



# 346 GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,  
GANDHINAGAR - 382010,  
(T) 079-23232152

No. GPCB/CCA-SRT-2983/ID-44514/ 883362

BY RPAD

Date:

17 OCT 2025

To,  
The Registrar,  
Hon'ble National Green Tribunal,  
Western Zone Bench,  
Pune – 411001.

**Subject:** Forwarding of Joint Committee Report in compliance of Hon'ble NGT's Order dated 18.08.2025 in Original Application No. 32 of 2020 (WZ).

**Reference:** Order dated 18.08.2025 passed by the Hon'ble National Green Tribunal, Western Zone Bench, Pune in OA No. 32 of 2020 (WZ) titled Kantha Vibhag Yuva Koli Samaj Parivartan Trust Versus GPCB & Ors.

**Respected Sir/Madam,**

With reference to the captioned subject and the directions issued by the Hon'ble National Green Tribunal, Western Zonal Bench, Pune, vide Order dated **18.08.2025**, this is to respectfully submit that the **Joint Committee Report duly signed by all the members of the Committee** is hereby forwarded for kind perusal and record of the Hon'ble Tribunal.

The submission is being made in compliance with Para-2 of the above referred order. You are requested to kindly take the same on record.

Thanking you.

For and on behalf of  
Gujarat Pollution Control Board,

(T. C. Patel)

Unit Head, Surat

**Enclosure:**

1. Joint Committee Report – 14 pages.

Clean Gujarat Green Gujarat

Website : <https://gpcb.gujarat.gov.in>

**REPORT OF GUJARAT POLLUTION CONTROL BOARD IN  
REFERENCE TO M/S. PARAS ENTERPRISE, PLOT NO: 447,  
ROAD NO-4, TAL: CHORASI, GIDC SACHIN – 395197, DIST:  
SURAT, GUJARAT**

ORIGINAL APPLICATION NO. 32 OF 2020 (WZ)  
KANTHA VIBHAG YUVA KOLI SAMAJ PARIVARTAN TRUST V/S.  
GUJARAT POLLUTION CONTROL BOARD & ORS.

WITH

APPEAL NO.37 OF 2021 (WZ)  
PARAS ENTERPRISES V/S. GUJARAT POLLUTION CONTROL BOARD  
& ORS.

FORWARD SUBMISSION TO THE HONBLE NATIONAL GREEN TRIBUNAL  
IN COMPLIANCE TO THE ORDER DATED: 23/08/2023 & DATED: 10/01/2024

MARCH-2024

## 1. BACK GROUND

- The applicant, Kantha Vibhag Yuva Koli Samaj, had filed Original Application No. 32/2020 (WZ) against the M/s. Paras Enterprise about violation of environmental law and damage to the environment by illegal operation of the unit.
- The Hon'ble NGT had conducted a hearing on Original Application No. 32/2020 and constituted a joint committee pursuant to an order dated: May 8, 2020. The concern Para - 9 is as follows:

“We deem it just and proper to constitute a committee consisting of (i) the Collector, Surat, (ii) the Gujarat Coastal Zone Management Authority, and (iii) the Representative of the Central Pollution Control Board (CPCB) and to direct them to submit a factual and action-taken report. Report be submitted within six weeks.”

- The Joint Committee Report was submitted before the Hon'ble NGT on dated: 29/10/2020. The joint committee had assessed the environment damage compensation in Chapter 6. The Formula & parameter taken by the joint committee, are reproduced as follows:

### Environmental Compensation

The base formula taken as per para 6 of the order of Hon'ble NGT in the O.A. No. 593/2017 (Paryavaran Suraksha Samiti & Anr. Vs Union of India & Ors.) Dated 19.02.2019. As given in the order, the Environmental Compensation (EC) is based on the following formula.

$$EC = (PI \times N \times R \times S \times LF)$$

Where, EC is Environmental Compensation in ₹

PI = Pollution Index of industrial sector

N = Number of days of violation took place

R = A factor in Rupees (₹) for EC

S = Factor for scale of operation

LF = Location factor

Accordingly, the joint committee computed environmental compensation based on above formula on an account of non-compliances w.r.t. procedural lapses by the industry to obtain mandatory statutory permissions i.e. CTE, CTO and EC from the regulatory agency and authority.

