

**HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA**

No. HPPCB/ OA No. 136/2020 /- 8915

Dated: 25.9.2021

From: The Member Secretary

To

✓
The Registrar General,
Hon'ble National Green Tribunal, Copernicus Marg,
New Delhi

Subject:- Compliance of order dated 23-06-2021 passed in OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of HP & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

This has reference to order dated 23-06-2021 passed by Hon'ble National Green Tribunal, Delhi in the afore-cited matter related to alleged discharge of waste water /APIs in HP wherein following directions has been passed:-

".....A joint Committee of nominee of MoEF&CC, CPCB, State PCB and District Magistrate, Solan may conduct inspection of the area and give a report of the status of violations and the remedial action taken within three months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF. The State PCB will be the nodal agency for compliance. The Committee may interact with the concerned stake holders, including the concerned Industries. The report may inter alia give status of performance of individual pharmaceutical units, particularly with reference to removal of API residue by them and by the CETP, the number of pharma industries connected to CETP and those discharging effluents directly into the drain and the river. The report may further indicate chemical and biological water quality of rivers in question - Sirsa and Satluj, including the status of residue at relevant locations....."

In compliance to afore-cited order dated 23-6-2021, the Joint Committee comprising of representatives of MoEF &CC, Govt of India, CPCB, HPSPCB and District Magistrate Solan made field visit on 6th - 7th September, 2021. The Joint Committee also held

its meeting with the stakeholders on 20-9-2021 at Regional Office, HPSPCB Baddi. The copy of report submitted by the Joint Committee is annexed as **Annexure-A** which may kindly be placed on record please.

(Encl. As above)


Apoorv Devgan (IAS)
Member Secretary
HPSPCB Shimla



Progress Report of the Joint Committee, in compliance to the directions of Hon'ble National Green Tribunal given vide order dated 23/6/2021, in OA No. 136/2020; Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors

1. Background

The matter in OA 136/2020 titled Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors., is related to pollution caused by discharge of effluents by the pharmaceutical industry.

"The Prayer in this application is for remedial action against discharge of waste from CETP at Baddi and from Acme Life Sciences, Nalagarh and Helios Pharmaceuticals at Solan, to prevent pollution of rivers Sirsa and Satluj. According to the applicant, the CETP is not connected to pharmaceutical units at Barotiwala and Nalagarh who are discharging their effluents directly into the rivers. It is further stated that even after treatment in ETP/STPs, pharmaceutical ingredients may still be coming out from the industries unless ETP/STPs are specialized for the purpose. It is further stated that present CETP is not designed to neutralize Active Pharmaceutical Ingredient (API). The TSDF does not receive sludge generated from the industrial units at Nalagarh. The industries located at Baddi area are generating 20779 KLD of industrial effluent, out of which 17894 KLD is being treated at CETP and remaining 2885 KLD is being disposed of by the occupiers directly into river Sirsa. There is no existing sewerage system in BBN area and no demarcation in residential and industrial area. Presence of Ciprofloxacin in the concentration of 296.1 ug/l was found on chemical analysis. Concentration of Ciprofloxacin in the effluent discharge of M/s Acme Life Sciences work out to be 13455 times of the prescribed limit. The increasing occurrence of multi-resistant pathogens is a serious global threat to human health and it is finding its way into the water bodies and drinking water through industrial discharge and also due to heavy use of antibiotics in human and veterinary medicine."

After considering the report of the Committee during hearing on 23/6/2021, Hon'ble NGT observed as follows:


25/9/21






22/9/21

"We find that there is gross failure on the part of the State PCB to act as per public trust doctrine in preventing discharge of toxic effluents containing harmful residue of antibiotics in water posing threat to aquatic life (reference: "biomonitoring of Sirsa River in Baddi area of Himachal Pradesh by Bhagat S. Chauhan, et al, International Journal of Theoretical and Applied Sciences 5 (1): 183-185(2013)) which is also in violation of the Water (Prevention and Control of Pollution) Act, 1974.

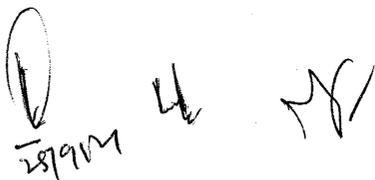
Such failure of statutory duties is at the cost of public health and protection of environment for which Chairman and Member Secretary of the PCB owe an explanation which may be furnished before the next date.

Mere fact that standards have not been revised by MoEF&CC of the residual antibiotics in industrial effluents can be no justification for State PCB not taking steps to prevent. Pending finalization of standards by MoEF&CC, State PCB can go by earlier standards or lay down standards by itself under section 17 of the Water Act. MoEF&CC needs to expedite the process of finalizing the standards in the interest of protection of environment."

2.0 Directions of Hon'ble National Green Tribunal:

It was directed by Hon'ble National Green Tribunal vide order dated 23/6/2021 (**Annexure-1**) as follows:

"Accordingly, MoEF& CC and the State PCB may take further remedial action expeditiously. The State PCB may ensure that no harmful components in the effluents are discharged into the water by the units in question or any other API unit. A joint Committee of nominee of MoEF&CC, CPCB, State PCB and District Magistrate, Solan may conduct inspection of the area and give a report of the status of violations and the remedial action taken within three months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF. The State PCB will be the nodal agency for compliance. The Committee may interact with the concerned stake holders, including the concerned Industries. The report may inter alia give status of performance of individual pharmaceutical units, particularly with reference to removal of API residue by them and by the CETP, the number of pharma industries connected to CETP and those discharging effluents directly into the drain and the river. The report may further indicate chemical and biological water quality of rivers in question - Sirsa and Satluj, including the status of residue at relevant locations. CPCB may also suggest monitoring mechanism for API residue through a credible system so as to cover all pharma industries in the country discharging API residue directly or indirectly in river systems. CPCB may propose the timelines to undertake monitoring which may also take a note of water quality monitoring guidelines of CPCB titled "Guidelines on Water Quality Monitoring, 2017" and the performance audit report dated 18.09.2020 filed by CPCB in OA 95/2018, Aryavart Foundation v. M/s Vapi Green Enviro Ltd. & Ors. and the

Handwritten signature and initials, including a circular stamp and the number 289114.

Handwritten signature.

directions of the Tribunal dated 05.02.2021. Relevant direction is reproduced below:

“22. The directions on the subject are summed up as follows:

i to vi xxx.....xxx.....xxx

vii. CPCB and State PCBs/PCCs, as directed earlier, may utilise EC funds on laboratory set up/upgradation, and on the mentioned areas in the report as well as on approved District Environment Plans. No approval of Central/State Government will be necessary in this regard in view of section 33 of the NGT Act, supra.”

3.0. Report on the Progress made by the Joint Committee for the compliance of the Directions of Hon'ble National Green Tribunal:

3.1 Constitution of the Joint Committee

In compliance to NGT Orders in the above matter, the joint committee comprising of the following members was constituted on 24.08.2021 based on the nominations received from concerned departments.

- Sh. Mahendra Pal Gurjar, IAS, Sub-Divisional Magistrate, Nalagarh, Solan (Member nominated by District Magistrate, Solan)
- Sh. P. C. Gupta, Regional Officer, HPSPCB, Baddi (Nominated by HPPCB)
- Dr. Narender Sharma, Additional Director, CPCB Regional Directorate, Chandigarh (Nominated by CPCB).
- Shri Ashwani Kumar, Assistant Director, IRO, MoEF&CC Shimla (Nominated by MoEF&CC)

3.2. Meeting of the Joint Committee:

Since the nomination from the Ministry of Environment, Forest and climate change was received on 24.08.2021, the first meeting of the Joint Committee could be conducted on 6th -7th September, 2021. During the first meeting the deliberations were made on the points to be complied by the Joint Committee. As per orders of Hon'ble National Green Tribunal, the joint committee is required to comply with the following directions:

- i. Interaction with the concerned stake holder including the concerned industries.


25/9/21






25/9/21

- 4-
- ii. Status of performance of individual pharmaceutical units, particularly with reference to removal of API residue by them and by the CETP and those discharging effluent directly into the drain and the river.
 - iii. Chemical and biological water quality of rivers in questions- Sirsa and Satluj, including the status of residue at relevant locations.
 - iv. Inspection of the area and the report on the status of violations and remedial action taken.

3.3. Progress made by the Joint Committee:

The report on the progress made by the Joint Committee on the directions of hon'ble National Green Tribunal is submitted as follows:

3.3.1. Interaction with the concerned stakeholders including the concerned industries:

In compliance of the orders of Hon'ble National Green Tribunal, a stakeholder meeting was called on 20/9/2021 at Regional Office, HPPCB, Baddi, wherein the following stakeholders were invited:

- Dr. Rajesh Gupta, President, Himachal Drugs Manufacturers Association, 153, 1 st floor, Motia Palaza, near Baddi Toll Barrier, Baddi, District Solan, H.P.-173205. **(Representative of Pharma Industry)**
- Mr. Sanjay Khurana, President, BBNIA, EPIP-Jharmajri Road, EPIP, Phase-1, Jharmajri, Baddi, Himachal Pradesh-174130 **(Representative of Industries located in Baddi, Barotiwala and Nalagarh)**
- The President, Lagu Bharti Udyog, 151, DIC, Industrial Area, Baddi, Himachal Pradesh 173205 **(Representative of Small Scale Industries)**
- Dr. Bishwanath Prasad Singh, Wing Commander (Retd), B-12 4, Swan Nagri, Greater Noid'a, Dist- G. B. Nagar, UP-201306 **(Applicant in the**


25/9/21






25/9/21

matter of OA. No. 136 of 2020; Veteran Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors.)

The applicant in this matter viz. Dr. Bishwanath Prasad Singh, Wing Commander (Retd) did not attend the stakeholders' meeting.

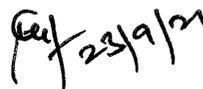
The members of the Joint Committee viz. SDM, Nalagarh, MoEF&CC member, HPPCB member alongwith other officials of HPPCB Regional Office, Baddi, attended the meeting. CPCB member could not participate in the meeting due to engagement in another matter in OA No. 124 of 2021.

The representations made by various stakeholders are attached as **Annexure-2** to **Annexure-4**. The minutes of the meeting of the stakeholders' meeting are attached herewith as **Annexure-5**.

The following is the summary of the views expressed by various stakeholders representing the industry with regard to antibiotic residues in the effluents from the Pharma industries and treated effluent from CETP, during the meeting and also in the written representations made by them:

- a) **MoEF&CC has notified the standards for Pharma industry vide Notification dated 06.08.2021 (Annexure-6), wherein limits of Antibiotic residues as mentioned in the draft standards have been removed in the final notification.**
- b) **In the standards notified by MoEF&CC vide Notification dated 06/08/2021, the chemical and biological sludge or any residue, reject, concentrate generated from wastewater treatment or its management facility at industry or CETP catering to industries engaged in manufacturing of bulk drug or formulation of pharmaceuticals, has been classified as Hazardous waste as per the provision of clause 17 of sub- rule(i) of rule 3 of the hazardous and other waste(Management) Rules,2016 and shall be subject to the provision made therein.**

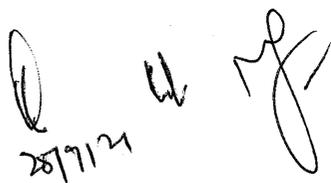


- c) **No action should be taken against the pharmaceutical industries as the parameters w.r.t. residual antibiotics in the treated effluents are not included in the standards notified by MOEF&CC.**
- d) Representative of BBN Industries Association informed during the meeting that they have received the funding support to the tune of Rs. 28 Crores from the Ministry of Commerce and Industry, Government of India, under "Trade Infrastructure for Export Scheme" for their proposal on "3 MLD Effluent Refractory Management and TDS reduction in CETP". The 3 MLD effluent proposed to be treated under this proposal includes pharmaceutical industrial effluent for treatment of API and Antibiotic residues. A DPR prepared in this regard by the Association was also provided to the Joint Committee. On the examination of the details provided by the Association in this regard, it was found that the aspect of API and antibiotic residues in the proposed scheme was not very clear and hence Association was requested to provide the clarification on the following points by HPPCB vide letter dated 22/9/2021 (Copy attached as Annexure-7):
- i. Composition of refractory material considered by you in the DPR.
 - ii. Concentration of API and Antibiotic Residues at the inlet of modified CETP designed by Association
 - iii. Concentration of API and Antibiotic residues at the outlet of modified CETPs designed by Association

The Baddi Infrastructure vide letter dated 23/9/2021 (Copy attached as Annexure-8) have submitted following clarification/confirmation on the above points raised by the Joint Committee:

- i. **Antibiotic residues and API are covered under the treatment scheme as submitted in the DPR of 3 MLD refractory management and TDS/FDS reduction in CETP Kenduwal, Baddi through adsorption process and subsequent ultra-filtration process.**
- ii. **The inlet antibiotic residue and API concentration (Cat III-Pharma Units) for this add on facility at CETP is considered as on higher side**

28/9/21



23/9/21

of 22-25 mg/l but actual testing will be done while undertaking treatability on pilot basis.

iii. **The content of antibiotic residue and API in the final outlet after treatment in this proposed add on facility in CETP, Baddi will be Nil.**

In this regard, it was also informed by the Association that **Govt. of Himachal Pradesh has already sanctioned and partially released the funds, for this proposal. Further, CETP Baddi has invited tenders for design, supply, construction, installation, commissioning, testing and trial run of 3 MLD capacity for effluent refractory management and TDS/FDS Reduction at their existing 25 MLD capacity CETP & MLD STP located at Baddi , Distt. Solan (HP) on 08.09.2021 and the tender opening process will start from 29.09.2021. As informed by the Association during the meeting and also in the written representation made during the meeting, this project shall be completed within one year i.e. upto 31.10.2022.**

It was decided that one more Stakeholders' consultation/meeting including industries shall be conducted, after the monitoring data with regard to performance of individual pharmaceutical industries and CETP for removal of antibiotic residues, is generated by the Joint Committee.

3.3.2. Status of performance of individual pharmaceutical units, particularly with reference to removal of API residue by them and by the CETP and those discharging effluent directly into the drain and the river.

Since, the joint committee was directed by Hon'ble National Green Tribunal to report the status of individual pharmaceutical units with reference to removal of API residues by them and by the CETP, the production schedule of different antibiotics was required, to plan the sampling and monitoring schedule to cover all the antibiotics through external laboratory with capability to analyse the antibiotic residues in the effluent. Therefore, Regional office, Baddi was requested to arrange the next 60 days' schedule of the production of the antibiotics, from the units which are engaged in manufacturing of antibiotics, enabling the committee to plan monitoring/sampling for assessing the performance of individual units and CETP, as well and decide the

Handwritten signatures and dates: 28/9/21, 23/9/21

parameters to be analysed. **The partial list in this regard has been provided by HPPCB to the Joint Committee.**

It was also decided by the Committee that HPPCB shall engage external laboratory for sampling and analysis of pharmaceutical industry effluents for the presence of residual antibiotics. **In this regard, HPPCB has obtained proposal from the external laboratory viz. Sri ram Institute of Industrial Research and submitted for the approval of the Competent Authority of the State Pollution Control Board (Annexure- 9 and Annexure-10).**

The Regional Office Baddi was requested by the Joint Committee through HPPCB Member, to provide the complete list of industries, falling in the catchment of CETP Baddi and outside the catchment of CETP Baddi, engaged in manufacturing of antibiotics. **The Information has been provided by the HPPSB to the Joint Committee.**

As per antibiotic manufacturing schedule for the next two months w.r.t. the partial list of industries provided by HPPCB to the Joint Committee, **it will take around 45 days for sampling of individual industries and CETP, covering all the antibiotics scheduled for production in this area, followed by 4-6 weeks for the extraction and analysis by the external laboratory.**

Therefore, 04 months are needed for sampling and analysis in compliance of this direction of Hon'ble National Green Tribunal i.e. Performance of Individual Pharmaceutical Units with reference to the removal of antibiotics them and by the CETP, followed by 15 days for evaluation of the generated data, consultation with the stakeholders and submission of authentic report by the Joint Committee.

3.3.3. Chemical and biological water quality of rivers in question- Sirsa and, including the status of residues at relevant locations.

The Joint Committee was directed by Hon'ble National Green Tribunal to report the status of chemical and biological water quality of Sirsa River and status of residues at relevant locations.


