence need no reply from the replying respondent.
- H-I. That the contents of para H – I already stand controverted in view of the submissions made in para supra.

PRAYER

In view of the submissions made above, It is humbly submitted that Interlocutory Application may kindly be disposed of qua the respondent Board. Any other order deemed fit by this Hon'ble Tribunal may kindly be passed in public interest.



Respondent No. 04

Regional Officer
H.P.State Pollution Control Board
Phase-IV, Rakkar Colony,
Distt. Una (H.P.)-174303

Through Counsel

Date: 11/11/2025

Place: Una (H.P.)

Vaibhav Shrivastava

(Advocate)

**BEFORE THE NATIONAL GREEN TRIBUNAL,
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IA No. 582 of 2025

IN THE MATTER OF:

Rohit Singh

.....Applicant

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State of Himachal Pradesh & Ors.

.....Respondents

AFFIDAVIT



I, Praveen Kumar, S/o Sh. Jagdish Ram, aged 49 years, presently, working as Assistant Environmental Engineer cum Regional Officer at Regional Office Una, H.P. State Pollution Control Board, Himachal Pradesh, do hereby solemnly declare and affirm on oath as under:

1. That the accompanying reply to IA has been drafted at my instance and under my instructions.
2. That the contents of reply of paras 1-8 are true and correct to the best of my knowledge, derived from official record, no part of it is false and nothing material has been concealed therefrom.
3. I further affirm that the contents of this affidavit of mine are true and correct to my knowledge and belief, no part of it is false and nothing material has been concealed therefrom.

Praveen Kumar
Regional Officer
H.P.State Pollution Control Board
Phase-IV, Rakkar Colony,
Distt. Una (H.P.)-174303

Verified at Una on 1st day of November, 2025.

DEPONENT

Regional Officer
H.P.State Pollution Control Board
Phase-IV, Rakkar Colony,
Distt. Una (H.P.)-174303



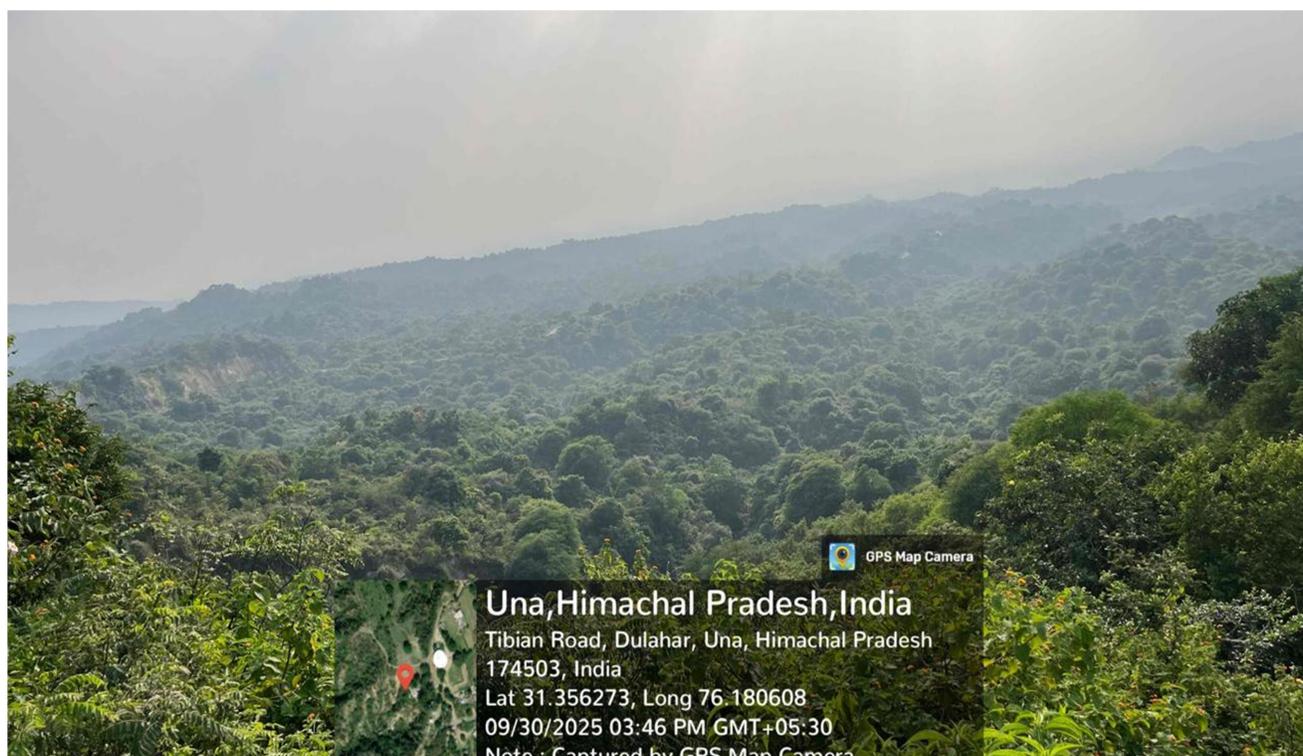
Certified That Sh. Pravden Kumar
Deponent made a declaration on oath
before me read over, explained and
admitted correct, identified by Sh. Pravden Kumar
clock HRPCB 1/11/25

ATTESTED

Shivam Sharma
Advocate-cum-
Oath Commissioner
Distt. Courts Una (H.P.)



Regional Officer
H.P.State Pollution Control Board
Phase-IV, Rakkar Colony,
Distt. Una (H.P.)-174303





सत्यमेव जयते

File No: 10/68/2023-IA.III
Government of India
Ministry of Environment, Forest and Climate Change
IA Division



Date 25/09/2025



To,

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

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

Sir/Madam,

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

2. The particulars of the proposal are as below :

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11. Details of water bodies, impact on drainage:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

24. As per CBRI report

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

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

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

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

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

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

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

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

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

Copy To

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

Annexure 1

Specific EC Conditions for (Synthetic Organic Chemicals Industry)

1. Specific Conditions

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

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

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

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

Standard EC Conditions for (Synthetic organic chemicals industry)

1.

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

S. No	EC Conditions
	suggestions/ representations, if any, were received while processing the proposal.
1.8	The project proponent shall also upload/submit six monthly reports on Parivesh Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
1.9	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.
1.10	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at https://parivesh.nic.in/ . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.
1.11	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.
1.12	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.

2. Specific Conditions

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

Signature Not Verified

Digitally Signed by : Dr Amardeep Raju
Member Secretary, MoEFCC (EC)

Date: 25/09/2025