- PI = Pollution Index of industrial sector The average pollution index of 80 was taken as Environmental Compensation for the unit (as the unit falls under red category of industry based on CTE issued by GPCB).
- N = Number of days of violation took place for which violation took place is the period between the day of violation observed and the day of compliance verified by CPCB/SPCB.
- R = A factor in Rupees (₹) which is a minimum of 100 to a maximum of 500. R is considered as ` 250, as the Environmental Compensation in case of violation.
- S = Factor for scale of operation. For small S = 0.5, For medium S = 1 and larger unit S = 1.5
- LF = Location factor, It is based on the population of the city/town and location of the industrial unit on the location of the industrial unit. For the industrial unit located within municipal boundary or up to 10 km distance from the municipal boundary of the city/town, different LF maybe used. LF of 1.25 is used as the industry is located within the municipal boundary and population as per Census, 2011 is 4.46 million (Population 1 to < 5 million, LF is 1.25).

As the industry was operational illegally without obtaining CTE, CTO and EC; the noncompliance was considered on 06th February, 2014 (starting date of illegal production activity) and to consider the last day of non-compliance/day of compliance, inspection has to be carried-out during subsequent course of any day of the year. Based on the available records with the GPCB, RO- Surat the last day of non-compliance was observed on 31st January, 2020 i.e. revocation of closure direction by GPCB (though last date of production was till 14th August, 2019). Hence a total day of non-compliance (N) is 2186 days. Based on consideration of above, the environmental compensation calculation is depicted as below.

$$EC = PI * N * R * S * LF$$

PI	N	R	S	LF	EC
80	2186	250	0.5	1.25	2,73,25000

Based on above, the environmental compensation to be levied on the industry for non compliances w.r.t. various provisions of environment statutes is worked-out to be ₹ 2,73,25,000/- (Rupees Two Crore Seventy-Three Lac and Twenty-Five Thousand Only).

- M/s. Paras Enterprise has filed Appeal No. 37 of 2021 against the EDC imposed by the GPCB based on the joint committee report.

## 2. DIRECTIONS OF HON'BLE NGT

### In Order Dated: 23/08/2023

The Hon'ble NGT had conducted a hearing for the Appeal No. 37/2021 filed in OA No. 32 of 2020 and, thereafter an order was issued on 22<sup>nd</sup> August, 2023 with the following directions:

**Para - 13:** "Since there is a difference of opinion with respect to number of days when the industry is said to have been found closed under directions issued by the GPCB, we deem it appropriate that the GPCB should give us exact number of days for which respondent No.8 remained closed so that the exact amount of EDC can be calculated, for which we grant two weeks' time to the GPCB to submit a report before us on an affidavit detailing therein the number of days during which the industry remained closed under the directions issued by the GPCB and this figure may be calculated after giving opportunity of hearing to the applicant as well as the Project Proponent."

### In Order DATED: 10/01/2024

The Hon'ble NGT had conducted a hearing for the Appeal No. 37/2021 filed in OA No. 32 of 2020 and, thereafter an order was issued on 10<sup>th</sup> January, 2024 with the following directions:

**Para - 3:** "Be that as it may, we direct the respondent No.1/GPCB to calculate the exact number of days for which the industry of respondent No.8 remained closed and make a calculation based on both, which would be applicable for Red Category as well as Orange Category so that at the time of final argument, when we decide this dispute, we will be assisted in getting the amount of EDC. This exercise shall be completed by the respondent No.1/GPCB within a period of two weeks and no more and a copy of the said calculation shall be served upon all other parties, who may file objection against the same, if any, within two weeks thereafter."