28/9/23





23/9/23

In compliance, the samples from the following locations were drawn by the Joint Committee for assessment of chemical and water quality of Sirsa River:

- i. Point before entry of Sirsa River from Haryana to Himachal Pradesh at Baddi
- ii. Point Upstream of CETP
- iii. Point Downstream of CETP

The report of analysis of samples is attached as **Annexure-11**. The analysis data shows that the **water quality of river Sirsa before entry from Haryana to Himachal Pradesh at Baddi is Class A and it becomes Class B in Himachal Pradesh, indicating deterioration in quality**. However, this deterioration may be due to muddy water flowing into the river due to rains in the ongoing monsoon season. Therefore, the monitoring of the water quality of Sirsa River during post monsoon season will give the exact status of water quality in Sirsa River.

The Joint Committee will take water samples of the Sirsa River and file supplementary report regarding water quality, for the consideration of Hon'ble National Green Tribunal.

The Joint Committee will also take samples of Sirsa River to assess the status of residues during post monsoon season while taking samples of individual industries and CETP for assessing the performance w.r.t treatment of antibiotic residues.

3.3.4. Inspection of the area and the report on the status of violations and remedial action taken:

In the last order of the Hon'ble National Green Tribunal, the following violations were also observed:

- *We find that there is gross failure on the part of the State PCB to act as per public trust doctrine in preventing discharge of toxic effluents containing harmful residue of antibiotics in water posing threat to aquatic life.....*
- *Mere fact that standards have not been revised by MoEF&CC of the residual antibiotics in industrial effluents can be no justification for State PCB not taking steps to prevent.*


28/9/17





28/9/17

- *Pending finalization of standards by MoEF&CC, State PCB can go by earlier standards or lay down standards by itself under section 17 of the Water Act. MoEF&CC needs to expedite the process of finalizing the standards in the interest of protection of environment.*

In compliance of the directions of Hon'ble National Green Tribunal, **the inspection of the area was made by the Joint Committee on September 6-7, 2021 and it was observed that pharmaceutical unit which are connected to CETP are not discharging effluent directly into the drain/river, but only through CETP.**

The performance of individual pharmaceutical units (which are connected to CETP and which are not connected to CETP and discharging into the drain/river after treatment) and CETP w.r.t treatment of antibiotic residues will be assessed by the Joint Committee as explained in Section 3.3.2.

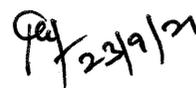
With regard to laying down of standards for antibiotic residues by HPPCB under Section 17 of the water Act, as directed by Hon'ble National Green Tribunal, **the representative of HPPCB in the Joint Committee apprised that the following action has been taken by HPPCB, which may be submitted in the report of the Joint Committee for consideration of Hon'ble National Green Tribunal:**

- The State Board has adopted all the national standards notified by the MoEF&CC Govt of India under Environment Protection Act, 1986 for discharge or emission of pollutant from industries. The antibiotic residual in the effluent is relatively new concept for which no research study, expertise or standards are available with the State Board.** The State Board has requested all SPCBs to intimate if any API residuals standards have been laid down by them and are being followed regarding monitoring of antibiotic residual effluent from pharma industries. In response, the Bihar Pollution Control Board, Odisha Pollution Control Board and Chandigarh Pollution Control Committee intimated that they have not laid down any specific antibiotic standards in industrial effluent of pharmaceutical units in their States. (Copies annexed as **Annexure-12**).


25/9/21






22/9/21

- ii. **The State Board has constituted two internal Committees vide office order dated 27-7-2021 & 06-08-2021 (copies annexed as Annexure-13) to examine the issue and prepare a proposal of standards for antibiotic residual discharge & to finalise the total requirement of instruments along with specifications to setup laboratory facility for analysis of antibiotics in water /waste water (effluent), respectively. The State Board has sought expertise from the CPCB vide letters dated 27-7-2021, 12-8-2021, 18-8-2021, 15-9-2021 and 20-9-2021 (copies annexed as Annexure-14). In this regard, CPCB vide letter dated 07/09/2021 has provided the steps/process to be followed, for development of standards. It was also informed by CPCB that recently MoEF&CC has notified standards for Bulk Drugs and Formulation (Pharmaceutical) Industry on 06/08/2021, wherein limits for antibiotic residues are not notified. It was suggested by CPCB that SPCBs/PCCs can develop location specific standards (Antibiotic Residues) by following the process described in CPCB letter (Annexure-15).**

- iii. **There is no sufficient research material, equipments/ instruments and expertise available with State Board to lay down such standards and recommended that MoEF &CC may notify the standards at national level.**

- iv. **The second committee constituted on 06-08-2021 has informed on 20-09-2021 that it is in the process of preparing analytical infrastructure requirements for analysis of pharmaceutical compounds/ antibiotics in environment samples and detailed specification of equipment will be finalised in consultation with CPCB in due course of time. In this regard, CPCB vide email dated 20/9/2021 has provided details of Analytical requirements, laboratory infrastructure, chemicals and manpower required for analysis of antibiotic residues in the effluents. (Annexure-16)**

- v. **The State Board has also repeatedly requested MoEF & CC, Govt of India vide letter dated 7-7-2021, 21-7-2021 and 12-8-2021 (copies annexed as Annexure-17) to notify the standards for residual antibiotics and response is still pending as it a matter of national concern. However, the final standards**

Handwritten signatures and dates at the bottom of the page. From left to right: a signature with the date '25/9/21', a signature with the date '25/9/21', a signature, and a signature with the date '25/9/21'.

notified by MoEF&CC vide Notification dated 06/08/2021, does not include the limits of API and antibiotic residues in the effluent, which were part of draft standards notified by MoEF&CC.

- vi. State Board has directed the drug manufacturing units through the Drug Manufacturing Associations vide letter dated 4-8-2021 (copy annexed as Annexure-18) to ensure that adequate treatment facility be provided by all pharma industries for the treatment of antibiotic residues and to reduce API residue discharge.

Prayer:

It is prayed that the above report of the progress made by the Joint Committee as elaborated in Subsection 3.3.1 to 3.3.4 of Section 3, with regard to the compliance of the directions, may kindly be considered by the Hon'ble National Green Tribunal.

Further, in view of the fact that i) Performance of individual pharmaceutical units and CETP w.r.t treatment of antibiotic residues, as directed by Hon'ble National Green Tribunal, will take another 4 months time to cover all type of pharmaceutical units and all types of antibiotics ii) Monitoring of the Sirsa River is required to assess the actual status of Chemical and biological water quality and concentrations of antibiotic residues at different locations in Post monsoon season, iii) Another Stakeholders' consultation is required before finalizing the report of the Joint Committee, it is humbly requested that extension of timeline upto 31/01/2022 for submission of complete and authentic report by the Joint Committee, may kindly be considered by the Hon'ble National Green Tribunal

The Joint Committee will abide by further directions of Hon'ble National Green Tribunal.


Ashwani Kumar,
MoEF&CC, IRO Shimla


P. C. Gupta,
HPPCB, Baddi


Dr. Narender Sharma
CPCB, Chandigarh


Mahendra Pal Gurjar, IAS
Distt. Admn, Solan

Dated: September 23, 2021

Item No. 03

(Court No. 1)

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

(By Video Conferencing)

Original Application No. 136/2020

(With reports dated 10.03.2021 & 05.05.2021)

Veterans Forum for Transparency in Public Life

Applicant

Versus

State of Himachal Pradesh & Ors.

Respondent(s)

Date of hearing: 23.06.2021

**CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE MR. JUSTICE SUDHIR AGARWAL, JUDICIAL MEMBER
HON'BLE MR. JUSTICE M. SATHYANARAYANAN, JUDICIAL MEMBER
HON'BLE MR. JUSTICE BRIJESH SETHI, JUDICIAL MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER**

Applicant: Dr. Bishwanath Prasad Singh, Wing Commiander (Retd.), in Person

Respondent: Mr. Nalin Kohli, Advocate for HPSPCB

ORDER

1. Prayer in this application is for remedial action against discharge of waste from CETP at Baddi and from Acme Life Sciences, Nalagarh and Helio Pharmaceuticals at Solan, to prevent pollution of rivers Sirsa and Satluj. According to the applicant, the CETP is not connected to pharmaceutical units at Barotiwala and Nalagarh who are discharging their effluents directly into the rivers. It is further stated that even after treatment in ETP/STPs, pharmaceutical ingredients may still be coming out from the industries unless ETP/STPs are specialized for the purpose. It is further stated that present CETP is not designed to neutralize Active Pharmaceutical Ingredient (API). The TSDF does not receive sludge generated from the industrial units at Nalagarh. The industries located at

ii. **As per Environmental Clearance granted to CETP Baddi by the Ministry of Environment, Forests and Climate Change (MoEF&CC), the member industries with hydraulic loading more than 200 KLD shall treat the effluent in the existing onsite ETPs and then discharge into CETP for further treatment and discharge. However, it was informed that Units with hydraulic loading of 200 KLD are not treating effluent in the onsite ETPs and supplying primary treated effluent to CETP. Therefore, CETP has not been complying with this condition of the Environmental Clearance granted by MoEF&CC for the last 04 years.** Accordingly, the sampling of these units was done by HPPCB team on 10/12/2020 and the samples were sent to HPPCB Central Laboratory. The results of the analysis are expected by 10/01/2021.

iii. The observations made by the Joint Committee during visit to the two Pharma units i.e. M/s Acme Life Sciences and M/s Helios Pharmaceuticals mentioned in the original application are as follows:

- Both the pharma units have connectivity with the CETP for supplying the primary treated effluent, for further treatment at CETP.
- No effluent was found to be discharged directly by the Units, in the drain.
- The Joint Committee collected the samples from the final outlet of the pharma units under reference, to see the concentration of residual antibiotics in the primary treated effluent which is being sent to CETP for further treatment. The results of the analysis are expected by 09/02/2021.

iv. The evaluation of the results of the analysis of the CETP samples collected by the Joint Committee on 12-13 October, 2020, indicated intended dilution by CETP so as to achieve the prescribed norms. Therefore, the Joint Committee conducted unannounced re-sampling and sent the samples for analysis from three different laboratories.

v. **The results of analysis for the samples collected by the Joint Committee have been analyzed in HPPCB Regional Laboratory, Paonta Sahib and evaluation of the results indicated that CETP is not meeting the norms prescribed for COD (264 mg/l > 250 mg/l), BOD (35 mg/l > 30 mg/l), FDS (2252 mg/l > 2100 mg/l) and Chloride (1838 mg/l > 1000 mg/l). Therefore, it is concluded that CETP is discharging the effluent into the Sirsa River without complying with the prescribed norms.** The results of the analysis of the samples are awaited from two other laboratories.

vi. The samples from CETP, upstream and downstream of Sirsa River and the pharma units under question, were

collected by the joint committee on 09/12/2020 for analysis of 12 Nos. residual antibiotic residues from Shri Ram Institute of Industrial Research, Delhi. The results of analysis of effluent samples for residual antibiotics is expected by 09/02/2021. The issue of discharge of residual antibiotics as raised by the applicant may be concluded by the Joint Committee after receipt of the analysis results.

In view of the fact that complete analysis reports will be available by 09/02/2021, it is humbly prayed to Hon'ble National Green Tribunal that Joint Committee may kindly be permitted to file the final conclusive report by 15/02/2020."

4. Accordingly, further action taken report may be separately filed by the State PCB before the next date by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF. The directions in the connected matter being OA No. 801/2018, *Jasmeet Singh v. State of Himachal Pradesh*, dealt with by a separate order, to the extent relevant for the present matter, may also be followed."

4. The State PCB has filed its report dated 10.03.2021 giving the analysis results of samples calculated from the units as follows:-

"Supplementary Report:

The analysis results from the remaining two laboratories w.r.t samples collected by the Joint Committee have been received (Annexure-2 and Annexure-3), Further, the report of analysis w.r.t. samples collected by the Joint Committee from CETP, Pharma Units and Sirsa River for the presence of antibiotics from the approved external laboratory has also been received (Annexure-4). Accordingly, supplementary report in this matter is being filed by the Joint Committee as follows:

- i) The results of analysis as received from three different laboratories of HPPCB, indicated that CETP is not meeting the norms prescribed for BOD (41, 35 & 38 mg/l > 30 mg/l), FDS (2252 & 3190 mg/l > 2100 mg/l) and Chloride (1209, 1838 & 1209 mg/l > 1000 mg/l). Therefore, it may be concluded that CETP is discharging the effluent into the Sirsa River without complying with the prescribed norms.
- ii) The results of analysis of the samples collected from various stages of CETP and also final discharge point in River Sirsa for the presence of residual antibiotics indicate that two antibiotics viz. Ciprofloxacin and Ofloxacin are present in the final treated effluent of CETP as a concentration of 22.8 ug/l and 69.8 ug/l respectively.
- iii) There are no standards notified by MoEF&CC for residual antibiotics in industrial effluents. However, these values are

1140 times higher for Ciprofloxacin (22.8 ug/l Vs. 0.02 ugh) and 349 times higher for Ofloxacin (69.8 ug/l Vs. 0.2 ugh) when compared with the proposed standards in the draft notification issued by MoEF&CC vide No. CG-DL-E-27012020- 215690 dated January 23, 2020 (Annexure-5), for pharmaceutical industry effluent and CETPs with membership of Bulk drug and formulation units.

- iv) Similarly, the samples collected by the Joint Committee from the outlets of two Pharmaceutical Industries viz. Helios Pharmaceutical and M/s Acme City Tech LLP, leading to CETP, were found to be much higher than the standards proposed in the draft notification issued by MoEF&CC. Also, the values reported as below quantification limit (BQL), in the analysis report of the external laboratories may not be considered as conclusive and within the proposed limits as draft notified by MoEF&CC, since the BQLs of external laboratory for various antibiotics tested in the samples, as shared with the Joint Committee, are much higher than the proposed standards.
- v) As per reports and research data available in the literature, the concentration of residual antibiotics has been found to be reduced by 60-90 % in conventional biological treatment plant. In view to assess the performance of the biological treatment system installed by CETP, the samples were collected from various stages of CETP. The results of analysis indicated that the performance of biological treatment system installed by CETP is not in line with the reports and data available in the literature, w.r.t. treatment of residual antibiotics. The inefficient performance of biological treatment system is also evident from the noncompliance of CETP with regard to biochemical oxygen demand (BOD).

Conclusion and Recommendations:

In view of the fact that:

- i) There are no standards notified by MoEF&CC w.r.t. residual antibiotics in industrial effluents;
- ii) Draft notified standards are yet to be decided by MoEF&CC;
- iii) The concentration of residual antibiotics at outlet of CETP in Sirsa River, is much higher than the draft notified standards;
- iv) The treatment efficiency of CETP w.r.t residual antibiotics is not at par with the reports and data available in the literature;
- v) The CETP is not meeting the prescribed norms of BOD, FDS and chloride and discharging effluent into Sirsa River without complying with the prescribed norms.

It is recommended that Pharmaceutical (both bulk drug and formulation units) may be directed by Himachal Pradesh Pollution Control Board to provide primary treatment to the level of predicted no effect concentration (PNEC) as developed by members of AMR

Industry Alliance (Annexure-6), as a site (Baddi) specific preventing measure, so that there is no adverse impact of residual antibiotics on the environment and also to prevent development of antimicrobial resistance (AMR)."

5. The report is followed by further report dated 05.05.2021 as follows:-

"It is further submitted that now the joint committee has submitted its supplementary report which is annexed as Annexure R-1/1. Based on the inspections and sampling conducted the conclusion and recommendations made by the joint committee are as under:-

- "i) There are no standards notified by MoEF & CC w.r.t. residual antibiotics in industrial effluents.*
- ii) Draft notified standards are yet to be decided by MoEF & CC.*
- iii) The concentration of residual antibiotics at outlet of CETP in Sirsa river is much higher than the draft notified standards.*
- iv) The treatment efficiency of CETP w.r.t. residual antibiotics is not at par with the reports and data available in the literature.*
- v) The CETP is not meeting the prescribed norms of BOD, FDS and chloride and discharging effluent into Sirsa River without complying with the prescribed norms....."*

The copy of Supplementary Report submitted by the joint committee dated 10-03-2021 (annexed as Annexure R-1/1) may be placed on record please.