## 3. HISTORY & CHRONOLOGY OF EVENTS OF M/S. PARAS ENTERPRISE

Name of industry &	M/s. Paras Enterprise
Location: (GIDC/ Area/ District name only)	Plot No:447, Road No-4, Tal : Chorasi, GIDC Sachin – 395197, Dis: : Surat

Investment:	
Total:	Rs. 2.33 Cr.
Plant & Machineries:	Rs. 0.55 Cr.
Scale:	Small
Product Name:	Polyester resin
CTE status	CTE obtained on 07/10/2015 valid up to 03/05/2020
CCA status	Not applied

## M/s. Paras Enterprise Chronology of events

Date	Action taken By Board
19/04/2014	This unit is inspected with reference to routine monitoring. <b><u>Unit is found in operation</u></b> and engaged in manufacturing Polyester resin without obtained any prior permission of the board. <ul style="list-style-type: none"> <li>Unit has instructed not to operate plant without permission of the board and Unit was instructed to obtained NOC/EC</li> </ul>
31/05/2015	<ul style="list-style-type: none"> <li>Unit is inspected with reference to CTE Fresh application dated 04/05/2015.</li> <li>Unit is <b><u>not found in operation during inspection</u></b>. Finish product are stored within premises.</li> </ul>
13/07/2015	Closure direction u/s 33-A of the water (prevention and control of pollution) Act, 1974 was issued to the industry on 13/07/2015 based on inspection report dated: 31/05/2015.
01/08/2015	CTE application was rejected by GPCB.
29/07/2015	<ul style="list-style-type: none"> <li>This unit is inspected with reference to Head Office Order no. GPCB/CTE-SRT-2893/ID-44514/320693,Dt.13/07/2015 for Direction u/s 33-A of the water act(15 day effect).</li> <li>During inspection production plant of the <b><u>unit is found not in operation</u></b> and unit had re-applied for CTE on 04/05/2015 and Application for E.C of the unit is in process.</li> <li>Power Supply not disconnected</li> </ul>
12/08/2015	<ul style="list-style-type: none"> <li>Board has revoked closure direction with specific condition i.e. Unit shall not start plant without CCA and EC”</li> </ul>
03/08/2015	<ul style="list-style-type: none"> <li>Board has issued CTE to the industry which is valid up to 03/05/2020.</li> </ul>

03/08/2015 to 08/07/2019	<ul style="list-style-type: none"> <li>• During this period no any inspection of industry (M/s.Paras Enterprise) was carried out.</li> </ul>
09/07/2019	<ul style="list-style-type: none"> <li>• Unit was visited with reference to telephonic complaint of Shree Gabru Bharvad and Shree Mahendra Ramolia, President of Sachin Notified Industrial Association regarding acidic wastewater discharge from the M/s. V B V Enterprise, Plot No. 447, Road No. 4, GIDC, Sachin</li> <li>• During the inspection, the industry was operational <b><u>without CC&amp;A and EC</u></b> Rain water contaminated with raw materials was flowing into GIDC storm water drain.</li> <li>• Also, unsolicited underground pipeline leading to GIDC storm water drain was seen.</li> </ul>
23/07/2019	<ul style="list-style-type: none"> <li>• Board has issued Closure direction u/s 33-A of the water (prevention and control of pollution) Act, 1974 to M/s. Paras Enterprise and Also directed to deposit the <b><u>environment damage compensation cost of Rs. 5 lacs. (Based on inspection report dated: 09/07/2019)</u></b></li> </ul>
19/10/2019	<ul style="list-style-type: none"> <li>• In continuation to the closure direction issued to the industry, GPCB also served legal notice to the industry to show cause within 15 days from the receipt of legal notice.</li> </ul>
18/11/2019	<ul style="list-style-type: none"> <li>• Based on the undertaking &amp; action taken reply including deposition of environment damage cost of Rs 5 lacs by the industry on 11/11/2019 to GPCB, Unit is inspected after Direction issued to the unit u/s 33(A) of water act vide letter no GPCB/CTE-SRT-2983/ID-44514/514641 dated 23/07/2019 with 15 days effect for the reasons stated therein.</li> <li>• <b><u>Observed that the industry was not in operation.</u></b></li> <li>• Electricity and water supply was disconnected on dated: 14/08/19</li> <li>• The industry had dismantled it is all unit's operation and process machineries except civil structure.</li> </ul>
31/01/2020	<ul style="list-style-type: none"> <li>• Board has revoked closure direction for three month.</li> </ul>
20/08/2020	<ul style="list-style-type: none"> <li>• The industry was inspected with reference to communication from GPCB, Gandhinagar in the Hon'ble NGT matter OA no 32 of 2020.</li> <li>• <b><u>Observed that the industry was closed permanently</u></b> and not in</li> </ul>

	<p>operation.</p> <ul style="list-style-type: none"> <li>• Except the civil structure, all unit operation and process machineries were dismantled including boiler &amp; its ancillary facilities.</li> </ul>
17/02/2021	<ul style="list-style-type: none"> <li>• This unit is inspected with reference to revoke the closure order permanently and release of bank guarantee as per RO Letter Inward No. 37629 dated 29/12/2020.</li> <li>• <b><u>During visit unit is observed in not in operation.</u></b></li> <li>• All the plant and machineries has been observed in remove condition.</li> </ul>
29/10/2020	Report filed by joint committee appoint by Hon'ble NGT in OA No. 32/2020
22/09/2021	<ul style="list-style-type: none"> <li>• Board has imposed EDC of Rs. 2, 73, 25,000 to the unit considering joint committee report which is not paid by unit till date.</li> <li>• <b><u>BG of Rs. 2 Lakh Forfeited as EDC</u></b></li> </ul>
20/11/2023	<ul style="list-style-type: none"> <li>• This plot is inspected with reference to H.O. letter No. GPCB/CTE-SRT-2983/ID-44514/757495 Dated-30/10/2023.</li> <li>• During inspection of plot no- 447, Road No.4, Sachin GIDC. Closed shed is observed at the said plot, looking to the condition of the plot it seems that unit has not in operation since long.</li> </ul>

#### 4. DATA ANALYSIS

- As per the Joint Committee report, they have considered 2186 days for the violations i.e. from 06/02/2014 to 14/08/2019.
- Based upon the official record of the GPCB (xgn online portal), this industry was first inspected on 19/04/2014, and the industry had declared that production was initiated since 06/02/2014, therefore the committee had considered first day of violation as 06/02/2014 instead of actual day of verification as per the concern inspection report of the GPCB i.e. 19/04/2014.
- This industry was found non-operational since May 31, 2015 as per the record in inspection reports dated May 31, 2015, and July 29, 2015. Later on violations were identified as per the inspection reports dated 09/07/2019. Based upon the noted violations vide inspection reports dated 09/07/2019, this industry's power supply was disconnected on August 14, 2019.

**5. METHODOLOGY ADOPTED FOR CONSIDERATION OF VIOLATION DAYS:**

- a) With reference to the above analysed data's, the GPCB had requested the following stake holders vide letters dated October 30, 2023, and December 9, 2023 to provide data for determination of the precise days of violation i.e. 06/02/2014 to 14/08/2019;
- The daily average electricity consumption of M/s. Paras Enterprise's from DGVCL.
  - Summary of the daily water consumption of M/s. Paras Enterprise from the Notified Area Authority's.
  - M/s. Paras Enterprise to provide the production data, income tax return, excise return, and its overall turnover.
- b) The Notified Area Authority had given details vide letters dated 8/11/2023 and 11/12/2023 stating that, the water supply connection was given to plot no. 447 (M/s. Paras Enterprise), with a fixed 15-mm pipeline connection for limited time water flow and without any metering device. Therefore there is no record of any data regarding water consumption.
- c) The DGVCL vide letter dated December 16, 2023 had provided summary of monthly electricity consumption of M/s. Paras Enterprise for the period of 02/06/2014 to 14/08/2019;