It is submitted that as of now there are no specific standards notified by the Govt. of India for residual antibiotics parameters in the existing notification of standards for pharmaceutical (Manufacturing and Formulation Industry). However, it is worthwhile to mention here that all the bulk drugs/pharmaceutical manufacturing units (if not connected with CETP) are being regulated for the compliance as per standards notified in MoEF & CC Notification dated 9-7-2009 (copy annexed as Annexure R-1/2). If the pharmaceutical (manufacturing and formulation industry) is member of CETP, then the unit is bound to comply with inlet quality standards notified by the Govt. of HP vide notification dated 17-3-2018 and 26-12-2019 (copies annexed as Annexure R-1/3 and R-1/4) The notification of specific standards for residual antibiotics (annexed as Annexure -5 with joint report) is still under proposed stage and shall be implemented for regulatory aspect as and when finalized by the MoEFF & CC."

6. The industrial units in question have also filed their Counter Affidavits. The said Counter Affidavits are of no assistance.

7. As against the above, the applicant has filed written submission on 11.06.2021 pointing out that the analysis of the samples shows presence of antibiotics in the water.

8. The conclusion drawn from the analytical results is as follows:-

“

1. *Ciprofloxacin (22.8µg/L) and Ofloxacin(69.8µg/L) were detected in higher concentrations in the effluent released to Sirsa river from CETP (Sr. no 4), i.e., 1139 and 348 times higher than the prescribed MoEF& CC draft notification limits.*
2. *The higher concentrations of antibiotics in the effluent released to Sirsa river (Sr. no 4) clearly indicate that CETP is unable to completely remove or degrade these antibiotics.*
3. *Ofloxacin (960µg/L) was found in the effluent from M/S Helios Pharmaceutical (Sr. no 13) release to CETP, which is much higher than the draft notification limit (0.2 µg/L). It clearly raises doubt on the level of pre-treatment of the pharma effluent from this industry before it is released to the CETP.*
4. *The samples drawn from the effluent of M/S Acme City Tech LLP (Sr. no 14 and 15) release to CETP shows reasonably high concentrations of Ofloxacin (170 µg/L) and Azithromycin (423µg/L) even after primary treatment, indicate inefficient pre-treatment at this industry.*
5. *In the research methodology Limit of quantification (LOQ) for a compound by any method indicates the lowest concentration that can be quantified with accuracy and precision. The values below LOQ cannot be correctly quantified during the analysis and are reported as Below Quantification Limit (BQL). In the present analysis, the LOQs of the compounds fixed for the analysis by the lab are very high; namely, Ciprofloxacin (5 µg/L), Ofloxacin (5 µg/L), Piperacillin (5 µg/L), Azithromycin (10 µg/L), Tazobactam (5 µg/L), Ceftazidime (50 µg/L), Cefixime (20 µg/L), Amoxicillin (10 µg/L), Ampicillin (10 µg/L), Cefpodoxime (10 µg/L), Sulbactam (10 µg/L), Ceftriaxone (50 µg/L) and Cefoperazone (10 µg/L). The above LOQs of the compounds are much higher than even the antibiotic discharge limits set by the MoEF & CC draft notification for these compounds; except for Tazobactam.*
6. *Incidentally Piperacillin and Amoxicillin are the antibiotics are known for the very adverse impact on the human health even in the very low concentration. In this laboratory analysis, BQL limit for these compounds are set as (5 µg/L) and (10 µg/L) which is significantly higher than the limit fixed in the draft standards. In the draft standards the limit set for these two compounds are (0.1µg/L).*

7. *This implies that the Limit of Quantification (LOQ) set up by the lab is significantly higher than the limit set by the draft notification and therefore many of the compounds are not being detected as has been marked as BQL in the analysis results.*
 8. *Therefore, the samples analysis should be conducted using an analytical method to precisely and accurately quantify lower concentrations of the compounds (LOQs should be kept as close or even lower than the draft notification limits) to quantify all the compounds at lower concentrations with accuracy and precision. This raises the question mark on integrity of the overall analysis by the lab.*
 9. *Further the findings also imply that the CETP is not designed to efficiently treat class IV effluents; however, operator of CETP has entered into agreement with various pharma manufacturing units who are releasing class IV effluents to the CETP since 2017.”*
9. Further submissions are reproduced below:-

“14. The migration of antimicrobials into the environment has significant impacts. They can disrupt wastewater treatment processes and adversely affect ecosystem because they are toxic to beneficial bacteria. Some antimicrobials also bio accumulates; for example, erythromycin has been found to have both a high bio accumulation factor of 45.31 and a tendency to accumulate in soil. Antimicrobials can also be persistence for extended periods of time, the environmental persistence of erythromycin for example, is longer than one year.

15. Although not well studied, the presence of antimicrobials in natural waters may be exerting selective pressure leading to the development of antibiotics resistance in bacteria. The threat of growing antibiotics resistance has been recognised by, among others, the WHO, the National Academy of Science, the American Medical Association, the American Public Health Association and the US government Accountability. In fact the Centre for Disease Control and prevention (CDC) has identified antibiotics resistance as one of the most pressing public health problem facing the nation. Infections caused by bacteria with resistance to at least one antibiotic have been estimated to kill over 60,000 hospitalized patients each year. Methicillin resistant strains of Staphylococcus aureus, although previously limited primarily to hospital and health facilities, are becoming more widespread. In 2007, Consumer Reports tested over 500 whole chickens for bacterial contamination and antibiotic resistance. They found wide spread bacterial contamination in their samples and 84 percent of the salmonella and 67 percent of the campylobacter organisms that were isolated showed resistance to one or more antibiotic.

16. Antibiotic resistance is caused by a number of factors including repeated and improper use of antibiotics in both humans and animals.

Half of the antibiotics used in livestock are in the same classes of drug that are used in humans and animals. The U.S. institute of Medicine and the WHO have both stated that widespread use of antibiotics in agriculture is contributing to antibiotic resistance.

17. *The above study done by the HPPCB shows that from whichever place samples have been taken by HPPCB these are having antibiotics discharge which should not have been there. There is not a single sample in which the aforesaid antibiotics discharging into surface water and also seeping into the subsoil water is not there. This would lead to harmful antibiotic resistance amongst human and animal population and, thus, reducing the chances of their recovering from diseases where absence of resistance from these antibiotic would have helped. The above table and the subsequent narration would show that the antibiotics found in the discharge include some of the ultimate antibiotics developing resistance of which may be a death warrant for different life forms - human and animal - if infected with diseases where these antibiotics could have provided a cure.*

18. *A situation where all random samples show the same results, in technical terms, is called '100% random test positivity'. In view of the '100% random test positivity', the study conducted by HPPCB cannot be stated to be complete and conclusive. It only indicates that a whole lot of polluting antibiotics are being discharged into the surface and subsoil water which is harmful for human and animal population.*

19. *As per information available at internet, there are more than 270 Pharmaceutical Companies operating in Baddi-Barotiwal-Nalagarh area. List of such Pharmaceutical Companies along with their addresses, as obtained through internet sites, is placed at Annexure A.*

20. *This necessarily requires a further and more detailed study as a sequel to 'the sample study' done by HPPCB to understand the entire extent of damage because of the aforesaid antibiotic discharge into the water bodies. It is being called 'sample study' because of the fact that it has '100% random test positivity' and therefore, in scientific tradition, there is an absolute need for following it up with a detailed, wide and more in depth study of the antibiotic discharge into river sirsa."*

10. We have heard the applicant in person and the Learned Counsel for State PCB.

11. We find that there is gross failure on the part of the State PCB to act as per public trust doctrine in preventing discharge of toxic effluents containing harmful residue of antibiotics in water posing threat to aquatic life (reference: "biomonitoring of Sirsa River in Baddi area of Himachal

Pradesh by Bhagat S. Chauhan, *et al*, *International Journal of Theoretical and Applied Sciences* 5 (1): 183-185(2013)) which is also in violation of the Water (Prevention and Control of Pollution) Act, 1974. Such failure of statutory duties is at the cost of public health and protection of environment for which Chairman and Member Secretary of the PCB owe an explanation which may be furnished before the next date. Mere fact that standards have not been revised by MoEF&CC of the residual antibiotics in industrial effluents can be no justification for State PCB not taking steps to prevent. Pending finalization of standards by MoEF&CC, State PCB can go by earlier standards or lay down standards by itself under section 17 of the Water Act. MoEF&CC needs to expedite the process of finalizing the standards in the interest of protection of environment.

12. Accordingly, MoEF&CC and the State PCB may take further remedial action expeditiously. The State PCB may ensure that no harmful components in the effluents are discharged into the water by the units in question or any other API unit. A joint Committee of nominee of MoEF&CC, CPCB, State PCB and District Magistrate, Solan may conduct inspection of the area and give a report of the status of violations and the remedial action taken within three months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF. The State PCB will be the nodal agency for compliance. The Committee may interact with the concerned stakeholders, including the concerned Industries. The report may inter alia give status of performance of individual pharmaceutical units, particularly with reference to removal of API residue by them and by the CETP, the number of pharma industries connected to CETP and those discharging effluents directly into the drain and the river. The report may further indicate chemical and biological water quality of rivers in

question - Sirsa and Satluj, including the status of residue at relevant locations. CPCB may also suggest monitoring mechanism for API residue through a credible system so as to cover all pharma industries in the country discharging API residue directly or indirectly in river systems. CPCB may propose the timelines to undertake monitoring which may also take a note of water quality monitoring guidelines of CPCB titled "Guidelines on Water Quality Monitoring, 2017" and the performance audit report dated 18.09.2020 filed by CPCB in OA 95/2018, *Aryavart Foundation v. M/s Vapi Green Enviro Ltd. & Ors.* and the directions of the Tribunal dated 05.02.2021. Relevant direction is reproduced below:

"22. The directions on the subject are summed up as follows:

i to vi xxx.....xxx.....xxx

vii. CPCB and State PCBs/PCCs, as directed earlier, may utilise EC funds on laboratory set up/upgradation, and on the mentioned areas in the report as well as on approved District Environment Plans. No approval of Central/State Government will be necessary in this regard in view of section 33 of the NGT Act, supra."

CPCB may file report on the above aspects before the next date of hearing by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF.

List for further consideration on 05.10.2021.

A copy of this order be forwarded to MoEF&CC, State PCB District Magistrate Solan and CPCB by e-mail for compliance.

Adarsh Kumar Goel, CP

Sudhir Agarwal, JM

-24-

M. Sathyanarayanan, JM

Brijesh Sethi, JM

Dr. Nagin Nanda, EM

June 23, 2021
Original Application No. 136/2020
SN

BADDI INFRASTRUCTURE

CIN: U45209HP2010NPL031349, GSTIN : 02AAECB3644E129

(SPV of BBN Industries Association)

Regd. Office: BTTI Complex, EPIP Phase - 1, Jharmajri, Tehsil Baddi, P.O. Barotiwala,

Distt. Solan (H.P.) 174103, Ph.: 01795-271105, 271106

Email: baddiinfra@yahoo.in, btti.pvtiti@gmail.com, web site: baddiinfra.org.in



No.BI/HPSPCB/2021- 1109- 1110

Date:- 20.09.2021

To
The Chief Environmental Engineer,
HP State Pollution Control Board
Regional Office, Baddi

Subject :- OA No. 801/2018 titled Jasmeet Singh Vs State of Himachal Pradesh & Ors. and
OA No. 136/2020 titled Veteran Forum for Transparency in Public Life Vs State
of Himachal Pradesh & Ors. pending before the Hon'ble National Green
Tribune.

Dear Sir,

1. We have already informed to your office that we had submitted the following action plan
w.r.t. control of FDS parameter, within the prescribed limits:

A. Short term plan

- i. Meeting was held with Senior Management of Vardhman and Winsome Textile to
modify their processes to reduce their TDS, till their ZLD facility is operational.
- ii. After deliberation they agreed to reduce TDS from their current level immediately.
- iii. Series of Meetings were held with SME members with consent to operate (COP) less
than 200 KLD discharging high TDS and following decision were taken:
 - The units discharging more than 50000 mg/l TDS will use facility of MEE available
at Shivalik Solid Waste Management to the extent of 20KLD capacity
 - Other Small units to modify their processes and reduce the TDS by 50%.

Outcome/Status

- TDS/FDS in the final discharge of CETP was significantly reduced.

B. Medium term plan

- i. Vardhman & Winsome to set up their individual facilities at their end to treat their
respective high TDS effluent of Category-IV by installing ZLD Facility, which is
expected to be completed by 30.06.2021.
- ii. The flow of Sewage to the STP at CETP should increase at least to 2-3 MLD by
31/03/2021.

Outcome/Status

- Vardhman & Winsome have already set up their individual facilities at their end to treat their respective high TDS effluent by installing ZLD Facility. Vardhman has already stopped the discharge of Effluent of Category-IV w.e.f 10.07.2021 & Winsome will stop the discharge of Effluent of Category-IV very shortly.
- **With the above stated action by the two textiles units, CETP has become compliant w.r.t FDS outlet parameter and all other notified outlet parameters.**
- The flow of Sewage to the STP at CETP has not increased to the desired level. The present flow of Sewage from the area under MC Baddi for the month of August was 431 KLD and for September (till date) 390 KLD. The commulative flow from February 2020 till date is 220 KLD only against a minimum agreed flow of 3000 KLD. The capacity of STP at CETP is 5500 KLD.
- With the increase of the flow of Sewage there will be further Reduction of FDS parameter.
- The Sample Test Results of HPSPCB & Final Outlet of CETP labs for w.r.t. FDS parameter are well within the prescribed limits along with all other parameters tested. **Hence CETP is compliant.**

The test results of the Final Outlet of CETP lab & HPSPCB are as below:

Sr. No	Date of collection	HPSPCB	CETP
1	21.05.21	2019	2347
2	07.06.21	2072	2023
3	19.06.21	1918	1802
4	07.07.21	2100	2017
5	02.08.21	Awaited	1442
6	23.08.21	Awaited	1446
7	06.09.21	Awaited	1509

From the above stated results it is very much evident that the CETP is compliant w.r.t FDS parameter and CETP was already compliant w.r.t. all other parameters.

C. Long term plan

- CETP to submit DPR to install separate facility for treatment of TDS for small units discharging less than 200KLD
- CETP plan also includes treatment of API from Pharma industry which is expected to be notified in near future.

Outcome/Status

- We have already submitted a Detailed Project Report (DPR) for **“3 MLD Refractory Management and TDS/FDS Reduction in CETP Kenduwal,**

Baddi", project to the Commissioner of Industries GoHP for financial assistance under Trade Infrastructure Export Scheme (TIES).

Copy of the DPR is attached as per **Annexure-A**

- The Proposal for "3 MLD Effluent Refractory Management & TDS Reduction in CETP under Trade Infrastructure for Export Scheme (TIES)" has been approved by the Ministry of Commerce & Industry GoI and out of a total grant of Rs. 20 Crores, Rs. 10 Crores payment has been released on 27.08.2021.

Copy of the letter No. Ind.Dev.F(16)ASIDE(CETP)-IV-7203 dated 06.09.2021 is attached as per **Annexure-B**

- Tender documents have been prepared and Notice Inviting Tender/Bid has been published in the News Paper on 08.09.2021.

Copy of the Tender Notice is attached as per **Annexure-C**

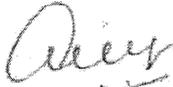
2. After completing the Tendering process of Technical and Financial evaluation of the Bids, we would be able to place the order for the project by 15th October 2021. The project is planned to be commissioned within a period of one year from the placement of the work order.
3. Regarding OA No.136/2020 titled Veteran Forum for Transparency in Public Life Vs State of Himachal Pradesh & Ors, we wish to state that letter No. BBNIA/PCB/2021 dated 20.09.2021 has been submitted by BBN Industries Association, presenting the view in the matter.

Copy of the letter is attached as per **Annexure-D**

The above is submitted for your kind information and consideration please.

Yours Faithfully

For Baddi Infrastructure



Vijay K Arora
Director & CEO

Enclosure: -Annexures A to D

Copy to :- President BBNIA-for Information

No. Ind.Dev.F(16)ASIDE(CETP)-IV/- - 7203
Government of Himachal Pradesh
"Directorate of Industries"

Dated: Shimla-171001; the

From:

Director of Industries, 06 SEP 2021.
Himachal Pradesh.

To

The Chief Executive Officer,
M/s Baddi Infrastructure,
EPIP Phase-I, Jharmajri, Baddi,
Distt. Solan, H.P.

Subject:-

Regarding starting the work of proposed facility at CETP, Baddi.