Year-2014		
Sr. No.	Month	Unit
1	Jan	6905
2	Feb	3992
3	Mar	5163
4	Apr	7257
5	May	9694
6	Jun	6400
7	Jul	7067
8	Aug	11835
9	Sep	7842
10	Oct	6323
11	Nov	5569

Year-2015		
Sr. No.	Month	Unit
1	Jan	5626
2	Feb	8206
3	Mar	8245
4	Apr	7993
5	May	7810
6	Jun	5845
7	Jul	5899
8	Aug	6581
9	Sep	4785
10	Oct	7635
11	Nov	6440

12	Dec	6917
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12	Dec	7358
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Year-2016		
Sr. No.	Month	Unit
1	Jan	9999
2	Feb	9295
3	Mar	4705
4	Apr	8713
5	May	5580
6	Jun	6938
7	Jul	6686
8	Aug	8314
9	Sep	9406
10	Oct	10612
11	Nov	7044
12	Dec	9475

Year-2017		
Sr. No.	Month	Unit
1	Jan	10784
2	Feb	10043
3	Mar	9168
4	Apr	12206
5	May	9359
6	Jun	8590
7	Jul	2352
8	Aug	7204
9	Sep	8709
10	Oct	7438
11	Nov	6093
12	Dec	7440

Year-2018		
Sr. No.	Month	Unit
1	Jan	8210
2	Feb	8752
3	Mar	4538
4	Apr	9640
5	May	7002
6	Jun	6698
7	Jul	6473
8	Aug	9654
9	Sep	8086
10	Oct	9644
11	Nov	10541
12	Dec	10121

Year-2019		
Sr. No.	Month	Unit
1	Jan	8099
2	Feb	8671
3	Mar	5470
4	Apr	8813
5	May	4499
6	Jun	4160
7	Jul	4174
8	Aug	3916
9	Sep	196
10	Oct	166
11	Nov	209
12	Dec	--

- d) As per the modified directions under Section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974, and the Air (Prevention and Control of Pollution) Act, 1981 regarding harmonization of the classification of industrial sectors under the red, orange, green, and white categories of CPCB Dated: 07/03/2016 to all SPCBS/PCCc; The “synthetic resins” Industry Sector is listed at “Final SI No. 75” (Page-39 of CPCB Directions) in “Table G-3: Final List of Orange Category of Industrial Sectors,” and this industry (M/s. Paras Enterprise) was engaged in the manufacturing of polyester resins. Final List of Orange Category of Industrial Sectors is annexed herewith as an **Annexure R1**.

#### 6. **REPRESENTATIONS:**

In para. 13 of the Hon’ble NGT's order dated August 22, 2023, read as;

*“this figure may be calculated after giving opportunity of hearing to the applicant as well as the project proponent.”*

Accordingly, with a view to provide a chance of hearing to the M/s. Paras Enterprise and applicant, this Board vide letter dated 19<sup>th</sup> Dec, 2023 have communicated to M/s. Paras Enterprise as well as the applicant to remain personally present along with all the relevant materials.