Sir,

As you are aware that the proposal for providing advance treatment facility for the improvement in the functioning of CETP Baddi (3 MLD effluent refractory management & TDS reduction) submitted to the Department of Commerce, GoI by the State Govt. for financial assistance under Trade Infrastructure for Export Scheme (TIES), has been approved in the 14th meeting of the Empowered Committee of TIES held on 02.08.2021 with the Financial Patten as under (copy of minutes of the meeting enclosed):-

Sr. No.	Means of Finance	Amount (Rs. in Cr.)
1	Central Grant (Max. limit of Rs. 20.00 Cr. i.e. 70% of Project Cost)	20.00
2	State Govt. Share (10%) i) Department of Industries (50%) = Rs. 1.425 Cr. ii) State Pollution Control Board (50%) = Rs. 1.425 Cr.	2.85
3	SPV Contribution (20%)	5.66
	Total:	28.51

All the requisite details/documents for processing release of funds for the project has been sent to the Department of Commerce, GoI and the first installment of Central Grant amounting to Rs. 10.00 Cr. is likely to be released to you by the Department of Commerce, GoI in a few days.

As per minutes of the meeting held on 4.8.2021 under the Chairmanship of the Chief Secretary to the Govt. of H.P. in compliance of latest Hon'ble NGT directions in OA No. 801/2018 and OA No. 136/2020, M/s Baddi Infrastructure has been directed to initiate and complete the process for floating of tenders and ensure that tenders shall be awarded by 15th September, 2021.

Contd. Page 2.

5718
08/09/21 Rest CEO Sir

2.

You are, therefore, requested to start the work of proposed facility at CETP, Baddi by completing all the codal formalities in this behalf immediately and complete the work at the earliest.

Yours faithfully,

Encls.: As above.


Director of Industries,
Himachal Pradesh.

Endst. No. Ind.Dev.F(16)ASIDE(CETP)-IV/-

Dated:

Copy to the Addl. Chief Secretary (Industries) to the Govt. of H.P., Shimla-2 with the request to take up the matter with the State Pollution Control Board at Govt. level to release its share of Rs. 1.425 Cr. to the SPV.


Director of Industries,
Himachal Pradesh.

Baddi Infrastructure

Baddi Technical Training Institute (BTI) Complex, EPIP Phase-1
Jharmajri, P.O. Barotiwala, Tehsil Baddi, Distt. Solan (H.P)-174103
Phone: - 01795-271105 & 271106. Email:- baddiinfra@yahoo.in

TENDER NOTICE

Date: 08/09/2021

The CEO, BADDI INFRASTRUCTURE BADDI, HP (a company registered under section 25 of the companies Act, 1956) invites sealed tenders for design, supply, construction, installation, commissioning, testing and trial run of **3 MLD capacity for Effluent Refractory Management and TDS/FDS Reduction** at their existing 25 MLD capacity CETP & 5.5 MLD capacity STP located at Baddi, Distt. Solan(H.P).

Estimated project cost is Rs. 25 Crores.

The scheme/design should be conforming to the specifications as per the Technical Bid/Financial Bid and DPR which are part of the tender.

In case any Bidder intends to submit his own process design, they may do so, subject to fulfillment of purified water and salt generation for recycling, however, it will be subject to the approval of Baddi Infrastructure.

Eligibility Criteria:

- I. Should have completed at-least two works of "Water Reclamation and Recycling from Waste water" of a minimum capacity of 1500KLD, one of them costing not less than Rs. 10 Crores, in last 3 years (Proof to be attached).
- II. Should have an average annual financial turnover not less than Rs. 60Crores during the last three years ending 31st March 2021. Group turnover of associate/sister entities will also be considered for the purpose of average annual financial turnover. (Audited Balance sheet to be attached).

General conditions:-

1. The Tender/Bidding documents may be downloaded from website www.baddiinfra.org and will be available up to 22.09.2021. The tender documents file will be password protected. Password will be made available to the Bidders upon payment of Rs. 17,700/- (including GST) through NEFT/IMPS by sending proof of payment on baddiinfra@yahoo.in
Account Holder Name : Baddi Infrastructure, Bank Account Number : 18630210001684.
Bank: UCO Bank, Baddi Distt. Solan, H.P. IFSC Code : UCBA0001863
2. The tender should be accompanied with Earnest Money of Rs. 50 lacs in shape of Demand Draft, FDR/Bank Guarantee issued by any Nationalized Bank valid for a period of 90 days from the date of opening of Bid, favoring BADDI INFRASTRUCTURE, payable at Baddi in a separate envelope. The tender not accompanied with requisite Earnest Money shall not be considered. The earnest money deposited by unsuccessful Tenderer will be returned without any interest within 15 days.
3. The validity of the bids shall be for 90 Days from the last date of opening of bid.
4. Pre-Bid meeting will be held for any techno-commercial clarification at Baddi Infrastructure at 2:30 PM to 5:30 PM on **23/09/2021**.
5. Bid must be delivered in the office of CEO, Baddi Infrastructure on or before 3 PM on **29/09/2021** during office hours. If it happens to be a holiday on the date of receipt of the bids the same will be received on the next working day.
6. Earnest Money, Technical Bid and Financial Bid are to be submitted in separate sealed Envelope.
7. The Technical bid along with the Earnest Money will be opened at 3 PM at Baddi Infrastructure on **30/09/2021** in the presence of the Bidders who wish to attend. The Financial Bids of the technically qualified Bidders will be opened on the same date.
8. Prospective Bidders must submit hard bound Bid Document of all pages duly numbered. Spiral or loose bidding shall not be entertained.
9. Bid must comprise of original documents containing proof of payment of tender money, earnest money, solvency certificate, undertaking of non-corrupt practices & non-cartelization and other documents as per tender document otherwise Bid will be out rightly rejected.
10. No conditional tender will be accepted which will be liable for rejection.
11. Baddi Infrastructure shall have the right to reject or accept any or all the tenders and will not be bound to accept the lowest or any tender or to give any reason for such a decision. The decision of Baddi Infra shall be final.
12. All disputes will be subject to jurisdiction of court at Nalagarh, Distt. Solan HP.
13. Bidding document shall prevail over relevant instruction in the notice inviting tender and the notice inviting tender shall be treated as modified to that extent.
14. Sealed tenders must be submitted super-scribed "TENDER FOR REFRACTORY MANAGEMENT AND TDS/FDS REDUCTION" in the office of BADDI INFRASTRUCTURE JHARMAJRI, BADDI, HP on the date as mentioned above.

Chief Executive Officer, Baddi Infrastructure.

SIZE: 17X8



B.B.N. Industries Association (Regd.)

EPIP-Jharmajri Road, EPIP Phase I, Jharmajri, Baddi, Distt. Solan H.P. - 174103
Phone : 01795-271195, fax: 01795-271195, Mobile : 098160-46495

Website : www.bbniia.com, E-mail : info@bbniiamail.in, admin@bbniiamail.in

BBNIA/PCB/2021

Dt. 20.09.2021

The Chairman,
Inspection Committee of Hon'ble NGT

Subject: Case No.136/2020 Veteran Forum for Transparency in Public Life V/s State of HP & Others

Dear Sir,

At the outset we thank you for giving us an opportunity to present our view on the above case. As per the hearing held at Hon'le NGT rested with last one on 23.06.2021, mainly the following issues came into light.

1. The issue started from direct discharge by some pharmaceutical units into drain and the applicant raised issue of API contents in river water resulting into resistant pathogens reaching living beings through water.
2. The CETP is not following the condition of EC to get pre-treated effluent from units discharging more than 200KLD.
3. The CETP beside category-IV (i.e mainly FDS and chloride) is also not capable of treating these API discharges in the effluent of Pharma formulation units.
4. The CETP is discharging higher than norm BOD and TDS/chloride to river.
5. There are no standards notified by MOEF for discharge of API contents and only draft notification is done. It directed the MOEF to expedite the final notification and in absence asked state PCB to formulate its own norm.
6. The testing labs have higher LOQ than specified in draft notification of MOEF hence most of the parameters are reported as not detectable by the Sri Ram Lab and asked CPCB/SPCB to use EC funds to upgrade their labs to test the API as per draft notification

We would like to submit our point wise view and action taken as under-

- A. We do not support any industry discharging untreated effluent in to water sources.
- B. The CETP was following the EC conditions as per pre-treatment notification of 2018 of SPCB and subsequently the revised notification of 2019, CETP submitted an action Plan along with the units above 200KLD which now stands completed at level of units mainly M/s Vardhman and Winsome Textile. The EC condition is therefore now stands complied with. The notification dates 26/12/19 of state PCB with respect to inlet norms is stayed by Hon'ble High Court of HP vide

stayed vide order dt. 15.09.2021 till 27.10.2021 with a direction not to take any coercive action against the petitioner (BBNIA) - (copy enclosed)

- C. The category-IV effluent is now being treated at unit level and the units are now Zero discharge for category-IV. Regarding API the CETP had submitted action plan to set up additional facility to treat API and FDS/Chloride if required to meet the standards after stopping of category-IV effluent. We may submit that the funding support from GOI and GOIP has already been sanctioned and partially released. The CETP has already notified tender for installation of these facilities and tender opening process to start from 29/09/21.
- D. The CETP had submitted short term, medium term and long term plan to control these parameters of BOD & FDS to NGT through State PCB and we are happy to declare that we became compliant in BOD long back but from May onward we are compliant in all respect. After stoppage of discharge from Vardhman our FDS level is as low as 1300-1500mg/ltr against norm of 2100.
- E. The MOEF has finally notified the proposed standards for Pharma industry vide notification dt. 06.08.2021 but instead of API norms they have termed the effluent as hazardous and asked industry to comply within one year from the date of notification. We, therefore, feel there is no need for state specific norms which otherwise may make the industry incompetent as compared to other states. We may also submit that the CETP in the meantime will upgrade its facility to treat APIs and units connected to CETP can continue to discharge to CETP.
- F. For up-gradation of Labs to test API the answer is with CPCB or SPCBs.

Hope the Committee report will highlight all these achievements specially the compliant CETP for all norms except APIs and its proposed up-gradation to treat these in about one-year's time.

Thanking you,

For BBN Industries Association



(Sanjay Khurana)
President



-33-

B.B.N. Industries Association (Regd.)

EPIP-Jharmajri Road, EPIP Phase I, Jharmajri, Baddi, Distt. Solan H.P.-174103

Phone : 01795-271195, fax: 01795-271195, Mobile : 098160-46495

Website : www.bbni.com, E-mail : info@bbniemail.in; admin@bbniemail.in

BBNIA/ PCB/2021

Dt. 20.09.2021

To
The Chairman,
Inspection Committee of Hon'ble NGT,
Baddi.

**Reg.: Case No.136/2020 Veteran Forum for Transparency in Public Life V/s
State of HP & Others**

Dear Sir,

In continuation of our submissions as made this morning verbally during the Stakeholder Meeting convened by you as well as submitted in writing by us, we would further like to bring following facts on records as the same was conveyed verbally during the discussions, for your kind consideration as addendum to our earlier submissions:

In the Draft Notification of MOEF&CC dated 23rd January, 2020, in part-D. "Antibiotic Residues in the treated effluent of Bulk Drug and Formulation Industry and CETP with membership of Bulk Drug and formulation Units" the 121 parameters with limiting value for concentration ($\mu\text{g/l}$) were mentioned for "Individual antibiotic residues".

Whereas as per **Final Notification of MOEF& CC dated 6th August, 2021** the said individual parameters, which were proposed for residuals of antibiotics are NOT notified, It has been now mentioned in **Part-D & notified now as "Chemical and Biological sludge or any residue, reject, concentrate generated from wastewater treatment or its management facility at Industry or CETP catering to industries engaged in manufacturing of bulk drug or formulation of Pharmaceuticals, shall be classified as Hazardous Waste as per the provision of clause 17 of sub-rule (i) of rule 3 of the Hazardous and Other Wastes**

(Management and Trans-boundary Movement) Rules, 2016 and shall be subject to the provision made therein".

Which means that any Pharmaceutical Formulation Industry / Bulk Drug Industry, OR CETP catering to industries engaged in manufacturing of Bulk Drugs or Pharma Formulations have to dispose the said effluent carrying the residuals of antibiotics, if any as per Hazardous Waste Management Rules 2016. BBN Area is having a Hazardous Waste Management Site available as Shivalik Solid Waste Management Ltd. (SSWML) as such the said industries can contact SSWML for the same. Though, we wish to state the Rules as per the notification dated 06.8.21 **shall come into force after one year from the date of publication** in the official Gazette i.e. 05.08.2022.

However, we once again reiterate that CETP Baddi is putting up API REFRACTORY MANAGEMENT SYSTEM, for its Pharma Formulation member industries, under its up gradation plan, which is under active implementation & will be functional within next one year.

In the light of the above, we request that Hon'ble NGT may kindly be apprised on the issue accordingly.

Thanking You,

Yours Sincerely

For BBN Industries Association



(Sanjay Khurana)
President



HIMACHAL DRUG MANUFACTURERS ASSOCIATION (Regd.)

153, 1st Floor, Motia Plaza, Nr. Baddi Toll Barrier, Baddi - 173205, Himachal Pradesh

E-mail : himachaldrugs@gmail.com, Ph. No. : 82196-17038

PRESIDENT

Dr. Rajesh Gupta
+91 97790 21318

CHAIRMAN

C. S. Pushkarna

GENERAL SECRETARY

Munnish Thakur
+91 98165 96332

TREASURER

Sanjay Sharma
+91 93563 01674

SR. VICE PRESIDENT

R.B. Gupta
Neeraj Bhatia

VICE PRESIDENT

Ajay Batra
Harpreet Singh
Harish Goyal
Paramjeet Arora
Manoj Aggarwal
Nirmal Singh Rana

JOINT SECRETARY

Ashwani Singla
Sumeet Gupta
Manu Jain
Vishal Chadha
Sanjay Ahuja
Sudhir Sharma

ADVISORY COMMITTEE

R. C. Juneja
B. R. Sikri
Sanjay Guleria
Vinod Gupta
S. L. Singla
M. B. Goyal
Rakesh Arora

CHIEF ADVISOR

Satish Singhal
+91 98726-33936

To

The Chief Environmental Engineer

H.P State Pollution Control Board

Regional office, Baddi

Subject: Meeting of stake Holders held in the o/o Chief Environmental officer, Regional office Baddi.

Respected Sir

This is in reference to letter number PCB/OA No. 136/2020/Consent/2021-5419-33 dated 4.8.21 through which the worthy member Secretary Himachal Pradesh state Pollution Control Board has issued in reference to order dated 23.6.2021 passed by honorable NGT related to antibiotic residues discharged in pharmaceutical industrial effluent in Baddi Industrial area and subsequently to letter no PCB/RO Baddi/NGT/21 1638-46 from Chief Environmental officer and the meeting of stake holders held on 20.9.21 in the Chief Environmental officer, Baddi. In this regard it is humbly submitted that Himachal Drugs Manufacturers Association which comprises of 70% MSME industry stands in Harmony with the concerns of the Hon'ble NGT which says that by **no means the antibiotics residues should be discharged on land or in water** and assures in letter and spirit that we are committed to protect our environment through complete adherence to and compliance of the standards laid down by the State and Central government Authorities from time to time.

Our pharmaceutical industrial manufacturing is in the noble profession of serving the humanity with quality and life saving



HIMACHAL DRUG MANUFACTURERS ASSOCIATION (Regd.)

153, 1st Floor, Motia Plaza, Nr. Baddi Toll Barrier, Baddi - 173205, Himachal Pradesh
E-mail : himachaldrugs@gmail.com, Ph. No. : 82196-17038

PRESIDENT

Dr. Rajesh Gupta
+91 97790 21318

CHAIRMAN

C. S. Pushkarna

GENERAL SECRETARY

Munnish Thakur
+91 98165 96332

TREASURER

Sanjay Sharma
+91 93563 01674

SR. VICE PRESIDENT

R.B. Gupta
Neeraj Bhatia

VICE PRESIDENT

Ajay Batra
Harpreet Singh
Harish Goyal
Paramjeet Arora
Manoj Aggarwal
Nirmal Singh Rana

JOINT SECRETARY

Ashwani Singla
Sumeet Gupta
Manu Jain
Vishal Chadha
Sanjay Ahuja
Sudhir Sharma

ADVISORY COMMITTEE

R. C. Juneja
B. R. Sikri
Sanjay Guleria
Vinod Gupta
S. L. Singla
M. B. Goyal
Rakesh Arora

CHIEF ADVISOR

Satish Singhal
+91 98726-33936

drugs. We have always stood by the government and the interests of our public in times of trouble may it be providing of free medicines supplies to the various flood affected areas in the country to being Corona warriors and providing uninterrupted supply of drugs needed for the management of covid 19 and in future assure compliance, solidarity and support to all mandatory, social and moral responsibility.

The issue of antibiotics residues has been recently pointed out by the Veterans forum and seriously taken by the Hon'ble NGT but there are still no standards laid down either by the Centre or by the State pollution control boards till date.

It is further submitted that most of our member pharmaceutical industries have already entered into tripartite agreement with the CETP on the directions of Hon'ble Himachal Pradesh High court and as such do not discharge our effluent in to soil or water but feed it to the CETP either through tankers or pipeline and believe that the CETP has the responsibility and capability of treating the same and in turn we discharge our duty of paying the charges of the same.

It is further submitted that Mr Guleria who represented the Baddi Infrastructure in the meeting of stake holders held at the office of the Chief Environmental as per the directions of Hon'ble NGT has assured verbally and in writing before the committee that the Baddi Infrastructure has floated tenders for the setting up of an additional effluent treatment facility which will ensure cent percent environmental compliance with respect to the antibiotics residues.

We also request the committee and the State Pollution Control Board to ensure adequate representation of the pharmaceutical sector in the CETP project right from conception to operations so as to have effectively be able to achieve the common objective of saving our environment and preserving nature and not face such embarrassing situations in future.



HIMACHAL DRUG MANUFACTURERS ASSOCIATION (Regd.)

153, 1st Floor, Motia Plaza, Nr. Baddi Toll Barrier, Baddi - 173205, Himachal Pradesh
E-mail : himachaldrugs@gmail.com, Ph. No. : 82196-17038

PRESIDENT

Dr. Rajesh Gupta
+91 97790 21318

CHAIRMAN

C. S. Pushkarna

GENERAL SECRETARY

Munnish Thakur
+91 98165 96332

TREASURER

Sanjay Sharma
+91 93563 01674

SR. VICE PRESIDENT

R.B. Gupta
Neeraj Bhatia

VICE PRESIDENT

Ajay Batra
Harpreet Singh
Harish Goyal
Paramjeet Arora
Manoj Aggarwal
Nirmal Singh Rana

JOINT SECRETARY

Ashwani Singla
Sumeet Gupta
Manu Jain
Vishal Chadha
Sanjay Ahuja
Sudhir Sharma

ADVISORY COMMITTEE

R. C. Juneja
B. R. Sikri
Sanjay Guleria
Vinod Gupta
S. L. Singla
M. B Goyal
Rakesh Arora

CHIEF ADVISOR

Satish Singhal
+91 98726-33936

It is further requested to the committee and the State and the Central Pollution Control Board to take necessary steps and issue necessary directions to the Baddi Infrastructure and BEIL infrastructure Ltd. to include cent percent of the industry especially pharmaceutical industry in the catchment area of the CETP to be able to achieve best environmental compliance w.r.t water pollution in this region.

It is finally submitted that with the assurance of the BEIL infrastructure ltd as mentioned above we are of the view that our effluent would be effectively treated with respect to all the standards already laid down and for the antibiotic residues and ensure that no antibiotic residues shall be discharged in water or land.

We also thank the Hon'ble NGT and the worthy Committee for giving us an opportunity to present our views and concerns as stake holders.

With warm regards

Munnish Thakur

General Secretary, HDMA

Minutes of Stake Holder Meeting held on dated 21.09.2021 in compliance to Hon'ble NGT Orders dated 23.06.2021 passed in OA 136/2020 titled Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors.

In compliance to NGT Orders dated 23.06.2021 passed in OA 136/2020 titled Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors to conduct the meeting with stakeholders, the meeting was fixed on 20-09-2021 and following stake holders were informed:

1)	Dr. Rajesh Gupta, President, Himachal Drugs Manufacturers Association, 153, 1 st floor, Motia Palaza, near Baddi Toll Barrier, Baddi, District Solan, H.P.-173205. (Stake Holder)
2)	Mr. Sanjay Khurana, President, BBNIA, EPIP-Jharmajri Road, EPIP, Phase-1, Jharmajri, Baddi, Himachal Pradesh-174130. (Stake Holder)
3)	The President, Lagu Bharti Udyog, 151, DIC, Industrial Area, Baddi, Himachal Pradesh 173205. (Stake Holder)
4)	DR. Bishwanath Prasad Singh, Wing Commander (Retd), B-12 4, Swan Nagri, Greater Noid'a, Dist- G. B. Nagar, UP-201306 (Applicant of the Veteran Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors. pending)

At the outset, Regional Officer, Baddi, HPSPCB welcomed all the members of Joint Inspection Committee and various stake holders the detail of stakeholders is annexed as Annexure-I. The member from CPCB and the applicant of Veteran Forum for Transparency in Public Life were not present in the meeting. He further apprised the members regarding the orders passed in OA 136/2020 titled Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors.

The State Pollution Control Board has constituted a committee to lay down the standards under section 17 of water Act, 1974 for residual antibiotics in industrial effluent and the meeting of committee was held on 11.08.2021 and minutes of meeting held were discussed (Copy Annexed as Annexure-I).

Further, in compliance to Hon'ble NGT order and minutes of meeting earlier held this meeting has been scheduled today for Stakeholders Consultation/meeting. The Regional officer, HPSPCB, apprised the stake holders that as per information received from drug office there are 210 numbers of units who have obtained the license for manufacturing of antibiotics. The directions were issued to all the industries to submit their production schedule for manufacturing of Antibiotics for upcoming 60 days through their Industrial Association i.e. Himachal Drug Manufacturers association units are asked to submit the manufacturing schedule of antibiotics. The Regional officer, HPSPCB requested the stake holders to give their views in the present court matter.

The representative of B.B.N. Industries Association (Regd.) has submitted the representation vide No. BBNIA/PCB/2021 dated 20.09.2021 (Copy Annexed as Annexure-III) and has further apprised all the members that from the OA no. 136/2020 pending before the Hon'ble NGT Delhi some issue has been come into light w.r.t. functioning of CETP, discharge of untreated effluent by the some pharmaceutical industries, CETP beside Cat-IV is not capable of treating API discharge of Pharma units, no standards has been notified by the MOEF&CC for discharge of API and the testing labs has higher Limit of Quantification (LOQ) than specified in draft notification of MOEF.

He further, apprised the Committee members that the Cat-IV effluent is now being treated at unit level and the units are zero discharge for Category-IV effluent and regarding the treatment of residual antibiotics in the CETP Baddi. The CETP Baddi has submitted action plan to setup additional facility to treat API and FDS/chloride if required. He further, apprised the Committee members they have received the funding support from the Govt. of India and Govt. of HP has already sanctioned and partially released the funds. The CETP Baddi has invited tenders for design, supply, construction, installation, commissioning, testing and trial run of 3 MLD capacity for effluent refractory management and TDS/FDS Reduction at their existing 25 MLD capacity CETP & MLD STP located at Baddi, Distt. Solan (HP) on 08.09.2021 and the tender opening process will start from 29.09.2021 and this project shall be completed within one year. (letter from Baddi Infrastructure Annexed as Annexure-II)

The president B.B.N. Industries Association (Regd.) further submitted before the Committee Members that the MOEF has notified the proposed standards for Pharma industry vide Notification dated 06.08.2021, but instead of API Norms they have termed the antibiotic residue in the effluent as hazardous and has notified that chemical and



biological sludge or any residue, reject, concentrate generated from wastewater treatment or its management facility at industry or CETP catering to industries engaged in manufacturing of bulk drug or formulation of pharmaceuticals, shall be classified as Hazardous waste as per the provision of clause 17 of sub- rule(i) of rule 3 of the hazardous and other waste(Management) Rules,2016 and shall be subject to the provision made therein.(Representation Annexed as Annexure-III)

The president from the Himachal Drug Manufacturers Association (regd.) further submitted before the Committee members through their representation (Copy Annexed as Annexure-IV) that earlier there were no standards for residual antibiotic in effluent by the MOEF& CC and in the notification dated 06.08.2021 the same has also not been included by the MOEF& CC. No action should be taken against the pharmaceutical industries as the parameters w.r.t. residual antibiotics are not framed by MOEF&CC and has termed the antibiotic residue in the effluent as hazardous and same is to be dealt under clause 17 of sub- rule (i) of rule 3 of the hazardous and other waste (Management) Rules, 2016.

Final Conclusion:

1. The MOEF&CC after detailed objection and suggestions received from all persons and stakeholders in response to Draft Notification dated 23.01.2020 finally notified the parameters for Bulk drug and formulation (pharmaceutical) on dated 06.08.2021. The parameters mentioned in the Part-D of draft notification w.r.t residual antibiotic in effluent has been further have termed as the antibiotic residue in the effluent as hazardous and has notified that chemical and biological sludge or any residue, reject, concentrate generated from wastewater treatment or its management facility at industry or CETP catering to industries engaged in manufacturing of bulk drug or formulation of pharmaceuticals, shall be classified as Hazardous waste as per the provision of clause 17 of sub- rule(i) of rule 3 of the hazardous and other waste(Management) Rules,2016 and shall be subject to the provision made therein. All the members present in the meeting were in view that the State pollution Control Board should follow the notification dated 06.08.2021 beside finalizing the separate parameters for residual Antibiotics in effluent.
2. In the Stakeholders meeting all the members were in opinion that State Board should follow the notification dated 06.08.2021 notified by the MOEF&CC for Bulk drug and formulation (pharmaceutical) as the draft notification stands quashed.



- 41-
3. The CETP Baddi to complete the proposed effluent refractory management and TDS/FDS Reduction of capacity 3 MLD within one year.
 4. The representative of Himachal Drugs Manufacturers Association was requested to direct all industries to submit their production schedule for manufacturing to State Pollution Control Board at earliest so that further sampling/study could be conducted in compliance to Hon'ble NGT orders dated 23.06.2021.
 5. No action should be taken against the pharmaceutical industries as the parameters w.r.t. residual antibiotics are not framed by MOEF&CC and has termed the antibiotic residue in the effluent as hazardous and same is to be dealt under clause 17 of sub- rule (i) of rule 3 of the hazardous and other waste(Management) Rules,2016


24/9/24
Ashwani Kumar,
MoEF&CC, IRO
Shimla

6.


P. C. Gupta,
HPPCB, Baddi


Mahendra Pal Gurjar, IAS
Distt. Admn, Solan

टिप्पण : मूल नियम भारत के राजपत्र, असाधारण, भाग II, खंड 3, उप-खंड (i) में संख्यांक का. आ. 844(अ) तारीख 19 नवंबर, 1986 में प्रकाशित किए गए थे और अंतिम बार अधिसूचना संख्यांक सा.का.नि. 243(अ) तारीख 31 मार्च, 2021 द्वारा अंतिम रूप से संशोधित किया गया था।

MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE

NOTIFICATION

New Delhi, the 6th August, 2021

G.S.R. 541(E).—Whereas, certain draft rules, namely the Environment (Protection) Amendment Rules, 2020 were published in the Gazette of India, Extraordinary, as required under sub-rule (3) of rule 5 of the Environment (Protection) Rules, 1986, *vide* notification of the Government of India in the Ministry of Environment, Forest and Climate Change *vide* number G.S.R. 44 (E), dated the 23rd January, 2020, inviting objections and suggestions from all persons likely to be affected thereby within a period of sixty days from the date on which copies of the Gazette containing the said notification were made available to the public;

And Whereas, copies of the Gazette containing the aforesaid notification were made available to the public on the 23rd January, 2020;

And Whereas, objections and suggestions received from all persons and stakeholders in response to the aforesaid notification have been duly considered by the Central Government;

Now, therefore, in exercise of the powers conferred by sections 6 and 25 of the Environment (Protection) Act, 1986 (29 of 1986) read with sub-rule (3) of rule 5 of the Environment (Protection) Rules, 1986, the Central Government hereby makes the following rules further to amend the Environment (Protection) Rules, 1986, namely: -

1. **Short title and commencement.** - (1) These rules may be called the Environment (Protection) Second Amendment Rules, 2021.

(2) They shall come into force after one year from the date of publication of this notification in the Official Gazette.

2. In the Environment (Protection) Rules, 1986, in Schedule-I, for serial number 73 and the entries relating thereto, the following serial number and entries shall be substituted, namely:-

S.No.	Industry	Parameters	Standard	
1	2	3	4	
“73.	Bulk Drug and Formulation (Pharmaceutical)	A. EFFLUENT STANDARDS*		
			Limiting value for concentration (in mg/l except for pH and Bio assay)	
		(i) Compulsory Parameters		
		pH		6.0 -8.5
		BOD (3 days 27°C)		30
		COD		250
		TSS		100
		Oil & Grease		10
		Ammonical Nitrogen		100
Bio - Assay Test**		90% Survival of Fish after first 96 hours in 100% effluent		

(ii) Additional Parameters^{##}	
***Benzene	0.1
***Xylene	0.12
***Methylene Chloride	0.9
***Chlorobenzene	0.2
Phosphates as P	5
Sulphides as S	2
Phenolic Compounds	1
Zinc	5
Copper	3
Total Chromium	2
Hexavalent Chromium (Cr ⁶⁺)	0.1
Cyanide (as HCN)	0.1
Arsenic	0.2
Mercury	0.01
Lead	0.1
SAR	Less than 26 (applicable only for discharge on land)
(iii) Industry connected with CETP	
<ul style="list-style-type: none"> The discharge norms for industry connected with CETP and of CETP shall be governed by Ministry of Environment, Forest & Climate Change notification S.O. 4 (E), dated the 1st January, 2016. State Pollution Control Board shall prescribe additional relevant parameters as given at para A (ii) of this notification as per needs and discharge potential of member industries and specify the frequency of monitoring considering the receiving environment conditions. 	
<p>Note:</p> <p>The standards in para A is applicable to all discharges except to CETP.</p> <p>*Not applicable to industry discharging to CETP, and shall be applicable to all discharge to land and surface water bodies including use of treated wastewater for horticulture or irrigation purpose.</p> <p>** The Bio assay test shall be conducted as per IS : 6582-1971</p> <p>## Parameters listed as “Additional Parameters” shall be prescribed by SPCB depending on the process and product and its monitoring frequency shall be monthly/quarterly as decided by SPCBs</p> <p>***Limits shall be applicable to industries those are using Benzene, Xylene, Methylene Chloride, Chlorobenzene.</p>	

B. EMISSION STANDARDS	
(Tank farm Vents)	
Parameter	Limiting value for concentration (mg/Nm³)
Chlorine	15
Hydrochloric acid vapor	35
Ammonia	30
Benzene	5
Toluene	100
Acetonitrile	1000
Dichloromethane	200
Xylene	100
Acetone	2000
<i>C. The total cumulative losses of solvent should not be more than 5% of the solvent on annual basis from storage inventory</i>	
D. Chemical and Biological sludge or any residue, reject, concentrate generated from wastewater treatment or its management facility at Industry or CETP catering to industries engaged in manufacturing of bulk drug or formulation of Pharmaceuticals, shall be classified as Hazardous Waste as per the provision of clause 17 of sub-rule (i) of rule 3 of the Hazardous and Other Wastes (Management and Trans-boundary Movement) Rules, 2016 and shall be subject to the provision made therein.	

[F. No. Q-15017/12/2018-CPW]

NARESH PAL GANGWAR, Jt. Secy.

Note : The principle rules were published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i) vide number S.O. 844(E), dated the 19th November, 1986 and lastly amended vide notification G.S.R. 243(E), dated the 31st March, 2021.



-45- (Annexure-7)

H.P. STATE POLLUTION CONTROL BOARD,
Regional Office "HIMUDA COMPLEX" Phase-I, Baddi
Tehsil Baddi, Distt. Solan (HP) Phone-01795-245374



No. PCB/RO Baddi/NGT/OA No 136/2020Veterans Forum/21- 1733

Dated: 22.09.2021

To

The Director,
Baddi Infrastructure,
BTTI Complex, EPIP Phase-I,
Jharmajri, Tehsil Baddi, P.O. Barotiwala, Distt. Solan, H.P.

Sub: OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors. Pending before the Hon'ble National Green.