- a) A committee consisting of Shri R. B. Trivedi (Senior Environmental Engineer and In Charge Law Officer), Shri R. R. Panchal (Legal Executive), and Dr. S. N. Agravat (Senior Environment Scientist and Unit Head-Surat) conducted hearing on 27<sup>th</sup> Dec, 2023.
- b) On 27<sup>th</sup> Dec, 2023 during hearing a representative of M/s. Paras Enterprise, namely: Shri Sanjaysinh Nakoom, was present before the aforementioned committee as per the Hon’ble NGT's order dated August 22, 2023. However, the applicant in the said NGT matter was not present before the aforementioned committee for hearing.
- c) During the course of hearing on 27<sup>th</sup> Dec, 2023 the representative of M/s. Paras Enterprise, namely: Shri Sanjaysinh Nakoom wanted to file documents in reply to the GPCB’s letter dated 30/10/2023. Based upon the said representation from Shri Sanjaysinh Nakoom, the committee had agreed to the request and gave next hearing date i.e. 2<sup>nd</sup> January 2024 @ 12:00pm noon.
- d) On the very same day of the hearing this Board vide its letter dated 27<sup>th</sup> Dec, 2023 have communicated to the applicant regarding the details of the hearing conducted at the Head Office of GPCB at Gandhinagar.

- e) The applicant, Shri Prakash Contractor, President, Kantha Vibhag Yuva Koli Samaj Parivartan Trust, had mailed the following details to the GPCB through his e-mail dated 28<sup>th</sup> Dec, 2023;

“In regard to the trailing mail and hearing on 27/12/2023, we as applicant would like to provide the following representation during the hearing. We do not want to remain present in person during the next hearing on 02/01/2024. But we wish to have the documents which M/s. Paras Enterprise is going to file for our reply or comment.

- (i) The EDC imposed by the committee is valid and justified.
- (ii) The 2186 days for which the EDC calculated is totally justified and the claim of 1470 days operation is not acceptable because the M/s. Paras Enterprise had not raised this issue with the committee and failed to produce any credible evidence in support of the claim before the NGT committee.
- (iii) We affirm the version of the committee in absence of documentary evidence.
- (iv) Thus in this GPCB hearing we deny the claims of M/s. Paras Enterprise to reduce the days of violation calculated by committee.

We reserve our right to file counter replies on the information/documents submitted to GPCB by M/s. Paras Enterprise on 2-1-2024. Requesting to provide the copies of documents on this email which will be filed by M/s. Paras Enterprise.

- f) A committee consisting of Shri R. R. Panchal (Legal Executive), and Dr. S. N. Agravat (Senior Environment Scientist and Unit Head-Surat) have conducted further II<sup>nd</sup> hearing on 2<sup>nd</sup> Jan, 2023.
- g) During II<sup>nd</sup> hearing the Proprietor of M/s Paras Enterprise was present before the aforementioned committee and the applicant was not present.
- h) During the course of hearing on 2<sup>nd</sup> Jan, 2023 the Proprietor of M/s Paras Enterprise had inform the committee that the person who had previously represented M/s. Paras Enterprise, namely: Shri Sanjaysinh Nakoom, was never been authorized by him. However, Shri Sanjaysinh Nakoom was from M/s. VBV Enterprise (who take over the Plot no. 447 after M/s. Paras Enterprise).
- i) During the course of the hearing, the Unit Head - Surat, and Legal Executive of the GPCB conveyed the following points:
  - I. The GPCB had obtained the electricity consumption data from the DGVCL, and as per these data, it was noted that M/s Paras Enterprise carried out production during 06/02/2014 to 14/08/2019.