Sir,

This is in reference to the stakeholders' meeting held on 20-09-2021 regarding antibiotic residues in the effluent released by pharma industries and treatment at CETP, your representation dated 20-9-2021 and DPR of "3 MLD Refractory Management and TDS/ FDS Reduction in CETP Kenduwal, Baddi. Submitted by you vide letter no. BI/HPSPCB/2021-1109-1110 dated 20-09-2021.

The details submitted by you were examined by the Joint Committee. In this regard you are requested to provide the following details:

1. Composition of refractory material considered by you in the DPR.
2. Concentration of API and Antibiotic Residues at the inlet of modified CETP designed by you.
3. Concentration of API and Antibiotic residues at the outlet of modified CETPs designed by you

Kindly treat it urgent since this is to be included in the report to be filed before Hon'ble National Green Tribunal by the Joint Committee.

Yours faithfully,


Regional Officer,
HP State Pollution Control Board,
Regional Office, Baddi.

-46-

(Annexure-8)

BADDI INFRASTRUCTURE

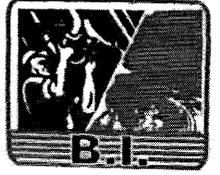
CIN: U45209HP2010NPL031349, GSTIN : 02AAECB3644E129

(SPV of BBN Industries Association)

Regd. Office: BTTI Complex, EPIP Phase - 1, Jharmajri, Tehsil Baddi, P.O. Barotiwala,

Distt. Solan (H.P.) 174103, Ph.: 01795-271105, 271106

Email: baddiinfra@yahoo.in, btti.pvtltd@gmail.com, web site: baddiinfra.org.in



No. BI/HPSPCB/2021-

Date-23-09-2021

To

The Regional Officer,
HP State Pollution Control Board,
Regional Office, Baddi.

Sub: OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors. Pending before the Hon'ble National Green.

Dear Sir,

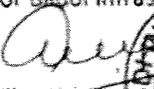
This is in reference to your letter no. 1733 dated 22-09-2021 regarding the subject cited as above.

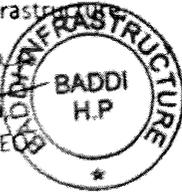
We wish to clarify and submit as under:

- 1) Antibiotic residue and API is covered under the treatment scheme as submitted in the DPR of 3 MLD Refractory Management and TDS/ FDS Reduction in CETP Kenduwal, Baddi through adsorption process and subsequent ultra-filtration process.
- 2) The inlet antibiotic residue plus API (CAT-III -Pharma units) for this add on facility at CETP is considered as on higher side of 22-25 mg/ltr but actual testing will be done while undertaking treatability on pilot basis
- 3) The content of antibiotic residue and API in final outlet after treatment in this proposed add on facility in CETP Kenduwal, Baddi will be Nil.

Yours faithfully

For Baddi Infrastructure


Vijay K Arora,
Director & CEO





Regional Officer Baddi <pcbrobaddi@gmail.com>

Analysis of Antibiotics in Water

1 message

Rohit Singh <rohit@shriraminstitute.org>

15 September 2021 at 18:41

To: pcbrobaddi@gmail.com

Cc: "Dr. Vivek Narayan Singh" <vnsingh@shriraminstitute.org>

Shriram Institute For Industrial Research

(A Unit of Shriram Scientific and Industrial Research Foundation)

19, University Road, Delhi 07

Ph. 011-2766 7267, 2766 7860, 27000100 Fax: 011-27667207

e-mail id: customercare@shriraminstitute.org

OFFER

Issued To:

Er. Parveen Gupta

Additional Director (Environment)

Cum-Sr. Environmental Engineer

HPSPCB Regional Office Baddi

Distt. Solan (HP)

Dear Sir,

This is to thank you for your query on the above subject. We ("Institute") are pleased to submit our offer as follows:-

S.No.	Sample Description	Study/Analysis	Charges (₹) / Per Sample	Quantity Required / Per Sample	NABL Accreditation YES/NO	Time Required
1.	Water	As per LCMS	4,000/- per antibiotic	5 ltr	No	30 days
		Sampling Charges	15000/- per day			

GST will be charged extra as applicable, present rate is 18%

Note: Requirement of decision rule (YES / NO)

a) Please note that if decision rule is required it will be given at 95% confidence Level (0.05)

b) Decision rule other than 95% CL will be provided on chargeable basis.

Note: Lab can provide conformity statement when observed value + lab MU is less than or equal to acceptance limit.

*The sample / Item (s) are to be labelled comprising; Name, Quantity & batch/ Lot No. etc.

HSN code : 998145

Payment: 100% in advance by Demand Draft/ RTGS / Electronic transfer in favor of "Shriram Institute for Industrial Research".

Terms & Conditions

1. Work to be undertaken by the Institute, and responsibility thereof will commence only after receipt of advance payment and required sample (s) / equipment (s)/material (s) at the Institute, in good order, and also any required clarifications etc., whichever is later.
2. If the method of analysis / calibration is not specified by the customer, the Institute will, at its discretion, follow any published method, or the Institute's own developed and validated method, which may be separately checked with the Institute, if desired.
3. Safety: Customer MUST inform the Institute about any hazard relating to materials/ Samples supplied by customer to the Institute for analysis or any other purpose. Customer shall provide Material Safety Data Sheet (MSDS) of the send materials/ sample for safe handling.
4. Dispatch of Reports/ Certificate: Test Reports / Certificates, (including any equipment provided by the customer to the Institute for validation/ calibration or any other purpose) will be handed over at the Institute's office to an authorized representative of the Customer, duly authorized in writing, by a competent Authority of the Customer, empowered to issue such authorizations. In case the test reports / certificates / equipment are not so collected within 10 (ten) working days of intimation to the Customer, these will be sent by registered post / courier at the address of the customer as contained in the Institute's Order Acceptance. Costs for return of equipment to be borne by customers. In case the Customer desires these to be sent to any other address, this must be clearly indicated by the Customer, and mentioned in the Institute's Order Acceptance. The responsibility of counter-checking the address to which these are to be sent is that of the Customer.
5. Validity: This offer is valid as under:
 - a) for acceptance by 90 days from date of issue.
 - b) incase of receipt of sample (s)/ equipment (s)/ material (s):
 - Initial sample (s)/ equipment (s) and payment to be received not later than 60 days from order acceptance.
 - In case of multiple sample (s)/ equipment (s)/ material (s) each sample and payment thereof to be received within due date

Other Terms

Other terms will be as per Terms and Condition contained in our Order Acceptance which will be issued on confirmation of your order and our General Terms and Conditions.

Institute's Bank and other Details

ICICI Bank Limited, Delhi University North Campus, Delhi – 110007

Account Holder Name: "Shriram Institute for Industrial Research"

Account No. : 022705000104

IFSC Code: ICIC0000227

Swift Code: ICICI NBB CTS

PAN No. AAATS0867K

GST Registration No. : 07AAATS0867K1Z7,

For any other information or clarification, please feel free to contact undersigned,

We look forward for receiving your valuable order and assuring you of our fullest attention.
Thanking you and assuring you our fullest cooperation.
Yours faithfully,

Authorised Signatory

Rohit Singh
Dy. Manager
Mob: 9811063111
Landline : 011 - 27000116

Dr Vivek Narayan Singh
Sr Assistance Director and Chief
Mob: 08882473339

--
SHRIRAM INSTITUTE FOR INDUSTRIAL RESEARCH
(A Unit of Shriram Scientific and Industrial Research Foundation)
19, UNIVERSITY ROAD
DELHI - 110007
INDIA.
PHONE : 91-11-27667267 FAX : 91-11-27667676, 91-11-27667207

VISIT US AT www.shriraminstitute.org

H.P. STATE POLLUTION CONTROL BOARD,
Regional Office "HIMUDA COMPLEX" Phase-1, Baddi
Tehsil Baddi, Distt. Solan (HP) Phone-01795- 245374



No. PCB/RO Baddi/NGT/21 - 1671

Dated: 17-9-21

To

The Member Secretary,
"Him Parivesh", BCS Phase III,
New Shimla- 171009.

Sub: Administrative and expenditure approval for conducting sampling.

Sir,

This is in reference to minutes of meeting held on dated 6-09-21 & 7-09-21 of the joint inspection committee in compliance to the orders passed by Hon'ble National Green Tribunal in OA No. 136/2020 titled Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors dated 23.06.2021. During the meeting the number of samples alongwith parameters shall be finalized depending upon the antibiotics which shall be manufactured by the pharmaceutical industry. Preliminary the sampling of River Sirsa, CETP and some of the units engaged in manufacturing of antibiotic shall be conducted.

The offer has been received through mail from Shriram Institute for Industrial Research and the analysis charges is ₹ 4000/- per antibiotic and collection charges ₹ 15,000/- per day. In addition to above the GST will be charged @ 18%.

The exact amount depends upon actual sampling and total number of parameters proposed to be tested. M/s Shri Ram Institute of Industrial Research in their quotations has seeked 100% advance payment. But as per telephonic conversation held with them being a government organization they are agreed to collect the sample and with at least 50 % of the payment. Hence it is requested to kindly grant the administrative and financial approval for getting the test conducted @ ₹4,000/- per antibiotic, collection charges @ ₹15,000/- per day and GST @ 18%.

Submitted for information and further necessary action please.

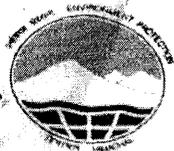
Yours faithfully,


Chief Environmental Engineer,
HP State Pollution Control Board,
Regional Office, Baddi.

Copy to:

DR. Vivek, Shri Ram Institute of Industrial Research, 19, University Road, Delhi, 110007 in reference to e-mail dated 15-09-2021 and telephonic conversation held on today i.e. 17-09-21 for information please.

Chief Environmental Engineer,
HP State Pollution Control Board,
Regional Office, Baddi.



-51-

H.P. STATE POLLUTION CONTROL BOARD

HIM PARIVESH, PHASE-III

NEW SHIMLA-171009

No. PCB/ OA no. 136/2020/Consent Branch/2021- 8338

Dated: 20.9.2022

To

✓ Chief Environmental Engineer,
Regional Office, Baddi
HPSPCB

Subject: Administrative and expenditure approval for conducting sampling.

Kindly refer to your office letter No. PCB/RO Baddi/ NGT/21-1671 dated 17.09.2021 on the subject cited above.

In this context, your attention is invited to the Office Order No. HPSPCB/Misc Purchase/ E-24/Vol-V/2019-21385-21415 dated 29th/30th December, 2020 whereby tender committee at field office level i.e Regional Office/Regional Lab have been constituted and such committee is responsible for procurement of goods/services after ascertaining the reasonableness of rates, quality and to identify the appropriate supply as per the provisions of the Finance Rule, HP, 2009. As per the letter under reference your office has identified M/s Shri Ram Institute for Industrial Research with analysis charges @4000/-per antibiotic and collection charges @ 15000/day excluding GST. Since only one institute has been recommended and there is no mention about the financial out go and reasonableness of rates, therefore you are directed to seek rates from other government labs/NABL accredited private labs/other Govt. institutes/rates/institutes approved by CPCB for the analysis charges of antibiotics along with collection charges.

-115
This being court matter, the proposal duly recommended by the tender/purchase committee at RO level after ascertaining the reasonableness of rates may kindly be sent to the Head Office at the earliest.

19/9/22

Apoorv Devgan, IAS
Member Secretary
HPSPCB



-52-

**H.P. STATE POLLUTION CONTROL BOARD,
Regional Office "HIMUDA COMPLEX" Phase-1, Baddi
Tehsil Baddi, Distt. Solan (HP) Phone-01795- 245374**



No. PCB/RO Baddi/O.A. No.136/2020-NGT/21-2143-44

Reminder-1
Urgent Hon'ble NGT Matter

Dated: 23-09-21

To

The Member Secretary,
"Him Parivesh", BCS Phase III,
New Shimla- 171009.

**Sub: Administrative and expenditure approval for conducting sampling of API
(Antibiotics Residual).**

Sir,

This is in continuation to this office letter No.PCB/RO-Baddi/NGT/2021-1671 dated 17.09.2021 and Head Office letter No.8338 dated 20.09.2021 on the subject cited above. The joint inspection committee in compliance to the orders passed by Hon'ble National Green Tribunal in OA No. 136/2020 titled Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors dated 23.06.2021. During the meeting the number of samples alongwith parameters shall be finalized depending upon the antibiotics residual which shall be manufactured by the pharmaceutical industry. Preliminary the sampling of River Sirsa, CETP and some of the units engaged in manufacturing of antibiotic shall be conducted.

In this regard, this office carried out survey regarding number of Labs which are engaged in testing of API (antibiotics residual) only in the State. But one vendor i.e. Shriram Institute for Industrial Research, 19, University Road, Delhi-7 were found for work of testing of API (antibiotics residual) which is nearby this office. As per the quotation submitted by the Shriram Institute for Industrial Research for getting the test conducted @ Rs.4,000/- per antibiotic and collection charges @ Rs.15,000/- per day and additional GST @ 18%.

So, you are requested to kindly grant the administrative and expenditure approval, so that the reply could be submitted to Hon'ble NGT along with analysis report well within time in the aforementioned O.A. No. 136/2020 titled Veterans Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors.

Submitted for information and further necessary action please.

Yours faithfully,


Chief Environmental Engineer,
HP State Pollution Control Board,
Regional Office, Baddi.

Copy to:

Dr. Vivek, Shri Ram Institute of Industrial Research, 19, University Road, Delhi, 110007
in reference to e-mail dated 15-09-2021 and telephonic conversation held on today i.e. 17-09-21 for
information please.


Chief Environmental Engineer,
HP State Pollution Control Board,

ANNEXURE-R-4



BIHAR STATE POLLUTION CONTROL BOARD

Parivesh Bhawan, Patliputra Industrial Area, P.O.-Sadakat Ashram, Patna-800010
EPABX-0612-2261250/2262265, Fax-0612-2261050

Ref. No. 1104.

Patna, dated- 04-8-2021

From,

S. Chandrasekar, IFS,
Member Secretary.

To,

The Member Secretary,
Himachal Pradesh State Pollution Control Board,
Below BCS, Phase-II,
New Shimla-171009.

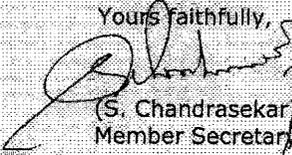
Sub: O.A. No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of HP & Ors. before the Hon'ble National Green Tribunal.

Ref: Your letter no. PCB/OA No. 136/2020/Consent/2021-4771-4806, dated- 27.07.2021.

Sir,

With reference to the subject mentioned above under reference it is to inform that this Board has not laid down any specific standards for antibiotics residues in industrial effluents of Pharma units till date.

Yours faithfully,


(S. Chandrasekar)
Member Secretary.

04/8/21

-55-

ANNEX - R-4 Copy



Tel: 0674-2564033
FAX: 0674-2564033/2564573
EPABX: 2561909/2562847
E-mail: paribesh1@ospcbboard.org
Website: www.ospcbboard.org

STATE POLLUTION CONTROL BOARD, ODISHA

(DEPARTMENT OF FOREST & ENVIRONMENT, GOVERNMENT OF ODISHA)
Paribesh Bhawan, A/118, Nilakantha Nagar, Unit - VII

Bhubaneswar - 751 012, INDIA

No. 13706

Date: 08/09/2021

VII-L(Misc) -868

By Speed Post/E-mail

To

The Member Secretary
Himachal Pradesh State Pollution Control Board
Below B.C.S. Phase - II
New Shimla - 9
E-mail - hpppcb.cs@gmail.com

SUB: OA No. 136/2020 filed Veteran Forum for Transparency in Public Life Vs. State of HP & Ors. pending before the Hon'ble NGT

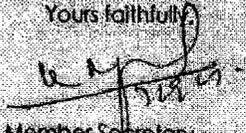
Ref: Your Letter dtd. 27.07.2021.

Sr

With reference to the above, this is to inform that the Board has no information with regard to any standards laid down/drafted for the Antibiotics residuals. However, the Board has come across a draft Gazette Notification regarding standards of 121 Antibiotic Residues in water which is downloaded from the website of MoEF&CC, bearing No. G.S.R. 44(E), dtd. 23.01.2020 is enclosed herewith for kind reference.

Encl: As above.

Yours faithfully,


Member Secretary

Chandigarh Pollution Control Committee

Paryaveeran Bhawan, Machya Marg, Sector 19-B, Chandigarh-160019

No. CPCO/2021/2773

Dated: 09/08/21

To,
The Member Secretary
Himachal Pradesh Pollution Control Board,
"Him Parivesh" New Shimla,
Himachal Pradesh-171009.

Sub: O.A. No. 188/2020 titled Veteran Forum for Transparency in Public Life Via
State of Himachal Pradesh & Ors. Pending before the Hon'ble National
Green Tribunal - regarding.

REPLY

This is with reference to your letter dated 02.08.2021 through e-mail on the
subject cited above.

18/8
10

In this regard, it is informed that there is no major Pharmaceutical unit
operational in U.T. of Chandigarh, hence no specific standards has been laid down by
Chandigarh Pollution Control Committee.


Debendra Dalai, IFS
Member Secretary



9/8/21
DESI
12/08/21

ANNEXURE - 13



H.P. STATE POLLUTION CONTROL BOARD

HIM PARIVESH, PHASE-III, NEW SHIMLA-171 009
Ph 0177-2673766, 2673020 & 32, FAX: 0177-2673018



Office Order

In view of observations and the orders passed by Hon'ble NGT in OA no. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of HP & Ors on 23.06.2021 State Board is to lay down the standards under section 17 of the Water Act, 1974 for residual Antibiotics in industrial effluents, the committee of following officers is hereby constituted:-

1. Sr. Environmental Engineer, H.O, HPSPCB, Shimla.
2. Sr. Environmental Engineer, HPSPCB, Baddi.
3. Senior Scientific Officer, Regional Lab, HPSPCB, Shimla.
4. Assistant Environmental Engineer-I, H.O, HPSPCB, Shimla
5. Expert Member, to be nominated by the Member Secretary, Central Pollution Control Board, Delhi.

The Committee shall examine the matter, evaluate and propose to lay down the standards of residual Antibiotics in the discharge of industrial effluents. Action taken report along with standards on the matter be submitted within three weeks.

[Signature]
Member Secretary
HP State Pollution Control Board,
Shimla-171009

No. PCB/ OA no. 136/2020/Consent/2021- 4807-10 dated: 27.7.2021
Copy forwarded to the following for necessary action:-

1. Sr. Environmental Engineer, H.O, HPSPCB, Shimla.
2. Sr. Environmental Engineer, HPSPCB, Baddi.
3. Senior Scientific Officer, Regional Lab, HPSPCB, Shimla.
4. Assistant Environmental Engineer-I, H.O, HPSPCB, Shimla

[Signature]
Member Secretary
HP State Pollution Control Board,
Shimla-171009

- 58 -



Himachal Pradesh State Pollution Control Board

"Him Parivesh" Phase-III, Below BCS, New Shimla-9

Tel: 0177-2673766, 2673276 Fax: 2673018



No. HPSPCB/OA No.136/2020 5560-62

Dated: 6-8-2021

Office Order

In compliance of the Hon'ble NGT direction passed in OA No.136/2020 dated 23.06.2021 titled Veteran Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors., a Committee comprising of following officers is hereby constituted to finalize the total requirement of instruments alongwith specifications to set-up laboratory facility for analysis of antibiotics in water/ waste water (effluent).

1. Dr. T. B. Singh,
Pr. Scientific Officer, Central Laboratory,
HP State Pollution Control Board, Parwanoo.
2. Sh. Anup Vaidya,
Sr. Scientific Officer, Regional Laboratory,
HP State Pollution Control Board, Dharamshala.
3. Dr. Hitender Sharma,
Sr. Scientific Officer, Regional Laboratory,
HP State Pollution Control Board, Paonta Sahib.
4. Expert Member from the Central Pollution Control Board.

The Committee shall finalize the requirement as per Hon'ble NGT order and submit its report to this office within 1 month positively.


Apoorv Devgan, IAS
Member Secretary

Copy to:

1. Dr. T.B. Singh, Pr. Scientific Officer, Central Laboratory, HP State Pollution Control Board, Parwanoo-173220 for information and necessary action please.
2. Sh. Anup Vaidya, Sr. Scientific Officer, Regional Laboratory, HP State Pollution Control Board, Dharamshala-176057 for information and necessary action please.
3. Dr. Hitender Sharma, Sr. Scientific Officer, Regional Laboratory, HP State Pollution Control Board, Paonta Sahib-173025 for information and necessary action please.


Apoorv Devgan, IAS
Member Secretary

-59-
-16-

ANNEX - F (copy) 1
98 Annexure-14

HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA

No. PCB/OA No. 136/2020/Consent/2021-
Dated:- 27.7.2021

4811

From: The Member Secretary

To
The Member Secretary,
Central Pollution Control Board
Parivesh Bhawan, East Arjun Nagar, Delhi 110032.

Subject:- OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s
State of HP & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

This has reference to order dated 23-06-2021 passed by Hon'ble NGT in the afore-
cited matter related to the issue of non-treatment of antibiotics residual discharged in
industrial effluent by Pharma units in Baddi industrial area of Himachal Pradesh.

The relevant part of the directions qua the CPCB is as under :-

*".....11 Mere fact that standards have not been revised by MoEF&CC of
the residual antibiotics in industrial effluents can be no justification for State
PCB not taking steps to prevent. Pending finalization of standards by
MoEF&CC, State PCB can go by earlier standards or lay down standards by
itself under section 17 of the Water Act. MoEF&CC needs to expedite the process
of finalizing the standards in the interest of protection of environment."*

In this connection as the State Board has been directed to lay down the standards
under section 17 of the Water Act, you are therefore requested to kindly nominate an expert
member from Central Pollution Control Board to be a part of a committee of the State Board
constituted to finalize the standards for antibiotics residual in effluent discharge by such units
so that necessary compliance could be made to the judgment of Hon'ble NGT, pending any
notification of such standards by MoEF & CC.

This may be treated as most urgent and time bound please.

Yours faithfully,



(Apoorv Devgan, IAS)

Member Secretary

HPSPCB, Shimla-9,

Tel No. 0177-2673766



-60 -
-47 -

ANNEX -

Reminder-I

**HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA**

No. PCB/ OA No. 136/2020/Consent/2021- 877

Dated:- 12/8/21

From: The Member Secretary

To

The Member Secretary,
Central Pollution Control Board
Parivesh Bhawan, East Arjun Nagar, Delhi 110032.

Subject:- OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s
State of HP & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

This is in continuation to this office even file letter no.4811 dated 27.07.2021 on the subject cited above.

In this connection as mentioned earlier the State Board has been directed to lay down the standards under section 17 of the Water Act, you are therefore once again requested to kindly nominate an expert member from Central Pollution Control Board to be a part of a committee of the State Board constituted to finalize the standards for antibiotics residual in effluent discharge by such units so that necessary compliance could be made to the judgment of Hon'ble NGT, pending any notification of such standards by MoEF & CC.

This may be treated as most urgent and time bound please.

Yours faithfully,

(Apoorv Devgan, IAS)
Member Secretary
HPSPCB, Shimla-9,
Tel No. 0177-2673766

o/c

ANNEXURE-1



Himachal Pradesh State Pollution Control Board
"Him Parivesh" Phase-III, Below BCS, New Shimla-9
Tel: 0177-2673766, 2673276 Fax: 2673018



No. HPSPCB/OA No.136/2020/Scientific/2021- 6363.

Dated: 18.8.2021

To

The Member Secretary,
Central Pollution Control Board,
Parivesh Bhawan, East Arjun Nagar, Delhi-110032.

Sub: OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

This has reference to order dated 23.06.2021 passed by the Hon'ble NGT in OA No. 136/2020, wherein the State Board has been directed to lay down standards, regulate residual antibiotics in the industrial effluent and to set-up laboratory facility for analysis of antibiotics in water/ waste water (effluent).

In this regard, the State Board is fully committed to implement the directions of the Hon'ble NGT and has also constituted a Committee vide order dated 06.08.2021 (copy enclosed) for finalization of total requirement of instruments alongwith specifications to set-up laboratory facilities for the analysis of antibiotics in water/ waste water (effluent). You are requested to kindly nominate an expert member from the Central Pollution Control Board to be a part of this Committee constituted by the State Board for finalization of equipments requirement and specifications thereof in a time bound manner.

Thanking You.

Yours faithfully,

Apoorv Devgan, IAS
Member Secretary

Encl.: As above.

- 62 -

8
Reminder-II

**HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA**

No. PCB/ OA No. 136/2020/Consent/2021- 8166

Dated:- 15.9.2021

From: The Member Secretary

To

The Member Secretary,
Central Pollution Control Board
Parivesh Bhawan, East Arjun Nagar, Delhi 110032.

**Subject:- OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s
State of HP & Ors. pending before the Hon'ble National Green Tribunal.**

Sir,

This is in continuation to this office letter no. 4811 dated 27.07.2021, no. 5877 dated 12.08.2021 and in reference to letter no. B-29016/04/07/IPC-I dated 07.09.2021 received from your good office on the subject cited above vide which it has been informed that "...the National environmental standards are discussed/deliberated in a Peer and Core Expert Committee constituted by CPCB. The members of core group comprising experts/representatives of related field/institutes..." In this regard it is submitted that State Board lacks the expertise in order to carry out the process/research and notify such standards.

In order to make the exercise fruitful and effective for notifying the API residual standards, as directed by the Ld. National Green Tribunal vide latest order dated 23.06.2021, the State Board requires hand holding from CPCB in the form of guidance/methodology to be followed.

In this context, you are again requested to nominate an expert member to be a part of the **committee of the State Board constituted to finalize the standards for antibiotics residual** in effluent discharge by such units, who can guide the State Board in a step by step manner, in order for the State Board to formulate such effluent standards so that necessary compliance could be made to the judgment of Hon'ble NGT.

This may be treated as most urgent and time bound please.

Yours faithfully,


(Apoorv Devgan, IAS)
Member Secretary
HPSPCB, Shimla-9,
Tel No.: 0177-2673766



Himachal Pradesh State Pollution Control Board

"Him Parivesh" Phase-III, Below BCS, New Shimla-9

Tel: 0177-2673766, 2673276 Fax: 2673018



No. HPSPCB/OA No.136/2020/Scientific/2021-

8409-11

Dated: 20.9.21

To

The Member Secretary,
Central Pollution Control Board,
Parivesh Bhawan, East Arjun Nagar, Delhi-110032.

Sub: OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of Himachal Pradesh & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

In continuation to this office letter No. HPSPCB/ OA No.136/ 2020/ Scientific/ 2021-6363 dated 18.08.2021, vide which nomination of an Expert Member was solicited from the Central Pollution Control Board for finalization of equipments requirement and specifications for the analysis of Pharmaceutical Compounds (antibiotics) in water/ waste water (effluent). In this regard, you are again requested to kindly nominate an expert from the Central Pollution Control Board to be a part of Committee constituted by the State Board, so that equipments requirement and specifications are finalized at the earliest for carrying out analysis/ testing in compliance of the orders of Hon'ble NGT in OA No.136/2020 titled Veteran Forum for Transparency in public Life V/s State of HP & Ors. dated 23.06.2021.

Thanking You.

Yours faithfully,

Encls: As above.

Copy to:

1. The Chief Scientific Officer, Central Laboratory, Parwanoo for information and necessary action please.
2. The Sr. Law Officer, Law Branch, Head Office, Shimla for information please.

Apoorv Devgan, IAS
Member Secretary

Apoorv Devgan, IAS
Member Secretary

WV



Annexure-15

- 64 -

CENTRAL POLLUTION CONTROL BOARD

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

B-29016/04/07/IPC-I

Speed Post / Email

September 07, 2021

✓ To

The Member Secretary
Himachal Pradesh State Pollution Control Board
Paryavaran Bhavan, Phase III,
New Shimla - 171009
Himachal Pradesh

Sub: OA No.136/2020 titled Veteran Forum for Transparency in Public Life V/s state of HP & Ors. pending before the Hon'ble National Green Tribunal.

Sir

This has in reference to your letter dated 18.08.2021 wherein it is requested to nominate an expert from CPCB. In this regard, it is to inform that the National environmental standards are discussed/deliberated in a Peer and Core Expert Committee constituted by CPCB. The members of core group comprising experts and representatives of CII, FICII, IITs, Government departments, CSIR-research and related institutes. The core group is further supported by peer group which is related to a particular type of industry and consist of Industry Associations, concerned Government departments, State Boards, where that type of industries are located in large number. The standards ratified by the Peer and Core Expert committee are placed in the Central Board's meeting for the consent. On the consent of Board, the standards are forwarded to the Government (Ministry of Environment & Forests) for notification under Environment (Protection) Rules, 1986. Further it is to inform that recently MoEF&CC has notified standards for Bulk Drug and Formulation (Pharmaceutical) on August 6, 2021 wherein for antibiotic residue is not notified. A copy of notified standards is enclosed herewith.

However SPCBs/PCCs can develop location specific standards (antibiotic residues) following due process as mentioned above.

Encl : as above

Yours faithfully

(Dinabandhu Gouda)
ADH & DH IPC-I

Copy to:

1. The Regional Director
Regional Directorate (Central)
Central Pollution Control Board
Paryavaran Bhawan
Ground floor, Sector-19B
Madhya Marg, Chandigarh -160019

(Dinabandhu Gouda)

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in

Analytical Infrastructure Requirements for Sampling, Processing and Analysis of Pharmaceutical Compounds in Environmental Samples

(Summary from USEPA Method 1694:2007)

Sample Bottles and Caps

- **Sample bottle, amber glass, 1 L minimum, with screw cap** for Liquid Samples (waters, sludge and similar materials containing 5 percent solids or less).
- **Sample bottle, wide mouth, amber glass, 500-mL minimum** for Solid samples (soil, sediment, sludge, filter cake, compost, and similar materials that contain more than 5 percent solids).
- If amber bottles are not available, samples must be protected from light.
- **Bottle caps – Threaded Caps must be lined with fluoropolymer.**
- **Cleaning –** Bottles are washed with detergent and water, then solvent rinsed before use. Liners are washed with detergent and water and rinsed with reagent water before use.

Equipment for Sample Preparation

- **Laboratory Fume Hood** of sufficient size to contain the sample preparation equipment listed below.
- Glove Box (optional)
- **Ultrasonic mixer**
- **Oven** – Capable of maintaining a temperature of 110 ± 5 °C
- **Desiccator**
- **Balance, Analytical** – Capable of weighing 0.1 mg
- **Balance, top loading** – Capable of weighing 10 mg

Apparatus for measuring pH

- pH meter, with combination glass electrode
- pH paper, wide

Apparatus for Ultrasonic and Solid-Phase Extraction

- Vac-Elute Manifold
- Vacuum trap: Made from 500-mL sidearm flask fitted with single-hole rubberstopper and glass tubing.
- Vacuum source – Capable of maintaining 25 in. Hg, equipped with shutoff valve and vacuum gauge.
- Rack for holding 50-mL volumetric flasks in the manifold.
- SPE Cartridge – Hydrophilic-Lipophilic-Balance (HLB) 60 mg, Waters Oasis, 20 cc/1 g LP, 60 μ m, or equivalent.

Filtration Apparatus

- **Vacuum Filtration Apparatus** – 1L, including glass funnel, frit support, clamp, adapter, stopper, filtration flask, and vacuum tubing. For wastewater samples, the apparatus should accept 90- or 144-mm disks.
- **Glass Fiber Filter** – 1 micron pore size, to fit the vacuum filtration apparatus.
- **Pressure Filtration Apparatus**
- **Whatman GF/A (1.6 μ m)**, or equivalent, differing diameters, to fit the pressure filtration apparatus.

Pipet Apparatus and Pipets

- **Pipetter** – variable volume
- **Pipet Tips**, disposable polypropylene, sizes from 1-10 μ L to 5 mL
- **Disposable, Pasteur**, 150-mm long x 5-mm
- **Disposable, Serological**, 50-mL (8- to 10- mm ID)

Rotary Evaporator –equipped with

- a variable temperature water bath
- a vacuum source with shutoff valve at the evaporator and
- a vacuum gauge.
- a recirculating water pump and chiller are recommended, as use of tap water for cooling the evaporator wastes large volumes of water and can lead to inconsistent performance as water temperatures and pressures vary.
- **Round-Bottom Flask** – 100-mL and 500-mL or larger, with ground-glass fitting compatible with the rotary evaporator

Nitrogen Evaporation Apparatus – Equipped with water bath controlled in the range of 30 – 60 °C, installed in a fume hood.