- II. Based upon the Board's official records, issued orders, and considering the period of operations of your industrial plant it noted that these violations are purely in the name of M/s. Paras Enterprise. Therefore, M/s. Paras Enterprise is held responsible for their part of violations.
- j) The proprietor of M/s. Paras Enterprise have covered following points through the physical hearing as well as by the way of document submission:
- (i) We, the proprietor have taken land on rent from the landowners Shri Arjunsinh Vaghela and Smt. Harshaben Vaghela in 2014 for the M/s. Paras Enterprise and obtained permission from the GPCB in the same year.
  - (ii) Thereafter, we had run this industry regularly and without discrepancy up to 5<sup>th</sup> October 2017 and had replied to all notices issued by GPCB and other government departments. Thereafter, we have shut down our industry and sold out plant machinery to the landowners ( namely; Shri Arjunsinh Vaghela and Smt. Harshaben Vaghela) and for the same, we are submitting a machinery selling agreement dated 5<sup>th</sup> October 2017, a cancellation letter dated 28<sup>th</sup> November 2018 for GST registration, letter dated 21<sup>st</sup> April 2018 regarding closing its bank account at the South Indian Bank and IT return for the year 2016-2017 to 2018-2019, and a GST return for the year 2017-2018 to 2018-2019.
  - (iii) As we have implemented Board rules and running this industry accordingly, and as violations are not as per the large category industrial unit and our activity is on a small scale, the penalty amount calculated for the Red category unit is not in a just way and proper.
  - (iv) After shut down of our industry, we have not visited that place of industrial plot. GPCB had issued the Closure Direction dated 23<sup>rd</sup> July 2019 to M/s. Paras Enterprise (New Name: M/s. V B V Enterprise). Then, to re-open the closure direction, the owner of M/s. V B V Enterprise and land owner Shri Arjunsinh informed us to re-open the bank account and pay 5 lakhs for reopening that closure direction, so we have paid the same amount to the GPCB through RTGS. During the operation of my industry, I paid all the rent and GEB bills through a bank check to the landowner. And after the shutdown of my industry, I have never paid any amount to the owners of the plot by way of bank checks. The purpose is, above all, to obtain a revocation of the closure direction.
  - (v) Then after a court case was started against the land owner and partner of M/s. V B V Enterprise, in which there was no role or responsibility of the proprietor of M/s.

Paras Enterprise because we have already shutdown and dismantled the M/s. Paras Enterprise in 2017, as above said.

- (vi) We are not aware of the ongoing Hon'ble NGT case, but after receiving a letter from GPCB, we have come here and sent these factual details. So, we inform GPCB that our old name, M/s. Paras Enterprise & Proprietor Shri Shailesh P. Shah, is not responsible in the future for any decision taken by the court in this matter.

## 7. CONCLUSION:

- ❖ The violation days considered by the Joint Committee constituted by the Hon'ble NGT are just and proper considering the DGVCL data as mentioned in Paragraph 9 above.
- ❖ The following are the calculations of Environment Compensation (EC) for both Orange as well as Red category industry, considering aforementioned days of violation:

- a) The Pollution Index (PI) considered by the Joint Committee, i.e., PI = 80, is as per the Red category; and

As per the Red category, the calculation of Environment Compensation (EC) is as follows:

$$EC = PI * N * R * S * LF$$

PI	N	R	S	LF	EC
80	2186	250	0.5	1.25	2, 73, 25,000

- b) Looking at the unit representation and CPCB Direction (dated March 7, 2016) regarding the revised classification of industrial sectors, the Resin manufacturing industry fall under the Orange category i.e. O75 - Synthetic Resin, therefore the PI is 50 for the Orange category.

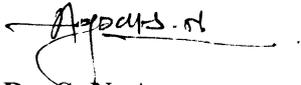
As per the Orange category, the calculation of Environment Compensation (EC) is as follows:

$$EC = PI * N * R * S * LF$$

PI	N	R	S	LF	EC
50	2186	250	0.5	1.25	1,70,78,125

- ❖ All Tenants and Landowners are responsible for violations of environmental laws; hence, all are responsible for paying environmental damage compensation.

i.e. Landowners; Shri Arjunsinh Vaghela and Smt. Harshaben Vaghela  
Tenants; M/s. Paras Enterprise and M/s. VBV Enterprise.



**Dr. S. N. Agravat**

(Senior Environment Scientist  
& Unit Head-Surat)



**Shri R. R. Panchal**

(Legal Executive)



**Shri R. B. Trivedi**

(Senior Environmental  
Engineer & In Charge Law  
Officer)