Nitrogen Vortex Evaporator (MiniVapSupelco or equivalent) – Set with 6 Port of Nitrogen outlet, common pressure regulation Nob.

Amber Glass Vials, 2- to 5-mL with fluoropolymer-lined screw-cap

Clear Glass Vials, 0.3-mL, conical, with fluoropolymer-lined screw or crimp cap

HPLC/MS/MS System - HPLC system with

high pressure inlet,
multi-segment gradient capability
and post-column pump for admission of calibrant.

The system must be able to produce the LC separations for the analytical runs under the instrument conditions and must meet other HPLC requirements in the method.

LC Columns

C18 –10.0 cm, 2.1 mm i.d., 3.5 μ m particle

Hydrophilic – 10 cm. 2.1 mm i.d., 3.0 μ m particle size

Alternative columns other than described above have not been tested and are not allowed for this method. EPA may establish criteria for equivalency in later versions of this method.

MS/MS System

Tandem MS with the necessary pumps, collision cell, makeup gases, high vacuum system, and capability for positive and negative ion electrospray ionization (ESI) of the effluent from the HPLC. The system must be able to produce parent-daughter transitions for the groups of compounds in the acid and base fractions of the PPCPs for the analytical runs.

Instrument Control and Data System – Interfaced to the HPLC and MS/MS to control the LC gradient and other LC and MS/MS operating conditions, and to acquire, store, and reduce LC/MS/MS data. The data system must be able to identify a compound by retention time and parent-daughter m/zs, and quantify the compound

using linear or quadratic multi-point relative responses and response factors by isotope dilution and internal standard techniques.

Miscellaneous Labware

- Beakers, 400- to 500-mL;
- Erlenmeyer flasks;
- volumetric flasks;
- pipets;
- syringes;
- stainless steel spatulas; etc.

Reagents and Standards

- pH adjustment and solution stabilization
 - Potassium hydroxide – Dissolve 20 g reagent grade KOH in 100 mL reagent water.
 - Sulfuric acid – Reagent grade (specific gravity 1.84)
 - Hydrochloric acid – Reagent grade, 6N
 - Phosphoric acid (H₃PO₄) – Reagent grade (85%),
 - Sodium chloride – Reagent grade, prepare at 5% (w/v) solution in reagent water
 - Ammonium hydroxide (NH₄OH) – Reagent grade,
 - Sodium dihydrogen phosphate monohydrate – Reagent grade,
 - Oxalic acid, anhydrous
- Pre-purified nitrogen
- Solvents, reagents, and solutions
 - Acetic acid, acetone, acetonitrile ammonium acetate, formic acid, methanol, methylene chloride, HPLC water, ammonium formate.
 - Solvents and purchased solutions should be lot-certified to be free of interferences. If necessary, solvents should be analyzed by this method to demonstrate that they are interference free.
- Reference Matrices – Matrices in which the PPCPs and interfering compounds are not detected by this method
 - Reagent water – Bottled water purchased locally, or prepared by passage through activated carbon
 - Other matrices – Other reference matrices of interest may be used if the results from the tests given demonstrate acceptable performance. Ideally, the matrix should be free of the analytes of interest, but in no case must the background level of the analytes in the reference matrix exceed the minimum levels given in the method. If low background levels of the analytes of interest are present in the reference matrix, the spike level of the analytes used should be increased to provide a spike-to-background ratio of approximately 5.
- Standard Solutions – Prepare from materials of known purity and composition or purchase as solutions or mixtures with certification to their purity, concentration, and authenticity. If the chemical purity is 98 % or greater, the weight may be used without correction to calculate the concentration of the standard. Observe the safety precautions as per method.
 - Preparation and storage of solutions - For preparation of stock solutions from neat materials, dissolve an appropriate amount of assayed reference material in solvent. For example, weigh 10 to 20 mg of Ampicillin to three significant figures in a 10mL ground-glass-stoppered volumetric flask and fill to the mark with methanol. After the

compound is completely dissolved, transfer the solution to a clean 15-mL vial with fluoropolymer-lined cap. When not being used, store standard solutions in the dark at less than -10 °C in screw-capped vials with fluoropolymer-lined caps or under a non-reactive gas (e.g., nitrogen) in a flame-sealed glass ampul. Place a mark on the vial or ampul at the level of the solution so that solvent loss by evaporation can be detected. Replace the solution if solvent loss has occurred.

- Native (unlabeled; authentic) compound spiking solution – Separately prepare Group 1 to Group 4 native compounds at the concentrations in methanol, or purchase prepared solutions. If additional native compounds are to be determined, include these compounds in this stock solution. Stock solutions should be prepared at a frequency necessary to preclude degradation from affecting the analysis. For example, it may be necessary to prepare the tetracycline compounds weekly if concentrations drop more than 30 % of their original concentration. Stock solutions should also be checked for signs of degradation prior to preparation of calibration or performance test standards.
- Calibration standards – Dilute and combine the stock solutions to produce the calibration solutions or purchase prepared standards for the CS-1 to CS-5 set of calibration solutions. The CS-3 standard is used for calibration verification (VER).
- QC Check Sample – A QC Check Sample should be obtained from a source independent of the calibration standards. Ideally, this check sample would be a Standard Reference Material (SRM) from the National Institute of Standards and Technology (NIST) containing the compounds of interest in known concentrations in a sample matrix similar to the matrix of interest. If no SRM is available, a certified reference material (CRM) may be used or a QC check sample may be prepared from materials from a source or lot of standards separate from those used for calibration and spiked into a clean reference matrix.
- Stability of solutions – standard solutions used for quantitative purposes should be assayed periodically (e.g., every 6 months) against SRMs from NIST (if available), or against certified reference materials from a source that will attest to the authenticity and concentration, to assure that the composition and concentrations have not changed.

X - X - X - X - X

REQUIRMENTS FOR THE ANALYSIS OF ANTIBIOTICS

S.No	Requirements	Quantity	Size	Remarks
Requirement of Space				
01	Room with AC and Exhaust	04	<ul style="list-style-type: none"> • ≈ 625.0 Square Feet (Instrument Room) • ≈ 400.0 Square Feet (Process Room) • ≈ 400.0 Square Feet (Sample Storage Room) • ≈ 400.0 Square Feet (Chemical and CRM Storage Room) 	
Requirement of Instruments and Equipment				
02	LC-MS/MS (Tandem Mass)	01		For Qualitative & Quantitative Analysis
03	Solid Phase Extraction System	01	12 or 24 port	For Extraction & Cleanup
04	Ultra Sonicator	01		For sonication of mobile phase and cleaning of HPLC parts
05	MiniVap or Turbovap Concentrator	01	06-10 port	For Concentration
06	Rotatory Evaporator	01		For Concentration
07	Millipore Filtration Assembly	01		For Filtration of sample And Mobile phase
08	MQ Water Assembly	01		For MQ Water
09	Deep Freezer	01		CRM Storage
10	Vici cooler	04		Sample Storage
11	UPS 20KVA	01	20KVA	Only for LC-MS/MS
12	UPS 10 KVA	01	10KVA	For others equipment
Miscellaneous Requirement				
Chemicals and Glassware/100 Sample (Approx.)				
13	Methanol	1.5L		LC-MS/MS Grade
14	Acetonitrile	1.5L		LC-MS/MS Grade
15	HPLC Water	3.0L		LC-MS/MS Grade
16	Formic Acid	5.0ml		LC-MS/MS Grade
17	Ammonium Acetate	5.0gm		LC-MS/MS Grade
18	Ammonia Liquid	5.0ml		LC-MS/MS Grade
19	Orthophosphoric Acid	100.0ml		AR-Grade
20	Sulphuric Acid	20.0ml		AR-Grade
21	pH paper	150 strip		
22	Filter Paper GF/A	200	0.45µm/ 47mm	
23	Filter Paper GF/A	10	0.25 µm/47mm	
24	Syringe Filter	100	0.25 µm nylon	

25	HLB Cartridge	100	60 mg/20cc	
26	Micropipette	01	100-1000 μ l (Variable)	
27	Micropipette	01	10 μ l (Fixed)	
28	Micropipette	01	25 μ l (Fixed)	
29	Micropipette	01	50 μ l (Fixed)	
30	Micropipette tip		As per requirements	
31	Sample Storage Vial	100		
32	Reference Standards for Antibiotics		As per requirements	
(1) Others				
33	Argon Gas Cylinder with Regulator	01	Approx. one cylinder for 500 sample	For LC-MS/MS
34	Nitrogen Gas Cylinder with regulator	01	Approx. one cylinder (47L) for 06 sample	For Sample Preparation
Requirement of Manpower				
35	Manpower	01		1. For Instrument operation, calibration & Analysis.
36	Manpower	02		2. For Sampling, processing including extraction, cleanup, & sample preparation.

-71-

HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA

No. PCB/ OA No. 136/2020 - 3647 Dated:- 7.7.2021

From: The Member Secretary

To

The Secretary,
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhawan, Jorbagh Road New Delhi-110003.

Subject:- OA No. 136/2020 titled **Veteran Forum for Transparency in Public Life V/s State of HP & Ors.** pending before the Hon'ble National Green Tribunal.

Sir,

This has reference to order dated 23-06-2021 passed by Hon'ble NGT in the afore-cited matter related to the issue of non-treatment of antibiotics residual discharged in industrial effluent by Pharma units in Baddi industrial area of Himachal Pradesh. The Hon'ble NGT vide order dated 22-7-2020 has constituted a joint committee comprising of representatives of CPCB, HPSPCB and DM Solan which submitted its report in the Hon'ble NGT vide letter No. HPPCB/ OA No. 136/2020 - 1391 dated 5-5-2021 (copy enclosed) wherein it has been reported that there are no standards notified by the MoEF & CC for residual antibiotics in industrial effluents and that the analysis results of the sample taken of the antibiotics residual are 1140 time higher for Ciprofloxacin (22.8ug/l Vs. 0.02ug/l) and 349 times higher for Ofloxacin (69.8ug/l Vs. 0.2ug/l) when compared with the proposed standards in the draft notification issued by MoEF&CC vide No. CG-DL-E-27012020-215690 dated January 23, 2020 for pharmaceutical industries effluent and CETPs with membership of bulk drug and formulation units.

The Hon'ble NGT while considering the report of the joint committee during the hearing dated 23-6-2021 has taken very serious view on this issue and passed various directions in the matter. The relevant part of the directions qua the MoEF & CC is as under :-

"11.MoEF&CC needs to expedite the process of finalizing the standards in the interest of protection of environment.

12. Accordingly, MoEF&CC and the State PCB may take further remedial action expeditiously."

In this connection and in continuation to this office letter No. PCB/ OA No. 136/2020 -2967-71 dated 28-6-2021 it is requested that as per directions of the Hon'ble NGT the standards for residual antibiotics may kindly be notified immediately as soon as possible, so that State PCB could take further action in the matter and directions of the Hon'ble Tribunal could be complied with.

This may be treated as most urgent and time bound please.

(Encl. as above)

(Apoorv Devgan, IAS)
Member Secretary
HPSPCB, Shimla-9,
Tel No. 0177-2673766

- 72 -

Reminder-I

Time Bound
Court Matter

**HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA**

No. PCB/ OA No. 136/2020 -

4422

Dated:- 22-7-2024

From: The Member Secretary

To

The Secretary,
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhawan, Jorbagh Road New Delhi-110003.

Subject:- OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of HP & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

This has reference to this office letter No. PCB/OA No. 136/2020-3647 dated 07-07-2021 on the subject cited above (copy enclosed).

In this context it is requested that as per directions of the Hon'ble NGT the imposed standards for residual antibiotics may kindly be notified as soon as possible and action taken report be intimated to this office to proceed further in the matter. The matter is time bound and HPSPCB has to apprise the Hon'ble NGT about action taken on next hearing, so an early action from your office is requested please.

This may be treated as most urgent and time bound please.

Yours faithfully,

(Apoorv Devgan, IAS)
Member Secretary
HPSPCB, Shimla-9,
Tel No. 0177-2673766

-73-

Reminder
Time Bound
Court Matter

**HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA**

No. PCB/ OA No. 136/2020 - 6466.

Dated:- 23. 8. 2021

From: The Member Secretary

To

The Secretary,
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhawan, Jorbagh Road New Delhi-110003.

Subject :- OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of HP & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

This has reference to the order dated 23-06-2021 passed by Hon'ble NGT in the afore-cited matter related to issues of existence of Active Pharmaceutical Ingredients (API) in the environment wherein MoEF & CC has been directed to lay down standards for antibiotic residuals in the interest of environment protection. Although, it has also been observed in the said order that mere fact that standards have not been revised by the MoEF & CC for residual antibiotics, it can be no justification for the State PCB and pending finalization of standards by MoEF & CC, State PCB can go by earlier standards or lay down standards itself.

In this connection and in continuation to this office letters No. PCB/OA No. 136/2020-3674 dated 7-7-2021 and PCB/OA No. 136/2020-4422 dated 22-7-2021 it intimated that laying down of residual antibiotic standards is a subject matter of national concern, so it will be prudent for MoEF & CC Govt. of India, to notify the same. Furthermore, HPSPCB is a small body which lacks the expertise and research capability to finalize and notify such standards. You are therefore requested to finalize and notify standards for antibiotic residuals as directed by the Hon'ble NGT.

This may be treated as most urgent and time bound please.

(Apoorv Devgan, IAS)
Member Secretary
HPSPCB, Shimla-9,
Tel No. 0177-2673766

o/c

+

(Annexure-18)

-74-



HP STATE POLLUTION CONTROL BOARD,
BELOW BCS, PHASE-III, NEW SHIMLA

4.00/24

No. PCB/ OA No. 136/2020/Consent/2021- 5419-33 Dated:- 4.8.2021

From: The Member Secretary

To

The President, Himachal Drug Manufacturing Association, Baddi, Distt Solan	The President, Drug Manufacturing Association, Kala Amb, Distt Sirmour
The President, Drug Manufacturing Association, Paonta Sahib, Distt Sirmour	The President, Drug Manufacturing Association Distt Solan

Subject: - OA No. 136/2020 titled Veteran Forum for Transparency in Public Life V/s State of HP & Ors. pending before the Hon'ble National Green Tribunal.

Sir,

This has reference to order dated 23-06-2021 passed by Hon'ble NGT in the afore-cited matter related to the issue of non-treatment of Antibiotics residual discharged in industrial effluent by Pharma units in Baddi industrial area of Himachal Pradesh (copy enclosed). The report of analysis with respect to samples collected by the Joint Committee from CETP, Pharma Units and Sirsa River for the presence of antibiotics shows that two antibiotics viz. Ciprofloxacin and Ofloxacin are present in the final treated effluent of CETP. The Hon'ble NGT has noted that "However, these values are 1140 time higher for Ciprofloxacin and 349 times higher for Ofloxacin when compared with the proposed standards in the draft notification issued by MoEF&CC vide No. CG-DL-E-27012020-215690 dated January 23, 2020, for pharmaceutical industry effluent and CETPs with membership of Bulk drug and formulation units. Similarly, the samples collected by the Joint Committee from the outlets of two Pharmaceutical Industries viz. Helios Pharmaceutical and M/s Acme City Tech LLP, leading to CETP, were found be much higher than the standards proposed in the draft notification issued by MoEF&CC."

SEE
JEE-III

4
10/8/21

In view of the afore cited order of Hon'ble NGT you are hereby requested to ensure that adequate treatment facility be provided by all the pharma industries for the treatment of Antibiotic residuals and to reduce the API residue discharge in light of ongoing proceedings.

This may be treated as most urgent and time bound please.

Yours faithfully,

(Apoorv Devgan, IAS)
Member Secretary
HPSPCB, Shimla-9,
Tel No. 0177-2673766

Copy forwarded to:-

1. The Senior Environmental Engineer/Environmental Engineer/Assistant Environmental Engineer Baddi, Chamba, Dharamshala, Bilaspur, Shimla, Rampur, Paonta Sahib, Parwanoo, Una and Kullu, to direct the pharma units under their jurisdiction as per the orders of the Hon'ble NGT.
2. M/s Baddi Infrastructure to submit action plan with final timeline for the advance treatment facility for the API residual in the industrial effluent discharged to CETP and also to ensure the strict compliance to the directions of Hon'ble NGT.

(Apoorv Devgan, IAS)
Member Secretary
HPSPCB, Shimla-9,
Tel No. 0177-2673766